GARDENA CITY COUNCIL

Regular Meeting Notice and Agenda

Council Chamber at City Hall
1700 West 162nd Street, Gardena, California
Website: www.cityofgardena.org

Tuesday, April 27, 2021
Closed Session 7:00 p.m.
Open Session 7:30 p.m.

TASHA CERDA, *Mayor*
RODNEY G. TANAKA, *Mayor Pro Tem*
PAULETTE C. FRANCIS, *Council Member*
ART KASKANIAN, *Council Member*
MARK E. HENDERSON, *Council Member*

MINA SEMENZA, *City Clerk*
J. INGRID TSUKIYAMA, *City Treasurer*
CLINT OSORIO, *City Manager*
CARMEN VASQUEZ, *City Attorney*
LISA KRANITZ, *Assistant City Attorney*
PETER L. WALLIN, *Deputy City Attorney*

In order to minimize the spread of the COVID 19 virus Governor Newsom has issued Executive Orders that temporarily suspend requirements of the Brown Act. Please be advised that the Council Chambers are closed to the public and that some, or all, of the Gardena City Council Members may attend this meeting telephonically.

If you would like to participate in this meeting, you can participate via the following options:

1. VIEW THE MEETING live on SPECTRUM CHANNEL 22 or ONLINE at youtube.com/CityofGardena

2. PARTICIPATE BEFORE THE MEETING by emailing the Deputy City Clerk at bromero@cityofgardena.org by 5:00p.m. on the day of the meeting and write "Public Comment" in the subject line. Comments will be read into the record up to the time limit of three (3) minutes.

3. PARTICIPATE DURING THE MEETING VIA ZOOM WEBINAR

   - Join Zoom Meeting Via the Internet or Via Phone Conference
   - Direct URL: https://us02web.zoom.us/j/87291141399
     Phone number: US: +1 669 900 9128, Meeting ID: 872 9114 1399
   - If you wish to speak live on a specific agenda item during the meeting you, may use the "Raise your Hand" feature during the item you wish to speak on. For Non-Agenda Items, you would be allowed to speak during Oral Communications, and during a Public Hearing you would be allowed to speak when the Mayor opens the Public Hearing. Members of the public wishing to address the City Council will be given three (3) minutes to speak.

4. The City of Gardena, in complying with the Americans with Disabilities Act (ADA), requests individuals who require special accommodations to access, attend and/or participate in the City meeting due to disability, to please contact the City Clerk's Office by phone (310) 217-9565 or email bromero@cityofgardena.org at least 24 hours prior to the scheduled general meeting to ensure assistance is provided. Assistive listening devices are available.

The City of Gardena thanks you in advance for taking all precautions to prevent spreading the COVID 19 virus.

STANDARDS OF BEHAVIOR THAT PROMOTE CIVILITY AT ALL PUBLIC MEETINGS

- Treat everyone **courteously**;
- Listen to others **respectfully**;
- Exercise **self-control**;
- Give **open-minded** consideration to all viewpoints;
- Focus on the issues and **avoid personalizing debate**; and
- **Embrace respectful disagreement** and dissent as democratic rights, inherent components of an inclusive public process, and tools for forging sound decisions.

Thank you for your attendance and cooperation

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1. **ROLL CALL**

PUBLIC COMMENT ON CLOSED SESSION

The City Council will hear from the public only on the items that have been described on this agenda (GC §54954.3)

2. **CLOSED SESSION**

2.A CONFERENCE WITH LABOR NEGOTIATORS
Government Code Section 54957.6
Agency Designated Representative: Clint Osorio, City Manager
Employee Organizations:
1. Gardena Police Officers Association (GPOA), Matt Hassholdt, Association President
2. Gardena Management Employees Organization (GMEO), Vicky L. Barker, Attorney
3. Gardena Municipal Employees Association (GMEA), Fred G. Quiel, Attorney
4. Confidential / Unrepresented Employees

3. **PLEDGE OF ALLEGIANCE**

Meleana Dyogi and Emmanuel Gillam
St. Anthony of Padua School

4. **INVOCATION**

Presented by Mayor Pro Tem Rodney Tanaka

5. **PRESENTATIONS**

6. **PROCLAMATIONS**

6.A Older Americans Month - To be Proclaimed Only
Proclaim Only-Older Americans Month- May 2021.doc

6.B 52nd Annual Municipal Clerks Week, May 2-8, 2021 (to be accepted by City Clerk Mina Semenza)
Proclamation - Municipal Clerks Week-2021.doc

7. **APPOINTMENTS**

8. **CONSENT CALENDAR**

NOTICE TO THE PUBLIC - Roll Call Vote Required On The Consent Calendar
All matters listed under the Consent Calendar will be enacted by one motion unless a Council Member requests Council discussion, in which case that item will be removed from the Consent Calendar and considered separately following this portion of the agenda.

8.A Waiver of Reading in Full of All Ordinances Listed on This Agenda and That They Be Read by Title Only

8.B Approve Minutes: Regular Meeting of the City Council, March 9, 2021
CONTACT: CITY CLERK
2021 03-09 REGULAR Minutes Gardena CC Meeting - FINAL.docx

8.C Receive and File of Minutes: Planning & Environmental Quality Commission MARCH 2, 2021
CONTACT: COMMUNITY DEVELOPMENT
21_03_02 PC Minutes.pdf

8.D Receive and File of Minutes: Planning & Environmental Quality Commission APRIL 6, 2021
CONTACT: COMMUNITY DEVELOPMENT
21_04_06 PC Minutes.pdf

8.E Approval of Warrants/Payroll Register, April 27, 2021
CONTACT: CITY TREASURER
Warrants-Payroll Register Memo 4-27-21.pdf

8.F Monthly Portfolio, February 2021
CONTACT: CITY TREASURER
February 2021 Investment Report.pdf

8.G Monthly Portfolio, March 2021
CONTACT: CITY TREASURER
March 2021 Investment Report.pdf

8.H Personnel Report No. P-2021-08
CONTACT: HUMAN RESOURCES
PERS RPT P-2021-8 04-27-21.doc

8.I Approval of Extension Agreement with JAS Pacific for Building Inspector services
CONTACT: COMMUNITY DEVELOPMENT
JAS Contractual Services Agreement - Building Inspector - 2018

8.J Second Reading and Adoption of ORDINANCE No. 1827, Amending Section 8.08.035 (Amendment of Section 7802.3) of Chapter 8.08 (Fire Code) and Amending Sections 8.16.010 (Definitions), 8.16.020 (Permit-Required), Section 8.16.130 (Dates and Hours of Sale and Use), Section 8.16.150 (Prohibitions on Discharge), 8.16.170 (Violation-Penalty) and Adding Section 8.16.155 (Social Host Liability) of Chapter 8.16 (Fireworks) of Title 8 (Health and Safety) of the Gardena Municipal Code
CONTACT: CITY MANAGER
ORDINANCE_No._1827.pdf

8.K Authorization to Purchase Personal Protective Equipment, in the amount of $70,185.00, Under the 2018 Homeland Security Program Grant
CONTACT: POLICE
2018 SHSP Agreement Part I.pdf
2018 SHSP Agreement Part II.pdf
2018 SHSP Project Ledger.pdf

8.L Purchase of High Yard Lighting for GTrans Campus from Majestic Lighting, Inc. in the amount of $43,306.20
CONTACT: TRANSPORTATION
High Yard Lighting Quote from Majestic Lighting.pdf

8.M Receive and File: Gardena General Plan Annual Progress Report
CONTACT: COMMUNITY DEVELOPMENT
Gardena General Plan APR 2021.pdf

9. **EXCLUDED CONSENT CALENDAR**

10. **PLANNING & ENVIRONMENTAL QUALITY COMMISSION ACTION SHEET**

10.A APRIL 20, 2021

Receive and File. No action needed.
2021_04_20 PCAX.doc

ORAL COMMUNICATIONS (LIMITED TO A 30-MINUTE PERIOD)

Oral Communications by the public will be heard for one-half hour at or before 8:30 p.m. or at the conclusion of the last agenda item commenced prior to 8:30 p.m. Oral Communications not concluded at that time shall be resumed at the end of the meeting after Council Reports. Speakers are to limit their remarks to three minutes, unless extended by the Mayor. An amber light will appear to alert the speaker when two minutes are complete, and a red light will appear when three minutes are over. Your cooperation is appreciated.

11. **DEPARTMENTAL ITEMS - ADMINISTRATIVE SERVICES**

12. **DEPARTMENTAL ITEMS - COMMUNITY DEVELOPMENT**

12.A PUBLIC HEARING: Environmental Assessment #1-20; General Plan Amendment #1-20; Specific Plan #1-20; Zone Change #1-20; Zoning Code Amendment #3-20; Development Agreement #1-20; Lot Lint Adjustment #1-20; Site Plan Review #1-20 (Gardena Transit Oriented Development Specific Plan)
Applicant: Din/Cal 4, Inc.

Staff Recommendation:

- **Conduct a Public Hearing**
- **Receive testimony from the public**
- **Adopt Resolution Nos. 6507 & 6508**
- **Introduce Ordinance No. 1828**

CC_staff_report_-_GTODSP_042721
CC Resolution No. 6507 - GTODSP EIR.pdf
CC Resolution No. 6508 GTODSP GPA.pdf
CC Ordinance No. 1828 - GTODSP.pdf
RESOLUTION NO. PC 4-21 without attachments.pdf
GTODSP PC staff report without Attachment A 040621.pdf

12.B ORDINANCE NO. 1829, Adopting the most recent version of the Los Angeles County Fire Code as set forth in Title 32 of the Los Angeles Code by Reference.

Staff Recommendation: Introduce Ordinance and set hearing date for May 25, 2021.
2019 adoption staff report.pdf
Ord. 1829 Fire Code 2019.pdf

13. **DEPARTMENTAL ITEMS - ELECTED & ADMINISTRATIVE OFFICES**

13.A COVID-19 Update

14. **DEPARTMENTAL ITEMS - POLICE**

15. **DEPARTMENTAL ITEMS - PUBLIC WORKS**

15.A RESOLUTION NO. 6504, Approving the Engineer's Report for the Gardena Artesia Boulevard Landscaping Assessment District for fiscal year 2021-2022, declaring its intention to levy and collect assessments under the Gardena Artesia Boulevard Landscaping Assessment District for fiscal year 2021-2022, and setting a time and place for hearing protests in relation thereto (Public Hearing: May 25, 2021)

Staff Recommendation: Adopt Resolution No. 6504
Engineer's Report - Artesia 2021-2022.pdf
Resolution 6504.pdf

15.B RESOLUTION NO. 6505, Approving the Engineer's Report for the Gardena Consolidated Street Lighting Assessment District for fiscal year 2021-2022, declaring its intention to levy and collect assessments under the Gardena Consolidated Street Lighting District for fiscal year 2021-2022, and setting a time and place for hearing protests in relation thereto (Public Hearing: May 25, 2021)

Staff Recommendation: Adopt Resolution No. 6505
Resolution 6505.pdf

Consolidated SLD Enginer's Report 2021-20221.pdf

16. **DEPARTMENTAL ITEMS - RECREATION & HUMAN SERVICES**

17. **DEPARTMENTAL ITEMS - TRANSPORTATION**

18. **COUNCIL ITEMS**

19. **COUNCIL DIRECTIVES**

20. **CITY MANAGER REMARKS RE: DIRECTIVES / COUNCIL ITEMS**

21. **COUNCIL REMARKS**

    1. COUNCIL MEMBER KASKANIAN
    2. MAYOR PRO TEM TANAKA
    3. COUNCIL MEMBER FRANCIS
    4. MAYOR CERDA
    5. COUNCIL MEMBER HENDERSON

22. **ANNOUNCEMENT(S)**

23. **REMEMBRANCES**

24. **ADJOURNMENT**

The Gardena City Council will adjourn to the Closed Session portion of the City Council Meeting at 7:00 p.m. followed by the Regular City Council Meeting at 7:30 p.m. on Tuesday, May 11, 2021.

I hereby certify under penalty of perjury under the laws of the State of California that the foregoing agenda was posted in the City Hall lobby not less than 72 hours prior to the meeting. A copy of said Agenda is available on our website at www.CityofGardena.org.

Dated this 23rd day of April 2021

/s/ MINA SEMENZA
MINA SEMENZA, City Clerk

TO BE PROCLAIMED ONLY

" OLDER AMERICANS MONTH "

~ MAY 2021 ~

Every May, the nation celebrates Older Americans Month. Gardena is fortunate to have countless older Americans who enrich and strengthen our community; and the City of Gardena is committed to engaging and supporting older adults, their families, and caregivers.

We acknowledge the importance of older Americans taking part in activities that promote physical, mental, and emotional well-being.

The theme for 2021 is ***Communities of Strength***. Older adults have built resilience and strength over their lives through successes, failures, joys, and difficulties. Their stories and contributions help support and inspire others. During this year's Older Americans Month, we will celebrate the strength of older adults with special emphasis on the power of connection and engagement in building strong communities.

Communities that encourage the contributions of older adults are stronger! By engaging and supporting all community members, we recognize that older adults play a key role in the vitality of our neighborhoods, networks, and lives. Connecting with others is one of the most important; it plays a vital role in our health and well-being.

In support of this nationwide observance, I, Tasha Cerda, Mayor of the City of Gardena, California, am pleased to proclaim May 2021**,** to be

"OLDER AMERICANS MONTH"

in our City and encourage every resident to take time this month to recognize older adults, and the people who serve them, as vital parts of our community.



PROCLAMATION

WHEREAS, the Office of the Municipal Clerk is a time-honored and vital part of local governments throughout the world, and is the oldest among public servants; and

WHEREAS, the Office of Municipal Clerk provides the professional link between citizens, local governing bodies, and agencies of government at other levels; and

WHEREAS, Municipal Clerks have pledged to be ever mindful of their neutrality and impartiality, rendering equal service to all; and

WHEREAS, the Office of the Municipal Clerk serves as the information center on the functions of local government and the community; and

WHEREAS, Municipal Clerks continually strive to improve the administration of the affairs of the Office of the Municipal Clerk through participation in education programs, seminars, workshops, and the annual meetings of their state, province, county, and international professional organizations; and

WHEREAS, it is most appropriate that we recognize the accomplishments of the Office of Municipal Clerk;

NOW, THEREFORE, I, TASHA CERDA, MAYOR OF THE CITY OF GARDENA, CALIFORNIA, hereby declare **May 2 through May 8, 2021**, to be the

FIFTY-SECOND ANNIVERSARY OF

MUNICIPAL CLERKS WEEK

in the City of Gardena; and further, extend appreciation to Gardena's Municipal Clerk MINA SEMENZA, and to all Municipal Clerks, for the vital services they, their Deputies, and staff members perform, and for their exemplary dedication to the communities they represent.

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MAYOR

Dated: **27th day of April, 2021**

MINUTES
Regular Meeting Notice and Agenda of the
Gardena City Council
Tuesday, March 9, 2021

The Regular Meeting Notice and Agenda of the Gardena City Council of the City of Gardena, California, was called to order at 7:30 PM on Tuesday, March 9, 2021, in the Council Chamber at City Hall 1700 West 162nd Street, Gardena, California, Mayor Tasha Cerda presiding.

1. **ROLL CALL**

Present: Mayor Tasha Cerda; Mayor Pro Tem Mark E. Henderson; Council Member Rodney G. Tanaka; Council Member Art Kaskanian; and Council Member Paulette C. Francis. Other City Officials and Employees present: City Manager Clint Osorio; City Attorney Carmen Vasquez; City Clerk Mina Semenza; and Deputy City Clerk Becky Romero. City Treasurer Ingrid Tsukiyama was not present.

At 7:10 p.m., the City Council recessed into Closed Session in the Management Information Center of the Council Chamber at City Hall, with the following in attendance: Mayor Tasha Cerda; Mayor Pro Tem Mark E. Henderson; Council Member Rodney G. Tanaka; Council Member Art Kaskanian; and Council Member Paulette C. Francis; City Manager Clint Osorio; and City Attorney Carmen Vasquez.

2. **CLOSED SESSION**

2.A CONFERENCE WITH LEGAL COUNSEL EXISTING LITIGATION
Government Code Section 54956.9(d)(1)
City of Gardena v. Regional Water Quality Control Board- Los Angeles Region, et al.
Orange County Superior Court Case No. 30-2016-00833722

2.B CONFERENCE WITH LEGAL COUNSEL ANTICIPATED LITIGATION Initiation of litigation pursuant to paragraph (4) of subdivision (d) of Section 54956.9
(One [1] Matter)

Mayor Cerda reconvened the meeting to the Regular Open Session at 7:41 p.m., and the City Clerk noted the return of all Council Members who were present at the meeting.

When City Attorney Vasquez was asked if there was anything to report from Closed Session, she stated the following:

2.A. Council unanimously voted (5-0) and authorized the City Attorney's office to file a petition for review with the California Supreme Court.

2.B. No reportable action.

3. **PLEDGE OF ALLEGIANCE**

Jordan Agyemang, Cameron Agyemang and Morgan Agyemang led the Pledge of Allegiance. Jordan, Cameron, and Morgan are siblings and live in Gardena. They currently attend Maria Regina Catholic School and are current participants at the Johnson Park Afterschool Program. They have attended many of our events and the brothers have played in our Youth Sports Program. It is Morgan's first year in the Afterschool Program and she has also participated in our dance classes.

4. **INVOCATION**

Council Member Rodney G. Tanaka led the Invocation.

5. **PRESENTATIONS** **–** ***No Items***

6. **PROCLAMATIONS**

6.A "American Red Cross Month," March 2021 ***- was proclaimed by Mayor Cerda***
Mr. Ken Phan, Community Volunteer Leader, came into the meeting to accept the Proclamation

7. **APPOINTMENTS** ***– No Appointments were made***

8. **CONSENT CALENDAR**

Waiver of Reading in Full of All Ordinances Listed on This Agenda and That They Be Read by Title Only

8.A Affidavit of Posting Agenda on March 5, 2021
CONTACT: CITY CLERK

8.B Approve Minutes: Regular Meeting of the City Council, January 26, 2021
CONTACT: CITY CLERK

8.C Received and File of Minutes: Planning & Environmental Quality Commission, FEBRUARY 16, 2021
CONTACT: CITY CLERK

8.D Approval of Warrants/Payroll Register, March 9, 2021
CONTACT: CITY TREASURER

March 9, 2021: Wire Transfer: 11979-11984; Prepay: 162274-162277; Check Nos. 162278-162453 – for a total Warrants issued in the amount of $2,238,523.57; Total Payroll Issued for February 26, 2021: $1,975,410.02.

8.E Monthly Portfolio for January 2021
CONTACT: CITY TREASURER

8.F Amendment to the Memorandum of Understanding by and between City of Gardena and the Los Angeles County Metropolitan Transportation Authority for Net Toll Revenue Re-Investment Grant
CONTACT: TRANSPORTATION

8.G Amendment No. 1 to Proposition A Discretionary Incentive Grant Program Memorandum of Understanding for Sub-Regional Paratransit Services
CONTACT: TRANSPORTATION

8.H RESOLUTION NO. 6496: Artesia Boulevard Landscaping Assessment District renewal for the fiscal year commencing July 1, 2021 and ending June 30, 2022.
CONTACT: PUBLIC WORKS

RESOLUTION NO. 6496

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF GARDENA, ARTESIA BOULEVARD LANDSCAPING ASSESSMENT DISTRICT RENEWAL FOR THE FISCAL YEAR COMMENCING JULY 1ST, 2021 AND ENDING JUNE 30TH, 2022.

8.I RESOLUTION NO. 6497: Consolidated Street Lighting District Renewal for the Fiscal Year Commencing July 1, 2021, and Ending June 30, 2022
CONTACT: PUBLIC WORKS

RESOLUTION NO. 6497

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF GARDENA CONSOLIDATED STREET LIGHTING DISTRICT RENEWAL FOR THE FISCAL YEAR COMMENCING JULY 1ST, 2021 AND ENDING JUNE 30TH, 2022.

8.J Personnel Report No. P-2021-05

It was moved by Council Member Tanaka, seconded by Mayor Pro Tem Henderson, and carried by the following roll call vote to Approve all Items on the Consent Calendar with the exception of Attachment 3 of Item 8.J – PERS Report:

Ayes: Council Members Tanaka, Mayor Pro Tem Henderson, and Council Members Kaskanian, Francis, and Mayor Cerda
Noes: None
Absent: None

9. **EXCLUDED CONSENT CALENDAR**

8.J Personnel Report No. P-2021-05 – Attachment 3

City Manager Osorio requested that Attachment 3 of Personnel Report No. 2021-05 be withdrawn from this item. City Attorney Vasquez confirmed that it would be brought back at a later date.

10. **PLANNING & ENVIRONMENTAL QUALITY COMMISSION ACTION SHEET**

10.A MARCH 2, 2021

A. **Environmental Assessment #14-20 and Conditional Use Permit #4-20.**
Direction by Staff: Continue Item to a future Planning and Environmental Quality Commission meeting. This item will be re-noticed Inc.

Commission Action: No action taken.

B. **Environmental Assessment #17-20, Zone Change #5-20, and associated General Plan Amendment.**
Direction by Staff: This item has been removed by staff.

Commission Action: No action taken.

C. **Environmental Assessment #9-20, Site Plan Review #4-20, Zone Change #4-20, General Plan Amendment #5-20, Tentative Tract Map #3-20, Variance #2-20**
The Planning Commission considered a request for a General Plan Amendment, Zone Change, Tentative Tract Map, Site Plan Review and Variance all related to the development of six condominium townhomes for the property located 1031 Magnolia Avenue. The project qualified for a categorically exemption from the provision the provisions of CEQA.
Project Location: 1031 Magnolia Ave
Applicant: Steve Stapakis

Commission Action: The Commission continued the item to an unspecified future date. The item will be re-noticed in the Gardena Valley News and mailers will be sent out to all properties within a 300-foot radius of the project site.

Receive and File

ORAL COMMUNICATIONS

11. **DEPARTMENTAL ITEMS - ADMINISTRATIVE SERVICES** – ***No Items***

12. **DEPARTMENTAL ITEMS - COMMUNITY DEVELOPMENT**

12.A PUBLIC HEARING: Adoption of Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program, Amendment to the Land Use Plan of the General Plan to Increase Floor Area Ratio for Specific Uses, and Introduction of an Ordinance Making Other Changes As Well

City Manager Osorio presented the Staff Report. Gregg McClain, Acting Interim Community Development Director, gave a PowerPoint presentation.

Mayor Cerda then opened the Public Hearing at 8:18p.m. There were two (2) speakers: 1) Vishal Patel, Ray Ahir's business partner, and 2) Zahid Ahmed. They both spoke and brought forth their concerns to the Council.

A very lengthy discussion took place which included our Mayor and Council regarding adopting a Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program, amending the Land Use Plan of the General Plan to increase Floor Area Ratio for specific uses, and making changes to Title 18 of the Gardena Municipal Code, primarily relating to Amenity Hotels. Assistant City Attorney Kranitz led the discussion and brought in Spencer Dela Cruz, our Economic Development Manager, to give some background regarding the project. She also brought in our two (2) Consultants, Starla Barker of the DeNovo Planning Group, and Clare Look-Jaeger of Linscott, Law & Greenspan, who gave information regarding the parking and environmental studies that were conducted. They went through all of the standards with Assistant City Attorney Kranitz and voiced each of their concerns regarding location, lot size, building height, CUP requirements, floor area ratio maximum, setbacks, and parking ratio and requirements.

Mayor Cerda then closed the Public Hearing at 10:47p.m.

Resolution Nos. 6498 and 6499 were both approved and adopted, and Mayor Cerda indicated that Ordinance No. 1825 would be brought back to the next Council Meeting for Introduction and with all the changes.

RESOLUTION NO. 6498, Adopting a Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program

RESOLUTION NO. 6498

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF GARDENA, ADOPTING A MITIGATED NEGATIVE DECLARATION AND MITIGATION MONITORING AND REPORTING PROGRAM RELATING TO THE AMENDMENT OF THE GENERAL PLAN TO ALLOW INCREASED FLOOR AREA RATIO IN THE COMMERCIAL AND INDUSTRIAL LAND USE DESIGNATIONS AND AMENDMENT TO THE GARDENA ZONING CODE RELATING TO CHANGES IN DEVELOPMENT STANDARDS, PRIMARILY RELATING TO AMENITY HOTELS IN THE COMMERCIAL AND INDUSTRIAL ZONES

It was moved by Council Member Kaskanian, seconded by Council Member Tanaka, and carried by the following roll call vote to Adopt Resolution No. 6498:

Ayes: Council Members Kaskanian, Tanaka, Mayor Pro Tem Henderson and Mayor Cerda
Noes: Council Member Francis
Absent: None

RESOLUTION NO. 6499, Amending the Land Use Plan of the General Plan to increase the FAR up to 2.75 for specific uses as identified in the Zoning Code for General Commercial uses and up to 2.0 for specific uses as identified in the Zoning Code for Industrial uses

RESOLUTION NO. 6499

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF GARDENA, CALIFORNIA AMENDING THE LAND USE PLAN OF THE GARDENA GENERAL PLAN TO ALLOW INCREASED FLOOR AREA RATIOS IN THE COMMERCIAL AND INDUSTRIAL LAND USE DESIGNATIONS

It was moved by Mayor Pro Tem Henderson, seconded by Council Member Tanaka, and carried by the following roll call vote to Adopt Resolution No. 6499:

Ayes: Mayor Pro Tem Henderson and Council Members Tanaka, Kaskanian, Francis, and Mayor Cerda
Noes: None
Absent: None

ORDINANCE NO. 1825, Amending the Zoning Code primarily relating to development standards for amenity hotels, but making other changes

ORDINANCE NO. 1825

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF GARDENA, CALIFORNIA, MAKING CHANGES TO TITLE 18, ZONING, OF THE GARDENA MUNICIPAL CODE RELATING TO AMENITY HOTELS AND OTHER MINOR REVISIONS

13. **DEPARTMENTAL ITEMS - ELECTED & ADMINISTRATIVE OFFICES** – ***No Items***

14. **DEPARTMENTAL ITEMS - POLICE** – ***No Items***

15. **DEPARTMENTAL ITEMS - PUBLIC WORKS** – ***No Items***

16. **DEPARTMENTAL ITEMS - RECREATION & HUMAN SERVICES** – ***No Items***

17. **DEPARTMENTAL ITEMS - TRANSPORTATION** – ***No Items***

18. **COUNCIL ITEMS** – ***No Items***

19. **COUNCIL DIRECTIVES**

Mayor Pro Tem Henderson

(1) Asked if we have a Service Level Agreement in place for those when requesting an inspection. He then asked what the turn-around time is for an inspection. City Manager Osorio indicated that he would get back to him regarding the agreement; and replied that our turn-around for an inspection is 6 weeks, which is due to COVID setbacks our Community Development Department has been experiencing.

Council Member Francis

(1) Asked if with the new Federal COVID Relief Plan coming, are we going to change the way we allocated the funds previously and asked if there can be some homeowner relief. City Manager Osorio replied we will be adhering to the requirements that come with the plan. He continued to say that we could look into some type of homeowner relief assistance.

20. **CITY MANAGER REMARKS RE: DIRECTIVES / COUNCIL ITEMS**

City Manager Osorio gave a verbal report of information to follow-up on matters that had been directed or requested by the Mayor and Members of Council. Those items were, as follows:

(1) A memo regarding the Landscape Median District;

(2) He showed a flyer from the Los Angeles County Assessor's office regarding a webinar for business owners on "How to File a 571-L and 571-R when it comes to Business Property Statements" taking place on March 15, 2021 from 1:00-2:30p.m.; and

(3) COVID Update

21. **COUNCIL REMARKS**

(1) Council Member Tanaka – He attended the South Bay COG Board Meeting. He then mentioned the South Bay Fiber Network has been cited as an innovative project and as an example that all cities across the state in state hearings on the panels by the Public Utilities Commissioner Martha Guzman Aceves of the 66th District and Al Muratsuchi. He stated that we are now an American City and County just awarded the project one of six 2020, Crown Community awards in the United States. The South Bay COG and SCAG because of the fiber networking was given the award and it is very honorable. He also attended the COG's Legislative meet and greet, and he was honored to be chosen to announce and introduce Senator Steve Bradford. He attended a funeral of one of his close friends retired Harbor Division Captain Bob McBay. Attended the South Bay COG Steering Committee meeting and attended the Gardena Economic Development Webinar on how to do business in Gardena, complimented all City staff on presenting to all vendors on how to become someone who wants to do business and stated there is a system on how to become a participating vendor in our City.

(2) Council Member Francis – Since the last meeting, she attended the District 1 Neighborhood Watch Meeting. She heard a good presentation on the proposed Aquatic and Senior Citizen Center; she thanked everyone that supported the Dr. Martin Luther King Jr. Cultural Community Fundraiser. Two-hundred tickets were sold and would like to give a special thanks to Stephany Santin, Director of Recreation and Human Services for the support and effort, all proceeds will go to the scholarship program. She then thanked Council Member Kaskanian for his support and everyone else that supported. She also welcomed Gregory McClain (Interim Acting Community Development Director) and mentioned it is great to see him on board and she hopes to hear more from him. She thanked everyone for all their hard work and would like to remind everyone to wear their mask, wash their hands, and watch distance. We will have better days ahead and will get through this.

(3) Mayor Pro Tem Henderson – He attended the SCAG Race Equity Meeting. He was at South Bay Workforce Investment Board Special Orientation. Attended the Virtual Housing Workshop and said it was very informative. He thanked City staff Spencer Dela Cruz, Mary Simonell and City Manager Clint Osorio for the doing Business in Gardena Workshop and his colleagues for sharing the same vision on wanting to promote our city, community, businesses, and everything as we all continue to move forward. He mentioned, Council Member Tanaka and was very happy the city received an award for fiber networking and believes Gardena will continue to move forward. He reiterated what Council Member Francis said and would like to encourage everyone to continue to physically distance, wash your hands, wear a mask and shared he received his first vaccine dose and is excited and he feels good. Lastly, he thanked Chief of Police and City Manager for working with Public Works to cut the shoes out of the telephone wire in the community and did it within an hour.

(4) Mayor Cerda – Since the last Council Meeting, she attended an event that Assembly Member Mike Gipson had and was a COVID-19 Memorial Service for all those that have passed away in his District and mentioned it was a very nice event with very few people because everyone has to social distance but representatives from Compton, Lynwood, Carson, Gardena, and a couple of others. There were wreaths that were put out to represent each City and was all done through Zoom and Social Media so people can see the funeral service. The service was held in the Roosevelt Memorial Park Cemetery and they called out all the family loved one's names that were submitted. Besides that, she has not attended many other meetings since she has been trying to socially distance and stay safe. She would like to add to the adjournment the Lakewood Sheriff Deputy that passed away and was killed in a traffic collision Thomas J. Albanese. Lastly, she met with the CEO of Nissin and mentioned they will keep our Food Pantry stocked on a regular basis.

(5) Council Member Kaskanian – Since the last meeting, he attended the Zoom meeting with Tri City Cert and was his first meeting with them. In the meeting there was about 25-30 attendees and they talked about how they work, what they do and how they get deployed. He would like to give a shout out to Public Works as he was driving on Gardena Blvd. west bound from outside City boundaries, one of the traffic lights was out; he called Kevin Thomas and gave him the report of the problem and an hour later it was fixed; he again thanked Public Works for their quick response. Also, three weeks ago another light problem was reported to City Manager and it was fixed. He then mentioned there is another problem on Western and Rosecrans that is from the Gas Company, he stated the access hole is open and anyone can have an accident or issue. He wanted to mention it to everyone, so they were aware.

22. **ANNOUNCEMENT(S)**

Mayor Cerda announced:

(1) Our baseball fields and basketball courts are now open at Johnson, Mas Fukai and Rowley Parks; you will need to make a reservation. You can get more information by calling (310) 217-9537.
(2) Please help support our "Give & Take" Pantry, you can get more information by calling (310) 217-9537.
(3) Easter Bunny Stampede that will be taking place at our different parks on Saturday, April 3, 2021 from 11: 00a.m to 1:00p.m. You will be given a card that needs to get stamped at each park; the first 100 stamped cards will receive a free Easter Basket.

23. **REMEMBRANCES**

Mr. Thomas J. Albanese, 41 years of age, a seven-year veteran of the Lakewood Los Angeles County Sheriff's Department, a 10-year Marine Corps veteran, who served four tours in Iraq, who was tragically killed in a traffic collision.

24. **ADJOURNMENT**

At 11:18 p.m., Mayor Cerda adjourned the Gardena City Council Meeting to the Closed Session portion of the City Council Meeting at 7:00 p.m., and the Regular City Council Meeting at 7:30 p.m. on Tuesday, March 23, 2021.

MINA SEMENZA
City Clerk of the City of Gardena and
Ex-officio Clerk of the Council

APPROVED:

_____
Tasha Cerda, Mayor

By:_____
Becky Romero, Deputy City Clerk

CITY OF GARDENA
PLANNING & ENVIRONMENTAL QUALITY COMMISSION
MINUTES
TUESDAY, March 2, 2021, MEETING
VIRTUAL MEETING VIA ZOOM

* * *

Called to order by Vice Chair Sherman at 7:02 P.M.

ROLL CALL

Present:	Dale Pierce, Stephen Langley, Steve Sherman
Absent:	Deryl Henderson, Brenda Jackson
Also in Attendance:	Gregg McClain, Interim Community Development Director
	Lisa Kranitz, Assistant City Attorney
	John F. Signo, AICP, Senior Planner
	Amanda Acuna, Senior Planner

APPROVAL OF MINUTES

A motion was made by Commissioner Langley and seconded by Commissioner Sherman to approve the minutes of the meeting on February 16, 2021. The minutes were approved 3-0-2.

Ayes:	Langley, Sherman, Pierce
Noes:	None
Absent:	Henderson, Jackson

ORAL COMMUNICATIONS FROM THE PUBLIC

Agenda Item #4

Senior Planner Amanda Acuna addressed the Commission and public on procedures for conducting the online meeting since all participants were attending from a remote location. Instructions on how to comment and ask questions via the Zoom application was given.

There were no oral communications from the public.

PUBLIC HEARING

Agenda Item #5(A)

Environmental Assessment #14-20 and Conditional Use Permit #4-20

This item will be re-noticed. There was no discussion.

Agenda Item #5(B)

Environmental Assessment #17-20, Zone Change #5-20, and associated General Plan Amendment

This item was removed by staff. There was no discussion.

Agenda Item #5(C)

Environmental Assessment #9-20, Site Plan Review #4-20, Zone Change #4-20, General Plan Amendment #5-20, Tentative Tract Map #3-20, Variance #2-20

A request for a Site Plan Review to allow the development of six detached condominium townhomes; a Zone Change changing the zoning from R-1/R-3 (Single-Family and Medium Multi-Family Residential Zone) to R-3 (Medium Density Multiple-Family Residential); a General Plan Amendment changing the land use designation from Low/Medium Residential to Medium Density Residential; a Tentative Tract Map to subdivide a 0.34 acre lot for condominium units; and a Variance for a reduced side yard setback, and direction to staff to file a Notice of Exemption.

Project Location: 1031 Magnolia Avenue
Applicant: Steve Stapakis

Senior Planner Acuna gave the staff presentation. She provided background on the property and showed an aerial of the subject property and neighboring properties. She mentioned the subject property is in two zoning districts: R-1 and R-3. She mentioned there are a total of six units: the unit in the front is a three-story detached unit; the units in the middle are three-story attached units; and the unit in the rear is a two-story detached unit. She described the requests for a tentative tract map to subdivide the property into six condominium units, and a variance to reduce the side yard setback. The project requires a General Plan Amendment and Zone Change to make the entire property Medium Residential in the R-3 zone. She mentioned that staff can make affirmative findings for all of the requests, and therefore, the project can be approved. She mentioned the project was found to be exempt from CEQA and was properly noticed in the Gardena Valley News and to owners and occupants within 300 feet of the subject property. She summarized the public correspondences that were received and stated the major issues: traffic and parking impacts, reduced setbacks, a lack of vegetation, and a lack of community outreach.

Vice Chair Sherman asked if the Commission had questions for staff.

Commissioner Langley asked about pictures of the property, particularly from Magnolia Avenue. He asked how the project impacted the single-family neighborhood to the north.

Ms. Acuna stated that the applicant has prepared a visual presentation. She mentioned the single-family zone allows for two stories, which is what is being proposed for the rear unit.

Commissioner Langley asked about the six-foot wall near the sidewalk. He mentioned he has not seen anything like this before. He stated his concerns with all the letters that were received. He asked if we can see what is going on in the rear portion of the property.

Ms. Acuna referred to the elevations in her presentation. She showed which elevations would be seen from the street and from neighboring properties.

Commissioner Pierce stated that the builder has taken into account neighbors' concerns and reduced at least one property down to two levels instead of three. He stated the builder has really accommodated the neighborhood.

Vice Chair Sherman opened the public hearing and called upon the applicant to speak.

George Andrews, applicant's representative, provided a visual presentation. He mentioned why he believes the design works best for the City and the neighborhood. He mentioned the challenges with the split zone and the land-locked R-1 portion; over two-thirds of the lot is zoned R-3. He showed elevations that showed it was important to reduce the mass and height in the rear of the property, which is the most impactful part of the project. He mentioned with the variance and reduction in the side yard, they can make the project as close to R-1 as possible.

Michael Lee, neighbor, stated he is in an R-1 area and the R-3 project is not consistent with the neighborhood. He stated he has not received any type of outreach from the developer. He stated the developer is trying to maximize the area on the property. He stated it would be possible to remove one of the units, expand the remaining units, and eliminate the variance. He mentioned because people hop over fences, the proposed six-foot fence is insufficient.

Neal Natsumeda, 15517 New Hampshire Avenue, stated there have been few development inquiries because the property needs to be developed as R-1. He stated the split zone line has been there for a reason and the project is against 65 years of the City's plan. He stated the R-1 and R-3 line has not been breached. He stated the project should respect the line and it is against the City's plan to change the zone. He stated something like this has not been done before because it cannot be done. He stated we do not know exactly what the project will look like.

Nick Alexandres, 1036 Magnolia Avenue, stated he received the notice from the developer. He stated he is looking to buy a house soon and this is close to what he is looking for. He stated this is what the City needs and is in favor of the project.

Chloe Blue, who lives across the street from the proposed development, stated she is in support of the project. She looked at the plans and felt it ressembles homes rather than townhomes, which is what she is looking for.

Enoch Wun, 1035 Magnolia Avenue, stated he is a neighbor and was excited for the project when he heard about it. He stated he appreciates the developer proposing the project because there is enough parking provided. He mentioned that new development would get rid of rodents living on the property.

Hanna Marie, neighbor, stated she received notice of the project and was concerned with the nuisance on the property. She stated this project is a really good idea because the empty lot attracts a lot of rodents. She stated this is what Gardena needs because the architecture is impressive and it is the right idea. She mentioned there is a lot of benefits to this project and it is a good move forward for the community.

Javier Marquez, 15606 S. Berendo Avenue, stated he has concerns with privacy. He stated he appreciates the two-story rear unit, but even with a five-foot setback the property will have a direct view into his property. He stated he agrees with Mr. Lee that the wall should be taller to discourage anyone from jumping it; there has been incidents of that in the past. He stated that sound will inevitably be an issue; it should be addressed. He mentioned they should use a material that blocks sound. He stated he owns the detached garage next to Unit D and there is no wall currently; he would urge a wall that protects that part of the property.

Mr. Andrews rebutted to the neighbor's statements that they would be happy to construct a higher perimeter wall. He would also work to provide improved landscaping. He stated he would rather have a two-story building with less setback than a three-story building with a ten-foot setback.

Vice Chair Sherman asked staff if they can respond to some of the comments.

Ms. Acuna stated that in regards to the rear unit in the R-1 zone, if it were to remain in the R-1 zone a variance would not be required because it would meet the R-1 side yard setback requirement which is 5 feet.

Commissioner Pierce stated he thinks the builder has bent over backwards in order to accommodate the neighborhood. He stated he feels sorry for the neighbors to the north, but it was zoned the way it was zoned and now is the time for change.

Commissioner Sherman stated he looked at the property from the New Hampshire Avenue perspective. He stated he likes the project, but was wondering about fence in the back. He asked if it were possible to put a gate to access New Hampshire Avenue. He stated the rear unit is the one he is most concerned about.

Commissioner Sherman asked the Assistant City Attorney if we could condition or modify the rear portion.

Assistant City Attorney Lisa Kranitz stated that the Commission can continue the meeting or condition the project.

Interim Community Development Director Gregg McClain stated it would be inappropriate to ask the applicant to provide access to New Hampshire Avenue because that would require an easement. He warned the Commission from moving toward that position. He stated a partial wrought iron or similar material may be a better option.

Ms. Kranitz stated in order for the General Plan Amendment to pass, it requires three votes and there are two commissioners missing. She advised to consider a continuance.

Vice Chair Sherman stated he is in favor of a continuance and reopened the public hearing.

Mr. McClain suggested the item be continued to April 6th.

Ms. Kranitz asked if a special meeting on March 30th was possible because there is a large project scheduled for the April 6th meeting which could be time consuming.

Vice Chair Sherman stated he is not available on March 30th.

MOTION: It was moved by Commissioner Langley and seconded by Vice Chair Sherman to continue the item and re-notice the project.

The motion passed by the following roll call vote:

Ayes:	Pierce, Langley, Sherman
Noes:	None
Absent:	Henderson, Jackson

Agenda Item #6

COMMUNITY DEVELOPMENT DIRECTOR'S REPORT

Mr. McClain stated he had nothing to report.

Agenda Item #7

PLANNING AND ENVIRONMENTAL QUALITY COMMISSION REPORTS

Commissioners had no report.

ADJOURNMENT

Vice Chair Sherman adjourned the meeting at 8:23 P.M.

Respectfully submitted,

GREGG MCCLAIN, SECRETARY
Planning and Environmental Quality Commission

/S/ STEVE SHERMAN

STEVE SHERMAN, VICE CHAIR
Planning and Environmental Quality Commission

CITY OF GARDENA
PLANNING & ENVIRONMENTAL QUALITY COMMISSION
MINUTES
TUESDAY, April 6, 2021, MEETING
VIRTUAL MEETING VIA ZOOM

* * *

Called to order by Vice Chair Sherman at 7:06 P.M.

ROLL CALL

Present:	Deryl Henderson, Brenda Jackson, Stephen Langley, Steve Sherman, Dale Pierce
Absent:	
Also in Attendance:	Gregg McClain, Interim Community Development Director Lisa Kranitz, Assistant City Attorney John F. Signo, AICP, Senior Planner Amanda Acuna, Senior Planner Rita Garcia, Kimley-Horn, Environmental Consultant

APPROVAL OF MINUTES

The minutes of the meeting on March 2, 2021 will be included at the next meeting on April 20, 2021.

ORAL COMMUNICATIONS FROM THE PUBLIC

Agenda Item #4

Chair Jackson invited anyone from the public to speak on any issues not on the agenda.

There were no oral communications from the public.

PUBLIC HEARING

Agenda Item #5(A)

Environmental Assessment #14-20, Conditional Use Permit #4-20
A request for a conditional use permit, per section 18.32.030.B of the Gardena Municipal Code, to allow the on-site sale and consumption of beer, wine, and distilled spirits ancillary to an existing restaurant establishment located in the General Commercial/Mixed-Use Overlay (C-3/MUO) zone and direct staff to file a Notice of Exemption as an existing facility project.

Applicant: Krave Dine & Lounge Inc.
Location: 2222 W. Rosecrans Avenue

Senior Planner Acuna gave the staff presentation. She provided background on the property and business. She mentioned the CUP runs with the land, not the applicant. For future tenants that want to operate at a different time, the condition on hours of operation was modified by Staff to allow operation until 10:00 pm under the CUP without having to come back to the Planning Commission. She indicated the outdoor patio is enclosed and only accessible from inside the restaurant building. The restaurant is a primary use allowed by-right in the zone. However, the Municipal Code requires a CUP for the sale of alcoholic beverages. The applicant's request does not include any interior or exterior modifications to the building. The required findings can be made in the affirmative thus supporting the project. The public hearing was duly noticed and public comments were received which were sent to all Commissioners.

Chair Jackson asked if any Commissioners had questions.

Vice Chair Sherman asked why they were requesting a Type 47 license when they could be requesting a Type 41. He asked about the food they would be serving.

Ms. Acuna stated they serve southern-style food. In regards to the license type, the question was referred to the applicant.

Liliger Damaso, 5243 E. Beverly Boulevard, Los Angeles, identified herself as the applicant's representative. The restaurant has been in operation since 2010. The restaurant has proven to be extremely desirable because of its food and reasonable prices. The operator guarantees that all employees will be properly trained to serve alcohol. Krave Dine and Lounge Inc. won a Type 47 ABC license from a lottery provided by ABC that would allow them to serve beer, wine, and distilled spirits. A Type 41 license does not allow the sale of distilled spirits. She stated surveillance cameras will be installed and recordings kept for 30 days.

Vice Chair Sherman indicated his questions were answered.

Commissioner Langley asked for clarification about the hours of operation.

Ms. Acuna stated the hours of operation would be 9 a.m. to 8 p.m. daily. However, the recommendation from staff extends the hours to 10 p.m. because the CUP runs with the land and not with the business. If ownership of the restaurant changes hands and the new owner wishes to operate until 10 p.m., the new owner would not have to apply for a new CUP; the current CUP would still be active provided all conditions are met.

Commissioner Langley asked about the location of the restaurant next to the new housing development. He was wondering why it does not open earlier for breakfast to serve those residents.

Assistant Attorney Kranitz stated the hours of operation only apply to alcohol sales, not to the operation of the restaurant. The restaurant may open earlier, but alcohol sales would be restricted to the hours stated in the CUP.

Commissioner Langley stated he understood and thanked Ms. Kranitz for her explanation.

Chair Jackson opened the public hearing.

Graham Jenkins, resident on Artesia Boulevard between Normandie and Western Avenues, stated the project sounds great and he is in support. He mentioned that buses should run more often so he can frequent the restaurant.

Vice Chair Sherman indicated he hopes everything is being included in the administrative record.

Ms. Kranitz stated it is.

MOTION: It was moved by Commissioner Langley and seconded by Vice Chair Henderson.

The motion passed by the following roll call vote:

Ayes:	Langley, Henderson, Sherman, Jackson
Noes:	None
Abstain:	Pierce (absent during first minutes of presentation)
Absent:	None

Agenda Item #5(B)

Environmental Assessment #1-20; General Plan Amendment #1-20; Specific Plan #1-20; Zone Change #1-20; Zoning Code Amendment #3-20; Development Agreement #1-20; Lot Line Adjustment #1-20; Site Plan Review #1-20

The applicant requests the following entitlements for the development of a 265-dwelling unit apartment building on a 1.33-acre site, with a 2,500-square-foot dynamic, digital display on the north side of the building:

1) General Plan Amendment (GPA #1-20) to change the land use designation from General Commercial to Specific Plan and amend the Land Use Plan text;
2) Specific Plan (SP #1-20) to adopt the Gardena Transit Oriented Development Specific Plan (GTODSP);
3) Zone Change (ZC #1-20) to change the zoning from C-3 (General Commercial) to GTODSP;
4) Zoning Code Amendment (ZCA #3-20) to amend the Gardena Municipal Code by adding a new land use category of GTODSP and amending the text to allow for digital signage;
5) Development Agreement (DA #1-20) to provide the developer with vested rights to build over a 5-year period, with the possibility of extensions, in return for community benefits;
6) Site Plan Review (SPR #1-20) to develop the 265-unit apartment building as shown on the plans within the Specific Plan; and
7) Lot Line Adjustment (LLA #1-20) to combine four legal lots into one single lot.

Approval of these items requires certification of an Environmental Impact Report (EA # 1-20), adoption of a Mitigation Monitoring and Reporting Plan, CEQA Findings, and a Statement of Overriding Considerations.

Applicant: Din/Cal 4, Inc.
Location: 12850-12900 Crenshaw Boulevard

Senior Planner Signo gave the staff presentation. He provided background on the property and showed an aerial of the subject property and neighboring properties. He described the project as a transit-oriented development because it is located near the Crenshaw Station and Dominguez Trail, and provides unbundled parking and bike parking. He discussed the digital dynamic display on the north building elevation and mentioned how the City will have opportunities to display messages and collect revenue via the Development Agreement. He discussed the many amenities and presented plans on the outdoor space, including the elevated courtyards. Development of the project would create economic benefits not provided by the current condition of the property.

Environmental Consultant Rita Garcia of Kimley-Horn, discussed the California Environmental Quality Act (CEQA) process and the purpose of an environmental impact report (EIR). She identified the environmental issue areas, the findings prepared in the EIR, the alternatives considered, the public comment period, and letters received from agencies. She indicated the only significant and unavoidable impact would be construction noise.

Mr. Signo indicated the project had been properly noticed. He gave staff's recommendation which was to adopt Resolution No. PC 4-21 approving the proposed project.

Commissioner Henderson asked about unbundled parking.

Mr. Signo explained the project is considered a transit-oriented development because of its proximity to the Crenshaw Station and bus lines. Residents will have to pay for a parking space and this is done to encourage alternative modes of transportation such as buses, bikes, and ride sharing.

Commissioner Langley asked about the adoption of the Gardena Transit Oriented Development Specific Plan (GTODSP) and whether it would apply elsewhere in the City.

Ms. Kranitz explained the purpose of the specific plan and stated it would become the zoning for the property. The Municipal Code currently does not allow a density of 200 dwelling units per acre and the specific plan is a tool that would allow for such a density. The specific plan includes development standards such as setbacks, parking, and density.

Commissioner Langley asked what would happen if the property to the south wanted to develop similarly. He also asked about the fire lane that goes around the building.

Ms. Kranitz explained the specific plan could be extended, but more likely a new specific plan would be more appropriate.

Mr. Signo explained the driveway gates along the northern and southern property lines would remain closed at all times with the exception of emergencies. In the event a fire truck would need to enter, the gates are equipped with Knox boxes which are accessible to emergency personnel. The fire truck would enter through the northern or southern driveway and could go around the building by using the driveway along the Dominguez Channel.

Vice Chair Sherman discussed the size of the units being studios, one-bedroom, and two-bedroom units. He asked how much rent would be. He was concerned that Crenshaw Boulevard would be closed for two years.

Mr. Signo explained it is a market-rate project and rents would be based on market conditions. He deferred the question to the applicant. He explained that closure usually involves one lane at a time, and there is typically one lane open at all times for each direction. Closure would most likely involve northbound lanes which are closest to the project site. Southbound lanes are farther away and located in the City of Hawthorne; it is unlikely they would be closed.

Ms. Garcia stated there is a mitigation measure in the EIR which deals with temporary road closures. MM Trans-1 requires the preparation of a Construction Transportation Plan which addresses the need for alternative access and provisions for minimizing disruptions during temporary closures. Road closures must be coordinated with local emergency and transportation services prior to implementation per MM Trans-2.

Vice Chair Sherman indicated construction would be between third quarter of 2021 to third quarter of 2023, which is a very long time.

Mr. Signo clarified that Condition BS12 needed to be amended per the applicant: "Each unit shall be separately sub-metered for all metered utilities..."

Josh Vasbinder, from The Dinerstein Companies, introduced himself as the representative for the applicant. The development team is a partnership between The Dinerstein Companies and Blackwood. He provided the background on each company and discussed the existing conditions of the project site. He stated the project will be a gateway into Gardena and provided a project overview. He indicated the environment is transit-rich, being accessible to bus lines and the Green Line Station. He discussed transportation demand management measures such as pre-leasing for area employees, free monthly Metro passes, unbundled parking, an on-site bike room, and a ride-sharing pick-up/drop-off area. He went over community benefits including the City's share in net profits and time on the digital dynamic display. He emphasized the amenities being offered and showed examples of existing facilities his company built. He mentioned that rents would be market driven and are expected to range from $1,900 for studios to low $3,000 for the largest two-bedroom units.

Chair Jackson thanked Mr. Vasbinder for his presentation and asked if the Commissioners had any questions.

Commissioner Pierce asked about the security plan.

Mr. Vasbinder indicated they would emulate the facility up the street which is 24 hours per day. They will have on-site staff during business hours and there will be onsite security during non-business hours. Electronic fobs will be provided to residents and parking is secured within the garage.

Commissioner Pierce asked about a strategic plan for future security problems.

Mr. Vasbinder indicted they self-manage their properties so they are cognizant of safety and how quickly bad news spreads on social media. They want to make sure they put the project in the best possible position at the highest standard possible.

Commissioner Pierce thanked the applicant and felt it would be a benefit to the community.

Chair Jackson thanked Mr. Vasbinder and opened the public hearing.

Ms. Acuna provided instructions on how the public can participate.

Ms. Wanda Love complimented the developer and stated she is very impressed with this project. She stated the amenities are amazing and 400 employees are a lot. She complimented the amount of tax generated and the digital marketing screen. She is excited to see this project move forward.

Mr. Graham Jenkins stated this is a transformative project that could be a catalyst for improving infrastructure in the area. It is an impressive conversion of the land use. His only issue is the DWP who restricted pedestrian access to the running path in the back. These are essential to the City and encouraged the City to work on that. He commended the project and thanked the Commission for considering it.

Mr. Steven Ludwig stated he is the owner of two businesses in Gardena: Tasoro Products and Turnaround Solutions. He wanted to congratulate the City and the developer for this collaborative effort. He mentioned he is in support of this project and the developer has been proactive in reaching out to local businesses.

Chair Jackson closed the public hearing with no other speakers.

MOTION: It was moved by Vice Chair Sherman and seconded by Commissioner Pierce to adopt Resolution No. PC 4-21 which recommends that the City Council certify the EIR and adopt the MMRP, findings related to alternatives and mitigation measures, and statement of overriding considerations, and approve the GPA, GTODSP, Zone Change, ZCA, DA, and SPR, with the amendment to Condition BS12.

The motion passed by the following roll call vote:

Ayes:	Henderson, Pierce, Langley, Sherman, Jackson
Noes:	None
Absent:	None

Agenda Item #6

COMMUNITY DEVELOPMENT DIRECTOR'S REPORT

Mr. McClain had nothing to report.

Agenda Item #7

PLANNING AND ENVIRONMENTAL QUALITY COMMISSION REPORTS

Commissioner Pierce commended staff, including the Assistant City Attorney, for all their work in the midst of the all the cut backs during the pandemic.

Commissioner Langley agreed with Commissioner Pierce and mentioned he hopes we can find other opportunities along Crenshaw Boulevard.

Vice Chair Sherman stated his support for the approval of the apartment building project.

ADJOURNMENT

Chair Jackson adjourned the meeting at 8:54 P.M.

Respectfully submitted,

GREGG MCCLAIN, SECRETARY
Planning and Environmental Quality Commission

BRENDA JACKSON, CHAIR
Planning and Environmental Quality Commission

MEMORANDUM

TO: Honorable Mayor and City Council

FROM: Treasurer's Department

DATE: April 22, 2021

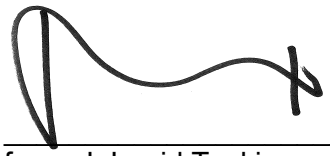
SUBJECT: WARRANT REGISTER
PAYROLL REGISTER

April 27, 2021	TOTAL WARRANTS ISSUED:	$2,614,346.33

Wire Transfer:	11995-12000
Prepay:	162853-162861
Check Numbers:	162862-163022
Checks Voided:	

Total Pages of Register: 19

April 23, 2021	TOTAL PAYROLL ISSUED:	$1,904,389.26



for J. Ingrid Tsukiyama, City Treasurer

cc: City Clerk

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
11995	4/8/2021	104058 ADMINSURE INC.	040821		WORKERS' COMP CLAIMS	39,923.84
					Total :	**39,923.84**
11996	4/8/2021	104058 ADMINSURE INC.	040621		WORKERS' COMP CLAIMS	17,667.14
					Total :	**17,667.14**
11997	4/14/2021	101641 CALPERS	100000016387120		2021 REPLACEMENT BENEFIT CHARGI	3,667.23
					Total :	**3,667.23**
11998	4/15/2021	104058 ADMINSURE INC.	041321		WORKERS' COMP CLAIMS	18,592.16
					Total :	**18,592.16**
11999	4/21/2021	104058 ADMINSURE INC.	042021		WORKERS' COMP CLAIMS ADMINISTRA	27,377.02
					Total :	**27,377.02**
12000	4/22/2021	321408 U.S. POSTAL SERVICE	042121		TMX #259234 REPLENISH POSTAGE MI	6,000.00
					Total :	**6,000.00**
162853	4/13/2021	111720 CECILE JONES AND, B&D LAW GROUP, APLC	15-08PW		SETTLEMENT - C.JONES V. GARDENA ·	68,500.00
					Total :	**68,500.00**
162854	4/13/2021	106513 RAWLINGS COMPANY LLC, THE	15-08PW		SETTLEMENT - C.JONES V. GARDENA ·	1,500.00
					Total :	**1,500.00**
162855	4/15/2021	111729 TERRACINA LLC	RA-CLARE		COVID-19 RENTAL ASSISTANCE PROGI	4,850.00
					Total :	**4,850.00**
162856	4/15/2021	111727 CLAYTON, WENDY	RA-WARREN		COVID-19 RENTAL ASSISTANCE PROGI	5,000.00
					Total :	**5,000.00**
162857	4/15/2021	111728 DANAEI, SHAWN	RA-PEREA		COVID-19 RENTAL ASSISTANCE PROGI	5,000.00
					Total :	**5,000.00**
162858	4/15/2021	111715 ISLAND BREEZE APARTMENTS	RA-OZOAGU		COVID-19 RENTAL ASSISTANCE PROGI	3,225.00
					Total :	**3,225.00**
162859	4/15/2021	107702 MABRY MANAGEMENT CO. INC.	RA-ALLEN		COVID-19 RENTAL ASSISTANCE PROGI	5,000.00

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
162859	4/15/2021	107702 107702 MABRY MANAGEMENT CO. INC.	(Continued)		**Total :**	**5,000.00**
162860	4/15/2021	111698 PELLEGRINO, RAYMOND	RA-PECH/CERROS		COVID-19 RENTAL ASSISTANCE PROGI	4,950.00
					Total :	**4,950.00**
162861	4/22/2021	100515 REGISTRAR-RECORDER/COUNTY, CLERK	042221		(3) BIRTH CERTIFICATES	57.00
					Total :	**57.00**
162862	4/27/2021	101748 AFTERMARKET PARTS COMPANY LLC, THE	82344671	037-09965	GTRANS AUTO PARTS	1,988.88
			82345633	037-09965	GTRANS AUTO PARTS	1,055.65
			82351113	037-09965	GTRANS AUTO PARTS	5.52
			82353295	037-09965	GTRANS AUTO PARTS	161.12
			82354580	037-09965	GTRANS AUTO PARTS	1,463.40
					Total :	**4,674.57**
162863	4/27/2021	111725 AKOPYAN, MARINE	PERMIT #16703		PERMIT DEPOSIT REFUND - 16240 WE:	1,000.00
					Total :	**1,000.00**
162864	4/27/2021	102730 ALL PRO SIGNS, INC.	11559	024-00708	CITY HALL MONUMENT PROJECT	12,268.60
					Total :	**12,268.60**
162865	4/27/2021	100925 AMERICAN MOVING PARTS	01A119418		GTRANS AUTO PARTS	1,582.90
			01A119419		GTRANS AUTO PARTS	1,582.90
					Total :	**3,165.80**
162866	4/27/2021	108625 ARAD OIL INC.	MARCH 2021		CAR WASH	220.00
					Total :	**220.00**
162867	4/27/2021	104687 AT&T	15952106		TELEPHONE	394.48
			16233673		TELEPHONE	394.35
			16258946		TELEPHONE	470.45
					Total :	**1,259.28**
162868	4/27/2021	616090 AT&T	3103232408 04/01/21		TELEPHONE	1,573.85
					Total :	**1,573.85**
162869	4/27/2021	111170 AT&T FIRSTNET	287293416290X3102021		PD CELL PHONE ACCT #287293416290	3,209.26
			287293416290X4102021		PD CELL PHONE ACCT #287293416290	3,212.18

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
162869	4/27/2021	111170 111170 AT&T FIRSTNET	(Continued)		**Total :**	**6,421.44**
162870	4/27/2021	100964 AT&T MOBILITY	287275681023X2012021		PD CELL PHONE ACCT #287275681023	74.67
					Total :	**74.67**
162871	4/27/2021	102880 AUTOPLEX, INC.	12699		2020 FORD INTRCPTR #1591742 OIL &	45.59
					Total :	**45.59**
162872	4/27/2021	110190 BASNET FAMILY CHILD CARE	MARCH 2021		CHILD CARE PROVIDER	5,749.00
					Total :	**5,749.00**
162873	4/27/2021	111481 BATEMAN COMMUNITY LIVING, LLC	INV4650005030	034-00458	SENIOR FEEDING PROGRAM	11,367.50
			INV4650005062	034-00458	SENIOR FEEDING PROGRAM	11,618.88
					Total :	**22,986.38**
162874	4/27/2021	102400 BAYSIDE MEDICAL CENTER	00121891		BLOOD DRAW	566.60
					Total :	**566.60**
162875	4/27/2021	102035 BD WHITE TOP SOIL CO., INC.	84769		STREET MAINT SUPPLIES	151.11
					Total :	**151.11**
162876	4/27/2021	108715 BOBBS, CINDY	MARCH 2021		CHILD CARE PROVIDER	4,442.00
					Total :	**4,442.00**
162877	4/27/2021	110938 BRANDON'S FAMILY CHILDCARE	MARCH 2021		CHILD CARE PROVIDER	1,978.00
					Total :	**1,978.00**
162878	4/27/2021	111615 BUCKNAM INFRASTRUCTURE GROUP, INC	369-01.03	024-00709	PAVEMENT MANAGEMENT PROGRAM	9,183.58
					Total :	**9,183.58**
162879	4/27/2021	103029 CALIFORNIA FENCE & SUPPLY	M3244IN		PARK MAINT SUPPLIES	56.24
			M3513IN		PARK MAINT SUPPLIES	79.80
					Total :	**136.04**
162880	4/27/2021	103383 CALPORTLAND	94989666		STREET MAINT SUPPLIES	988.12
					Total :	**988.12**
162881	4/27/2021	823003 CARL WARREN & COMPANY	MARCH 2021		CLAIMS MANAGEMENT	1,216.55

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
162881	4/27/2021	823003 823003 CARL WARREN & COMPANY	(Continued)		**Total :**	**1,216.55**
162882	4/27/2021	803420 CARPENTER, ROTHANS & DUMONT, LAW OFI	37660		PROFESSIONAL SERVICES	36.00
			37661		PROFESSIONAL SERVICES	270.00
			37662		PROFESSIONAL SERVICES	583.20
			37663		PROFESSIONAL SERVICES	57.60
			37664		PROFESSIONAL SERVICES	126.00
			37665		PROFESSIONAL SERVICES	627.00
			37667		PROFESSIONAL SERVICES	252.00
			37669		PROFESSIONAL SERVICES	900.00
			37670		PROFESSIONAL SERVICES	360.00
			37733		PROFESSIONAL SERVICES	144.00
			37766		PROFESSIONAL SERVICES	108.00
					Total :	**3,463.80**
162883	4/27/2021	111366 CASSO & SPARKS, LLP	20496		PROFESSIONAL SERVICES	9,044.00
					Total :	**9,044.00**
162884	4/27/2021	303331 CDTFA	JAN-MAR 2021		UNDERGROUND STORAGE TANK MAIN	1,697.00
					Total :	**1,697.00**
162885	4/27/2021	109666 CHEM PRO LABORATORY, INC.	673478		STORM WATER SAMPLE ANALYSIS	210.00
					Total :	**210.00**
162886	4/27/2021	103127 CHILD 2 CHILD CONNECTION, FAMILY DAY CA	MARCH 2021		CHILD CARE PROVIDER	5,131.00
					Total :	**5,131.00**
162887	4/27/2021	308112 CITY OF HAWTHORNE	032421	035-01061	MARK43 PROJECT	58,643.40
					Total :	**58,643.40**
162888	4/27/2021	104338 CODE PUBLISHING, INC.	69386		MUNICIPAL CODE - WEB UPDATE	160.00
					Total :	**160.00**
162889	4/27/2021	111669 COMMERCIAL DOOR OF LOS ANGELES, COUI	19429	024-00712	ROLLING STEEL SERVICE DOOR - ROV	4,649.00
					Total :	**4,649.00**
162890	4/27/2021	103470 CONNEY SAFETY PRODUCTS, LLC	05964841		COVID-19 EMERGENCY SUPPLIES	1,666.98

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
162890	4/27/2021	103470 103470 CONNEY SAFETY PRODUCTS, LLC (Continued)			**Total :**	**1,666.98**
162891	4/27/2021	104152 CREATIVE BUS SALES, INC.	5214133		COVID-19 EMERGENCY SUPPLIES	2,097.51
					Total :	**2,097.51**
162892	4/27/2021	103512 CRENSHAW LUMBER CO.	13628		STREET MAINT SUPPLIES	164.95
					Total :	**164.95**
162893	4/27/2021	312558 DEPARTMENT OF ANIMAL CARE, & CONTROL	FEBRUARY 2021	023-01293	MONTHLY HOUSING SERVICES - FEBR	2,405.78
					Total :	**2,405.78**
162894	4/27/2021	312117 DEPARTMENT OF WATER & POWER	040121		LIGHT & POWER	60.87
					Total :	**60.87**
162895	4/27/2021	104343 DISCOUNT SCHOOL SUPPLY	P40261230103	331-00052	FCC PROGRAM SUPPLIES	307.01
			P40263600101	331-00052	FCC PROGRAM SUPPLIES	425.18
			P40267950101	331-00052	FCC PROGRAM SUPPLIES	385.86
			P40267960101	331-00052	FCC PROGRAM SUPPLIES	458.08
			P40267970101	331-00052	FCC PROGRAM SUPPLIES	188.30
			P40267980101	331-00052	FCC PROGRAM SUPPLIES	332.45
			P40268020101	331-00052	FCC PROGRAM SUPPLIES	300.52
			P40268060101	331-00052	FCC PROGRAM SUPPLIES	366.56
			P40290400101	331-00052	FCC PROGRAM SUPPLIES	237.31
			P40292310101	331-00052	FCC PROGRAM SUPPLIES	212.94
			P40292330101	331-00052	FCC PROGRAM SUPPLIES	524.92
			P40312740101	331-00052	FCC PROGRAM SUPPLIES	443.84
			P40312760101	331-00052	FCC PROGRAM SUPPLIES	440.12
			P40312780102	331-00052	FCC PROGRAM SUPPLIES	289.56
			P40312800101	331-00052	FCC PROGRAM SUPPLIES	322.91
			P40312840101	331-00052	FCC PROGRAM SUPPLIES	427.34
					Total :	**5,662.90**
162896	4/27/2021	111452 DRAW TAP GIS, LLC	2021GAR-0005	032-00083	CONSULTANT SERVICES - ZONING & G	650.00
					Total :	**650.00**
162897	4/27/2021	109416 E S SPORTS	11300		CUSTOM GRAPHICS FOR UNIT P04	780.16
			11301		CUSTOM GRAPHICS FOR UNIT P14	52.05
			11302		CUSTOM GRAPHICS FOR UNIT P06	780.16

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
162897	4/27/2021	109416 109416 E S SPORTS	(Continued)		**Total :**	**1,612.37**
162898	4/27/2021	110534 EL DORADO NATIONAL	402146	037-09973	2020 ENC AXXESS 40' CNG BUS #2016	704,259.38
			402147	037-09973	2020 ENC AXXESS 40' CNG BUS #2017	704,259.38
					Total :	**1,408,518.76**
162899	4/27/2021	107353 EMERGENCY RESPONSE CRIME SCENE, CLE	T2021-227		DISINFECT (1) POLICE VEHICLE	650.00
					Total :	**650.00**
162900	4/27/2021	105418 EMPIRE CLEANING SUPPLY	S4525781	024-00673	CUSTODIAL SUPPLIES	2,143.08
					Total :	**2,143.08**
162901	4/27/2021	107690 ENLIGHTENMENT CHILD, DEVELOPMENT CEI	MARCH 2021		CHILD CARE PROVIDER	8,993.00
					Total :	**8,993.00**
162902	4/27/2021	107510 ESCALANTE, WENDY E.	MARCH 2021		CHILD CARE PROVIDER	6,476.00
					Total :	**6,476.00**
162903	4/27/2021	109426 ESPINOSA, VANESSA	03/22-04/02/21		PROFESSIONAL SERVICES - CASE WO	1,260.00
					Total :	**1,260.00**
162904	4/27/2021	105650 EWING IRRIGATION PRODUCTS	13781839		PARK MAINT SUPPLIES	230.76
			13810119		PARK MAINT SUPPLIES	449.66
			13848809		PARK MAINT SUPPLIES	261.17
			13949385		PARK MAINT SUPPLIES	268.63
					Total :	**1,210.22**
162905	4/27/2021	111723 EXCEL BUILDERS, INC.	PERMIT #50020-0300		PERMIT DEPOSIT REFUND - 1051 ELEC	7,500.00
					Total :	**7,500.00**
162906	4/27/2021	106129 FEDEX	7-318-62216		SHIPPING SERVICES	63.50
			7-319-22326		SHIPPING SERVICES	547.09
			7-327-46157		SHIPPING SERVICES	276.14
			7-333-78861		SHIPPING SERVICES	20.50
			7-334-28582		SHIPPING SERVICES	80.49
			7-334-46727		SHIPPING SERVICES	27.62
			7-334-99713		SHIPPING SERVICES	10.14

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
162906	4/27/2021	106129 106129 FEDEX	(Continued)		**Total :**	**1,025.48**
162907	4/27/2021	111724 FINE VISTA BUILDER, INC.	PERMIT #50019-0847		PERMIT DEPOSIT REFUND - 1029 160T	7,500.00
					Total :	**7,500.00**
162908	4/27/2021	106545 FLEETPRIDE, INC	71357094		PW AUTO PARTS	148.68
			71404023		PW AUTO PARTS	320.12
			71589007		SEWER PROGRAM SUPPLIES	316.46
					Total :	**785.26**
162909	4/27/2021	107724 GARCIA, CLAUDIA CRISTINA	MARCH 2021		CHILD CARE PROVIDER	11,808.00
					Total :	**11,808.00**
162910	4/27/2021	207133 GARCIA, NANCY C.	MARCH 2021		CHILD CARE PROVIDER	9,165.00
					Total :	**9,165.00**
162911	4/27/2021	107030 GARDENA AUTO PARTS	128172		PW AUTO PARTS	17.85
			133019		PW AUTO PARTS	110.33
			133020		PW AUTO PARTS	89.74
			133057		PW AUTO PARTS	21.20
			133137		PW AUTO PARTS	144.99
			133138		SEWER PROGRAM SUPPLIES	73.71
			133704		PW AUTO PARTS	56.06
			135591		SEWER PROGRAM SUPPLIES	279.96
					Total :	**793.84**
162912	4/27/2021	107011 GARDENA VALLEY NEWS, INC.	00100727		RESTAURANT WEEK AD	100.00
			00100729		RESTAURANT WEEK AD	300.00
			00104699		SUMMARY OF ORDINANCE NO. 1825 -	115.50
			00104943		NOTICE OF PUBLIC HEARING -	199.50
					Total :	**715.00**
162913	4/27/2021	107011 GARDENA VALLEY NEWS, INC.	041621		YEARLY SUBSCRIPTION	20.00
					Total :	**20.00**
162914	4/27/2021	111726 GARDNER, JORDAN	PERMIT #16729		PERMIT DEPOSIT REFUND - 14321 VAN	1,000.00
					Total :	**1,000.00**

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
162915	4/27/2021	619005 GAS COMPANY, THE	040721		CNG FUEL	974.63
					Total :	**974.63**
162916	4/27/2021	619004 GOLDEN STATE WATER CO.	040221		WATER	10,426.30
					Total :	**10,426.30**
162917	4/27/2021	107513 GRAINGER	9734915946		BUS FACILITY SUPPLIES	12.31
			9735646698		BUS FACILITY SUPPLIES	305.31
			9766455829		BUS FACILITY SUPPLIES	-495.61
			9796025527		BUS FACILITY SUPPLIES	-59.35
			9835292096		BUS FACILITY SUPPLIES	26.53
			9843151425		BUS FACILITY SUPPLIES	8.90
			9847704385		STREET MAINT SUPPLIES	1,150.15
			9848801883		STREET MAINT SUPPLIES	-1,150.15
			9850406993		BUS FACILITY SUPPLIES	96.91
			9853987387		COVID-19 EMERGENCY FACILITY SUPI	91.29
			9857958525		BUS FACILITY SUPPLIES	289.66
			9866003230		BUS FACILITY SUPPLIES	981.77
			9871082898		BUS FACILITY SUPPLIES	41.12
					Total :	**1,298.84**
162918	4/27/2021	110435 GUERRERO, ANGELICA	MARCH 2021		CHILD CARE PROVIDER	9,055.00
					Total :	**9,055.00**
162919	4/27/2021	108012 H&H AUTO PARTS WHOLESALE	1IN0410802		PW AUTO PARTS	702.55
					Total :	**702.55**
162920	4/27/2021	110588 H&H NURSERY	16138		TREE TRIMMING MAINT SUPPLIES	78.50
			16148		TREE TRIMMING MAINT SUPPLIES	89.40
					Total :	**167.90**
162921	4/27/2021	108956 HANOVER DISPLAYS INC.	SIN21000805S		GTRANS PROGRAM SUPPLIES	1,291.33
					Total :	**1,291.33**
162922	4/27/2021	208114 HASSOLDT, MATTHEW S.	05/03-05/07		TRAINING - INTERNAL AFFAIRS INVEST	150.00
					Total :	**150.00**
162923	4/27/2021	108607 HENDERSON-BATISTE, TANEKA	MARCH 2021		CHILD CARE PROVIDER	3,921.00

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
162923	4/27/2021	108607 108607 HENDERSON-BATISTE, TANEKA	(Continued)		**Total :**	**3,921.00**
162924	4/27/2021	111716 HERALD PUBLICATION INC	57799		PUBLIC NOTICE - DEVELOPMENT OF A	308.00
					Total :	**308.00**
162925	4/27/2021	102916 HILL CRANE SERVICE	PERMIT #16670		PERMIT DEPOSIT REFUND - 2931 131S	1,000.00
					Total :	**1,000.00**
162926	4/27/2021	110371 HINDERLITER DE LLAMAS, & ASSOCIATES	SIN007807		CONTRACT SERVICES - TRANSACTION	300.00
					Total :	**300.00**
162927	4/27/2021	108434 HOME DEPOT CREDIT SERVICES	0314722		PARK MAINT SUPPLIES	95.75
			1045893		BLDG MAINT SUPPLIES	11.64
			1901968		PD PROGRAM SUPPLIES	188.17
			3523493		BLDG MAINT SUPPLIES	50.92
			3903435		PD PROGRAM SUPPLIES	284.45
			4046726		BLDG MAINT SUPPLIES	47.12
			4314868		BLDG MAINT SUPPLIES	279.19
			4523290		BLDG MAINT SUPPLIES	36.79
			5542123		PD PROGRAM SUPPLIES	37.94
			5902254		BUS MAINT SUPPLIES	65.63
			6510315		BLDG MAINT SUPPLIES	30.74
			7031696		REC CUSTODIAL SUPPLIES	26.32
			7524339		SIGNS/SIGNALS SUPPLIES	21.92
			7646588		PD PROGRAM SUPPLIES	913.82
			7902383		PD PROGRAM SUPPLIES	19.37
			8532106		SIGNS/SIGNALS SUPPLIES	108.95
					Total :	**2,218.72**
162928	4/27/2021	104503 HP COMMUNICATIONS, INC.	PERMIT #16730		PERMIT DEPOSIT REFUND - 168TH ANI	1,000.00
					Total :	**1,000.00**
162929	4/27/2021	111722 HURT-CANADY, NANCY	RECEIPT #76548		REFUND - WITHDRAWAL OF APPLICAT	564.00
					Total :	**564.00**
162930	4/27/2021	105513 INDUSTRIAL CLEANING SYSTEMS, INC.	38985		PD PROGRAM SUPPLIES	481.52
			39038		PD PROGRAM SUPPLIES	158.53

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
162930	4/27/2021	105513 105513 INDUSTRIAL CLEANING SYSTEMS, INC. (Continued)			**Total :**	**640.05**
162931	4/27/2021	110132 IPERMIT	PERMIT #50020-0693		PERMIT DEPOSIT REFUND - 1919 W. RI	5,000.00
					Total :	**5,000.00**
162932	4/27/2021	103064 ITERIS, INC.	130802		RAILROAD TIMING CALCULATIONS - VI	1,571.30
					Total :	**1,571.30**
162933	4/27/2021	108555 JALISCO TIRE & AUTO REPAIR	033121		FLAT REPAIR	10.00
			040121		(4) TIRES MOUNT & BALANCE	50.00
					Total :	**60.00**
162934	4/27/2021	105226 JEKAL FAMILY CHILD CARE	MARCH 2021		CHILD CARE PROVIDER	8,457.00
					Total :	**8,457.00**
162935	4/27/2021	111045 KJ SERVICES	2141		BOTTLE & CAN RECYCLING PROGRAM	340.00
					Total :	**340.00**
162936	4/27/2021	108475 L.A. CASCADE INC.	43765		SERVICE CALL - TEMPURE LAB FREEZ	545.68
					Total :	**545.68**
162937	4/27/2021	109939 LA UNIFORMS & TAILORING	04		PD UNIFORM SUPPLIES	777.26
			15		PD UNIFORM SUPPLIES	887.51
			16		PD UNIFORM SUPPLIES	887.51
			17		PD UNIFORM SUPPLIES	887.51
			21		PD UNIFORM SUPPLIES	777.26
			35		PD UNIFORM SUPPLIES	777.26
			36		PD UNIFORM SUPPLIES	777.26
			38		PD UNIFORM SUPPLIES	887.51
			8138		PD UNIFORM SUPPLIES	134.39
			8266		PD UNIFORM SUPPLIES	98.07
			8290		PD UNIFORM SUPPLIES	158.65
			8301		PD UNIFORM SUPPLIES	150.00
			8409		PD UNIFORM SUPPLIES	655.38
					Total :	**7,855.57**
162938	4/27/2021	112015 LACERDA, DALVANICE	MARCH 2021		CHILD CARE PROVIDER	9,241.00

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
162938	4/27/2021	112015 112015 LACERDA, DALVANICE	(Continued)		**Total :**	**9,241.00**
162939	4/27/2021	112014 LAKESHORE LEARNING MATERIALS	5044090321		FCC PROGRAM SUPPLIES	-5.46
			5395670421	331-00053	FCC PROGRAM SUPPLIES	42.99
					Total :	**37.53**
162940	4/27/2021	110777 LEARN N PLAY FAMILY DAYCARE	MARCH 2021		CHILD CARE PROVIDER	8,249.00
					Total :	**8,249.00**
162941	4/27/2021	102376 LEXISNEXIS RISK SOLUTIONS	1328345-20210331		MONTHLY SUBSCRIPTION FEE #13283	1,393.48
					Total :	**1,393.48**
162942	4/27/2021	110920 LIBERTY MANUFACTURING, INC	313		PD RANGER SERVICES	420.00
			314		PD RANGE SERVICES	-20.00
					Total :	**400.00**
162943	4/27/2021	109446 LINSCOTT, LAW & GREENSPAN, ENGINEERS	14396-00104	032-00082	TRAFFIC ENGINEERING SERVICES - H	2,371.00
					Total :	**2,371.00**
162944	4/27/2021	102233 LITTLE PEOPLE DAY CARE	MARCH 2021		CHILD CARE PROVIDER	5,485.00
					Total :	**5,485.00**
162945	4/27/2021	109517 LOAD N' GO BUILDING MATERIALS	18953		STREET MAINT SUPPLIES	70.11
					Total :	**70.11**
162946	4/27/2021	109058 LOBBY TRAFFIC SYSTEMS INC	74474	024-00725	EMERGENCY REMOVAL OF FENCE AT	3,500.00
					Total :	**3,500.00**
162947	4/27/2021	105279 LOS ANGELES TRUCK CENTERS LLC	XA220285274		SWEEPER AUTO PARTS	247.42
					Total :	**247.42**
162948	4/27/2021	113036 MANERI SIGN CO., INC.	40009818		SIGNS - 18"X24" "NO PARKING"	355.68
					Total :	**355.68**
162949	4/27/2021	107951 MARK HANDLER & ASSOCIATES	MARCH 2021	032-00065	BUILDING INSPECTION SERVICES	14,787.50
					Total :	**14,787.50**
162950	4/27/2021	107644 MARTINEZ, CHERYL NAOMI	MARCH 2021		CHILD CARE PROVIDER	7,594.00

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
162950	4/27/2021	107644 107644 MARTINEZ, CHERYL NAOMI	(Continued)		**Total :**	**7,594.00**
162951	4/27/2021	104773 MARTINEZ, KAMBY	MARCH 2021		CHILD CARE PROVIDER	6,368.00
					Total :	**6,368.00**
162952	4/27/2021	113046 MARX BROS. FIRE EXTINGUISHER, CO., INC.	P30510		FIRE EXTINGUISHER SERVICE - CITY H	91.00
			P30511		FIRE EXTINGUISHER SERVICE - NCC	84.00
					Total :	**175.00**
162953	4/27/2021	104106 MCCAIN, INC.	INV0257745	024-00680	SIGNS/SIGNALS SUPPLIES	5,544.05
					Total :	**5,544.05**
162954	4/27/2021	113064 MCMASTER-CARR SUPPLY COMPANY	55860518		GTRANS SHOP SUPPLIES	154.51
					Total :	**154.51**
162955	4/27/2021	111721 MENA, JOE	RECEIPT #40207		REFUND - EVENT CANCELLED DUE TO	70.00
					Total :	**70.00**
162956	4/27/2021	108699 MEZIERE ENTERPRISES INC.	75463		ELECTRIC WATER PUMP	1,282.95
					Total :	**1,282.95**
162957	4/27/2021	111604 MICRO ELECTRONICS, INC	11190334	023-01322	(5) REPLACEMENT PCS & (1) MONITOR	4,740.38
					Total :	**4,740.38**
162958	4/27/2021	213431 MOSES, PAULINE	032921		REIMBURSEMENT FOR EASTER EVEN	200.00
					Total :	**200.00**
162959	4/27/2021	113355 MR. HOSE INC.	185954		PW AUTO PARTS	139.74
					Total :	**139.74**
162960	4/27/2021	105622 N/S CORPORATION	0104553	037-09955	GTRANS BUS WASH EQUIPMENT MAIN	515.00
					Total :	**515.00**
162961	4/27/2021	105622 N/S CORPORATION	0103897	037-09955	GTRANS BUS WASH EQUIPMENT MAIN	515.00
					Total :	**515.00**
162962	4/27/2021	110819 NORTHERN SAFETY CO., INC.	904366119		COVID-19 EMERGENCY SHOP SUPPLIE	648.71
					Total :	**648.71**

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
162963	4/27/2021	110575 OCCUPATIONAL HEALTH CENTERS, OF CALIF	70752326		RANDOM BAT & DRUG TEST	189.00
			70895877		RANDOM BAT & DRUG TEST	326.00
					Total :	**515.00**
162964	4/27/2021	115168 OFFICE DEPOT	156319224		FCC OFFICE SUPPLIES	11.12
			162429455		CM OFFICE SUPPLIES	62.81
			163243048		FINANCE OFFICE SUPPLIES	4.95
			163460511		BUS OFFICE SUPPLIES	194.41
			163461948		BUS OFFICE SUPPLIES	46.88
			164843256		PD OFFICE SUPPLIES	100.25
			166318612		FCC OFFICE SUPPLIES	197.62
					Total :	**618.04**
162965	4/27/2021	111358 O'REILLY AUTO PARTS	109832		PW AUTO PARTS	19.82
			111637		PW AUTO PARTS	141.03
					Total :	**160.85**
162966	4/27/2021	115810 ORKIN PEST CONTROL	207750749		PEST CONTROL - ACCT #27336703	230.90
					Total :	**230.90**
162967	4/27/2021	109890 OWUSU FAMILY CHILD CARE	MARCH 2021		CHILD CARE PROVIDER	9,545.00
					Total :	**9,545.00**
162968	4/27/2021	116140 PETE'S ROAD SERVICE, INC.	490047		TIRES - ST17580D13 SPORT TRAIL	177.70
					Total :	**177.70**
162969	4/27/2021	108628 PETROLEUM MARKETING EQUIPMENT	3148865		PW AUTO SUPPLIES	751.67
			3149771		PW AUTO SUPPLIES	185.17
					Total :	**936.84**
162970	4/27/2021	105574 PINNACLE PETROLEUM, INC.	0245026	037-09960	87 OCTANE REGULAR UNLEADED CAR	27,347.60
			0245027		87 OCTANE REGULAR UNLEADED CAR	27,319.65
				037-09960		
					Total :	**54,667.25**
162971	4/27/2021	109851 PLANETBIDS, INC.	032135	037-10014	PB SYSTEM VENDOR AND BID MANAG	6,763.24
					Total :	**6,763.24**

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
162972	4/27/2021	116225 PLUMBERS DEPOT, INC.	PD-47279		SEWER PROGRAM SUPPLIES	136.88
					Total :	**136.88**
162973	4/27/2021	102677 PROVIDENCE HEALTH & SERVICES	1010125 03/05/21		SART EXAMS	2,700.00
			600000283 03/05/21		PRE-EMPLOYMENT PHYSICAL EXAM	570.00
			600000283 04/05/21		PRE-EMPLOYMENT PHYSICAL EXAM	120.00
					Total :	**3,390.00**
162974	4/27/2021	106092 PRUDENTIAL OVERALL SUPPLY	42610945		UNIFORM & SUPPLY RENTAL	145.42
			42610946		UNIFORM & SUPPLY RENTAL	43.78
			42610947		SUPPLY RENTAL - MATS - GTRANS	50.10
			42610948		SUPPLY RENTAL - MATS - NCC	13.65
			42610949		SUPPLY RENTAL - MATS - CH	19.00
			42610950		SUPPLY RENTAL - MATS - PD	91.60
			42610951		SUPPLY RENTAL - MATS - HS	11.60
			42612972		UNIFORM & SUPPLY RENTAL	146.19
			42612974		UNIFORM & SUPPLY RENTAL	43.78
			42612975		SUPPLY RENTAL - MATS - GTRANS	50.10
			42613298		UNIFORM & SUPPLY RENTAL	272.00
					Total :	**887.22**
162975	4/27/2021	116575 PSYCHOLOGICAL CONSULTING, ASSOCIATES	524091		INDIVIDUAL PSYCHOTHERAPY	275.00
			524200		INDIVIDUAL PSYCHOTHERAPY	412.50
			525202		INDIVIDUAL PSYCHOTHERAPY	1,100.00
					Total :	**1,787.50**
162976	4/27/2021	108623 PUN GROUP LLP, THE	112890	023-01296	AUDIT SERVICES FY 2019-2020	10,200.00
					Total :	**10,200.00**
162977	4/27/2021	100147 RCI IMAGE SYSTEMS	76682		MICROFICHE SCANNING - 13700 GRAM	46.86
					Total :	**46.86**
162978	4/27/2021	103072 REACH	0421612		EAP SERVICES/REACHLINE NEWSLET	902.00
					Total :	**902.00**
162979	4/27/2021	118142 REFRIGERATION SUPPLIES, DISTRIBUTOR	48429884		BLDG MAINT SUPPLIES	32.34
					Total :	**32.34**

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
162980	4/27/2021	111730 REYES, MARIA	PERMIT #16767		PERMIT DEPOSIT REFUND - 14904 VAN	500.00
					Total :	**500.00**
162981	4/27/2021	118476 RICOH USA, INC.	5061782366		RICOH MPC3300SPF COPIER USAGE C	800.87
			5061782369		RICOH MPC3300SPF COPIER USAGE C	799.12
			9028812765		RICOH MPC3503 COPIER LEASE - HS~	278.19
			9028812891		RICOH MPC3503 COPIER LEASE - GTR	1,191.45
			9028813015		RICOH COPIER LEASE & USAGE CHAR	2,555.89
			9028813412		RICOH DD6650P COPIER LEASE - PRIN	556.24
			9028813510		RICOH PRO8100S COPIER LEASE - PR	380.97
			9028813649		RICOH MPC3503 COPIER LEASE - ADM	541.47
			9028813650		RICOH MPC3503 COPIER LEASE - SR. I	171.08
			9028813765		RICOH MPC3503 COPIER LEASE - FCC	209.22
					Total :	**7,484.50**
162982	4/27/2021	118536 RIO HONDO COLLEGE	S21-80-ZGDA		REGISTRATION - FIELD TRAINING OFF	178.00
					Total :	**178.00**
162983	4/27/2021	119126 S.B.R.P.C.A.	03968	035-01063	AMBER LIGHT BAR FOR ANIMAL CONT	5,214.74
					Total :	**5,214.74**
162984	4/27/2021	119022 SAFE MART OF SOUTHERN, CALIFORNIA, INC	92007		STREET MAINT SUPPLIES	9.70
			92009		BUS PROGRAM SUPPLIES	40.68
			92094		BUS PROGRAM SUPPLIES	11.03
					Total :	**61.41**
162985	4/27/2021	106044 SARDO BUS & COACH UPHOLSTERY	67815	037-09984	PROTECTIVE SHIELDS FOR GTRANS E	854.10
					Total :	**854.10**
162986	4/27/2021	108654 SECTRAN SECURITY INC.	21040666		ARMORED TRANSPORTATION SERVICI	187.63
					Total :	**187.63**
162987	4/27/2021	110676 SF MOBILE-VISION, INC	39367		PD PROGRAM SUPPLIES	190.08
					Total :	**190.08**
162988	4/27/2021	110731 SHAW HR CONSULTING, INC	16713		PROFESSIONAL SERVICES - PERSONN	525.00
			16721		PROFESSIONAL SERVICES - PERSONN	857.50
			16755		PROFESSIONAL SERVICES - PERSONN	1,102.50

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
162988	4/27/2021	110731 110731 SHAW HR CONSULTING, INC	(Continued)		**Total :**	**2,485.00**
162989	4/27/2021	106050 SHEHATA, AMY	FEBRUARY 2021		CHILD CARE PROVIDER	-735.23
			MARCH 2021		CHILD CARE PROVIDER	7,351.00
					Total :	**6,615.77**
162990	4/27/2021	119233 SHERWIN-WILLIAMS CO.	7283-7		STREET MAINT SUPPLIES	59.49
			8333-6		STREET MAINT SUPPLIES	614.09
					Total :	**673.58**
162991	4/27/2021	109918 SHIGE'S FOREIGN CAR SERVICE	81297		2019 FORD F-250 SUPER DUTY XLT SE	142.23
			81319	035-01021	2017 FORD INTRCPTR #1368929 SERVI	488.46
			81336	035-01021	2011 FORD CROWN VIC #1376572 OIL &	59.34
			81350	035-01021	2011 FORD CROWN VIC #1376572 TRAI	314.00
			81388	035-01021	2018 FORD INTRCPTR #1554880 SERVI	596.82
			81391	035-01021	2018 TOYOTA AVALON #7ZZP485 OIL &	97.35
					Total :	**1,698.20**
162992	4/27/2021	101649 SILVIA ESPINOZA FAMILY CHILD, CARE	MARCH 2021		CHILD CARE PROVIDER	2,746.00
					Total :	**2,746.00**
162993	4/27/2021	109531 SMILLIN, MAGE	MARCH 2021		CHILD CARE PROVIDER	10,509.00
					Total :	**10,509.00**
162994	4/27/2021	119202 SOUTH BAY DOCUMENT DESTRUCTION, INC	78392		DOCUMENT DESTRUCTION 04/12/21	100.00
					Total :	**100.00**
162995	4/27/2021	119447 SOUTH BAY FORD	323287		PW AUTO PARTS	22.15
			503205		2012 FORD ESCAPE #1156334 SERVICI	1,029.24
					Total :	**1,051.39**
162996	4/27/2021	619003 SOUTHERN CALIFORNIA EDISON	041621		LIGHT & POWER	125,944.24
					Total :	**125,944.24**
162997	4/27/2021	103202 SOUTHERN COUNTIES LUBRICANTS, LLC	142360		OLYMPUS OMEGA RED AF 50/50	1,597.19
					Total :	**1,597.19**
162998	4/27/2021	108238 SPARKLETTS	15638236 032621		DRINKING WATER FILTRATION SYSTEM	37.00

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
162998	4/27/2021	108238 108238 SPARKLETTS	(Continued)		**Total :**	**37.00**
162999	4/27/2021	104126 SPECTRUM SOLUTIONS	0027122041121		CABLE & BACKUP INTERNET SERVICE	3,971.80
					Total :	**3,971.80**
163000	4/27/2021	119010 STAPLES ADVANTAGE	3472718554		PW OFFICE SUPPLIES	79.93
			3472908016		PW OFFICE SUPPLIES	71.95
					Total :	**151.88**
163001	4/27/2021	119550 SWRCB	SW-0212207		ANNUAL PERMIT FEE	1,474.00
					Total :	**1,474.00**
163002	4/27/2021	100609 TANK SPECIALISTS OF CALIFORNIA	30539		CERTIFIED DESIGNATED OPERATOR S	189.75
					Total :	**189.75**
163003	4/27/2021	110877 TAYLORING MINDS FAMILY CHILD, CARE	MARCH 2021		CHILD CARE PROVIDER	5,087.00
					Total :	**5,087.00**
163004	4/27/2021	107928 TELECOM LAW FIRM, P.C.	10131		PROFESSIONAL SERVICES - 15598 PUI	2,450.00
					Total :	**2,450.00**
163005	4/27/2021	110238 TIREHUB, LLC	19320431	035-01065	TIRES - GY EAGLE RS A POLICE BW 10	2,341.20
			19601651		TIRES - GY ASSUR ALL SEASON BW 95	785.64
					Total :	**3,126.84**
163006	4/27/2021	120525 TRANS UNION LLC	03104813		CREDIT REPORT	59.16
					Total :	**59.16**
163007	4/27/2021	110818 TRANSIT AND PARATRANSIT CO.	T-2084		BUS OPERATOR TRAINING MATERIALS	550.00
					Total :	**550.00**
163008	4/27/2021	109900 U.S. BANK CORPORATE PAYMENT, SYSTEMS	CRESPO 03/22/21		CAL CARD STATEMENT 02/23-03/22/21	673.66
			FOX 03/22/21		CAL CARD STATEMENT 02/23-03/22/21	57.25
			LEWIS 03/22/21		CAL CARD STATEMENT 02/23-03/22/21	1,074.14
			NOLAN 03/22/21		CAL CARD STATEMENT 02/23-03/22/21	1,830.41
			PALMA 03/22/21		CAL CARD STATEMENT 02/23-03/22/21	1,743.49
			PD TRAINING 03/22/21		CAL CARD STATEMENT 02/23-03/22/21	3,040.08
			PD TRAINING2 3/22/21		CAL CARD STATEMENT 02/23-03/22/21	571.31

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
163008	4/27/2021	109900 U.S. BANK CORPORATE PAYMENT, SYSTEMS	(Continued)			
			PD TRAINING3 3/22/21		CAL CARD STATEMENT 02/23-03/22/21	268.65
			PD TRAINING4 3/22/21		CAL CARD STATEMENT 02/23-03/22/21	371.51
			RECREATION 03/22/21		CAL CARD STATEMENT 02/23-03/22/21	4,832.70
			ROMERO 03/22/21		CAL CARD STATEMENT 02/23-03/22/21	689.66
			SANTIN 03/22/21		CAL CARD STATEMENT 02/23-03/22/21	3,051.73
			SANTOS 03/22/21		CAL CARD STATEMENT 02/23-03/22/21	955.64
			SWEENEY 03/22/21		CAL CARD STATEMENT 02/23-03/22/21	1,467.79
			V.OSORIO 03/22/21		CAL CARD STATEMENT 02/23-03/22/21	1,019.27
					Total :	**21,647.29**
163009	4/27/2021	109220 U.S. BANK EQUIPMENT FINANCE	439658022		RICOH MPC4503 COPIER LEASE - CD	175.10
					Total :	**175.10**
163010	4/27/2021	121275 UNDERGROUND SERVICE ALERT, OF SC	320210283		NEW TICKETS	183.25
			dsb20201453		NEW TICKETS	55.38
					Total :	**238.63**
163011	4/27/2021	103227 UNIPLAN ENGINEERING, INC.	800151-01	024-00702	DESIGN & CMI SERVICES - LOCAL STR	31,800.00
					Total :	**31,800.00**
163012	4/27/2021	105549 VALDEZ, MATILDE	MARCH 2021		CHILD CARE PROVIDER	11,091.00
					Total :	**11,091.00**
163013	4/27/2021	122435 VISTA PAINT CORPORATION	2021-930663-00		GTRANS FACILITY PAINT	372.67
					Total :	**372.67**
163014	4/27/2021	101195 WASTE RESOURCES GARDENA	041621		WASTE COLLECTION	244,437.54
					Total :	**244,437.54**
163015	4/27/2021	101903 WATER TECHNIQUES	77978		DRINKING WATER SYSTEM RENTAL	45.00
					Total :	**45.00**
163016	4/27/2021	104107 WAXIE SANITARY SUPPLY	79922927		BUS WASH SUPPLIES	351.92
					Total :	**351.92**
163017	4/27/2021	123154 WEST COAST ARBORISTS, INC.	171003-A	024-00676	TREE TRIMMING SERVICES FY 2020/2(	23,521.00
			171370		TREE TRIMMING SERVICES FY 2020/2(	1,280.00

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
163017	4/27/2021	123154 123154 WEST COAST ARBORISTS, INC.	(Continued)		**Total :**	**24,801.00**
163018	4/27/2021	110370 WESTERN COLLISION CENTER, INC	1050	035-01022	2018 FORD EXPLR #1554678 BODY REI	632.66
			1051	035-01066	2016 FORD EXPLR BODY REPAIRS	2,127.38
			1053	035-01022	2016 FORD EXPLR #1488055 BODY REI	175.00
					Total :	**2,935.04**
163019	4/27/2021	109342 WHITMAN ELECTRIC	031021	024-00726	TRAFFIC SIGNAL POLE INSTALLATION	2,973.60
					Total :	**2,973.60**
163020	4/27/2021	103956 WORTHINGTON FORD	6055217	035-01067	2016 FORD ULTL #1488057 DIAGNOSE	3,243.71
					Total :	**3,243.71**
163021	4/27/2021	125001 YAMADA COMPANY, INC.	80596		TREE PROGRAM SUPPLIES	224.84
			80607		BLDG MAINT SUPPLIES	29.07
			80618		TREE PROGRAM SUPPLIES	502.70
			80619		PARK MAINT SUPPLIES	161.79
			80652		STREET MAINT SUPPLIES	553.85
					Total :	**1,472.25**
163022	4/27/2021	107051 ZAVALETA, MARITZA	MARCH 2021		CHILD CARE PROVIDER	4,349.00
					Total :	**4,349.00**

176 Vouchers for bank code : usb **Bank total : 2,614,346.33**

176 Vouchers in this report **Total vouchers : 2,614,346.33**

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount

CLAIMS VOUCHER APPROVAL

I hereby certify that the demands or claims covered by the checks listed on pages 1 to 19 inclusive of the check register are accurate and funds are available for payment thereof.

By: _____

Chief Fiscal Officer

This is to certify that the claims or demands covered by checks listed on pages 1 to 19 inclusive of the check register have been audited by the City Council of the City of Gardena and that all of the said checks are approved for payment except check numbers:

_____

_____ 04/27/2021

Mayor Date

_____ _____

Councilmember Date

_____ _____

Councilmember Date

Acknowledged:

_____ _____

Councilmember Date

_____ _____

Councilmember Date

CITY OF GARDENA

INVESTMENT REPORT

February 2021

Reviewed: Deputy City Treasurer

Reviewed: Chief Fiscal Officer

City of Gardena Consolidated - Account #10647

MONTHLY ACCOUNT STATEMENT

FEBRUARY 1, 2021 THROUGH FEBRUARY 28, 2021

Chandler Team:
For questions about your account, please call (800) 317-4747,
or contact **operations@chandlerasset.com**

CHANDLER ASSET MANAGEMENT
chandlerasset.com

Information contained herein is confidential. We urge you to compare this statement to the one you receive from your qualified custodian. Please see Important Disclosures.

City of Gardena Consolidated

Account #10647

Portfolio Summary

As of February 28, 2021

PORTFOLIO CHARACTERISTICS

Average Modified Duration	1.01
Average Coupon	1.30%
Average Purchase YTM	0.90%
Average Market YTM	0.25%
Average S&P/Moody Rating	AA-/Aa2
Average Final Maturity	1.14 yrs
Average Life	1.03 yrs

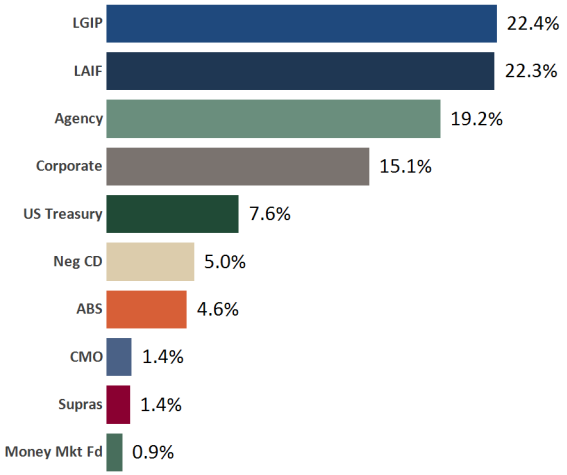
ACCOUNT SUMMARY

	Beg. Values as of 1/31/21	End Values as of 2/28/21
Market Value	29,787,730	29,753,181
Accrued Interest	64,359	66,887
Total Market Value	**29,852,089**	**29,820,067**
Income Earned	26,565	24,230
Cont/WD		
Par	23,313,200	23,341,622
Book Value	29,336,833	29,358,535
Cost Value	29,374,598	29,399,154

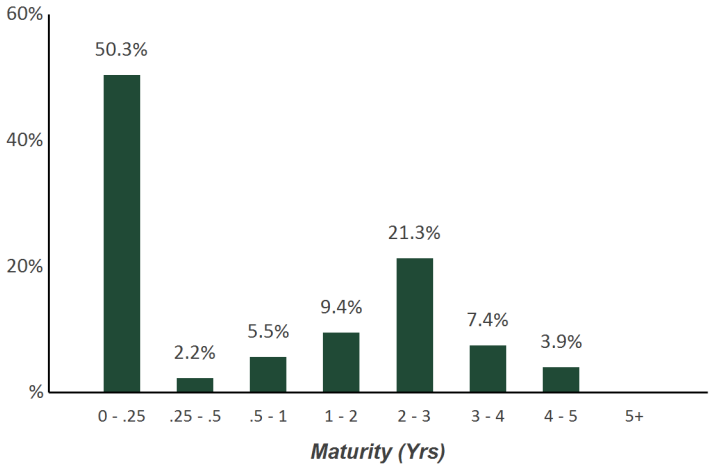
TOP ISSUERS

CalTrust	22.4%
Local Agency Investment Fund	22.3%
Federal Home Loan Mortgage Corp	10.3%
Government of United States	7.6%
Federal Home Loan Bank	4.2%
Federal National Mortgage Assoc	4.1%
Federal Farm Credit Bank	2.1%
Apple Inc	1.4%
Total	**74.4%**

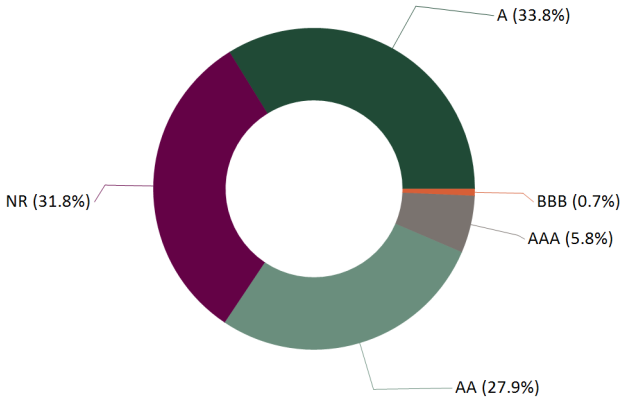
SECTOR ALLOCATION



MATURITY DISTRIBUTION



CREDIT QUALITY (S&P)



Holdings Report

As of February 28, 2021

CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
ABS									
89238KAD4	Toyota Auto Receivables Trust 2017-D A3 1.93% Due 1/18/2022	6,635.16	02/05/2019 3.14%	6,556.63 6,611.59	100.12 0.16%	6,643.16 4.62	0.02% 31.57	Aaa / AAA NR	0.89 0.07
477870AB5	John Deere Owner Trust 2019-B A2 2.28% Due 5/16/2022	2,732.25	10/30/2019 2.18%	2,736.09 2,734.07	100.11 0.24%	2,735.19 2.77	0.01% 1.12	Aaa / NR AAA	1.21 0.05
89231PAD0	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	117,965.81	08/29/2019 1.98%	120,486.40 119,416.17	101.39 0.34%	119,608.01 166.73	0.40% 191.84	Aaa / AAA NR	2.04 0.49
47789JAD8	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	343,906.37	Various 1.39%	351,957.48 348,680.22	101.65 0.15%	349,573.26 444.79	1.17% 893.04	Aaa / NR AAA	2.38 0.59
43815NAC8	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	115,000.00	08/20/2019 1.79%	114,999.05 114,999.52	101.35 0.33%	116,551.01 90.98	0.39% 1,551.49	Aaa / AAA NR	2.46 0.92
92348AAA3	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	80,000.00	10/01/2019 1.95%	79,993.83 79,995.73	101.84 0.30%	81,475.52 47.42	0.27% 1,479.79	NR / AAA AAA	3.15 1.11
89232HAC9	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	215,000.00	07/06/2020 0.70%	219,736.72 218,942.22	101.89 0.11%	219,066.73 158.62	0.74% 124.51	Aaa / AAA NR	3.21 1.21
65479JAD5	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	120,000.00	10/16/2019 1.94%	119,993.66 119,995.48	101.91 0.32%	122,291.04 102.93	0.41% 2,295.56	Aaa / AAA NR	3.38 1.18
43813KAC6	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	85,000.00	09/22/2020 0.38%	84,987.51 84,989.18	100.11 0.31%	85,097.67 11.36	0.29% 108.49	NR / AAA AAA	3.64 1.89
89236XAC0	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	70,000.00	10/06/2020 0.36%	69,986.96 69,988.13	99.98 0.36%	69,988.13 10.89	0.23% 0.00	NR / AAA AAA	3.88 1.76
92290BAA9	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	120,000.00	08/04/2020 0.48%	119,974.80 119,977.86	100.37 0.28%	120,438.24 17.23	0.40% 460.38	Aaa / NR AAA	3.98 1.92
43813GAC5	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	80,000.00	02/17/2021 0.27%	79,998.54 79,998.55	99.86 0.34%	79,885.36 4.20	0.27% (113.19)	Aaa / NR AAA	4.15 2.15
Total ABS		**1,356,239.59**	**1.20%**	**1,371,407.67 1,366,328.72**	**0.24%**	**1,373,353.32 1,062.54**	**4.61% 7,024.60**	**Aaa / AAA AAA**	**3.01 1.14**

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CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
AGENCY									
3130AHSR5	FHLB Note 1.625% Due 12/20/2021	320,000.00	12/19/2019 1.68%	319,654.40 319,861.00	101.25 0.08%	324,010.56 1,025.56	1.09% 4,149.56	Aaa / AA+ AAA	0.81 0.81
3137EADB2	FHLMC Note 2.375% Due 1/13/2022	350,000.00	10/30/2019 1.69%	355,124.00 352,024.14	101.97 0.12%	356,901.30 1,108.33	1.20% 4,877.16	Aaa / AA+ AAA	0.87 0.87
3133ELWD2	FFCB Note 0.375% Due 4/8/2022	285,000.00	04/03/2020 0.45%	284,578.20 284,767.14	100.26 0.14%	285,731.60 424.53	0.96% 964.46	Aaa / AA+ AAA	1.11 1.11
3133ELYR9	FFCB Note 0.25% Due 5/6/2022	325,000.00	04/30/2020 0.31%	324,587.25 324,756.31	100.12 0.15%	325,380.57 259.55	1.09% 624.26	Aaa / AA+ AAA	1.18 1.19
3134GVJ66	FHLMC Note 0.25% Due 6/8/2022	350,000.00	06/04/2020 0.28%	349,790.00 349,866.52	100.14 0.14%	350,502.95 201.74	1.18% 636.43	Aaa / NR AAA	1.27 1.28
3137EAET2	FHLMC Note 0.125% Due 7/25/2022	170,000.00	07/21/2020 0.24%	169,615.80 169,731.79	100.01 0.12%	170,021.25 21.25	0.57% 289.46	Aaa / AA+ AAA	1.40 1.41
3130ADRG9	FHLB Note 2.75% Due 3/10/2023	350,000.00	04/11/2019 2.34%	355,330.50 352,758.57	105.28 0.15%	368,463.90 4,571.88	1.25% 15,705.33	Aaa / AA+ NR	2.03 1.97
3137EAER6	FHLMC Note 0.375% Due 5/5/2023	305,000.00	05/05/2020 0.39%	304,871.90 304,906.83	100.43 0.18%	306,321.26 368.54	1.03% 1,414.43	Aaa / AA+ AAA	2.18 2.17
3135G04Q3	FNMA Note 0.25% Due 5/22/2023	245,000.00	05/20/2020 0.35%	244,262.55 244,453.14	100.13 0.19%	245,311.64 168.44	0.82% 858.50	Aaa / AA+ AAA	2.23 2.22
3137EAES4	FHLMC Note 0.25% Due 6/26/2023	300,000.00	06/24/2020 0.35%	299,124.00 299,322.40	100.01 0.24%	300,043.50 135.42	1.01% 721.10	Aaa / AA+ AAA	2.32 2.32
3135G05G4	FNMA Note 0.25% Due 7/10/2023	250,000.00	07/08/2020 0.32%	249,462.50 249,577.36	100.08 0.22%	250,202.00 88.54	0.84% 624.64	Aaa / AA+ AAA	2.36 2.36
3137EAEV7	FHLMC Note 0.25% Due 8/24/2023	300,000.00	08/19/2020 0.28%	299,694.00 299,747.51	100.08 0.22%	300,230.70 14.58	1.01% 483.19	Aaa / AA+ AAA	2.48 2.48
3137EAEW5	FHLMC Note 0.25% Due 9/8/2023	300,000.00	09/11/2020 0.24%	300,093.00 300,078.65	99.95 0.27%	299,852.10 368.75	1.01% (226.55)	Aaa / AA+ AAA	2.53 2.51
3135G0U43	FNMA Note 2.875% Due 9/12/2023	350,000.00	09/25/2019 1.63%	366,702.00 360,676.81	106.51 0.30%	372,796.20 4,723.78	1.27% 12,119.39	Aaa / AA+ AAA	2.54 2.44
3137EAEY1	FHLMC Note 0.125% Due 10/16/2023	225,000.00	10/14/2020 0.25%	224,160.75 224,264.99	99.62 0.27%	224,149.05 105.47	0.75% (115.94)	Aaa / AA+ AAA	2.63 2.63
3137EAEZ8	FHLMC Note 0.25% Due 11/6/2023	335,000.00	11/03/2020 0.28%	334,698.50 334,730.41	99.89 0.29%	334,618.44 269.86	1.12% (111.97)	Aaa / AA+ AAA	2.69 2.68

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AGENCY									
3130A0F70	FHLB Note 3.375% Due 12/8/2023	350,000.00	10/30/2019 1.72%	372,781.50 365,380.17	108.53 0.29%	379,860.25 2,723.44	1.28% 14,480.08	Aaa / AA+ AAA	2.78 2.66
3130A1XJ2	FHLB Note 2.875% Due 6/14/2024	155,000.00	03/24/2020 0.99%	167,010.95 164,354.83	108.06 0.41%	167,486.49 953.14	0.56% 3,131.66	Aaa / AA+ NR	3.29 3.15
3135G06G3	FNMA Note 0.5% Due 11/7/2025	350,000.00	11/18/2020 0.52%	349,639.50 349,659.77	98.76 0.77%	345,657.90 529.86	1.16% (4,001.87)	Aaa / AA+ AAA	4.69 4.62
Total Agency		**5,615,000.00**	**0.81%**	**5,671,181.30 5,650,918.34**	**0.24%**	**5,707,541.66 18,062.66**	**19.20% 56,623.32**	**Aaa / AA+ AAA**	**2.17 2.14**
CMO									
3137BM6P6	FHLMC K721 A2 3.09% Due 8/25/2022	134,470.91	06/26/2019 2.09%	138,158.35 136,202.79	103.22 0.40%	138,797.12 346.26	0.47% 2,594.33	Aaa / NR NR	1.49 1.25
3137B4GY6	FHLMC K032 A2 3.31% Due 5/25/2023	275,000.00	07/23/2019 2.21%	285,881.84 281,339.31	106.22 0.38%	292,109.68 151.71	0.98% 10,770.37	NR / NR AAA	2.24 2.13
Total CMO		**409,470.91**	**2.17%**	**424,040.19 417,542.10**	**0.38%**	**430,906.80 497.97**	**1.45% 13,364.70**	**Aaa / NR AAA**	**1.99 1.84**
CORPORATE									
06051GFW4	Bank of America Corp Note 2.625% Due 4/19/2021	200,000.00	04/25/2019 2.69%	199,750.00 199,983.01	100.31 0.41%	200,625.40 1,925.00	0.68% 642.39	A2 / A- A+	0.14 0.14
857477AV5	State Street Bank Note 1.95% Due 5/19/2021	200,000.00	04/30/2019 2.64%	197,280.00 199,712.73	100.37 0.29%	200,747.60 1,105.00	0.68% 1,034.87	A1 / A AA-	0.22 0.22
808513AW5	Charles Schwab Corp Callable Note Cont 4/21/2021 3.25% Due 5/21/2021	200,000.00	04/25/2019 2.66%	202,274.00 200,160.41	100.42 0.43%	200,833.20 1,805.56	0.68% 672.79	A2 / A A	0.22 0.14
02665WBF7	American Honda Finance Note 1.65% Due 7/12/2021	200,000.00	07/30/2019 2.26%	197,692.00 199,568.87	100.51 0.28%	201,015.40 449.17	0.68% 1,446.53	A3 / A- NR	0.37 0.37
69371RP42	Paccar Financial Corp Note 3.15% Due 8/9/2021	200,000.00	04/24/2019 2.74%	201,814.00 200,349.35	101.26 0.32%	202,523.40 385.00	0.68% 2,174.05	A1 / A+ NR	0.44 0.45
68389XBK0	Oracle Corp Callable Note Cont 8/15/2021 1.9% Due 9/15/2021	200,000.00	04/11/2019 2.66%	196,464.00 199,208.00	100.75 0.29%	201,497.20 1,752.22	0.68% 2,289.20	A3 / A A-	0.55 0.45

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CORPORATE									
69353RFB9	PNC Bank Callable Note Cont 1/18/2022 2.625% Due 2/17/2022	250,000.00	02/21/2019 3.07%	246,827.50 248,970.69	102.09 0.27%	255,234.00 255.21	0.86% 6,263.31	A2 / A A+	0.97 0.88
459200JX0	IBM Corp Note 2.85% Due 5/13/2022	200,000.00	05/16/2019 2.80%	200,300.00 200,120.66	103.09 0.28%	206,187.00 1,710.00	0.70% 6,066.34	A2 / A NR	1.20 1.19
24422ETV1	John Deere Capital Corp Note 2.15% Due 9/8/2022	305,000.00	04/17/2019 2.78%	298,851.20 302,231.80	102.77 0.33%	313,458.87 3,151.24	1.06% 11,227.07	A2 / A A	1.53 1.49
89236TEL5	Toyota Motor Credit Corp Note 2.7% Due 1/11/2023	200,000.00	04/25/2019 2.72%	199,856.00 199,927.52	104.32 0.38%	208,645.20 750.00	0.70% 8,717.68	A1 / A+ A+	1.87 1.83
037833DE7	Apple Inc Callable Note Cont 12/13/2022 2.4% Due 1/13/2023	200,000.00	11/21/2019 1.83%	203,350.00 201,960.68	103.80 0.28%	207,593.00 640.00	0.70% 5,632.32	Aa1 / AA+ NR	1.87 1.75
949746SK8	Wells Fargo Company Callable Note 1X 1/24/2023 3.069% Due 1/24/2023	200,000.00	04/29/2019 3.00%	200,338.00 200,111.20	102.40 0.41%	204,797.20 630.85	0.69% 4,686.00	A2 / BBB+ A+	1.90 0.90
747525AR4	Qualcomm Inc Callable Note Cont 12/30/2022 2.6% Due 1/30/2023	75,000.00	02/11/2020 1.75%	76,775.25 76,130.01	104.17 0.33%	78,126.98 167.92	0.26% 1,996.97	A2 / A- NR	1.92 1.80
037833AK6	Apple Inc Note 2.4% Due 5/3/2023	200,000.00	03/11/2019 2.79%	196,968.00 198,409.80	104.47 0.34%	208,944.80 1,573.33	0.71% 10,535.00	Aa1 / AA+ NR	2.18 2.12
404280BA6	HSBC Holdings PLC Note 3.6% Due 5/25/2023	200,000.00	05/15/2019 2.97%	204,780.00 202,651.94	107.07 0.43%	214,132.60 1,920.00	0.72% 11,480.66	A2 / A- A+	2.24 2.15
90331HNV1	US Bank NA Callable Note Cont 6/23/2023 3.4% Due 7/24/2023	250,000.00	05/17/2019 2.70%	256,695.00 253,782.18	106.96 0.38%	267,396.25 873.61	0.90% 13,614.07	A1 / AA- AA-	2.40 2.24
06406FAD5	Bank of NY Mellon Corp Callable Note Cont 6/16/2023 2.2% Due 8/16/2023	200,000.00	04/11/2019 2.90%	194,298.00 196,767.43	104.28 0.33%	208,559.60 183.33	0.70% 11,792.17	A1 / A AA-	2.46 2.25
594918BX1	Microsoft Callable Note Cont 12/6/2023 2.875% Due 2/6/2024	200,000.00	03/05/2020 1.06%	213,320.00 209,841.40	106.89 0.37%	213,784.80 399.31	0.72% 3,943.40	Aaa / AAA AA+	2.94 2.67
89114QCB2	Toronto Dominion Bank Note 3.25% Due 3/11/2024	200,000.00	07/16/2019 2.49%	206,600.00 204,298.94	107.87 0.63%	215,745.00 3,069.44	0.73% 11,446.06	Aa3 / A AA-	3.03 2.87
78015K7C2	Royal Bank of Canada Note 2.25% Due 11/1/2024	225,000.00	09/22/2020 0.69%	239,145.75 237,654.74	105.39 0.76%	237,123.45 1,687.50	0.80% (531.29)	A2 / A AA	3.68 3.51

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CORPORATE									
46647PAH9	JP Morgan Chase & Co Callable Note 2X 3/1/2024 3.22% Due 3/1/2025	210,000.00	08/19/2020 0.91%	226,818.90 224,311.73	107.23 0.79%	225,177.33 3,381.00	0.77% 865.60	A2 / A- AA-	4.01 2.84
Total Corporate		**4,315,000.00**	**2.40%**	**4,360,197.60** **4,356,153.09**	**0.40%**	**4,472,148.28** **27,814.69**	**15.09%** **115,995.19**	**A1 / A+** **A+**	**1.75** **1.57**
LAIF									
90LAIF$00	Local Agency Investment Fund State Pool	6,646,613.32	Various 0.39%	6,646,613.32 6,646,613.32	1.00 0.39%	6,646,613.32 4,696.23	22.30% 0.00	NR / NR NR	0.00 0.00
Total LAIF		**6,646,613.32**	**0.39%**	**6,646,613.32** **6,646,613.32**	**0.39%**	**6,646,613.32** **4,696.23**	**22.30%** **0.00**	**NR / NR** **NR**	**0.00** **0.00**
LOCAL GOV INVESTMENT POOL									
09CATR$05	CalTrust Medium Term Fund	651,201.89	Various 0.11%	6,550,595.23 6,550,595.23	10.27 0.11%	6,687,843.44 0.00	22.43% 137,248.21	NR / A+ NR	0.00 0.00
Total Local Gov Investment Pool		**651,201.89**	**0.11%**	**6,550,595.23** **6,550,595.23**	**0.11%**	**6,687,843.44** **0.00**	**22.43%** **137,248.21**	**NR / A+** **NR**	**0.00** **0.00**
MONEY MARKET FUND FI									
31846V203	First American Govt Obligation Fund Class Y	275,096.54	Various 0.01%	275,096.54 275,096.54	1.00 0.01%	275,096.54 0.00	0.92% 0.00	Aaa / AAA AAA	0.00 0.00
Total Money Market Fund FI		**275,096.54**	**0.01%**	**275,096.54** **275,096.54**	**0.01%**	**275,096.54** **0.00**	**0.92%** **0.00**	**Aaa / AAA** **AAA**	**0.00** **0.00**
NEGOTIABLE CD									
48714LAC3	Kearny Bank Negotiable CD 1.75% Due 3/1/2021	248,000.00	02/09/2017 1.73%	248,000.00 248,000.00	100.01 -3.24%	248,034.09 11.89	0.83% 34.09	NR / NR NR	0.00 0.00
140420XR6	Capital One Bank USA NA Negotiable CD 1.7% Due 4/6/2021	248,000.00	03/30/2016 1.70%	248,000.00 248,000.00	100.15 0.25%	248,364.56 1,686.40	0.84% 364.56	NR / NR NR	0.10 0.10
55266CRD0	MB Financial Bank NA Negotiable CD 1.4% Due 4/15/2021	248,000.00	03/31/2016 1.40%	248,000.00 248,000.00	100.15 0.21%	248,372.00 133.17	0.83% 372.00	NR / NR NR	0.13 0.13

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NEGOTIABLE CD									
87164XMJ2	Synchrony Bank Negotiable CD 1.55% Due 6/29/2021	248,000.00	06/24/2016 1.55%	248,000.00 248,000.00	100.47 0.14%	249,160.33 652.95	0.84% 1,160.33	NR / NR NR	0.33 0.33
08173QBS4	Beneficial Bank Negotiable CD 1.55% Due 10/7/2021	248,000.00	09/20/2016 1.55%	248,000.00 248,000.00	100.86 0.13%	250,135.03 1,527.07	0.84% 2,135.03	NR / NR NR	0.61 0.60
29976D2F6	Everbank Negotiable CD 2.05% Due 2/14/2022	248,000.00	02/09/2017 2.04%	248,000.00 248,000.00	101.96 0.01%	252,861.79 111.43	0.85% 4,861.79	NR / NR NR	0.96 0.96
Total Negotiable CD		**1,488,000.00**	**1.66%**	**1,488,000.00** **1,488,000.00**	**-0.41%**	**1,496,927.80** **4,122.91**	**5.03%** **8,927.80**	**NR / NR** **NR**	**0.36** **0.36**
SUPRANATIONAL									
459058JM6	Intl. Bank Recon & Development Note 0.25% Due 11/24/2023	165,000.00	11/17/2020 0.32%	164,645.25 164,676.68	99.68 0.37%	164,478.60 111.15	0.55% (198.08)	Aaa / AAA AAA	2.74 2.72
459058GQ0	Intl. Bank Recon & Development Note 2.5% Due 3/19/2024	225,000.00	01/26/2021 0.26%	240,736.50 240,297.09	106.29 0.43%	239,156.33 2,531.25	0.81% (1,140.76)	Aaa / AAA AAA	3.05 2.93
Total Supranational		**390,000.00**	**0.29%**	**405,381.75** **404,973.77**	**0.40%**	**403,634.93** **2,642.40**	**1.36%** **(1,338.84)**	**Aaa / AAA** **AAA**	**2.93** **2.85**
US TREASURY									
912828Q78	US Treasury Note 1.375% Due 4/30/2021	30,000.00	01/30/2020 1.48%	29,960.16 29,994.75	100.21 0.10%	30,064.38 137.88	0.10% 69.63	Aaa / AA+ AAA	0.17 0.17
912828M80	US Treasury Note 2% Due 11/30/2022	300,000.00	Various 1.60%	303,459.37 302,030.30	103.22 0.16%	309,656.40 1,500.00	1.04% 7,626.10	Aaa / AA+ AAA	1.75 1.72
912828VB3	US Treasury Note 1.75% Due 5/15/2023	250,000.00	12/16/2019 1.69%	250,517.58 250,334.66	103.41 0.20%	258,525.50 1,281.08	0.87% 8,190.84	Aaa / AA+ AAA	2.21 2.17
912828T26	US Treasury Note 1.375% Due 9/30/2023	300,000.00	Various 1.94%	293,108.59 295,852.15	102.91 0.24%	308,730.60 1,722.53	1.04% 12,878.45	Aaa / AA+ AAA	2.59 2.53
912828V80	US Treasury Note 2.25% Due 1/31/2024	200,000.00	11/26/2019 1.59%	205,304.69 203,705.64	105.65 0.31%	211,296.80 360.50	0.71% 7,591.16	Aaa / AA+ AAA	2.92 2.84
912828WJ5	US Treasury Note 2.5% Due 5/15/2024	300,000.00	12/12/2019 1.74%	309,691.41 307,027.02	106.87 0.35%	320,601.60 2,196.13	1.08% 13,574.58	Aaa / AA+ AAA	3.21 3.08
912828Y87	US Treasury Note 1.75% Due 7/31/2024	300,000.00	01/31/2020 1.35%	305,203.13 303,952.23	104.53 0.42%	313,581.90 420.58	1.05% 9,629.67	Aaa / AA+ AAA	3.42 3.33

Holdings Report

As of February 28, 2021

CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
US TREASURY									
912828ZT0	US Treasury Note 0.25% Due 5/31/2025	365,000.00	02/25/2021 0.60%	359,653.32 359,663.64	98.41 0.63%	359,182.63 228.13	1.21% (481.01)	Aaa / AA+ AAA	4.25 4.22
91282CAZ4	US Treasury Note 0.375% Due 11/30/2025	150,000.00	12/09/2020 0.41%	149,742.19 149,753.69	98.32 0.74%	147,474.60 140.63	0.50% (2,279.09)	Aaa / AA+ AAA	4.76 4.69
Total US Treasury		**2,195,000.00**	**1.39%**	**2,206,640.44** **2,202,314.08**	**0.36%**	**2,259,114.41** **7,987.46**	**7.60%** **56,800.33**	**Aaa / AA+** **AAA**	**3.04** **2.97**
TOTAL PORTFOLIO		**23,341,622.25**	**0.90%**	**29,399,154.04** **29,358,535.19**	**0.25%**	**29,753,180.50** **66,886.86**	**100.00%** **394,645.31**	**Aa2 / AA-** **AAA**	**1.14** **1.01**
TOTAL MARKET VALUE PLUS ACCRUED						**29,820,067.36**			

Transaction Ledger

As of February 28, 2021

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/Sold	Total Amount	Gain/Loss
ACQUISITIONS										
Purchase	02/01/2021	31846V203	315.95	First American Govt Obligation Fund Class Y	1.000	0.01%	315.95	0.00	315.95	0.00
Purchase	02/01/2021	31846V203	1.35	First American Govt Obligation Fund Class Y	1.000	0.01%	1.35	0.00	1.35	0.00
Purchase	02/06/2021	31846V203	2,875.00	First American Govt Obligation Fund Class Y	1.000	0.01%	2,875.00	0.00	2,875.00	0.00
Purchase	02/09/2021	31846V203	3,150.00	First American Govt Obligation Fund Class Y	1.000	0.01%	3,150.00	0.00	3,150.00	0.00
Purchase	02/15/2021	31846V203	294.88	First American Govt Obligation Fund Class Y	1.000	0.01%	294.88	0.00	294.88	0.00
Purchase	02/16/2021	31846V203	248,000.00	First American Govt Obligation Fund Class Y	1.000	0.01%	248,000.00	0.00	248,000.00	0.00
Purchase	02/16/2021	31846V203	4,325.33	First American Govt Obligation Fund Class Y	1.000	0.01%	4,325.33	0.00	4,325.33	0.00
Purchase	02/16/2021	31846V203	20.42	First American Govt Obligation Fund Class Y	1.000	0.01%	20.42	0.00	20.42	0.00
Purchase	02/16/2021	31846V203	297.42	First American Govt Obligation Fund Class Y	1.000	0.01%	297.42	0.00	297.42	0.00
Purchase	02/16/2021	31846V203	193.00	First American Govt Obligation Fund Class Y	1.000	0.01%	193.00	0.00	193.00	0.00
Purchase	02/16/2021	31846V203	170.58	First American Govt Obligation Fund Class Y	1.000	0.01%	170.58	0.00	170.58	0.00
Purchase	02/16/2021	31846V203	27,329.97	First American Govt Obligation Fund Class Y	1.000	0.01%	27,329.97	0.00	27,329.97	0.00
Purchase	02/16/2021	31846V203	46,624.97	First American Govt Obligation Fund Class Y	1.000	0.01%	46,624.97	0.00	46,624.97	0.00
Purchase	02/16/2021	31846V203	11,415.26	First American Govt Obligation Fund Class Y	1.000	0.01%	11,415.26	0.00	11,415.26	0.00
Purchase	02/16/2021	31846V203	8,753.86	First American Govt Obligation Fund Class Y	1.000	0.01%	8,753.86	0.00	8,753.86	0.00
Purchase	02/17/2021	31846V203	3,281.25	First American Govt Obligation Fund Class Y	1.000	0.01%	3,281.25	0.00	3,281.25	0.00

Transaction Ledger

As of February 28, 2021

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/Sold	Total Amount	Gain/Loss
ACQUISITIONS										
Purchase	02/18/2021	31846V203	26.21	First American Govt Obligation Fund Class Y	1.000	0.01%	26.21	0.00	26.21	0.00
Purchase	02/21/2021	31846V203	2,562.89	First American Govt Obligation Fund Class Y	1.000	0.01%	2,562.89	0.00	2,562.89	0.00
Purchase	02/22/2021	31846V203	129.33	First American Govt Obligation Fund Class Y	1.000	0.01%	129.33	0.00	129.33	0.00
Purchase	02/22/2021	31846V203	47.00	First American Govt Obligation Fund Class Y	1.000	0.01%	47.00	0.00	47.00	0.00
Purchase	02/24/2021	31846V203	381.25	First American Govt Obligation Fund Class Y	1.000	0.01%	381.25	0.00	381.25	0.00
Purchase	02/24/2021	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	99.998	0.27%	79,998.54	0.00	79,998.54	0.00
Purchase	02/25/2021	31846V203	758.53	First American Govt Obligation Fund Class Y	1.000	0.01%	758.53	0.00	758.53	0.00
Purchase	02/25/2021	31846V203	876.72	First American Govt Obligation Fund Class Y	1.000	0.01%	876.72	0.00	876.72	0.00
Purchase	02/26/2021	31846V203	248,000.00	First American Govt Obligation Fund Class Y	1.000	0.01%	248,000.00	0.00	248,000.00	0.00
Purchase	02/26/2021	31846V203	264.99	First American Govt Obligation Fund Class Y	1.000	0.01%	264.99	0.00	264.99	0.00
Purchase	02/26/2021	912828ZT0	365,000.00	US Treasury Note 0.25% Due 5/31/2025	98.535	0.60%	359,653.32	220.60	359,873.92	0.00
Purchase	02/28/2021	09CATR$05	295.33	CalTrust Medium Term Fund	10.270	0.11%	3,033.00	0.00	3,033.00	0.00
Purchase	02/28/2021	31846V203	2,187.84	First American Govt Obligation Fund Class Y	1.000	0.01%	2,187.84	0.00	2,187.84	0.00
Subtotal			**1,057,579.33**				**1,054,968.86**	**220.60**	**1,055,189.46**	**0.00**
TOTAL ACQUISITIONS			**1,057,579.33**				**1,054,968.86**	**220.60**	**1,055,189.46**	**0.00**

Transaction Ledger

As of February 28, 2021

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/Sold	Total Amount	Gain/Loss
DISPOSITIONS										
Sale	02/24/2021	31846V203	79,998.54	First American Govt Obligation Fund Class Y	1.000	0.01%	79,998.54	0.00	79,998.54	0.00
Sale	02/26/2021	31846V203	359,873.92	First American Govt Obligation Fund Class Y	1.000	0.01%	359,873.92	0.00	359,873.92	0.00
Subtotal			**439,872.46**				**439,872.46**	**0.00**	**439,872.46**	**0.00**
Paydown	02/16/2021	43815NAC8	0.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	100.000		0.00	170.58	170.58	0.00
Paydown	02/16/2021	477870AB5	27,272.96	John Deere Owner Trust 2019-B A2 2.28% Due 5/16/2022	100.000		27,272.96	57.01	27,329.97	0.00
Paydown	02/16/2021	47789JAD8	45,680.22	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	100.000		45,680.22	944.75	46,624.97	0.00
Paydown	02/16/2021	65479JAD5	0.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	100.000		0.00	193.00	193.00	0.00
Paydown	02/16/2021	89231PAD0	11,073.31	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	100.000		11,073.31	341.95	11,415.26	0.00
Paydown	02/16/2021	89232HAC9	0.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	100.000		0.00	297.42	297.42	0.00
Paydown	02/16/2021	89236XAC0	0.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	100.000		0.00	20.42	20.42	0.00
Paydown	02/16/2021	89238KAD4	8,729.15	Toyota Auto Receivables Trust 2017-D A3 1.93% Due 1/18/2022	100.000		8,729.15	24.71	8,753.86	0.00
Paydown	02/18/2021	43813KAC6	0.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	100.000		0.00	26.21	26.21	0.00
Paydown	02/22/2021	92290BAA9	0.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	100.000		0.00	47.00	47.00	0.00
Paydown	02/22/2021	92348AAA3	0.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	100.000		0.00	129.33	129.33	0.00
Paydown	02/25/2021	3137B4GY6	0.00	FHLMC K032 A2Due 5/25/2023	100.000		0.00	758.53	758.53	0.00

Transaction Ledger

As of February 28, 2021

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/Sold	Total Amount	Gain/Loss
DISPOSITIONS										
Paydown	02/25/2021	3137BM6P6	529.09	FHLMC K721 A2Due 8/25/2022	100.000		529.09	347.63	876.72	0.00
Subtotal			**93,284.73**				**93,284.73**	**3,358.54**	**96,643.27**	**0.00**
Maturity	02/16/2021	98878BER5	248,000.00	Zions Bank Negotiable CD 1.7% Due 2/16/2021	100.000		248,000.00	0.00	248,000.00	0.00
Maturity	02/26/2021	46147URQ5	248,000.00	Investors Community Bank Negotiable CD 1.5% Due 2/26/2021	100.000		248,000.00	0.00	248,000.00	0.00
Subtotal			**496,000.00**				**496,000.00**	**0.00**	**496,000.00**	**0.00**
TOTAL DISPOSITIONS			**1,029,157.19**				**1,029,157.19**	**3,358.54**	**1,032,515.73**	**0.00**
OTHER TRANSACTIONS										
Interest	02/01/2021	46147URQ5	248,000.00	Investors Community Bank Negotiable CD 1.5% Due 2/26/2021	0.000		315.95	0.00	315.95	0.00
Interest	02/06/2021	594918BX1	200,000.00	Microsoft Callable Note Cont 12/6/2023 2.875% Due 2/6/2024	0.000		2,875.00	0.00	2,875.00	0.00
Interest	02/09/2021	69371RP42	200,000.00	Paccar Financial Corp Note 3.15% Due 8/9/2021	0.000		3,150.00	0.00	3,150.00	0.00
Interest	02/15/2021	55266CRD0	248,000.00	MB Financial Bank NA Negotiable CD 1.4% Due 4/15/2021	0.000		294.88	0.00	294.88	0.00
Interest	02/16/2021	06406FAD5	200,000.00	Bank of NY Mellon Corp Callable Note Cont 6/16/2023 2.2% Due 8/16/2023	0.000		2,200.00	0.00	2,200.00	0.00
Interest	02/16/2021	98878BER5	248,000.00	Zions Bank Negotiable CD 1.7% Due 2/16/2021	0.000		2,125.33	0.00	2,125.33	0.00
Interest	02/17/2021	69353RFB9	250,000.00	PNC Bank Callable Note Cont 1/18/2022 2.625% Due 2/17/2022	0.000		3,281.25	0.00	3,281.25	0.00

Transaction Ledger

As of February 28, 2021

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/Sold	Total Amount	Gain/Loss
OTHER TRANSACTIONS										
Interest	02/21/2021	29976D2F6	248,000.00	Everbank Negotiable CD 2.05% Due 2/14/2022	0.000		2,562.89	0.00	2,562.89	0.00
Interest	02/24/2021	3137EAEV7	300,000.00	FHLMC Note 0.25% Due 8/24/2023	0.000		381.25	0.00	381.25	0.00
Interest	02/26/2021	46147URQ5	248,000.00	Investors Community Bank Negotiable CD 1.5% Due 2/26/2021	0.000		264.99	0.00	264.99	0.00
Interest	02/28/2021	48714LAC3	248,000.00	Kearny Bank Negotiable CD 1.75% Due 3/1/2021	0.000		2,187.84	0.00	2,187.84	0.00
Subtotal			**2,638,000.00**				**19,639.38**	**0.00**	**19,639.38**	**0.00**
Dividend	02/01/2021	31846V203	103,000.95	First American Govt Obligation Fund Class Y	0.000		1.35	0.00	1.35	0.00
Dividend	02/28/2021	09CATR$05	650,906.57	CalTrust Medium Term Fund	0.000		3,033.00	0.00	3,033.00	0.00
Subtotal			**753,907.52**				**3,034.35**	**0.00**	**3,034.35**	**0.00**
TOTAL OTHER TRANSACTIONS			**3,391,907.52**				**22,673.73**	**0.00**	**22,673.73**	**0.00**

Income Earned

As of February 28, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
FIXED INCOME						
02665WBF7	American Honda Finance Note 1.65% Due 07/12/2021	07/30/2019 07/31/2019 200,000.00	199,478.11 0.00 0.00 199,568.87	174.17 0.00 449.17 275.00	90.76 0.00 90.76 365.76	365.76
037833AK6	Apple Inc Note 2.4% Due 05/03/2023	03/11/2019 03/13/2019 200,000.00	198,353.66 0.00 0.00 198,409.80	1,173.33 0.00 1,573.33 400.00	56.14 0.00 56.14 456.14	456.14
037833DE7	Apple Inc Callable Note Cont 12/13/2022 2.4% Due 01/13/2023	11/21/2019 11/25/2019 200,000.00	202,044.88 0.00 0.00 201,960.68	240.00 0.00 640.00 400.00	0.00 84.20 (84.20) 315.80	315.80
06051GFW4	Bank of America Corp Note 2.625% Due 04/19/2021	04/25/2019 04/29/2019 200,000.00	199,973.30 0.00 0.00 199,983.01	1,487.50 0.00 1,925.00 437.50	9.71 0.00 9.71 447.21	447.21
06406FAD5	Bank of NY Mellon Corp Callable Note Cont 6/16/2023 2.2% Due 08/16/2023	04/11/2019 04/15/2019 200,000.00	196,666.63 0.00 0.00 196,767.43	2,016.67 2,200.00 183.33 366.66	100.80 0.00 100.80 467.46	467.46
24422ETV1	John Deere Capital Corp Note 2.15% Due 09/08/2022	04/17/2019 04/22/2019 305,000.00	302,092.39 0.00 0.00 302,231.80	2,604.78 0.00 3,151.24 546.46	139.41 0.00 139.41 685.87	685.87
3130A0F70	FHLB Note 3.375% Due 12/08/2023	10/30/2019 10/31/2019 350,000.00	365,805.71 0.00 0.00 365,380.17	1,739.06 0.00 2,723.44 984.38	0.00 425.54 (425.54) 558.84	558.84
3130A1XJ2	FHLB Note 2.875% Due 06/14/2024	03/24/2020 03/25/2020 155,000.00	164,572.93 0.00 0.00 164,354.83	581.79 0.00 953.14 371.35	0.00 218.10 (218.10) 153.25	153.25
3130ADRG9	FHLB Note 2.75% Due 03/10/2023	04/11/2019 04/12/2019 350,000.00	352,863.09 0.00 0.00 352,758.57	3,769.79 0.00 4,571.88 802.09	0.00 104.52 (104.52) 697.57	697.57

Income Earned

As of February 28, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
3130AHSR5	FHLB Note 1.625% Due 12/20/2021	12/19/2019 12/20/2019 320,000.00	319,847.77 0.00 0.00 319,861.00	592.22 0.00 1,025.56 433.34	13.23 0.00 13.23 446.57	446.57
3133ELWD2	FFCB Note 0.375% Due 04/08/2022	04/03/2020 04/08/2020 285,000.00	284,750.96 0.00 0.00 284,767.14	335.47 0.00 424.53 89.06	16.18 0.00 16.18 105.24	105.24
3133ELYR9	FFCB Note 0.25% Due 05/06/2022	04/30/2020 05/06/2020 325,000.00	324,740.48 0.00 0.00 324,756.31	191.84 0.00 259.55 67.71	15.83 0.00 15.83 83.54	83.54
3134GVJ66	FHLMC Note 0.25% Due 06/08/2022	06/04/2020 06/08/2020 350,000.00	349,858.47 0.00 0.00 349,866.52	128.82 0.00 201.74 72.92	8.05 0.00 8.05 80.97	80.97
3135G04Q3	FNMA Note 0.25% Due 05/22/2023	05/20/2020 05/22/2020 245,000.00	244,434.28 0.00 0.00 244,453.14	117.40 0.00 168.44 51.04	18.86 0.00 18.86 69.90	69.90
3135G05G4	FNMA Note 0.25% Due 07/10/2023	07/08/2020 07/10/2020 250,000.00	249,563.62 0.00 0.00 249,577.36	36.46 0.00 88.54 52.08	13.74 0.00 13.74 65.82	65.82
3135G06G3	FNMA Note 0.5% Due 11/07/2025	11/18/2020 11/19/2020 350,000.00	349,654.21 0.00 0.00 349,659.77	384.03 0.00 529.86 145.83	5.56 0.00 5.56 151.39	151.39
3135G0U43	FNMA Note 2.875% Due 09/12/2023	09/25/2019 09/26/2019 350,000.00	361,000.00 0.00 0.00 360,676.81	3,885.24 0.00 4,723.78 838.54	0.00 323.19 (323.19) 515.35	515.35
3137B4GY6	FHLMC K032 A2 3.31% Due 05/25/2023	07/23/2019 07/26/2019 275,000.00	281,557.11 0.00 0.00 281,339.31	151.71 758.53 151.71 758.53	0.00 217.80 (217.80) 540.73	540.73

Income Earned

As of February 28, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
3137BM6P6	FHLMC K721 A2 3.09% Due 08/25/2022	06/26/2019 06/28/2019 134,470.91	136,828.52 0.00 529.09 136,202.79	347.63 347.63 346.26 346.26	0.00 96.64 (96.64) 249.62	249.62
3137EADB2	FHLMC Note 2.375% Due 01/13/2022	10/30/2019 10/31/2019 350,000.00	352,202.37 0.00 0.00 352,024.14	415.63 0.00 1,108.33 692.70	0.00 178.23 (178.23) 514.47	514.47
3137EAER6	FHLMC Note 0.375% Due 05/05/2023	05/05/2020 05/07/2020 305,000.00	304,903.54 0.00 0.00 304,906.83	273.23 0.00 368.54 95.31	3.29 0.00 3.29 98.60	98.60
3137EAES4	FHLMC Note 0.25% Due 06/26/2023	06/24/2020 06/26/2020 300,000.00	299,300.00 0.00 0.00 299,322.40	72.92 0.00 135.42 62.50	22.40 0.00 22.40 84.90	84.90
3137EAET2	FHLMC Note 0.125% Due 07/25/2022	07/21/2020 07/23/2020 170,000.00	169,717.10 0.00 0.00 169,731.79	3.54 0.00 21.25 17.71	14.69 0.00 14.69 32.40	32.40
3137EAEV7	FHLMC Note 0.25% Due 08/24/2023	08/19/2020 08/21/2020 300,000.00	299,739.70 0.00 0.00 299,747.51	333.33 381.25 14.58 62.50	7.81 0.00 7.81 70.31	70.31
3137EAEW5	FHLMC Note 0.25% Due 09/08/2023	09/11/2020 09/14/2020 300,000.00	300,081.04 0.00 0.00 300,078.65	306.25 0.00 368.75 62.50	0.00 2.39 (2.39) 60.11	60.11
3137EAEY1	FHLMC Note 0.125% Due 10/16/2023	10/14/2020 10/16/2020 225,000.00	224,243.53 0.00 0.00 224,264.99	82.03 0.00 105.47 23.44	21.46 0.00 21.46 44.90	44.90
3137EAEZ8	FHLMC Note 0.25% Due 11/06/2023	11/03/2020 11/05/2020 335,000.00	334,722.71 0.00 0.00 334,730.41	200.07 0.00 269.86 69.79	7.70 0.00 7.70 77.49	77.49

Income Earned

As of February 28, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
404280BA6	HSBC Holdings PLC Note 3.6% Due 05/25/2023	05/15/2019 05/17/2019 200,000.00	202,743.05 0.00 0.00 202,651.94	1,320.00 0.00 1,920.00 600.00	0.00 91.11 (91.11) 508.89	508.89
43813GAC5	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 04/21/2025	02/17/2021 02/24/2021 80,000.00	0.00 79,998.54 0.00 79,998.55	0.00 0.00 4.20 4.20	0.01 0.00 0.01 4.21	4.21
43813KAC6	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	09/22/2020 09/29/2020 85,000.00	84,988.87 0.00 0.00 84,989.18	11.36 26.21 11.36 26.21	0.31 0.00 0.31 26.52	26.52
43815NAC8	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 08/15/2023	08/20/2019 08/27/2019 115,000.00	114,999.50 0.00 0.00 114,999.52	90.98 170.58 90.98 170.58	0.02 0.00 0.02 170.60	170.60
459058GQ0	Intl. Bank Recon & Development Note 2.5% Due 03/19/2024	01/26/2021 01/28/2021 225,000.00	240,681.57 0.00 0.00 240,297.09	2,062.50 0.00 2,531.25 468.75	0.00 384.48 (384.48) 84.27	84.27
459058JM6	Intl. Bank Recon & Development Note 0.25% Due 11/24/2023	11/17/2020 11/24/2020 165,000.00	164,667.60 0.00 0.00 164,676.68	76.77 0.00 111.15 34.38	9.08 0.00 9.08 43.46	43.46
459200JX0	IBM Corp Note 2.85% Due 05/13/2022	05/16/2019 05/20/2019 200,000.00	200,128.37 0.00 0.00 200,120.66	1,235.00 0.00 1,710.00 475.00	0.00 7.71 (7.71) 467.29	467.29
46647PAH9	JP Morgan Chase & Co Callable Note 2X 3/1/2024 3.22% Due 03/01/2025	08/19/2020 08/21/2020 210,000.00	224,677.36 0.00 0.00 224,311.73	2,817.50 0.00 3,381.00 563.50	0.00 365.63 (365.63) 197.87	197.87
477870AB5	John Deere Owner Trust 2019-B A2 2.28% Due 05/16/2022	10/30/2019 10/31/2019 2,732.25	30,026.53 0.00 27,272.96 2,734.07	30.41 57.01 2.77 29.37	0.00 19.50 (19.50) 9.87	9.87

Income Earned

As of February 28, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
47789JAD8	John Deere Owner Trust 2019-A A3 2.91% Due 07/17/2023	Various Various 343,906.37	395,279.17 0.00 45,680.22 348,680.22	503.86 944.75 444.79 885.68	0.00 918.73 (918.73) (33.05)	(33.05)
594918BX1	Microsoft Callable Note Cont 12/6/2023 2.875% Due 02/06/2024	03/05/2020 03/09/2020 200,000.00	210,114.24 0.00 0.00 209,841.40	2,795.14 2,875.00 399.31 479.17	0.00 272.84 (272.84) 206.33	206.33
65479JAD5	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 07/15/2024	10/16/2019 10/23/2019 120,000.00	119,995.37 0.00 0.00 119,995.48	102.93 193.00 102.93 193.00	0.11 0.00 0.11 193.11	193.11
68389XBK0	Oracle Corp Callable Note Cont 8/15/2021 1.9% Due 09/15/2021	04/11/2019 04/15/2019 200,000.00	199,096.00 0.00 0.00 199,208.00	1,435.56 0.00 1,752.22 316.66	112.00 0.00 112.00 428.66	428.66
69353RFB9	PNC Bank Callable Note Cont 1/18/2022 2.625% Due 02/17/2022	02/21/2019 02/25/2019 250,000.00	248,889.04 0.00 0.00 248,970.69	2,989.58 3,281.25 255.21 546.88	81.65 0.00 81.65 628.53	628.53
69371RP42	Paccar Financial Corp Note 3.15% Due 08/09/2021	04/24/2019 04/26/2019 200,000.00	200,410.10 0.00 0.00 200,349.35	3,010.00 3,150.00 385.00 525.00	0.00 60.75 (60.75) 464.25	464.25
747525AR4	Qualcomm Inc Callable Note Cont 12/30/2022 2.6% Due 01/30/2023	02/11/2020 02/13/2020 75,000.00	76,177.31 0.00 0.00 76,130.01	5.42 0.00 167.92 162.50	0.00 47.30 (47.30) 115.20	115.20
78015K7C2	Royal Bank of Canada Note 2.25% Due 11/01/2024	09/22/2020 09/24/2020 225,000.00	237,918.97 0.00 0.00 237,654.74	1,265.63 0.00 1,687.50 421.87	0.00 264.23 (264.23) 157.64	157.64
808513AW5	Charles Schwab Corp Callable Note Cont 4/21/2021 3.25% Due 05/21/2021	04/25/2019 04/29/2019 200,000.00	200,248.47 0.00 0.00 200,160.41	1,263.89 0.00 1,805.56 541.67	0.00 88.06 (88.06) 453.61	453.61

Income Earned

As of February 28, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
857477AV5	State Street Bank Note 1.95% Due 05/19/2021	04/30/2019 05/02/2019 200,000.00	199,610.91 0.00 0.00 199,712.73	780.00 0.00 1,105.00 325.00	101.82 0.00 101.82 426.82	426.82
89114QCB2	Toronto Dominion Bank Note 3.25% Due 03/11/2024	07/16/2019 07/18/2019 200,000.00	204,407.77 0.00 0.00 204,298.94	2,527.78 0.00 3,069.44 541.66	0.00 108.83 (108.83) 432.83	432.83
89231PAD0	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 03/15/2023	08/29/2019 08/30/2019 117,965.81	130,685.34 0.00 11,073.31 119,416.17	182.38 341.95 166.73 326.30	0.00 195.86 (195.86) 130.44	130.44
89232HAC9	Toyota Auto Receivable Own 2020-A A3 1.66% Due 05/15/2024	07/06/2020 07/08/2020 215,000.00	219,036.48 0.00 0.00 218,942.22	158.62 297.42 158.62 297.42	0.00 94.26 (94.26) 203.16	203.16
89236TEL5	Toyota Motor Credit Corp Note 2.7% Due 01/11/2023	04/25/2019 04/29/2019 200,000.00	199,924.54 0.00 0.00 199,927.52	300.00 0.00 750.00 450.00	2.98 0.00 2.98 452.98	452.98
89236XAC0	Toyota Auto Receivables 2020-D A3 0.35% Due 01/15/2025	10/06/2020 10/13/2020 70,000.00	69,987.89 0.00 0.00 69,988.13	10.89 20.42 10.89 20.42	0.24 0.00 0.24 20.66	20.66
89238KAD4	Toyota Auto Receivables Trust 2017-D A3 1.93% Due 01/18/2022	02/05/2019 02/07/2019 6,635.16	15,304.99 0.00 8,729.15 6,611.59	10.71 24.71 4.62 18.62	35.75 0.00 35.75 54.37	54.37
90331HNV1	US Bank NA Callable Note Cont 6/23/2023 3.4% Due 07/24/2023	05/17/2019 05/21/2019 250,000.00	253,907.66 0.00 0.00 253,782.18	165.28 0.00 873.61 708.33	0.00 125.48 (125.48) 582.85	582.85
912828M80	US Treasury Note 2% Due 11/30/2022	Various Various 300,000.00	302,119.26 0.00 0.00 302,030.30	1,038.46 0.00 1,500.00 461.54	0.00 88.96 (88.96) 372.58	372.58

Income Earned

As of February 28, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
912828Q78	US Treasury Note 1.375% Due 04/30/2021	01/30/2020 01/31/2020 30,000.00	29,992.29 0.00 0.00 29,994.75	105.97 0.00 137.88 31.91	2.46 0.00 2.46 34.37	34.37
912828T26	US Treasury Note 1.375% Due 09/30/2023	Various Various 300,000.00	295,728.99 0.00 0.00 295,852.15	1,405.22 0.00 1,722.53 317.31	123.16 0.00 123.16 440.47	440.47
912828V80	US Treasury Note 2.25% Due 01/31/2024	11/26/2019 11/27/2019 200,000.00	203,802.97 0.00 0.00 203,705.64	12.43 0.00 360.50 348.07	0.00 97.33 (97.33) 250.74	250.74
912828VB3	US Treasury Note 1.75% Due 05/15/2023	12/16/2019 12/17/2019 250,000.00	250,346.30 0.00 0.00 250,334.66	942.68 0.00 1,281.08 338.40	0.00 11.64 (11.64) 326.76	326.76
912828WJ5	US Treasury Note 2.5% Due 05/15/2024	12/12/2019 12/13/2019 300,000.00	307,195.05 0.00 0.00 307,027.02	1,616.02 0.00 2,196.13 580.11	0.00 168.03 (168.03) 412.08	412.08
912828Y87	US Treasury Note 1.75% Due 07/31/2024	01/31/2020 01/31/2020 300,000.00	304,040.90 0.00 0.00 303,952.23	14.50 0.00 420.58 406.08	0.00 88.67 (88.67) 317.41	317.41
912828ZT0	US Treasury Note 0.25% Due 05/31/2025	02/25/2021 02/26/2021 365,000.00	0.00 359,653.32 0.00 359,663.64	0.00 (220.60) 228.13 7.53	10.32 0.00 10.32 17.85	17.85
91282CAZ4	US Treasury Note 0.375% Due 11/30/2025	12/09/2020 12/10/2020 150,000.00	149,749.71 0.00 0.00 149,753.69	97.36 0.00 140.63 43.27	3.98 0.00 3.98 47.25	47.25
92290BAA9	Verizon Owner Trust 2020-B A 0.47% Due 02/20/2025	08/04/2020 08/12/2020 120,000.00	119,977.44 0.00 0.00 119,977.86	17.23 47.00 17.23 47.00	0.42 0.00 0.42 47.42	47.42

Income Earned

As of February 28, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
92348AAA3	Verizon Owner Trust 2019-C A1A 1.94% Due 04/22/2024	10/01/2019 10/08/2019 80,000.00	79,995.62 0.00 0.00 79,995.73	47.42 129.33 47.42 129.33	0.11 0.00 0.11 129.44	129.44
949746SK8	Wells Fargo Company Callable Note 1X 1/24/2023 3.069% Due 01/24/2023	04/29/2019 04/30/2019 200,000.00	200,120.67 0.00 0.00 200,111.20	119.35 0.00 630.85 511.50	0.00 9.47 (9.47) 502.03	502.03
Total Fixed Income		**14,280,710.50**	**14,055,972.41** **439,651.86** **93,284.73** **14,398,230.10**	**52,213.74** **15,025.44** **58,067.72** **20,879.42**	**1,050.04** **5,159.48** **(4,109.44)** **16,769.98**	**16,769.98**
CASH & EQUIVALENT						
08173QBS4	Beneficial Bank Negotiable CD 1.55% Due 10/07/2021	09/20/2016 09/20/2016 248,000.00	248,000.00 0.00 0.00 248,000.00	1,232.19 0.00 1,527.07 294.88	0.00 0.00 0.00 294.88	294.88
140420XR6	Capital One Bank USA NA Negotiable CD 1.7% Due 04/06/2021	03/30/2016 03/30/2016 248,000.00	248,000.00 0.00 0.00 248,000.00	1,362.98 0.00 1,686.40 323.42	0.00 0.00 0.00 323.42	323.42
29976D2F6	Everbank Negotiable CD 2.05% Due 02/14/2022	02/09/2017 02/09/2017 248,000.00	248,000.00 0.00 0.00 248,000.00	2,284.32 2,562.89 111.43 390.00	0.00 0.00 0.00 390.00	390.00
31846V203	First American Govt Obligation Fund Class Y	10/15/2020 10/15/2020 275,096.54	102,685.00 612,284.00 439,872.46 275,096.54	0.00 1.35 0.00 1.35	0.00 0.00 0.00 1.35	1.35
46147URQ5	Investors Community Bank Negotiable CD Due 02/26/2021	03/31/2016 03/31/2016 0.00	248,000.00 0.00 248,000.00 0.00	315.95 580.94 0.00 264.99	0.00 0.00 0.00 264.99	264.99

Income Earned

As of February 28, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
48714LAC3	Kearny Bank Negotiable CD 1.75% Due 03/01/2021	02/09/2017 02/09/2017 248,000.00	248,000.00 0.00 0.00 248,000.00	1,866.79 2,187.84 11.89 332.94	0.00 0.00 0.00 332.94	332.94
55266CRD0	MB Financial Bank NA Negotiable CD 1.4% Due 04/15/2021	03/31/2016 03/31/2016 248,000.00	248,000.00 0.00 0.00 248,000.00	161.71 294.88 133.17 266.34	0.00 0.00 0.00 266.34	266.34
87164XMJ2	Synchrony Bank Negotiable CD 1.55% Due 06/29/2021	06/24/2016 06/24/2016 248,000.00	248,000.00 0.00 0.00 248,000.00	358.07 0.00 652.95 294.88	0.00 0.00 0.00 294.88	294.88
98878BER5	Zions Bank Negotiable CD Due 02/16/2021	02/09/2017 02/09/2017 0.00	248,000.00 0.00 248,000.00 0.00	1,952.07 2,125.33 0.00 173.26	0.00 0.00 0.00 173.26	173.26
			2,086,685.00 **612,284.00** **935,872.46**	**9,534.08** **7,753.23** **4,122.91**	**0.00** **0.00** **0.00**	
Total Cash & Equivalent		**1,763,096.54**	**1,763,096.54**	**2,342.06**	**2,342.06**	**2,342.06**
LOCAL AGENCY INVESTMENT FUND						
90LAIF$00	Local Agency Investment Fund State Pool	Various Various 6,646,613.32	6,646,613.32 0.00 0.00 6,646,613.32	2,611.18 0.00 4,696.23 2,085.05	0.00 0.00 0.00 2,085.05	2,085.05
			6,646,613.32 **0.00** **0.00**	**2,611.18** **0.00** **4,696.23**	**0.00** **0.00** **0.00**	
Total Local Agency Investment Fund		**6,646,613.32**	**6,646,613.32**	**2,085.05**	**2,085.05**	**2,085.05**

Income Earned

As of February 28, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
INVESTMENT POOL						
09CATR$05	CalTrust	Various	6,547,562.23	0.00	0.00	3,033.00
	Medium Term Fund	Various	3,033.00	3,033.00	0.00	
		651,201.89	0.00	0.00	0.00	
			6,550,595.23	3,033.00	3,033.00	
			6,547,562.23	**0.00**	**0.00**	
			3,033.00	**3,033.00**	**0.00**	
			0.00	**0.00**	**0.00**	
Total Investment Pool		**651,201.89**	**6,550,595.23**	**3,033.00**	**3,033.00**	**3,033.00**
			29,336,832.96	**64,359.00**	**1,050.04**	
			1,054,968.86	**25,811.67**	**5,159.48**	
			1,029,157.19	**66,886.86**	**(4,109.44)**	
TOTAL PORTFOLIO		**23,341,622.25**	**29,358,535.19**	**28,339.53**	**24,230.09**	**24,230.09**

Cash Flow Report

As of February 28, 2021

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
03/01/2021	Interest	46647PAH9	210,000.00	JP Morgan Chase & Co Callable Note 2X 3/1/2024 3.22% Due 3/1/2025	0.00	3,381.00	3,381.00
03/01/2021	Maturity	48714LAC3	248,000.00	Kearny Bank Negotiable CD	248,000.00	11.89	248,011.89
03/08/2021	Interest	24422ETV1	305,000.00	John Deere Capital Corp Note 2.15% Due 9/8/2022	0.00	3,278.75	3,278.75
03/08/2021	Interest	3137EAEW5	300,000.00	FHLMC Note 0.25% Due 9/8/2023	0.00	383.33	383.33
03/10/2021	Interest	3130ADRG9	350,000.00	FHLB Note 2.75% Due 3/10/2023	0.00	4,812.50	4,812.50
03/11/2021	Interest	89114QCB2	200,000.00	Toronto Dominion Bank Note 3.25% Due 3/11/2024	0.00	3,250.00	3,250.00
03/12/2021	Interest	3135G0U43	350,000.00	FNMA Note 2.875% Due 9/12/2023	0.00	5,031.25	5,031.25
03/15/2021	Interest	68389XBK0	200,000.00	Oracle Corp Callable Note Cont 8/15/2021 1.9% Due 9/15/2021	0.00	1,900.00	1,900.00
03/15/2021	Interest	55266CRD0	248,000.00	MB Financial Bank NA Negotiable CD 1.4% Due 4/15/2021	0.00	266.35	266.35
03/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	0.00	297.42	297.42
03/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,593.56	20.42	1,613.98
03/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	8,253.63	170.58	8,424.21
03/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,797.19	193.00	2,990.19
03/15/2021	Paydown	477870AB5	2,732.25	John Deere Owner Trust 2019-B A2 2.28% Due 5/16/2022	168.11	5.19	173.30
03/15/2021	Paydown	47789JAD8	343,906.37	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,724.44	833.97	19,558.41
03/15/2021	Paydown	89231PAD0	117,965.81	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,618.99	312.61	4,931.60
03/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
03/18/2021	Paydown	89238KAD4	6,635.16	Toyota Auto Receivables Trust 2017-D A3 1.93% Due 1/18/2022	1,069.49	10.67	1,080.16
03/19/2021	Interest	459058GQ0	225,000.00	Intl. Bank Recon & Development Note 2.5% Due 3/19/2024	0.00	2,812.50	2,812.50
03/19/2021	Paydown	3137BM6P6	0.00	FHLMC K721 A2 3.09% Due 8/25/2022	529.09	347.63	876.72
03/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	1,964.91	129.33	2,094.24
03/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,477.06	47.00	2,524.06
03/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	16.20	16.20
03/25/2021	Interest	3137BM6P6	134,470.91	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	346.26	346.26
03/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
03/31/2021	Interest	912828T26	300,000.00	US Treasury Note 1.375% Due 9/30/2023	0.00	2,062.50	2,062.50
MAR 2021					**290,196.47**	**30,705.10**	**320,901.57**
04/06/2021	Maturity	140420XR6	248,000.00	Capital One Bank USA NA Negotiable CD 1.7% Due 4/6/2021	248,000.00	2,102.22	250,102.22
04/07/2021	Interest	08173QBS4	248,000.00	Beneficial Bank Negotiable CD 1.55% Due 10/7/2021	0.00	1,916.73	1,916.73
04/08/2021	Interest	3133ELWD2	285,000.00	FFCB Note 0.375% Due 4/8/2022	0.00	534.38	534.38
04/15/2021	Dividend	90LAIF$00	391,992,818.48	Local Agency Investment Fund State Pool	0.00	4,696.17	4,696.17
04/15/2021	Maturity	55266CRD0	248,000.00	MB Financial Bank NA Negotiable CD 1.4% Due 4/15/2021	248,000.00	294.88	248,294.88
04/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	8,012.42	158.34	8,170.76
04/15/2021	Paydown	47789JAD8	343,906.37	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,768.76	788.56	19,557.32

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
04/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,589.74	19.95	1,609.69
04/15/2021	Paydown	89231PAD0	117,965.81	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,627.18	300.37	4,927.55
04/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	0.00	297.42	297.42
04/15/2021	Paydown	477870AB5	2,732.25	John Deere Owner Trust 2019-B A2 2.28% Due 5/16/2022	168.47	4.87	173.34
04/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,803.49	188.50	2,991.99
04/16/2021	Interest	3137EAEY1	225,000.00	FHLMC Note 0.125% Due 10/16/2023	0.00	140.63	140.63
04/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
04/18/2021	Paydown	89238KAD4	6,635.16	Toyota Auto Receivables Trust 2017-D A3 1.93% Due 1/18/2022	976.91	8.95	985.86
04/19/2021	Maturity	06051GFW4	200,000.00	Bank of America Corp Note 2.625% Due 4/19/2021	200,000.00	2,625.00	202,625.00
04/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,478.03	46.03	2,524.06
04/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	1,969.32	126.16	2,095.48
04/21/2021	Call	808513AW5	200,000.00	Charles Schwab Corp Callable Note Cont 4/21/2021 3.25% Due 5/21/2021	200,000.00	2,708.33	202,708.33
04/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
04/25/2021	Interest	3137BM6P6	134,470.91	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	346.26	346.26
04/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
04/30/2021	Maturity	912828Q78	30,000.00	US Treasury Note 1.375% Due 4/30/2021	30,000.00	206.25	30,206.25
APR 2021					**967,394.32**	**18,312.75**	**985,707.07**

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
05/01/2021	Interest	78015K7C2	225,000.00	Royal Bank of Canada Note 2.25% Due 11/1/2024	0.00	2,531.25	2,531.25
05/03/2021	Interest	037833AK6	200,000.00	Apple Inc Note 2.4% Due 5/3/2023	0.00	2,400.00	2,400.00
05/05/2021	Interest	3137EAER6	305,000.00	FHLMC Note 0.375% Due 5/5/2023	0.00	571.88	571.88
05/06/2021	Interest	3137EAEZ8	335,000.00	FHLMC Note 0.25% Due 11/6/2023	0.00	421.08	421.08
05/06/2021	Interest	3133ELYR9	325,000.00	FFCB Note 0.25% Due 5/6/2022	0.00	406.25	406.25
05/07/2021	Interest	3135G06G3	350,000.00	FNMA Note 0.5% Due 11/7/2025	0.00	850.69	850.69
05/13/2021	Interest	459200JX0	200,000.00	IBM Corp Note 2.85% Due 5/13/2022	0.00	2,850.00	2,850.00
05/15/2021	Interest	912828WJ5	300,000.00	US Treasury Note 2.5% Due 5/15/2024	0.00	3,750.00	3,750.00
05/15/2021	Interest	912828VB3	250,000.00	US Treasury Note 1.75% Due 5/15/2023	0.00	2,187.50	2,187.50
05/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	7,770.61	146.46	7,917.07
05/15/2021	Paydown	47789JAD8	343,906.37	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,813.18	743.05	19,556.23
05/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,809.80	183.99	2,993.79
05/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	0.00	297.42	297.42
05/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,585.87	19.49	1,605.36
05/15/2021	Paydown	477870AB5	2,732.25	John Deere Owner Trust 2019-B A2 2.28% Due 5/16/2022	168.82	4.55	173.37
05/15/2021	Paydown	89231PAD0	117,965.81	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,635.38	288.11	4,923.49
05/18/2021	Paydown	89238KAD4	6,635.16	Toyota Auto Receivables Trust 2017-D A3 1.93% Due 1/18/2022	884.10	7.38	891.48

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
05/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
05/19/2021	Maturity	857477AV5	200,000.00	State Street Bank Note 1.95% Due 5/19/2021	200,000.00	1,950.00	201,950.00
05/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	1,973.76	122.97	2,096.73
05/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,479.00	45.06	2,524.06
05/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
05/22/2021	Interest	3135G04Q3	245,000.00	FNMA Note 0.25% Due 5/22/2023	0.00	306.25	306.25
05/24/2021	Interest	459058JM6	165,000.00	Intl. Bank Recon & Development Note 0.25% Due 11/24/2023	0.00	206.25	206.25
05/25/2021	Interest	3137BM6P6	134,470.91	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	346.26	346.26
05/25/2021	Interest	404280BA6	200,000.00	HSBC Holdings PLC Note 3.6% Due 5/25/2023	0.00	3,600.00	3,600.00
05/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
05/31/2021	Interest	91282CAZ4	150,000.00	US Treasury Note 0.375% Due 11/30/2025	0.00	281.25	281.25
05/31/2021	Interest	912828M80	300,000.00	US Treasury Note 2% Due 11/30/2022	0.00	3,000.00	3,000.00
05/31/2021	Interest	912828ZT0	365,000.00	US Treasury Note 0.25% Due 5/31/2025	0.00	456.25	456.25
MAY 2021					**241,120.52**	**28,776.14**	**269,896.66**
06/08/2021	Interest	3130A0F70	350,000.00	FHLB Note 3.375% Due 12/8/2023	0.00	5,906.25	5,906.25
06/08/2021	Interest	3134GVJ66	350,000.00	FHLMC Note 0.25% Due 6/8/2022	0.00	437.50	437.50
06/14/2021	Interest	3130A1XJ2	155,000.00	FHLB Note 2.875% Due 6/14/2024	0.00	2,228.13	2,228.13

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
06/15/2021	Paydown	47789JAD8	343,906.37	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,857.70	697.43	19,555.13
06/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	7,528.23	134.93	7,663.16
06/15/2021	Paydown	89231PAD0	117,965.81	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,643.61	275.82	4,919.43
06/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	0.00	297.42	297.42
06/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,581.96	19.03	1,600.99
06/15/2021	Paydown	477870AB5	2,732.25	John Deere Owner Trust 2019-B A2 2.28% Due 5/16/2022	169.17	4.23	173.40
06/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,816.12	179.47	2,995.59
06/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
06/18/2021	Paydown	89238KAD4	6,635.16	Toyota Auto Receivables Trust 2017-D A3 1.93% Due 1/18/2022	791.07	5.96	797.03
06/20/2021	Interest	3130AHSR5	320,000.00	FHLB Note 1.625% Due 12/20/2021	0.00	2,600.00	2,600.00
06/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	1,978.20	119.78	2,097.98
06/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,479.97	44.09	2,524.06
06/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
06/25/2021	Interest	3137BM6P6	134,470.91	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	346.26	346.26
06/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
06/26/2021	Interest	3137EAES4	300,000.00	FHLMC Note 0.25% Due 6/26/2023	0.00	375.00	375.00
06/29/2021	Maturity	87164XMJ2	248,000.00	Synchrony Bank Negotiable CD 1.55% Due 6/29/2021	248,000.00	1,916.73	249,916.73

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
JUN 2021					**288,846.03**	**16,390.78**	**305,236.81**
07/10/2021	Interest	3135G05G4	250,000.00	FNMA Note 0.25% Due 7/10/2023	0.00	312.50	312.50
07/11/2021	Interest	89236TEL5	200,000.00	Toyota Motor Credit Corp Note 2.7% Due 1/11/2023	0.00	2,700.00	2,700.00
07/12/2021	Maturity	02665WBF7	200,000.00	American Honda Finance Note 1.65% Due 7/12/2021	200,000.00	1,650.00	201,650.00
07/13/2021	Interest	037833DE7	200,000.00	Apple Inc Callable Note Cont 12/13/2022 2.4% Due 1/13/2023	0.00	2,400.00	2,400.00
07/13/2021	Interest	3137EADB2	350,000.00	FHLMC Note 2.375% Due 1/13/2022	0.00	4,156.25	4,156.25
07/15/2021	Paydown	477870AB5	2,732.25	John Deere Owner Trust 2019-B A2 2.28% Due 5/16/2022	169.52	3.91	173.43
07/15/2021	Paydown	47789JAD8	343,906.37	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,902.32	651.70	19,554.02
07/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	7,285.26	123.76	7,409.02
07/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	0.00	297.42	297.42
07/15/2021	Paydown	89231PAD0	117,965.81	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,651.84	263.52	4,915.36
07/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,578.01	18.56	1,596.57
07/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,822.46	174.94	2,997.40
07/18/2021	Paydown	89238KAD4	6,635.16	Toyota Auto Receivables Trust 2017-D A3 1.93% Due 1/18/2022	697.81	4.69	702.50
07/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
07/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	1,982.65	116.58	2,099.23
07/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,480.94	43.12	2,524.06

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
07/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
07/24/2021	Interest	949746SK8	200,000.00	Wells Fargo Company Callable Note 1X 1/24/2023	0.00	3,069.00	3,069.00
07/24/2021	Interest	90331HNV1	250,000.00	US Bank NA Callable Note Cont 6/23/2023 3.4% Due 7/24/2023	0.00	4,250.00	4,250.00
07/25/2021	Interest	3137BM6P6	134,470.91	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	346.26	346.26
07/25/2021	Interest	3137EAET2	170,000.00	FHLMC Note 0.125% Due 7/25/2022	0.00	106.25	106.25
07/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
07/30/2021	Interest	747525AR4	75,000.00	Qualcomm Inc Callable Note Cont 12/30/2022 2.6% Due 1/30/2023	0.00	975.00	975.00
07/31/2021	Interest	912828Y87	300,000.00	US Treasury Note 1.75% Due 7/31/2024	0.00	2,625.00	2,625.00
07/31/2021	Interest	912828V80	200,000.00	US Treasury Note 2.25% Due 1/31/2024	0.00	2,250.00	2,250.00
JUL 2021					**240,570.81**	**27,341.21**	**267,912.02**
08/06/2021	Interest	594918BX1	200,000.00	Microsoft Callable Note Cont 12/6/2023 2.875% Due 2/6/2024	0.00	2,875.00	2,875.00
08/09/2021	Maturity	69371RP42	200,000.00	Paccar Financial Corp Note 3.15% Due 8/9/2021	200,000.00	3,150.00	203,150.00
08/15/2021	Paydown	89231PAD0	117,965.81	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,660.09	251.19	4,911.28
08/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	0.00	297.42	297.42
08/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,574.01	18.10	1,592.11
08/15/2021	Paydown	477870AB5	2,732.25	John Deere Owner Trust 2019-B A2 2.28% Due 5/16/2022	169.87	3.59	173.46
08/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,828.81	170.40	2,999.21

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
08/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	7,041.70	112.96	7,154.66
08/15/2021	Paydown	47789JAD8	343,906.37	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,947.06	605.86	19,552.92
08/16/2021	Interest	06406FAD5	200,000.00	Bank of NY Mellon Corp Callable Note Cont 6/16/2023 2.2% Due 8/16/2023	0.00	2,200.00	2,200.00
08/17/2021	Interest	69353RFB9	250,000.00	PNC Bank Callable Note Cont 1/18/2022 2.625% Due 2/17/2022	0.00	3,281.25	3,281.25
08/18/2021	Paydown	89238KAD4	6,635.16	Toyota Auto Receivables Trust 2017-D A3 1.93% Due 1/18/2022	604.33	3.56	607.89
08/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
08/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	1,987.11	113.38	2,100.49
08/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,481.91	42.15	2,524.06
08/21/2021	Interest	29976D2F6	248,000.00	Everbank Negotiable CD 2.05% Due 2/14/2022	0.00	2,521.11	2,521.11
08/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
08/24/2021	Interest	3137EAEV7	300,000.00	FHLMC Note 0.25% Due 8/24/2023	0.00	375.00	375.00
08/25/2021	Interest	3137BM6P6	134,470.91	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	346.26	346.26
08/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
AUG 2021					**240,294.89**	**17,169.98**	**257,464.87**
09/01/2021	Interest	46647PAH9	210,000.00	JP Morgan Chase & Co Callable Note 2X 3/1/2024 3.22% Due 3/1/2025	0.00	3,381.00	3,381.00
09/08/2021	Interest	3137EAEW5	300,000.00	FHLMC Note 0.25% Due 9/8/2023	0.00	375.00	375.00
09/08/2021	Interest	24422ETV1	305,000.00	John Deere Capital Corp Note 2.15% Due 9/8/2022	0.00	3,278.75	3,278.75

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
09/10/2021	Interest	3130ADRG9	350,000.00	FHLB Note 2.75% Due 3/10/2023	0.00	4,812.50	4,812.50
09/11/2021	Interest	89114QCB2	200,000.00	Toronto Dominion Bank Note 3.25% Due 3/11/2024	0.00	3,250.00	3,250.00
09/12/2021	Interest	3135G0U43	350,000.00	FNMA Note 2.875% Due 9/12/2023	0.00	5,031.25	5,031.25
09/15/2021	Maturity	68389XBK0	200,000.00	Oracle Corp Callable Note Cont 8/15/2021 1.9% Due 9/15/2021	200,000.00	1,900.00	201,900.00
09/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	0.00	297.42	297.42
09/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,835.17	165.85	3,001.02
09/15/2021	Paydown	477870AB5	2,732.25	John Deere Owner Trust 2019-B A2 2.28% Due 5/16/2022	170.23	3.26	173.49
09/15/2021	Paydown	89231PAD0	117,965.81	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,668.36	238.84	4,907.20
09/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,569.97	17.64	1,587.61
09/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	6,797.55	102.51	6,900.06
09/15/2021	Paydown	47789JAD8	343,906.37	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,991.91	559.91	19,551.82
09/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
09/18/2021	Paydown	89238KAD4	6,635.16	Toyota Auto Receivables Trust 2017-D A3 1.93% Due 1/18/2022	510.62	2.59	513.21
09/19/2021	Interest	459058GQ0	225,000.00	Intl. Bank Recon & Development Note 2.5% Due 3/19/2024	0.00	2,812.50	2,812.50
09/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	1,991.58	110.17	2,101.75
09/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,482.89	41.17	2,524.06
09/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
09/25/2021	Interest	3137BM6P6	134,470.91	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	346.26	346.26
09/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
09/30/2021	Interest	912828T26	300,000.00	US Treasury Note 1.375% Due 9/30/2023	0.00	2,062.50	2,062.50
SEP 2021					**240,018.28**	**29,591.87**	**269,610.15**
10/07/2021	Maturity	08173QBS4	248,000.00	Beneficial Bank Negotiable CD 1.55% Due 10/7/2021	248,000.00	1,927.27	249,927.27
10/08/2021	Interest	3133ELWD2	285,000.00	FFCB Note 0.375% Due 4/8/2022	0.00	534.38	534.38
10/15/2021	Paydown	47789JAD8	343,906.37	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	19,036.85	513.86	19,550.71
10/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	6,552.81	92.43	6,645.24
10/15/2021	Paydown	89231PAD0	117,965.81	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,676.63	226.47	4,903.10
10/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	10,100.64	297.42	10,398.06
10/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,565.87	17.19	1,583.06
10/15/2021	Paydown	477870AB5	2,732.25	John Deere Owner Trust 2019-B A2 2.28% Due 5/16/2022	170.58	2.94	173.52
10/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,841.55	161.29	3,002.84
10/16/2021	Interest	3137EAEY1	225,000.00	FHLMC Note 0.125% Due 10/16/2023	0.00	140.63	140.63
10/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
10/18/2021	Paydown	89238KAD4	6,635.16	Toyota Auto Receivables Trust 2017-D A3 1.93% Due 1/18/2022	416.68	1.77	418.45
10/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,483.86	40.20	2,524.06

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
10/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	1,996.06	106.95	2,103.01
10/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
10/25/2021	Interest	3137BM6P6	134,470.91	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	346.26	346.26
10/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
OCT 2021					**297,841.53**	**5,211.81**	**303,053.34**
11/01/2021	Interest	78015K7C2	225,000.00	Royal Bank of Canada Note 2.25% Due 11/1/2024	0.00	2,531.25	2,531.25
11/03/2021	Interest	037833AK6	200,000.00	Apple Inc Note 2.4% Due 5/3/2023	0.00	2,400.00	2,400.00
11/05/2021	Interest	3137EAER6	305,000.00	FHLMC Note 0.375% Due 5/5/2023	0.00	571.88	571.88
11/06/2021	Interest	3137EAEZ8	335,000.00	FHLMC Note 0.25% Due 11/6/2023	0.00	418.75	418.75
11/06/2021	Interest	3133ELYR9	325,000.00	FFCB Note 0.25% Due 5/6/2022	0.00	406.25	406.25
11/07/2021	Interest	3135G06G3	350,000.00	FNMA Note 0.5% Due 11/7/2025	0.00	875.00	875.00
11/13/2021	Interest	459200JX0	200,000.00	IBM Corp Note 2.85% Due 5/13/2022	0.00	2,850.00	2,850.00
11/15/2021	Interest	912828WJ5	300,000.00	US Treasury Note 2.5% Due 5/15/2024	0.00	3,750.00	3,750.00
11/15/2021	Interest	912828VB3	250,000.00	US Treasury Note 1.75% Due 5/15/2023	0.00	2,187.50	2,187.50
11/15/2021	Paydown	477870AB5	2,732.25	John Deere Owner Trust 2019-B A2 2.28% Due 5/16/2022	170.93	2.62	173.55
11/15/2021	Paydown	47789JAD8	343,906.37	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	19,081.90	467.70	19,549.60
11/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	6,307.48	82.71	6,390.19

Cash Flow Report

As of February 28, 2021

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
11/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	9,891.57	283.44	10,175.01
11/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,847.95	156.72	3,004.67
11/15/2021	Paydown	89231PAD0	117,965.81	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,684.92	214.08	4,899.00
11/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,561.74	16.73	1,578.47
11/18/2021	Paydown	89238KAD4	6,635.16	Toyota Auto Receivables Trust 2017-D A3 1.93% Due 1/18/2022	322.52	1.10	323.62
11/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
11/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	2,000.55	103.72	2,104.27
11/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,484.83	39.23	2,524.06
11/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
11/22/2021	Interest	3135G04Q3	245,000.00	FNMA Note 0.25% Due 5/22/2023	0.00	306.25	306.25
11/24/2021	Interest	459058JM6	165,000.00	Intl. Bank Recon & Development Note 0.25% Due 11/24/2023	0.00	206.25	206.25
11/25/2021	Interest	404280BA6	200,000.00	HSBC Holdings PLC Note 3.6% Due 5/25/2023	0.00	3,600.00	3,600.00
11/25/2021	Interest	3137BM6P6	134,470.91	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	346.26	346.26
11/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
11/30/2021	Interest	912828M80	300,000.00	US Treasury Note 2% Due 11/30/2022	0.00	3,000.00	3,000.00
11/30/2021	Interest	912828ZT0	365,000.00	US Treasury Note 0.25% Due 5/31/2025	0.00	456.25	456.25
11/30/2021	Interest	91282CAZ4	150,000.00	US Treasury Note 0.375% Due 11/30/2025	0.00	281.25	281.25

Cash Flow Report

As of February 28, 2021

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
NOV 2021					**49,354.39**	**26,357.69**	**75,712.08**
12/08/2021	Interest	3130A0F70	350,000.00	FHLB Note 3.375% Due 12/8/2023	0.00	5,906.25	5,906.25
12/08/2021	Interest	3134GVJ66	350,000.00	FHLMC Note 0.25% Due 6/8/2022	0.00	437.50	437.50
12/14/2021	Interest	3130A1XJ2	155,000.00	FHLB Note 2.875% Due 6/14/2024	0.00	2,228.13	2,228.13
12/15/2021	Paydown	477870AB5	2,732.25	John Deere Owner Trust 2019-B A2 2.28% Due 5/16/2022	171.29	2.29	173.58
12/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,854.35	152.14	3,006.49
12/15/2021	Paydown	89231PAD0	117,965.81	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,693.24	201.66	4,894.90
12/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,557.57	16.27	1,573.84
12/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	9,681.60	269.76	9,951.36
12/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	6,061.55	73.35	6,134.90
12/15/2021	Paydown	47789JAD8	343,906.37	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	19,127.07	421.42	19,548.49
12/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
12/18/2021	Paydown	89238KAD4	6,635.16	Toyota Auto Receivables Trust 2017-D A3 1.93% Due 1/18/2022	228.13	0.58	228.71
12/20/2021	Maturity	3130AHSR5	320,000.00	FHLB Note 1.625% Due 12/20/2021	320,000.00	2,600.00	322,600.00
12/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	2,005.05	100.49	2,105.54
12/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,485.81	38.25	2,524.06
12/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00

Cash Flow Report

As of February 28, 2021

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
12/25/2021	Interest	3137BM6P6	134,470.91	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	346.26	346.26
12/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
12/26/2021	Interest	3137EAES4	300,000.00	FHLMC Note 0.25% Due 6/26/2023	0.00	375.00	375.00
DEC 2021					**368,865.66**	**13,972.10**	**382,837.76**
01/10/2022	Interest	3135G05G4	250,000.00	FNMA Note 0.25% Due 7/10/2023	0.00	312.50	312.50
01/11/2022	Interest	89236TEL5	200,000.00	Toyota Motor Credit Corp Note 2.7% Due 1/11/2023	0.00	2,700.00	2,700.00
01/13/2022	Interest	037833DE7	200,000.00	Apple Inc Callable Note Cont 12/13/2022 2.4% Due 1/13/2023	0.00	2,400.00	2,400.00
01/13/2022	Maturity	3137EADB2	350,000.00	FHLMC Note 2.375% Due 1/13/2022	350,000.00	4,156.25	354,156.25
01/15/2022	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	9,470.75	256.37	9,727.12
01/15/2022	Paydown	89231PAD0	117,965.81	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,701.56	189.22	4,890.78
01/15/2022	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,553.34	15.82	1,569.16
01/15/2022	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	5,815.03	64.36	5,879.39
01/15/2022	Paydown	477870AB5	2,732.25	John Deere Owner Trust 2019-B A2 2.28% Due 5/16/2022	171.65	1.97	173.62
01/15/2022	Paydown	47789JAD8	343,906.37	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	19,172.33	375.04	19,547.37
01/15/2022	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,860.78	147.55	3,008.33
01/18/2022	Paydown	89238KAD4	6,635.16	Toyota Auto Receivables Trust 2017-D A3 1.93% Due 1/18/2022	133.52	0.21	133.73
01/18/2022	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21

Cash Flow Report

As of February 28, 2021

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
01/20/2022	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	2,009.57	97.24	2,106.81
01/20/2022	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,486.78	37.28	2,524.06
01/21/2022	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
01/24/2022	Interest	949746SK8	200,000.00	Wells Fargo Company Callable Note 1X 1/24/2023	0.00	3,069.00	3,069.00
01/24/2022	Interest	90331HNV1	250,000.00	US Bank NA Callable Note Cont 6/23/2023 3.4% Due 7/24/2023	0.00	4,250.00	4,250.00
01/25/2022	Interest	3137BM6P6	134,470.91	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	346.26	346.26
01/25/2022	Interest	3137EAET2	170,000.00	FHLMC Note 0.125% Due 7/25/2022	0.00	106.25	106.25
01/25/2022	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
01/30/2022	Interest	747525AR4	75,000.00	Qualcomm Inc Callable Note Cont 12/30/2022 2.6% Due 1/30/2023	0.00	975.00	975.00
01/31/2022	Interest	912828Y87	300,000.00	US Treasury Note 1.75% Due 7/31/2024	0.00	2,625.00	2,625.00
01/31/2022	Interest	912828V80	200,000.00	US Treasury Note 2.25% Due 1/31/2024	0.00	2,250.00	2,250.00
JAN 2022					**398,375.31**	**25,178.07**	**423,553.38**
02/06/2022	Interest	594918BX1	200,000.00	Microsoft Callable Note Cont 12/6/2023 2.875% Due 2/6/2024	0.00	2,875.00	2,875.00
02/14/2022	Maturity	29976D2F6	248,000.00	Everbank Negotiable CD 2.05% Due 2/14/2022	248,000.00	2,465.39	250,465.39
02/15/2022	Paydown	47789JAD8	343,906.37	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	19,217.70	328.55	19,546.25
02/15/2022	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	5,567.92	55.73	5,623.65
02/15/2022	Paydown	477870AB5	2,732.25	John Deere Owner Trust 2019-B A2 2.28% Due 5/16/2022	172.01	1.64	173.65

Cash Flow Report

As of February 28, 2021

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
02/15/2022	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,867.21	142.95	3,010.16
02/15/2022	Paydown	89231PAD0	117,965.81	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,709.89	176.77	4,886.66
02/15/2022	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	9,259.00	243.27	9,502.27
02/15/2022	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,549.06	15.37	1,564.43
02/16/2022	Interest	06406FAD5	200,000.00	Bank of NY Mellon Corp Callable Note Cont 6/16/2023 2.2% Due 8/16/2023	0.00	2,200.00	2,200.00
02/17/2022	Maturity	69353RFB9	250,000.00	PNC Bank Callable Note Cont 1/18/2022 2.625% Due 2/17/2022	250,000.00	3,281.25	253,281.25
02/18/2022	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
02/19/2022	Paydown	3137BM6P6	134,470.91	FHLMC K721 A2 3.09% Due 8/25/2022	1,281.08	2.64	1,283.72
02/20/2022	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	2,014.08	94.00	2,108.08
02/20/2022	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,487.75	36.31	2,524.06
02/21/2022	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
02/24/2022	Interest	3137EAEV7	300,000.00	FHLMC Note 0.25% Due 8/24/2023	0.00	375.00	375.00
02/25/2022	Interest	3137BM6P6	134,470.91	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	342.96	342.96
02/25/2022	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
FEB 2022					**547,125.70**	**13,439.58**	**560,565.28**
TOTAL					**4,170,003.91**	**252,447.08**	**4,422,450.99**

Important Disclosures

Chandler Asset Management, Inc. (“Chandler”) is an SEC registered investment adviser. For additional information about our firm, please see our current disclosures (Form ADV). To obtain a copy of our current disclosures, you may contact your client service representative by calling the number on the front of this statement or you may visit our website at www.chandlerasset.com.

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Custody: Your qualified custodian bank maintains control of all assets reflected in this statement and we urge you to compare this statement to the one you receive from your qualified custodian. Chandler does not have any authority to withdraw or deposit funds from/to the custodian account.

Valuation: Prices are provided by IDC, an independent pricing source. In the event IDC does not provide a price or if the price provided is not reflective of fair market value, Chandler will obtain pricing from an alternative approved third party pricing source in accordance with our written valuation policy and procedures. Our valuation procedures are also disclosed in Item 5 of our Form ADV Part 2A.

Performance: Performance results are presented gross-of-advisory fees and represent the client’s Total Return. The deduction of advisory fees lowers performance results. These results include the reinvestment of dividends and other earnings. Past performance may not be indicative of future results. Therefore, clients should not assume that future performance of any specific investment or investment strategy will be profitable or equal to past performance levels. All investment strategies have the potential for profit or loss. Economic factors, market conditions or changes in investment strategies, contributions or withdrawals may materially alter the performance and results of your portfolio.

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Ratings: Ratings information have been provided by Moody’s, S&P and Fitch through data feeds we believe to be reliable as of the date of this statement, however we cannot guarantee its accuracy.

Security level ratings for U.S. Agency issued mortgage-backed securities (“MBS”) reflect the issuer rating because the securities themselves are not rated. The issuing U.S. Agency guarantees the full and timely payment of both principal and interest and carries a AA+/Aaa/AAA by S&P, Moody’s and Fitch respectively.

CITY OF GARDENA

INVESTMENT REPORT

March 2021

Reviewed: Deputy City Treasurer

Reviewed: Chief Fiscal Officer

City of Gardena Consolidated - Account #10647

MONTHLY ACCOUNT STATEMENT

MARCH 1, 2021 THROUGH MARCH 31, 2021

Chandler Team:
For questions about your account, please call (800) 317-4747,
or contact **operations@chandlerasset.com**

CHANDLER ASSET MANAGEMENT
chandlerasset.com

Information contained herein is confidential. We urge you to compare this statement to the one you receive from your qualified custodian. Please see Important Disclosures.

City of Gardena Consolidated

Account #10647

Portfolio Summary

As of March 31, 2021

PORTFOLIO CHARACTERISTICS

Average Modified Duration	1.02
Average Coupon	1.25%
Average Purchase YTM	0.87%
Average Market YTM	0.29%
Average S&P/Moody Rating	AA-/Aa1
Average Final Maturity	1.14 yrs
Average Life	1.04 yrs

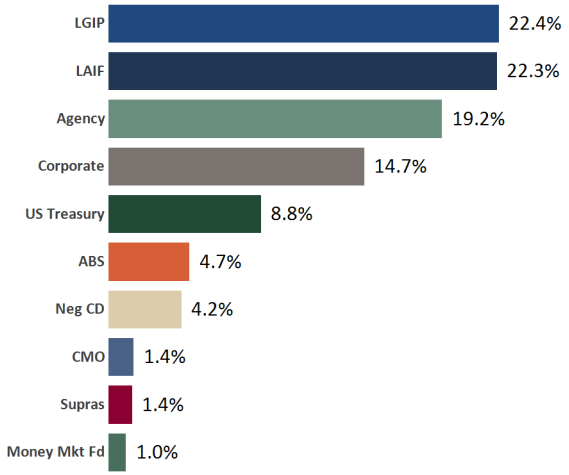
ACCOUNT SUMMARY

	Beg. Values as of 2/28/21	End Values as of 3/31/21
Market Value	29,753,181	29,752,493
Accrued Interest	66,887	60,276
Total Market Value	**29,820,067**	**29,812,768**
Income Earned	24,230	23,572
Cont/WD		
Par	23,341,622	23,379,293
Book Value	29,358,535	29,393,804
Cost Value	29,399,154	29,437,452

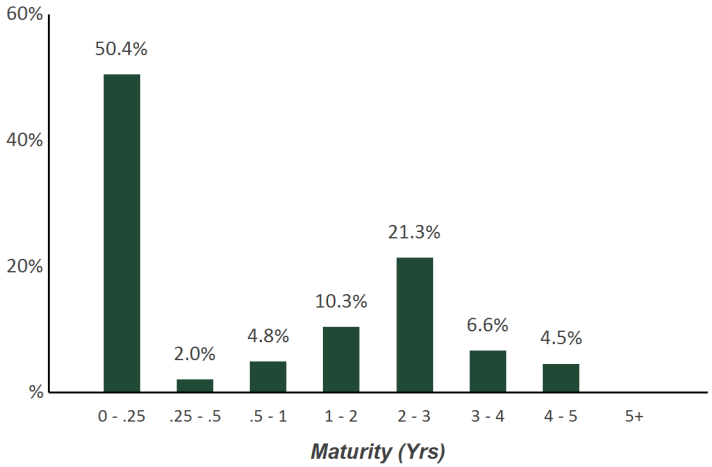
TOP ISSUERS

CalTrust	22.4%
Local Agency Investment Fund	22.3%
Federal Home Loan Mortgage Corp	10.3%
Government of United States	8.8%
Federal Home Loan Bank	4.2%
Federal National Mortgage Assoc	4.1%
Federal Farm Credit Bank	2.1%
Apple Inc	1.4%
Total	**75.5%**

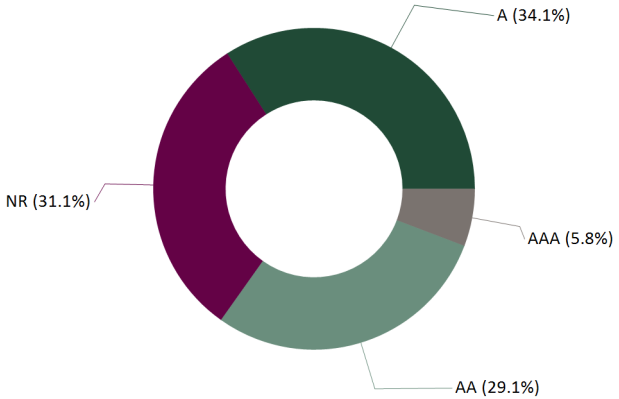
SECTOR ALLOCATION



MATURITY DISTRIBUTION



CREDIT QUALITY (S&P)



Statement of Compliance

As of March 31, 2021

City of Gardena

Assets managed by Chandler Asset Management are in full compliance with state law and with the City's investment policy.

Category	Standard	Comment
Municipal Securities	"A" rating category or better by a NRSRO; 30% maximum; 5% max per issuer	*Complies*
Treasury Issues	No Limitation	*Complies*
Agency Issues	20% maximum agency callable securities; 25% max per Agency/GSE issuer; Federal Agencies or U.S. Government Sponsored Enterprise obligations, participations, or other instruments, including those issued by or fully guaranteed as to principal and interest by federal agencies or U.S. GSEs.	*Complies*
Supranationals	"AA" rating category or better by a NRSRO; 30% maximum; 10% max per issuer; U.S. dollar denominated senior unsecured unsubordinated obligations issued or unconditionally guaranteed by the International Bank for Reconstruction and Development ("IBRD"), the International Finance Corporation ("IFC") or the Inter-American Development Bank ("IADB")	*Complies*
Banker's Acceptances	"A-1" short term debt rated or better by a NRSRO; or "A" long-term debt rated or better by a NRSRO; 40% maximum; 5% max per issuer; 180 days max maturity	*Complies*
Commercial Paper	"A-1" short term debt rated or better by a NRSRO; "A" long-term debt issuer rated or better by a NRSRO; 25% maximum; 5% max per issuer; 270 days max maturity; Issuer is a corporation organized and operating in the U.S. with assets > $500 million	*Complies*
Negotiable Certificates of Deposit (NCDs)	No rating required if amount of the NCD is insured up to the FDIC limit; If above FDIC insured limit, requires "A-1" short-term or "A" long-term rated issuer or better by a NRSRO; 30% maximum; (inclusive of CDARS); 5% max per issuer	*Complies*
Federally Insured Certificates of Deposit (CDs)/ Time Deposit (TDs)	20% maximum (combined FDIC insured and collateralized TD/ CD); Amount per institution is limited to maximum covered under federal insurance	*Complies*
Collateralized Certificates of Deposit (CDs)/Time Deposit (TDs)/	20% maximum (combined FDIC and collateralized TD/ CD)	*Complies*
Corporate Medium Term Notes	"A" rated category or better by a NRSRO; 30% maximum; 5% max per issuer; Issued by corporations organized and operating within the U.S. or by depository institutions licensed by the U.S. or any state and operating within the U.S.	*Complies*
Mutual Fund & Money Market Mutual Fund	Highest rating or "AAA" rated by two NRSROs; SEC registered adviser with AUM >$500 million and experience > 5 years; 20% maximum in Mutual Funds and Money Market Mutual Funds; 10% max per one Mutual Fund; 20% max per one Money Market Mutual Fund	*Complies*
Asset-Backed (ABS), Mortgage-Backed Securities (MBS); Mortgage Pass-Throughs (MPT); Collateralized Mortgage Obligations (CMOs)	"AA" rating category or better by a NRSRO; "A" long-term debt issuer rating category or better by a NRSRO; 20% maximum (combined ABS, MBS, MPTs, CMOs); 5% max per issuer in any ABS or Commercial Mortgage security issuer; No issuer limitation on any Mortgage security where the issuer is the US Treasury or Federal Agency/GSE.	*Complies*
Local Agency Investment Fund (LAIF)	Maximum amount permitted by LAIF; Not used by investment adviser	*Complies*
Local Government Investment Pools	Other LGIP permitted by client; No issuer limitation; Not used by investment adviser	*Complies*
Investment Trust of California	Issued by CALTRUST in accordance with Section 53601 (p) of the Government Code	*Complies*
Los Angeles County Pooled Investment Fund (LACPIF)	Issued by LACPIF in accordance with Section 53601 (p) of the Government Code	*Complies*
Prohibited Securities	Inverse floaters; Ranges notes, Interest-only strips from mortgaged backed securities; Zero interest accrual securities; Margin purchasing or selling; Repurchase agreements; Reverse repurchase agreements; Foreign currency denominated securities	*Complies*
Max Per Issuer	5% of portfolio per issuer, unless otherwise specified in the policy	*Complies*
Maximum maturity	5 years	*Complies*

Holdings Report

As of March 31, 2021

CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
ABS									
89231PAD0	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	108,034.47	08/29/2019 1.98%	110,342.86 109,307.39	101.31 0.31%	109,446.91 152.69	0.37% 139.52	Aaa / AAA NR	1.96 0.46
47789JAD8	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	319,425.71	Various 1.39%	326,903.71 323,601.37	101.41 0.31%	323,933.44 413.12	1.09% 332.07	Aaa / NR AAA	2.30 0.54
43815NAC8	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	115,000.00	08/20/2019 1.79%	114,999.05 114,999.55	101.25 0.27%	116,441.41 90.98	0.39% 1,441.86	Aaa / AAA NR	2.38 0.83
92348AAA3	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	80,000.00	10/01/2019 1.95%	79,993.83 79,995.84	101.72 0.31%	81,376.32 47.42	0.27% 1,380.48	NR / AAA AAA	3.06 1.05
89232HAC9	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	215,000.00	07/06/2020 0.70%	219,736.72 218,837.85	101.67 0.29%	218,589.21 158.62	0.73% (248.64)	Aaa / AAA NR	3.13 1.21
65479JAD5	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	120,000.00	10/16/2019 1.94%	119,993.66 119,995.59	101.81 0.30%	122,175.00 102.93	0.41% 2,179.41	Aaa / AAA NR	3.29 1.11
43813KAC6	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	85,000.00	09/22/2020 0.38%	84,987.51 84,989.52	100.03 0.35%	85,028.48 11.36	0.29% 38.96	NR / AAA AAA	3.55 1.78
89236XAC0	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	70,000.00	10/06/2020 0.36%	69,986.96 69,988.39	99.98 0.36%	69,988.39 10.89	0.23% 0.00	NR / AAA AAA	3.80 1.67
92290BAA9	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	120,000.00	08/04/2020 0.48%	119,974.80 119,978.34	100.26 0.33%	120,309.12 17.23	0.40% 330.78	Aaa / NR AAA	3.90 1.83
43813GAC5	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	80,000.00	02/17/2021 0.27%	79,998.54 79,998.59	99.85 0.35%	79,878.32 6.00	0.27% (120.27)	Aaa / NR AAA	4.06 2.01
47788UAC6	John Deere Owner Trust 2021-A A3 0.36% Due 9/15/2025	60,000.00	03/02/2021 0.37%	59,988.47 59,988.66	99.61 0.52%	59,764.26 12.60	0.20% (224.40)	Aaa / NR AAA	4.46 2.43
Total ABS		**1,372,460.18**	**1.14%**	**1,386,906.11** **1,381,681.09**	**0.32%**	**1,386,930.86** **1,023.84**	**4.66%** **5,249.77**	**Aaa / AAA** **AAA**	**3.03** **1.15**
AGENCY									
3130AHSR5	FHLB Note 1.625% Due 12/20/2021	320,000.00	12/19/2019 1.68%	319,654.40 319,875.66	101.10 0.09%	323,532.48 1,458.89	1.09% 3,656.82	Aaa / AA+ AAA	0.72 0.72

Holdings Report

As of March 31, 2021

CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
AGENCY									
3137EADB2	FHLMC Note 2.375% Due 1/13/2022	350,000.00	10/30/2019 1.69%	355,124.00 351,826.82	101.80 0.08%	356,297.55 1,801.04	1.20% 4,470.73	Aaa / AA+ AAA	0.79 0.78
3133ELWD2	FFCB Note 0.375% Due 4/8/2022	285,000.00	04/03/2020 0.45%	284,578.20 284,785.06	100.28 0.10%	285,785.46 513.59	0.96% 1,000.40	Aaa / AA+ AAA	1.02 1.02
3133ELYR9	FFCB Note 0.25% Due 5/6/2022	325,000.00	04/30/2020 0.31%	324,587.25 324,773.84	100.12 0.14%	325,400.07 327.26	1.09% 626.23	Aaa / AA+ AAA	1.10 1.09
3134GVJ66	FHLMC Note 0.25% Due 6/8/2022	350,000.00	06/04/2020 0.28%	349,790.00 349,875.44	100.15 0.12%	350,538.30 274.65	1.18% 662.86	Aaa / NR AAA	1.19 1.18
3137EAET2	FHLMC Note 0.125% Due 7/25/2022	170,000.00	07/21/2020 0.24%	169,615.80 169,748.07	99.99 0.13%	169,979.94 38.96	0.57% 231.87	Aaa / AA+ AAA	1.32 1.31
3130ADRG9	FHLB Note 2.75% Due 3/10/2023	350,000.00	04/11/2019 2.34%	355,330.50 352,642.85	104.91 0.22%	367,179.40 561.46	1.23% 14,536.55	Aaa / AA+ NR	1.94 1.90
3137EAER6	FHLMC Note 0.375% Due 5/5/2023	305,000.00	05/05/2020 0.39%	304,871.90 304,910.46	100.43 0.17%	306,298.69 463.85	1.03% 1,388.23	Aaa / AA+ AAA	2.10 2.08
3135G04Q3	FNMA Note 0.25% Due 5/22/2023	245,000.00	05/20/2020 0.35%	244,262.55 244,474.02	100.12 0.19%	245,297.92 219.48	0.82% 823.90	Aaa / AA+ AAA	2.14 2.13
3137EAES4	FHLMC Note 0.25% Due 6/26/2023	300,000.00	06/24/2020 0.35%	299,124.00 299,347.20	100.08 0.21%	300,236.70 197.92	1.01% 889.50	Aaa / AA+ AAA	2.24 2.23
3135G05G4	FNMA Note 0.25% Due 7/10/2023	250,000.00	07/08/2020 0.32%	249,462.50 249,592.58	100.07 0.22%	250,179.75 140.63	0.84% 587.17	Aaa / AA+ AAA	2.28 2.27
3137EAEV7	FHLMC Note 0.25% Due 8/24/2023	300,000.00	08/19/2020 0.28%	299,694.00 299,756.15	100.03 0.24%	300,088.80 77.08	1.01% 332.65	Aaa / AA+ AAA	2.40 2.39
3137EAEW5	FHLMC Note 0.25% Due 9/8/2023	300,000.00	09/11/2020 0.24%	300,093.00 300,076.01	99.98 0.26%	299,927.70 47.92	1.01% (148.31)	Aaa / AA+ AAA	2.44 2.43
3135G0U43	FNMA Note 2.875% Due 9/12/2023	350,000.00	09/25/2019 1.63%	366,702.00 360,319.00	106.40 0.25%	372,408.05 531.08	1.25% 12,089.05	Aaa / AA+ AAA	2.45 2.38
3137EAEY1	FHLMC Note 0.125% Due 10/16/2023	225,000.00	10/14/2020 0.25%	224,160.75 224,288.75	99.62 0.28%	224,140.05 128.91	0.75% (148.70)	Aaa / AA+ AAA	2.55 2.53
3137EAEZ8	FHLMC Note 0.25% Due 11/6/2023	335,000.00	11/03/2020 0.28%	334,698.50 334,738.94	99.92 0.28%	334,731.33 339.65	1.12% (7.61)	Aaa / AA+ AAA	2.60 2.58
3130A0F70	FHLB Note 3.375% Due 12/8/2023	350,000.00	10/30/2019 1.72%	372,781.50 364,909.04	108.14 0.33%	378,501.20 3,707.81	1.28% 13,592.16	Aaa / AA+ AAA	2.69 2.57

Holdings Report

As of March 31, 2021

CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
AGENCY									
3130A1XJ2	FHLB Note 2.875% Due 6/14/2024	155,000.00	03/24/2020 0.99%	167,010.95 164,113.37	107.79 0.42%	167,068.15 1,324.50	0.56% 2,954.78	Aaa / AA+ NR	3.21 3.06
3135G06G3	FNMA Note 0.5% Due 11/7/2025	350,000.00	11/18/2020 0.52%	349,639.50 349,665.93	98.44 0.85%	344,522.85 675.69	1.16% (5,143.08)	Aaa / AA+ AAA	4.61 4.52
Total Agency		**5,615,000.00**	**0.81%**	**5,671,181.30** **5,649,719.19**	**0.24%**	**5,702,114.39** **12,830.37**	**19.17%** **52,395.20**	**Aaa / AA+** **AAA**	**2.08** **2.05**
CMO									
3137BM6P6	FHLMC K721 A2 3.09% Due 8/25/2022	134,222.00	06/26/2019 2.09%	137,902.61 135,851.80	102.65 0.66%	137,780.49 345.62	0.46% 1,928.69	Aaa / NR NR	1.40 1.16
3137B4GY6	FHLMC K032 A2 3.31% Due 5/25/2023	275,000.00	07/23/2019 2.21%	285,881.84 281,098.19	105.86 0.41%	291,126.83 151.71	0.98% 10,028.64	NR / NR AAA	2.15 2.04
Total CMO		**409,222.00**	**2.17%**	**423,784.45** **416,949.99**	**0.49%**	**428,907.32** **497.33**	**1.44%** **11,957.33**	**Aaa / NR** **AAA**	**1.91** **1.76**
CORPORATE									
06051GFW4	Bank of America Corp Note 2.625% Due 4/19/2021	200,000.00	04/25/2019 2.69%	199,750.00 199,993.76	100.09 0.76%	200,185.60 2,362.50	0.68% 191.84	A2 / A- A+	0.05 0.05
857477AV5	State Street Bank Note 1.95% Due 5/19/2021	200,000.00	04/30/2019 2.64%	197,280.00 199,825.45	100.21 0.37%	200,419.40 1,430.00	0.68% 593.95	A1 / A AA-	0.13 0.13
808513AW5	Charles Schwab Corp Callable Note Cont 4/21/2021 3.25% Due 5/21/2021	200,000.00	04/25/2019 2.66%	202,274.00 200,062.90	100.14 0.21%	200,270.00 2,347.22	0.68% 207.10	A2 / A A	0.14 0.06
02665WBF7	American Honda Finance Note 1.65% Due 7/12/2021	200,000.00	07/30/2019 2.26%	197,692.00 199,669.36	100.37 0.34%	200,735.20 724.17	0.68% 1,065.84	A3 / A- NR	0.28 0.28
69371RP42	Paccar Financial Corp Note 3.15% Due 8/9/2021	200,000.00	04/24/2019 2.74%	201,814.00 200,282.08	101.04 0.21%	202,086.00 910.00	0.68% 1,803.92	A1 / A+ NR	0.36 0.36
68389XBK0	Oracle Corp Callable Note Cont 8/15/2021 1.9% Due 9/15/2021	200,000.00	04/11/2019 2.66%	196,464.00 199,332.00	100.59 0.32%	201,172.00 168.89	0.68% 1,840.00	Baa2 / A BBB+	0.46 0.37
69353RFB9	PNC Bank Callable Note Cont 1/18/2022 2.625% Due 2/17/2022	250,000.00	02/21/2019 3.07%	246,827.50 249,061.08	101.86 0.28%	254,655.25 802.08	0.86% 5,594.17	A2 / A A+	0.88 0.79

Holdings Report

As of March 31, 2021

CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
CORPORATE									
459200JX0	IBM Corp Note 2.85% Due 5/13/2022	200,000.00	05/16/2019 2.80%	200,300.00 200,112.12	102.85 0.29%	205,696.20 2,185.00	0.70% 5,584.08	A2 / A NR	1.12 1.09
24422ETV1	John Deere Capital Corp Note 2.15% Due 9/8/2022	305,000.00	04/17/2019 2.78%	298,851.20 302,386.14	102.67 0.29%	313,133.74 418.95	1.05% 10,747.60	A2 / A A	1.44 1.42
89236TEL5	Toyota Motor Credit Corp Note 2.7% Due 1/11/2023	200,000.00	04/25/2019 2.72%	199,856.00 199,930.82	104.04 0.42%	208,071.80 1,200.00	0.70% 8,140.98	A1 / A+ A+	1.78 1.74
037833DE7	Apple Inc Callable Note Cont 12/13/2022 2.4% Due 1/13/2023	200,000.00	11/21/2019 1.83%	203,350.00 201,867.46	103.68 0.23%	207,367.80 1,040.00	0.70% 5,500.34	Aa1 / AA+ NR	1.79 1.67
747525AR4	Qualcomm Inc Callable Note Cont 12/30/2022 2.6% Due 1/30/2023	75,000.00	02/11/2020 1.75%	76,775.25 76,077.65	103.87 0.38%	77,901.53 330.42	0.26% 1,823.88	A2 / A- NR	1.84 1.71
037833AK6	Apple Inc Note 2.4% Due 5/3/2023	200,000.00	03/11/2019 2.79%	196,968.00 198,471.97	104.47 0.26%	208,931.40 1,973.33	0.71% 10,459.43	Aa1 / AA+ NR	2.09 2.03
404280BA6	HSBC Holdings PLC Note 3.6% Due 5/25/2023	200,000.00	05/15/2019 2.97%	204,780.00 202,551.07	106.41 0.59%	212,825.40 2,520.00	0.72% 10,274.33	A2 / A- A+	2.15 2.06
90331HNV1	US Bank NA Callable Note Cont 6/23/2023 3.4% Due 7/24/2023	250,000.00	05/17/2019 2.70%	256,695.00 253,643.26	106.72 0.37%	266,788.75 1,581.94	0.90% 13,145.49	A1 / AA- AA-	2.32 2.15
06406FAD5	Bank of NY Mellon Corp Callable Note Cont 6/16/2023 2.2% Due 8/16/2023	200,000.00	04/11/2019 2.90%	194,298.00 196,879.02	104.00 0.38%	207,992.80 550.00	0.70% 11,113.78	A1 / A AA-	2.38 2.16
594918BX1	Microsoft Callable Note Cont 12/6/2023 2.875% Due 2/6/2024	200,000.00	03/05/2020 1.06%	213,320.00 209,539.34	106.65 0.38%	213,299.00 878.47	0.72% 3,759.66	Aaa / AAA AA+	2.85 2.59
89114QCB2	Toronto Dominion Bank Note 3.25% Due 3/11/2024	200,000.00	07/16/2019 2.49%	206,600.00 204,178.45	107.56 0.65%	215,118.40 361.11	0.72% 10,939.95	Aa3 / A AA-	2.95 2.82
808513BN4	Charles Schwab Corp Callable Note Cont 2/18/2024 0.75% Due 3/18/2024	95,000.00	03/16/2021 0.77%	94,952.50 94,953.11	100.51 0.57%	95,485.83 25.73	0.32% 532.72	A2 / A A	2.97 2.85
78015K7C2	Royal Bank of Canada Note 2.25% Due 11/1/2024	225,000.00	09/22/2020 0.69%	239,145.75 237,362.20	104.89 0.86%	236,001.15 2,109.38	0.80% (1,361.05)	A2 / A AA	3.59 3.42
46647PAH9	JP Morgan Chase & Co Callable Note 2X 3/1/2024 3.22% Due 3/1/2025	210,000.00	08/19/2020 0.91%	226,818.90 223,906.93	106.67 0.90%	223,998.18 563.50	0.75% 91.25	A2 / A- AA-	3.92 2.80

Holdings Report

As of March 31, 2021

CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
Total Corporate		**4,210,000.00**	**2.33%**	**4,254,812.10** **4,250,086.17**	**0.43%**	**4,352,135.43** **24,482.69**	**14.68%** **102,049.26**	**A1 / A+** **A+**	**1.69** **1.54**
LAIF									
90LAIF$00	Local Agency Investment Fund State Pool	6,646,613.32	Various 0.35%	6,646,613.32 6,646,613.32	1.00 0.35%	6,646,613.32 6,721.11	22.32% 0.00	NR / NR NR	0.00 0.00
Total LAIF		**6,646,613.32**	**0.35%**	**6,646,613.32** **6,646,613.32**	**0.35%**	**6,646,613.32** **6,721.11**	**22.32%** **0.00**	**NR / NR** **NR**	**0.00** **0.00**
LOCAL GOV INVESTMENT POOL									
09CATR$05	CalTrust Medium Term Fund	651,508.07	Various 0.12%	6,553,736.61 6,553,736.61	10.26 0.12%	6,684,472.79 0.00	22.42% 130,736.18	NR / A+ NR	0.00 0.00
Total Local Gov Investment Pool		**651,508.07**	**0.12%**	**6,553,736.61** **6,553,736.61**	**0.12%**	**6,684,472.79** **0.00**	**22.42%** **130,736.18**	**NR / A+** **NR**	**0.00** **0.00**
MONEY MARKET FUND FI									
31846V203	First American Govt Obligation Fund Class Y	299,489.74	Various 0.01%	299,489.74 299,489.74	1.00 0.01%	299,489.74 0.00	1.00% 0.00	Aaa / AAA AAA	0.00 0.00
Total Money Market Fund FI		**299,489.74**	**0.01%**	**299,489.74** **299,489.74**	**0.01%**	**299,489.74** **0.00**	**1.00%** **0.00**	**Aaa / AAA** **AAA**	**0.00** **0.00**
NEGOTIABLE CD									
140420XR6	Capital One Bank USA NA Negotiable CD 1.7% Due 4/6/2021	248,000.00	03/30/2016 1.70%	248,000.00 248,000.00	100.03 0.12%	248,064.48 2,044.47	0.84% 64.48	NR / NR NR	0.02 0.02
55266CRD0	MB Financial Bank NA Negotiable CD 1.4% Due 4/15/2021	248,000.00	03/31/2016 1.40%	248,000.00 248,000.00	100.03 0.38%	248,069.44 161.71	0.83% 69.44	NR / NR NR	0.04 0.04
87164XMJ2	Synchrony Bank Negotiable CD 1.55% Due 6/29/2021	248,000.00	06/24/2016 1.55%	248,000.00 248,000.00	100.25 0.53%	248,622.48 979.43	0.84% 622.48	NR / NR NR	0.25 0.25
08173QBS4	Beneficial Bank Negotiable CD 1.55% Due 10/7/2021	248,000.00	09/20/2016 1.55%	248,000.00 248,000.00	100.73 0.15%	249,809.16 1,853.55	0.84% 1,809.16	NR / NR NR	0.52 0.52

Holdings Report

As of March 31, 2021

CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
NEGOTIABLE CD									
29976D2F6	Everbank Negotiable CD 2.05% Due 2/14/2022	248,000.00	02/09/2017 2.04%	248,000.00 248,000.00	101.75 0.05%	252,349.67 543.22	0.85% 4,349.67	NR / NR NR	0.88 0.87
Total Negotiable CD		**1,240,000.00**	**1.65%**	**1,240,000.00** **1,240,000.00**	**0.24%**	**1,246,915.23** **5,582.38**	**4.20%** **6,915.23**	**NR / NR** **NR**	**0.34** **0.34**
SUPRANATIONAL									
459058JM6	Intl. Bank Recon & Development Note 0.25% Due 11/24/2023	165,000.00	11/17/2020 0.32%	164,645.25 164,686.72	99.72 0.36%	164,541.30 145.52	0.55% (145.42)	Aaa / AAA AAA	2.65 2.63
459058GQ0	Intl. Bank Recon & Development Note 2.5% Due 3/19/2024	225,000.00	01/26/2021 0.26%	240,736.50 239,871.40	106.11 0.42%	238,758.08 187.50	0.80% (1,113.32)	Aaa / AAA AAA	2.97 2.87
Total Supranational		**390,000.00**	**0.29%**	**405,381.75** **404,558.12**	**0.40%**	**403,299.38** **333.02**	**1.35%** **(1,258.74)**	**Aaa / AAA** **AAA**	**2.84** **2.78**
US TREASURY									
912828Q78	US Treasury Note 1.375% Due 4/30/2021	30,000.00	01/30/2020 1.48%	29,960.16 29,997.46	100.11 0.10%	30,031.59 173.20	0.10% 34.13	Aaa / AA+ AAA	0.08 0.08
912828M80	US Treasury Note 2% Due 11/30/2022	300,000.00	Various 1.60%	303,459.37 301,931.80	103.08 0.15%	309,234.30 2,010.99	1.04% 7,302.50	Aaa / AA+ AAA	1.67 1.64
912828VB3	US Treasury Note 1.75% Due 5/15/2023	250,000.00	12/16/2019 1.69%	250,517.58 250,321.77	103.29 0.20%	258,213.00 1,655.73	0.87% 7,891.23	Aaa / AA+ AAA	2.12 2.08
912828T26	US Treasury Note 1.375% Due 9/30/2023	300,000.00	Various 1.94%	293,108.59 295,988.51	102.82 0.24%	308,472.60 11.27	1.03% 12,484.09	Aaa / AA+ AAA	2.50 2.46
912828V80	US Treasury Note 2.25% Due 1/31/2024	200,000.00	11/26/2019 1.59%	205,304.69 203,597.87	105.44 0.32%	210,882.80 745.86	0.71% 7,284.93	Aaa / AA+ AAA	2.84 2.75
912828WJ5	US Treasury Note 2.5% Due 5/15/2024	300,000.00	12/12/2019 1.74%	309,691.41 306,841.00	106.55 0.39%	319,664.10 2,838.40	1.08% 12,823.10	Aaa / AA+ AAA	3.13 3.00
912828Y87	US Treasury Note 1.75% Due 7/31/2024	300,000.00	01/31/2020 1.35%	305,203.13 303,854.05	104.29 0.45%	312,855.60 870.17	1.05% 9,001.55	Aaa / AA+ AAA	3.34 3.24

Holdings Report

As of March 31, 2021

CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
US TREASURY									
912828ZF0	US Treasury Note 0.5% Due 3/31/2025	350,000.00	03/25/2021 0.58%	348,906.26 348,908.50	99.32 0.67%	347,621.05 4.78	1.17% (1,287.45)	Aaa / AA+ AAA	4.00 3.95
912828ZT0	US Treasury Note 0.25% Due 5/31/2025	365,000.00	02/25/2021 0.60%	359,653.32 359,770.22	98.08 0.72%	357,985.07 305.84	1.20% (1,785.15)	Aaa / AA+ AAA	4.17 4.13
91282CAZ4	US Treasury Note 0.375% Due 11/30/2025	150,000.00	12/09/2020 0.41%	149,742.19 149,758.09	97.77 0.86%	146,654.25 188.53	0.49% (3,103.84)	Aaa / AA+ AAA	4.67 4.61
Total US Treasury		**2,545,000.00**	**1.28%**	**2,555,546.70** **2,550,969.27**	**0.43%**	**2,601,614.36** **8,804.77**	**8.76%** **50,645.09**	**Aaa / AA+** **AAA**	**3.09** **3.03**
TOTAL PORTFOLIO		**23,379,293.31**	**0.87%**	**29,437,452.08** **29,393,803.50**	**0.29%**	**29,752,492.82** **60,275.51**	**100.00%** **358,689.32**	**Aa1 / AA-** **AAA**	**1.14** **1.02**
TOTAL MARKET VALUE PLUS ACCRUED						**29,812,768.33**			

Transaction Ledger

As of March 31, 2021

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/Sold	Total Amount	Gain/Loss
ACQUISITIONS										
Purchase	03/01/2021	31846V203	3,392.89	First American Govt Obligation Fund Class Y	1.000	0.01%	3,392.89	0.00	3,392.89	0.00
Purchase	03/01/2021	31846V203	248,000.00	First American Govt Obligation Fund Class Y	1.000	0.01%	248,000.00	0.00	248,000.00	0.00
Purchase	03/01/2021	31846V203	1.13	First American Govt Obligation Fund Class Y	1.000	0.01%	1.13	0.00	1.13	0.00
Purchase	03/02/2021	31846V203	205,843.90	First American Govt Obligation Fund Class Y	1.000	0.01%	205,843.90	0.00	205,843.90	0.00
Purchase	03/08/2021	31846V203	3,662.08	First American Govt Obligation Fund Class Y	1.000	0.01%	3,662.08	0.00	3,662.08	0.00
Purchase	03/10/2021	31846V203	4,812.50	First American Govt Obligation Fund Class Y	1.000	0.01%	4,812.50	0.00	4,812.50	0.00
Purchase	03/10/2021	47788UAC6	60,000.00	John Deere Owner Trust 2021-A A3 0.36% Due 9/15/2025	99.981	0.37%	59,988.47	0.00	59,988.47	0.00
Purchase	03/11/2021	31846V203	3,250.00	First American Govt Obligation Fund Class Y	1.000	0.01%	3,250.00	0.00	3,250.00	0.00
Purchase	03/12/2021	31846V203	5,031.25	First American Govt Obligation Fund Class Y	1.000	0.01%	5,031.25	0.00	5,031.25	0.00
Purchase	03/15/2021	31846V203	2,166.35	First American Govt Obligation Fund Class Y	1.000	0.01%	2,166.35	0.00	2,166.35	0.00
Purchase	03/15/2021	31846V203	297.42	First American Govt Obligation Fund Class Y	1.000	0.01%	297.42	0.00	297.42	0.00
Purchase	03/15/2021	31846V203	193.00	First American Govt Obligation Fund Class Y	1.000	0.01%	193.00	0.00	193.00	0.00
Purchase	03/15/2021	31846V203	170.58	First American Govt Obligation Fund Class Y	1.000	0.01%	170.58	0.00	170.58	0.00
Purchase	03/15/2021	31846V203	20.42	First American Govt Obligation Fund Class Y	1.000	0.01%	20.42	0.00	20.42	0.00
Purchase	03/15/2021	31846V203	2,737.44	First American Govt Obligation Fund Class Y	1.000	0.01%	2,737.44	0.00	2,737.44	0.00
Purchase	03/15/2021	31846V203	25,314.63	First American Govt Obligation Fund Class Y	1.000	0.01%	25,314.63	0.00	25,314.63	0.00

Transaction Ledger

As of March 31, 2021

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/Sold	Total Amount	Gain/Loss
ACQUISITIONS										
Purchase	03/15/2021	31846V203	10,243.95	First American Govt Obligation Fund Class Y	1.000	0.01%	10,243.95	0.00	10,243.95	0.00
Purchase	03/15/2021	31846V203	6,645.83	First American Govt Obligation Fund Class Y	1.000	0.01%	6,645.83	0.00	6,645.83	0.00
Purchase	03/18/2021	31846V203	26.21	First American Govt Obligation Fund Class Y	1.000	0.01%	26.21	0.00	26.21	0.00
Purchase	03/18/2021	808513BN4	95,000.00	Charles Schwab Corp Callable Note Cont 2/18/2024 0.75% Due 3/18/2024	99.950	0.77%	94,952.50	0.00	94,952.50	0.00
Purchase	03/19/2021	31846V203	2,812.50	First American Govt Obligation Fund Class Y	1.000	0.01%	2,812.50	0.00	2,812.50	0.00
Purchase	03/22/2021	31846V203	16.20	First American Govt Obligation Fund Class Y	1.000	0.01%	16.20	0.00	16.20	0.00
Purchase	03/22/2021	31846V203	47.00	First American Govt Obligation Fund Class Y	1.000	0.01%	47.00	0.00	47.00	0.00
Purchase	03/22/2021	31846V203	129.33	First American Govt Obligation Fund Class Y	1.000	0.01%	129.33	0.00	129.33	0.00
Purchase	03/25/2021	31846V203	758.53	First American Govt Obligation Fund Class Y	1.000	0.01%	758.53	0.00	758.53	0.00
Purchase	03/25/2021	31846V203	595.17	First American Govt Obligation Fund Class Y	1.000	0.01%	595.17	0.00	595.17	0.00
Purchase	03/29/2021	912828ZF0	350,000.00	US Treasury Note 0.5% Due 3/31/2025	99.688	0.58%	348,906.26	865.38	349,771.64	0.00
Purchase	03/31/2021	09CATR$05	306.18	CalTrust Medium Term Fund	10.260	0.12%	3,141.38	0.00	3,141.38	0.00
Purchase	03/31/2021	31846V203	2,937.50	First American Govt Obligation Fund Class Y	1.000	0.01%	2,937.50	0.00	2,937.50	0.00
Subtotal			**1,034,411.99**				**1,036,094.42**	**865.38**	**1,036,959.80**	**0.00**
TOTAL ACQUISITIONS			**1,034,411.99**				**1,036,094.42**	**865.38**	**1,036,959.80**	**0.00**

Transaction Ledger

As of March 31, 2021

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/Sold	Total Amount	Gain/Loss
DISPOSITIONS										
Sale	03/10/2021	31846V203	59,988.47	First American Govt Obligation Fund Class Y	1.000	0.01%	59,988.47	0.00	59,988.47	0.00
Sale	03/18/2021	31846V203	94,952.50	First American Govt Obligation Fund Class Y	1.000	0.01%	94,952.50	0.00	94,952.50	0.00
Sale	03/29/2021	31846V203	349,771.64	First American Govt Obligation Fund Class Y	1.000	0.01%	349,771.64	0.00	349,771.64	0.00
Subtotal			**504,712.61**				**504,712.61**	**0.00**	**504,712.61**	**0.00**
Paydown	03/15/2021	43815NAC8	0.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	100.000		0.00	170.58	170.58	0.00
Paydown	03/15/2021	477870AB5	2,732.25	John Deere Owner Trust 2019-B A2 2.28% Due 5/16/2022	100.000		2,732.25	5.19	2,737.44	0.00
Paydown	03/15/2021	47789JAD8	24,480.66	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	100.000		24,480.66	833.97	25,314.63	0.00
Paydown	03/15/2021	65479JAD5	0.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	100.000		0.00	193.00	193.00	0.00
Paydown	03/15/2021	89231PAD0	9,931.34	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	100.000		9,931.34	312.61	10,243.95	0.00
Paydown	03/15/2021	89232HAC9	0.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	100.000		0.00	297.42	297.42	0.00
Paydown	03/15/2021	89236XAC0	0.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	100.000		0.00	20.42	20.42	0.00
Paydown	03/15/2021	89238KAD4	6,635.16	Toyota Auto Receivables Trust 2017-D A3 1.93% Due 1/18/2022	100.000		6,635.16	10.67	6,645.83	0.00
Paydown	03/18/2021	43813KAC6	0.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	100.000		0.00	26.21	26.21	0.00
Paydown	03/22/2021	43813GAC5	0.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	100.000		0.00	16.20	16.20	0.00

Transaction Ledger

As of March 31, 2021

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/Sold	Total Amount	Gain/Loss
DISPOSITIONS										
Paydown	03/22/2021	92290BAA9	0.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	100.000		0.00	47.00	47.00	0.00
Paydown	03/22/2021	92348AAA3	0.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	100.000		0.00	129.33	129.33	0.00
Paydown	03/25/2021	3137B4GY6	0.00	FHLMC K032 A2Due 5/25/2023	100.000		0.00	758.53	758.53	0.00
Paydown	03/25/2021	3137BM6P6	248.91	FHLMC K721 A2Due 8/25/2022	100.000		248.91	346.26	595.17	0.00
Subtotal			**44,028.32**				**44,028.32**	**3,167.39**	**47,195.71**	**0.00**
Redemption	03/02/2021	949746SK8	200,000.00	Wells Fargo Company Callable Note 1X 1/24/2023 3.069% Due 1/24/2023	102.598	3.00%	205,196.00	647.90	205,843.90	5,085.14
Subtotal			**200,000.00**				**205,196.00**	**647.90**	**205,843.90**	**5,085.14**
Maturity	03/01/2021	48714LAC3	248,000.00	Kearny Bank Negotiable CD 1.75% Due 3/1/2021	100.000		248,000.00	0.00	248,000.00	0.00
Subtotal			**248,000.00**				**248,000.00**	**0.00**	**248,000.00**	**0.00**
TOTAL DISPOSITIONS			**996,740.93**				**1,001,936.93**	**3,815.29**	**1,005,752.22**	**5,085.14**
OTHER TRANSACTIONS										
Interest	03/01/2021	46647PAH9	210,000.00	JP Morgan Chase & Co Callable Note 2X 3/1/2024 3.22% Due 3/1/2025	0.000		3,381.00	0.00	3,381.00	0.00
Interest	03/01/2021	48714LAC3	248,000.00	Kearny Bank Negotiable CD 1.75% Due 3/1/2021	0.000		11.89	0.00	11.89	0.00
Interest	03/08/2021	24422ETV1	305,000.00	John Deere Capital Corp Note 2.15% Due 9/8/2022	0.000		3,278.75	0.00	3,278.75	0.00
Interest	03/08/2021	3137EAEW5	300,000.00	FHLMC Note 0.25% Due 9/8/2023	0.000		383.33	0.00	383.33	0.00
Interest	03/10/2021	3130ADRG9	350,000.00	FHLB Note 2.75% Due 3/10/2023	0.000		4,812.50	0.00	4,812.50	0.00
Interest	03/11/2021	89114QCB2	200,000.00	Toronto Dominion Bank Note 3.25% Due 3/11/2024	0.000		3,250.00	0.00	3,250.00	0.00

Transaction Ledger

As of March 31, 2021

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/Sold	Total Amount	Gain/Loss
OTHER TRANSACTIONS										
Interest	03/12/2021	3135G0U43	350,000.00	FNMA Note 2.875% Due 9/12/2023	0.000		5,031.25	0.00	5,031.25	0.00
Interest	03/15/2021	55266CRD0	248,000.00	MB Financial Bank NA Negotiable CD 1.4% Due 4/15/2021	0.000		266.35	0.00	266.35	0.00
Interest	03/15/2021	68389XBK0	200,000.00	Oracle Corp Callable Note Cont 8/15/2021 1.9% Due 9/15/2021	0.000		1,900.00	0.00	1,900.00	0.00
Interest	03/19/2021	459058GQ0	225,000.00	Intl. Bank Recon & Development Note 2.5% Due 3/19/2024	0.000		2,812.50	0.00	2,812.50	0.00
Interest	03/31/2021	912828T26	300,000.00	US Treasury Note 1.375% Due 9/30/2023	0.000		2,062.50	0.00	2,062.50	0.00
Interest	03/31/2021	912828ZF0	350,000.00	US Treasury Note 0.5% Due 3/31/2025	0.000		875.00	0.00	875.00	0.00
Subtotal			**3,286,000.00**				**28,065.07**	**0.00**	**28,065.07**	**0.00**
Dividend	03/01/2021	31846V203	526,489.43	First American Govt Obligation Fund Class Y	0.000		1.13	0.00	1.13	0.00
Dividend	03/31/2021	09CATR$05	651,201.89	CalTrust Medium Term Fund	0.000		3,141.38	0.00	3,141.38	0.00
Subtotal			**1,177,691.32**				**3,142.51**	**0.00**	**3,142.51**	**0.00**
TOTAL OTHER TRANSACTIONS			**4,463,691.32**				**31,207.58**	**0.00**	**31,207.58**	**0.00**

Income Earned

As of March 31, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
FIXED INCOME						
02665WBF7	American Honda Finance Note 1.65% Due 07/12/2021	07/30/2019 07/31/2019 200,000.00	199,568.87 0.00 0.00 199,669.36	449.17 0.00 724.17 275.00	100.49 0.00 100.49 375.49	375.49
037833AK6	Apple Inc Note 2.4% Due 05/03/2023	03/11/2019 03/13/2019 200,000.00	198,409.80 0.00 0.00 198,471.97	1,573.33 0.00 1,973.33 400.00	62.17 0.00 62.17 462.17	462.17
037833DE7	Apple Inc Callable Note Cont 12/13/2022 2.4% Due 01/13/2023	11/21/2019 11/25/2019 200,000.00	201,960.68 0.00 0.00 201,867.46	640.00 0.00 1,040.00 400.00	0.00 93.22 (93.22) 306.78	306.78
06051GFW4	Bank of America Corp Note 2.625% Due 04/19/2021	04/25/2019 04/29/2019 200,000.00	199,983.01 0.00 0.00 199,993.76	1,925.00 0.00 2,362.50 437.50	10.75 0.00 10.75 448.25	448.25
06406FAD5	Bank of NY Mellon Corp Callable Note Cont 6/16/2023 2.2% Due 08/16/2023	04/11/2019 04/15/2019 200,000.00	196,767.43 0.00 0.00 196,879.02	183.33 0.00 550.00 366.67	111.59 0.00 111.59 478.26	478.26
24422ETV1	John Deere Capital Corp Note 2.15% Due 09/08/2022	04/17/2019 04/22/2019 305,000.00	302,231.80 0.00 0.00 302,386.14	3,151.24 3,278.75 418.95 546.46	154.34 0.00 154.34 700.80	700.80
3130A0F70	FHLB Note 3.375% Due 12/08/2023	10/30/2019 10/31/2019 350,000.00	365,380.17 0.00 0.00 364,909.04	2,723.44 0.00 3,707.81 984.37	0.00 471.13 (471.13) 513.24	513.24
3130A1XJ2	FHLB Note 2.875% Due 06/14/2024	03/24/2020 03/25/2020 155,000.00	164,354.83 0.00 0.00 164,113.37	953.14 0.00 1,324.50 371.36	0.00 241.46 (241.46) 129.90	129.90
3130ADRG9	FHLB Note 2.75% Due 03/10/2023	04/11/2019 04/12/2019 350,000.00	352,758.57 0.00 0.00 352,642.85	4,571.88 4,812.50 561.46 802.08	0.00 115.72 (115.72) 686.36	686.36

Income Earned

As of March 31, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
3130AHSR5	FHLB Note 1.625% Due 12/20/2021	12/19/2019 12/20/2019 320,000.00	319,861.00 0.00 0.00 319,875.66	1,025.56 0.00 1,458.89 433.33	14.66 0.00 14.66 447.99	447.99
3133ELWD2	FFCB Note 0.375% Due 04/08/2022	04/03/2020 04/08/2020 285,000.00	284,767.14 0.00 0.00 284,785.06	424.53 0.00 513.59 89.06	17.92 0.00 17.92 106.98	106.98
3133ELYR9	FFCB Note 0.25% Due 05/06/2022	04/30/2020 05/06/2020 325,000.00	324,756.31 0.00 0.00 324,773.84	259.55 0.00 327.26 67.71	17.53 0.00 17.53 85.24	85.24
3134GVJ66	FHLMC Note 0.25% Due 06/08/2022	06/04/2020 06/08/2020 350,000.00	349,866.52 0.00 0.00 349,875.44	201.74 0.00 274.65 72.91	8.92 0.00 8.92 81.83	81.83
3135G04Q3	FNMA Note 0.25% Due 05/22/2023	05/20/2020 05/22/2020 245,000.00	244,453.14 0.00 0.00 244,474.02	168.44 0.00 219.48 51.04	20.88 0.00 20.88 71.92	71.92
3135G05G4	FNMA Note 0.25% Due 07/10/2023	07/08/2020 07/10/2020 250,000.00	249,577.36 0.00 0.00 249,592.58	88.54 0.00 140.63 52.09	15.22 0.00 15.22 67.31	67.31
3135G06G3	FNMA Note 0.5% Due 11/07/2025	11/18/2020 11/19/2020 350,000.00	349,659.77 0.00 0.00 349,665.93	529.86 0.00 675.69 145.83	6.16 0.00 6.16 151.99	151.99
3135G0U43	FNMA Note 2.875% Due 09/12/2023	09/25/2019 09/26/2019 350,000.00	360,676.81 0.00 0.00 360,319.00	4,723.78 5,031.25 531.08 838.55	0.00 357.81 (357.81) 480.74	480.74
3137B4GY6	FHLMC K032 A2 3.31% Due 05/25/2023	07/23/2019 07/26/2019 275,000.00	281,339.31 0.00 0.00 281,098.19	151.71 758.53 151.71 758.53	0.00 241.12 (241.12) 517.41	517.41

Income Earned

As of March 31, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
3137BM6P6	FHLMC K721 A2 3.09% Due 08/25/2022	06/26/2019 06/28/2019 134,222.00	136,202.79 0.00 248.91 135,851.80	346.26 346.26 345.62 345.62	0.00 102.08 (102.08) 243.54	243.54
3137EADB2	FHLMC Note 2.375% Due 01/13/2022	10/30/2019 10/31/2019 350,000.00	352,024.14 0.00 0.00 351,826.82	1,108.33 0.00 1,801.04 692.71	0.00 197.32 (197.32) 495.39	495.39
3137EAER6	FHLMC Note 0.375% Due 05/05/2023	05/05/2020 05/07/2020 305,000.00	304,906.83 0.00 0.00 304,910.46	368.54 0.00 463.85 95.31	3.63 0.00 3.63 98.94	98.94
3137EAES4	FHLMC Note 0.25% Due 06/26/2023	06/24/2020 06/26/2020 300,000.00	299,322.40 0.00 0.00 299,347.20	135.42 0.00 197.92 62.50	24.80 0.00 24.80 87.30	87.30
3137EAET2	FHLMC Note 0.125% Due 07/25/2022	07/21/2020 07/23/2020 170,000.00	169,731.79 0.00 0.00 169,748.07	21.25 0.00 38.96 17.71	16.28 0.00 16.28 33.99	33.99
3137EAEV7	FHLMC Note 0.25% Due 08/24/2023	08/19/2020 08/21/2020 300,000.00	299,747.51 0.00 0.00 299,756.15	14.58 0.00 77.08 62.50	8.64 0.00 8.64 71.14	71.14
3137EAEW5	FHLMC Note 0.25% Due 09/08/2023	09/11/2020 09/14/2020 300,000.00	300,078.65 0.00 0.00 300,076.01	368.75 383.33 47.92 62.50	0.00 2.64 (2.64) 59.86	59.86
3137EAEY1	FHLMC Note 0.125% Due 10/16/2023	10/14/2020 10/16/2020 225,000.00	224,264.99 0.00 0.00 224,288.75	105.47 0.00 128.91 23.44	23.76 0.00 23.76 47.20	47.20
3137EAEZ8	FHLMC Note 0.25% Due 11/06/2023	11/03/2020 11/05/2020 335,000.00	334,730.41 0.00 0.00 334,738.94	269.86 0.00 339.65 69.79	8.53 0.00 8.53 78.32	78.32

Income Earned

As of March 31, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
404280BA6	HSBC Holdings PLC Note 3.6% Due 05/25/2023	05/15/2019 05/17/2019 200,000.00	202,651.94 0.00 0.00 202,551.07	1,920.00 0.00 2,520.00 600.00	0.00 100.87 (100.87) 499.13	499.13
43813GAC5	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 04/21/2025	02/17/2021 02/24/2021 80,000.00	79,998.55 0.00 0.00 79,998.59	4.20 16.20 6.00 18.00	0.04 0.00 0.04 18.04	18.04
43813KAC6	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	09/22/2020 09/29/2020 85,000.00	84,989.18 0.00 0.00 84,989.52	11.36 26.21 11.36 26.21	0.34 0.00 0.34 26.55	26.55
43815NAC8	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 08/15/2023	08/20/2019 08/27/2019 115,000.00	114,999.52 0.00 0.00 114,999.55	90.98 170.58 90.98 170.58	0.03 0.00 0.03 170.61	170.61
459058GQ0	Intl. Bank Recon & Development Note 2.5% Due 03/19/2024	01/26/2021 01/28/2021 225,000.00	240,297.09 0.00 0.00 239,871.40	2,531.25 2,812.50 187.50 468.75	0.00 425.69 (425.69) 43.06	43.06
459058JM6	Intl. Bank Recon & Development Note 0.25% Due 11/24/2023	11/17/2020 11/24/2020 165,000.00	164,676.68 0.00 0.00 164,686.72	111.15 0.00 145.52 34.37	10.04 0.00 10.04 44.41	44.41
459200JX0	IBM Corp Note 2.85% Due 05/13/2022	05/16/2019 05/20/2019 200,000.00	200,120.66 0.00 0.00 200,112.12	1,710.00 0.00 2,185.00 475.00	0.00 8.54 (8.54) 466.46	466.46
46647PAH9	JP Morgan Chase & Co Callable Note 2X 3/1/2024 3.22% Due 03/01/2025	08/19/2020 08/21/2020 210,000.00	224,311.73 0.00 0.00 223,906.93	3,381.00 3,381.00 563.50 563.50	0.00 404.80 (404.80) 158.70	158.70
477870AB5	John Deere Owner Trust 2019-B A2 Due 05/16/2022	10/30/2019 10/31/2019 0.00	2,734.07 0.00 2,732.25 0.00	2.77 5.19 0.00 2.42	0.00 1.82 (1.82) 0.60	0.60

Income Earned

As of March 31, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
47788UAC6	John Deere Owner Trust 2021-A A3 0.36% Due 09/15/2025	03/02/2021 03/10/2021 60,000.00	0.00 59,988.47 0.00 59,988.66	0.00 0.00 12.60 12.60	0.19 0.00 0.19 12.79	12.79
47789JAD8	John Deere Owner Trust 2019-A A3 2.91% Due 07/17/2023	Various Various 319,425.71	348,680.22 0.00 24,480.66 323,601.37	444.79 833.97 413.12 802.30	0.00 598.19 (598.19) 204.11	204.11
594918BX1	Microsoft Callable Note Cont 12/6/2023 2.875% Due 02/06/2024	03/05/2020 03/09/2020 200,000.00	209,841.40 0.00 0.00 209,539.34	399.31 0.00 878.47 479.16	0.00 302.06 (302.06) 177.10	177.10
65479JAD5	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 07/15/2024	10/16/2019 10/23/2019 120,000.00	119,995.48 0.00 0.00 119,995.59	102.93 193.00 102.93 193.00	0.11 0.00 0.11 193.11	193.11
68389XBK0	Oracle Corp Callable Note Cont 8/15/2021 1.9% Due 09/15/2021	04/11/2019 04/15/2019 200,000.00	199,208.00 0.00 0.00 199,332.00	1,752.22 1,900.00 168.89 316.67	124.00 0.00 124.00 440.67	440.67
69353RFB9	PNC Bank Callable Note Cont 1/18/2022 2.625% Due 02/17/2022	02/21/2019 02/25/2019 250,000.00	248,970.69 0.00 0.00 249,061.08	255.21 0.00 802.08 546.87	90.39 0.00 90.39 637.26	637.26
69371RP42	Paccar Financial Corp Note 3.15% Due 08/09/2021	04/24/2019 04/26/2019 200,000.00	200,349.35 0.00 0.00 200,282.08	385.00 0.00 910.00 525.00	0.00 67.27 (67.27) 457.73	457.73
747525AR4	Qualcomm Inc Callable Note Cont 12/30/2022 2.6% Due 01/30/2023	02/11/2020 02/13/2020 75,000.00	76,130.01 0.00 0.00 76,077.65	167.92 0.00 330.42 162.50	0.00 52.36 (52.36) 110.14	110.14
78015K7C2	Royal Bank of Canada Note 2.25% Due 11/01/2024	09/22/2020 09/24/2020 225,000.00	237,654.74 0.00 0.00 237,362.20	1,687.50 0.00 2,109.38 421.88	0.00 292.54 (292.54) 129.34	129.34

Income Earned

As of March 31, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
808513AW5	Charles Schwab Corp Callable Note Cont 4/21/2021 3.25% Due 05/21/2021	04/25/2019 04/29/2019 200,000.00	200,160.41 0.00 0.00 200,062.90	1,805.56 0.00 2,347.22 541.66	0.00 97.51 (97.51) 444.15	444.15
808513BN4	Charles Schwab Corp Callable Note Cont 2/18/2024 0.75% Due 03/18/2024	03/16/2021 03/18/2021 95,000.00	0.00 94,952.50 0.00 94,953.11	0.00 0.00 25.73 25.73	0.61 0.00 0.61 26.34	26.34
857477AV5	State Street Bank Note 1.95% Due 05/19/2021	04/30/2019 05/02/2019 200,000.00	199,712.73 0.00 0.00 199,825.45	1,105.00 0.00 1,430.00 325.00	112.72 0.00 112.72 437.72	437.72
89114QCB2	Toronto Dominion Bank Note 3.25% Due 03/11/2024	07/16/2019 07/18/2019 200,000.00	204,298.94 0.00 0.00 204,178.45	3,069.44 3,250.00 361.11 541.67	0.00 120.49 (120.49) 421.18	421.18
89231PAD0	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 03/15/2023	08/29/2019 08/30/2019 108,034.47	119,416.17 0.00 9,931.34 109,307.39	166.73 312.61 152.69 298.57	0.00 177.44 (177.44) 121.13	121.13
89232HAC9	Toyota Auto Receivable Own 2020-A A3 1.66% Due 05/15/2024	07/06/2020 07/08/2020 215,000.00	218,942.22 0.00 0.00 218,837.85	158.62 297.42 158.62 297.42	0.00 104.37 (104.37) 193.05	193.05
89236TEL5	Toyota Motor Credit Corp Note 2.7% Due 01/11/2023	04/25/2019 04/29/2019 200,000.00	199,927.52 0.00 0.00 199,930.82	750.00 0.00 1,200.00 450.00	3.30 0.00 3.30 453.30	453.30
89236XAC0	Toyota Auto Receivables 2020-D A3 0.35% Due 01/15/2025	10/06/2020 10/13/2020 70,000.00	69,988.13 0.00 0.00 69,988.39	10.89 20.42 10.89 20.42	0.26 0.00 0.26 20.68	20.68
89238KAD4	Toyota Auto Receivables Trust 2017-D A3 Due 01/18/2022	02/05/2019 02/07/2019 0.00	6,611.59 0.00 6,635.16 0.00	4.62 10.67 0.00 6.05	23.57 0.00 23.57 29.62	29.62

Income Earned

As of March 31, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
90331HNV1	US Bank NA Callable Note Cont 6/23/2023 3.4% Due 07/24/2023	05/17/2019 05/21/2019 250,000.00	253,782.18 0.00 0.00 253,643.26	873.61 0.00 1,581.94 708.33	0.00 138.92 (138.92) 569.41	569.41
912828M80	US Treasury Note 2% Due 11/30/2022	Various Various 300,000.00	302,030.30 0.00 0.00 301,931.80	1,500.00 0.00 2,010.99 510.99	0.00 98.50 (98.50) 412.49	412.49
912828Q78	US Treasury Note 1.375% Due 04/30/2021	01/30/2020 01/31/2020 30,000.00	29,994.75 0.00 0.00 29,997.46	137.88 0.00 173.20 35.32	2.71 0.00 2.71 38.03	38.03
912828T26	US Treasury Note 1.375% Due 09/30/2023	Various Various 300,000.00	295,852.15 0.00 0.00 295,988.51	1,722.53 2,062.50 11.27 351.24	136.36 0.00 136.36 487.60	487.60
912828V80	US Treasury Note 2.25% Due 01/31/2024	11/26/2019 11/27/2019 200,000.00	203,705.64 0.00 0.00 203,597.87	360.50 0.00 745.86 385.36	0.00 107.77 (107.77) 277.59	277.59
912828VB3	US Treasury Note 1.75% Due 05/15/2023	12/16/2019 12/17/2019 250,000.00	250,334.66 0.00 0.00 250,321.77	1,281.08 0.00 1,655.73 374.65	0.00 12.89 (12.89) 361.76	361.76
912828WJ5	US Treasury Note 2.5% Due 05/15/2024	12/12/2019 12/13/2019 300,000.00	307,027.02 0.00 0.00 306,841.00	2,196.13 0.00 2,838.40 642.27	0.00 186.02 (186.02) 456.25	456.25
912828Y87	US Treasury Note 1.75% Due 07/31/2024	01/31/2020 01/31/2020 300,000.00	303,952.23 0.00 0.00 303,854.05	420.58 0.00 870.17 449.59	0.00 98.18 (98.18) 351.41	351.41
912828ZF0	US Treasury Note 0.5% Due 03/31/2025	03/25/2021 03/29/2021 350,000.00	0.00 348,906.26 0.00 348,908.50	0.00 9.62 4.78 14.40	2.24 0.00 2.24 16.64	16.64

Income Earned

As of March 31, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
912828ZT0	US Treasury Note 0.25% Due 05/31/2025	02/25/2021 02/26/2021 365,000.00	359,663.64 0.00 0.00 359,770.22	228.13 0.00 305.84 77.71	106.58 0.00 106.58 184.29	184.29
91282CAZ4	US Treasury Note 0.375% Due 11/30/2025	12/09/2020 12/10/2020 150,000.00	149,753.69 0.00 0.00 149,758.09	140.63 0.00 188.53 47.90	4.40 0.00 4.40 52.30	52.30
92290BAA9	Verizon Owner Trust 2020-B A 0.47% Due 02/20/2025	08/04/2020 08/12/2020 120,000.00	119,977.86 0.00 0.00 119,978.34	17.23 47.00 17.23 47.00	0.48 0.00 0.48 47.48	47.48
92348AAA3	Verizon Owner Trust 2019-C A1A 1.94% Due 04/22/2024	10/01/2019 10/08/2019 80,000.00	79,995.73 0.00 0.00 79,995.84	47.42 129.33 47.42 129.33	0.11 0.00 0.11 129.44	129.44
949746SK8	Wells Fargo Company Callable Note 1X 1/24/2023 Due 01/24/2023	04/29/2019 04/30/2019 0.00	200,111.20 0.00 200,110.86 0.00	630.85 647.90 0.00 17.05	0.00 0.34 (0.34) 16.71	16.71
Total Fixed Income		**14,541,682.18**	**14,398,230.10** **503,847.23** **244,139.18** **14,653,963.83**	**58,067.72** **30,736.74** **47,972.02** **20,641.04**	**1,244.75** **5,219.07** **(3,974.32)** **16,666.72**	**16,666.72**
CASH & EQUIVALENT						
08173QBS4	Beneficial Bank Negotiable CD 1.55% Due 10/07/2021	09/20/2016 09/20/2016 248,000.00	248,000.00 0.00 0.00 248,000.00	1,527.07 0.00 1,853.55 326.48	0.00 0.00 0.00 326.48	326.48
140420XR6	Capital One Bank USA NA Negotiable CD 1.7% Due 04/06/2021	03/30/2016 03/30/2016 248,000.00	248,000.00 0.00 0.00 248,000.00	1,686.40 0.00 2,044.47 358.07	0.00 0.00 0.00 358.07	358.07

Income Earned

As of March 31, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
29976D2F6	Everbank Negotiable CD 2.05% Due 02/14/2022	02/09/2017 02/09/2017 248,000.00	248,000.00 0.00 0.00 248,000.00	111.43 0.00 543.22 431.79	0.00 0.00 0.00 431.79	431.79
31846V203	First American Govt Obligation Fund Class Y	Various Various 299,489.74	275,096.54 529,105.81 504,712.61 299,489.74	0.00 1.13 0.00 1.13	0.00 0.00 0.00 1.13	1.13
48714LAC3	Kearny Bank Negotiable CD Due 03/01/2021	02/09/2017 02/09/2017 0.00	248,000.00 0.00 248,000.00 0.00	11.89 11.89 0.00 0.00	0.00 0.00 0.00 0.00	0.00
55266CRD0	MB Financial Bank NA Negotiable CD 1.4% Due 04/15/2021	03/31/2016 03/31/2016 248,000.00	248,000.00 0.00 0.00 248,000.00	133.17 266.35 161.71 294.89	0.00 0.00 0.00 294.89	294.89
87164XMJ2	Synchrony Bank Negotiable CD 1.55% Due 06/29/2021	06/24/2016 06/24/2016 248,000.00	248,000.00 0.00 0.00 248,000.00	652.95 0.00 979.43 326.48	0.00 0.00 0.00 326.48	326.48
			1,763,096.54 **529,105.81** **752,712.61**	**4,122.91** **279.37** **5,582.38**	**0.00** **0.00** **0.00**	
Total Cash & Equivalent		**1,539,489.74**	**1,539,489.74**	**1,738.84**	**1,738.84**	**1,738.84**
LOCAL AGENCY INVESTMENT FUND						
90LAIF$00	Local Agency Investment Fund State Pool	Various Various 6,646,613.32	6,646,613.32 0.00 0.00 6,646,613.32	4,696.23 0.00 6,721.11 2,024.88	0.00 0.00 0.00 2,024.88	2,024.88
			6,646,613.32 **0.00** **0.00**	**4,696.23** **0.00** **6,721.11**	**0.00** **0.00** **0.00**	
Total Local Agency Investment Fund		**6,646,613.32**	**6,646,613.32**	**2,024.88**	**2,024.88**	**2,024.88**

Income Earned

As of March 31, 2021

CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
INVESTMENT POOL						
09CATR$05	CalTrust Medium Term Fund	Various Various 651,508.07	6,550,595.23 3,141.38 0.00 6,553,736.61	0.00 3,141.38 0.00 3,141.38	0.00 0.00 0.00 3,141.38	3,141.38
Total Investment Pool		**651,508.07**	**6,550,595.23** **3,141.38** **0.00** **6,553,736.61**	**0.00** **3,141.38** **0.00** **3,141.38**	**0.00** **0.00** **0.00** **3,141.38**	**3,141.38**
TOTAL PORTFOLIO		**23,379,293.31**	**29,358,535.19** **1,036,094.42** **996,851.79** **29,393,803.50**	**66,886.86** **34,157.49** **60,275.51** **27,546.14**	**1,244.75** **5,219.07** **(3,974.32)** **23,571.82**	**23,571.82**

Cash Flow Report

As of March 31, 2021

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
04/06/2021	Maturity	140420XR6	248,000.00	Capital One Bank USA NA Negotiable CD	248,000.00	2,102.22	250,102.22
04/07/2021	Interest	08173QBS4	248,000.00	Beneficial Bank Negotiable CD 1.55% Due 10/7/2021	0.00	1,916.73	1,916.73
04/08/2021	Interest	3133ELWD2	285,000.00	FFCB Note 0.375% Due 4/8/2022	0.00	534.38	534.38
04/15/2021	Dividend	90LAIF$00	598,037,831.40	Local Agency Investment Fund State Pool	0.00	6,720.87	6,720.87
04/15/2021	Maturity	55266CRD0	248,000.00	MB Financial Bank NA Negotiable CD 1.4% Due 4/15/2021	248,000.00	294.88	248,294.88
04/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	8,631.94	170.58	8,802.52
04/15/2021	Paydown	47788UAC6	60,000.00	John Deere Owner Trust 2021-A A3 0.36% Due 9/15/2025	0.00	21.00	21.00
04/15/2021	Paydown	47789JAD8	319,425.71	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,436.52	774.61	19,211.13
04/15/2021	Paydown	89231PAD0	108,034.47	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,410.32	286.29	4,696.61
04/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	0.00	297.42	297.42
04/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,870.40	193.00	3,063.40
04/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,626.77	20.42	1,647.19
04/16/2021	Interest	3137EAEY1	225,000.00	FHLMC Note 0.125% Due 10/16/2023	0.00	140.63	140.63
04/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
04/19/2021	Maturity	06051GFW4	200,000.00	Bank of America Corp Note 2.625% Due 4/19/2021	200,000.00	2,625.00	202,625.00
04/19/2021	Paydown	3137BM6P6	0.00	FHLMC K721 A2 3.09% Due 8/25/2022	248.91	346.26	595.17
04/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	2,018.91	129.33	2,148.24

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04/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,530.26	47.00	2,577.26
04/21/2021	Call	808513AW5	200,000.00	Charles Schwab Corp Callable Note Cont 4/21/2021 3.25% Due 5/21/2021	200,000.00	2,708.33	202,708.33
04/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
04/25/2021	Interest	3137BM6P6	134,222.00	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	345.62	345.62
04/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
04/30/2021	Maturity	912828Q78	30,000.00	US Treasury Note 1.375% Due 4/30/2021	30,000.00	206.25	30,206.25
APR 2021					**966,774.03**	**20,683.57**	**987,457.60**
05/01/2021	Interest	78015K7C2	225,000.00	Royal Bank of Canada Note 2.25% Due 11/1/2024	0.00	2,531.25	2,531.25
05/03/2021	Interest	037833AK6	200,000.00	Apple Inc Note 2.4% Due 5/3/2023	0.00	2,400.00	2,400.00
05/05/2021	Interest	3137EAER6	305,000.00	FHLMC Note 0.375% Due 5/5/2023	0.00	571.88	571.88
05/06/2021	Interest	3137EAEZ8	335,000.00	FHLMC Note 0.25% Due 11/6/2023	0.00	421.08	421.08
05/06/2021	Interest	3133ELYR9	325,000.00	FFCB Note 0.25% Due 5/6/2022	0.00	406.25	406.25
05/07/2021	Interest	3135G06G3	350,000.00	FNMA Note 0.5% Due 11/7/2025	0.00	850.69	850.69
05/13/2021	Interest	459200JX0	200,000.00	IBM Corp Note 2.85% Due 5/13/2022	0.00	2,850.00	2,850.00
05/15/2021	Interest	912828WJ5	300,000.00	US Treasury Note 2.5% Due 5/15/2024	0.00	3,750.00	3,750.00
05/15/2021	Interest	912828VB3	250,000.00	US Treasury Note 1.75% Due 5/15/2023	0.00	2,187.50	2,187.50
05/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,876.86	188.38	3,065.24

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
05/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	0.00	297.42	297.42
05/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,622.82	19.94	1,642.76
05/15/2021	Paydown	89231PAD0	108,034.47	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,418.14	274.60	4,692.74
05/15/2021	Paydown	47789JAD8	319,425.71	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,480.15	729.90	19,210.05
05/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	8,371.44	157.78	8,529.22
05/15/2021	Paydown	47788UAC6	60,000.00	John Deere Owner Trust 2021-A A3 0.36% Due 9/15/2025	0.00	18.00	18.00
05/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
05/19/2021	Maturity	857477AV5	200,000.00	State Street Bank Note 1.95% Due 5/19/2021	200,000.00	1,950.00	201,950.00
05/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	2,023.45	126.07	2,149.52
05/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,531.25	46.01	2,577.26
05/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
05/22/2021	Interest	3135G04Q3	245,000.00	FNMA Note 0.25% Due 5/22/2023	0.00	306.25	306.25
05/24/2021	Interest	459058JM6	165,000.00	Intl. Bank Recon & Development Note 0.25% Due 11/24/2023	0.00	206.25	206.25
05/25/2021	Interest	3137BM6P6	134,222.00	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	345.62	345.62
05/25/2021	Interest	404280BA6	200,000.00	HSBC Holdings PLC Note 3.6% Due 5/25/2023	0.00	3,600.00	3,600.00
05/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
05/31/2021	Interest	91282CAZ4	150,000.00	US Treasury Note 0.375% Due 11/30/2025	0.00	281.25	281.25

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
05/31/2021	Interest	912828M80	300,000.00	US Treasury Note 2% Due 11/30/2022	0.00	3,000.00	3,000.00
05/31/2021	Interest	912828ZT0	365,000.00	US Treasury Note 0.25% Due 5/31/2025	0.00	456.25	456.25
MAY 2021					**240,324.11**	**28,775.12**	**269,099.23**
06/08/2021	Interest	3130A0F70	350,000.00	FHLB Note 3.375% Due 12/8/2023	0.00	5,906.25	5,906.25
06/08/2021	Interest	3134GVJ66	350,000.00	FHLMC Note 0.25% Due 6/8/2022	0.00	437.50	437.50
06/14/2021	Interest	3130A1XJ2	155,000.00	FHLB Note 2.875% Due 6/14/2024	0.00	2,228.13	2,228.13
06/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	8,110.32	145.36	8,255.68
06/15/2021	Paydown	89231PAD0	108,034.47	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,425.97	262.90	4,688.87
06/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	0.00	297.42	297.42
06/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,618.82	19.47	1,638.29
06/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,883.32	183.76	3,067.08
06/15/2021	Paydown	47788UAC6	60,000.00	John Deere Owner Trust 2021-A A3 0.36% Due 9/15/2025	0.00	18.00	18.00
06/15/2021	Paydown	47789JAD8	319,425.71	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,523.89	685.08	19,208.97
06/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
06/20/2021	Interest	3130AHSR5	320,000.00	FHLB Note 1.625% Due 12/20/2021	0.00	2,600.00	2,600.00
06/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	2,028.01	122.80	2,150.81
06/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,532.24	45.02	2,577.26

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
06/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
06/25/2021	Interest	3137BM6P6	134,222.00	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	345.62	345.62
06/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
06/26/2021	Interest	3137EAES4	300,000.00	FHLMC Note 0.25% Due 6/26/2023	0.00	375.00	375.00
06/29/2021	Maturity	87164XMJ2	248,000.00	Synchrony Bank Negotiable CD 1.55% Due 6/29/2021	248,000.00	1,916.73	249,916.73
JUN 2021					**288,122.57**	**16,391.79**	**304,514.36**
07/10/2021	Interest	3135G05G4	250,000.00	FNMA Note 0.25% Due 7/10/2023	0.00	312.50	312.50
07/11/2021	Interest	89236TEL5	200,000.00	Toyota Motor Credit Corp Note 2.7% Due 1/11/2023	0.00	2,700.00	2,700.00
07/12/2021	Maturity	02665WBF7	200,000.00	American Honda Finance Note 1.65% Due 7/12/2021	200,000.00	1,650.00	201,650.00
07/13/2021	Interest	037833DE7	200,000.00	Apple Inc Callable Note Cont 12/13/2022 2.4% Due 1/13/2023	0.00	2,400.00	2,400.00
07/13/2021	Interest	3137EADB2	350,000.00	FHLMC Note 2.375% Due 1/13/2022	0.00	4,156.25	4,156.25
07/15/2021	Paydown	47789JAD8	319,425.71	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,567.73	640.17	19,207.90
07/15/2021	Paydown	47788UAC6	60,000.00	John Deere Owner Trust 2021-A A3 0.36% Due 9/15/2025	0.00	18.00	18.00
07/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,889.81	179.12	3,068.93
07/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	7,848.56	133.33	7,981.89
07/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	0.00	297.42	297.42
07/15/2021	Paydown	89231PAD0	108,034.47	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,433.82	251.17	4,684.99

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
07/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,614.77	19.00	1,633.77
07/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
07/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	2,032.57	119.52	2,152.09
07/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,533.23	44.03	2,577.26
07/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
07/24/2021	Interest	90331HNV1	250,000.00	US Bank NA Callable Note Cont 6/23/2023 3.4% Due 7/24/2023	0.00	4,250.00	4,250.00
07/25/2021	Interest	3137EAET2	170,000.00	FHLMC Note 0.125% Due 7/25/2022	0.00	106.25	106.25
07/25/2021	Interest	3137BM6P6	134,222.00	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	345.62	345.62
07/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
07/30/2021	Interest	747525AR4	75,000.00	Qualcomm Inc Callable Note Cont 12/30/2022 2.6% Due 1/30/2023	0.00	975.00	975.00
07/31/2021	Interest	912828Y87	300,000.00	US Treasury Note 1.75% Due 7/31/2024	0.00	2,625.00	2,625.00
07/31/2021	Interest	912828V80	200,000.00	US Treasury Note 2.25% Due 1/31/2024	0.00	2,250.00	2,250.00
JUL 2021					**239,920.49**	**24,275.13**	**264,195.62**
08/06/2021	Interest	594918BX1	200,000.00	Microsoft Callable Note Cont 12/6/2023 2.875% Due 2/6/2024	0.00	2,875.00	2,875.00
08/09/2021	Maturity	69371RP42	200,000.00	Paccar Financial Corp Note 3.15% Due 8/9/2021	200,000.00	3,150.00	203,150.00
08/15/2021	Paydown	89231PAD0	108,034.47	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,441.68	239.42	4,681.10
08/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	0.00	297.42	297.42

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
08/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,610.67	18.53	1,629.20
08/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	7,586.17	121.69	7,707.86
08/15/2021	Paydown	47788UAC6	60,000.00	John Deere Owner Trust 2021-A A3 0.36% Due 9/15/2025	0.00	18.00	18.00
08/15/2021	Paydown	47789JAD8	319,425.71	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,611.67	595.14	19,206.81
08/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,896.32	174.47	3,070.79
08/16/2021	Interest	06406FAD5	200,000.00	Bank of NY Mellon Corp Callable Note Cont 6/16/2023 2.2% Due 8/16/2023	0.00	2,200.00	2,200.00
08/17/2021	Interest	69353RFB9	250,000.00	PNC Bank Callable Note Cont 1/18/2022 2.625% Due 2/17/2022	0.00	3,281.25	3,281.25
08/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
08/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	2,037.15	116.23	2,153.38
08/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,534.23	43.03	2,577.26
08/21/2021	Interest	29976D2F6	248,000.00	Everbank Negotiable CD 2.05% Due 2/14/2022	0.00	2,521.11	2,521.11
08/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
08/24/2021	Interest	3137EAEV7	300,000.00	FHLMC Note 0.25% Due 8/24/2023	0.00	375.00	375.00
08/25/2021	Interest	3137BM6P6	134,222.00	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	345.62	345.62
08/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
AUG 2021					**239,717.89**	**17,174.66**	**256,892.55**
09/01/2021	Interest	46647PAH9	210,000.00	JP Morgan Chase & Co Callable Note 2X 3/1/2024 3.22% Due 3/1/2025	0.00	3,381.00	3,381.00

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
09/08/2021	Interest	3137EAEW5	300,000.00	FHLMC Note 0.25% Due 9/8/2023	0.00	375.00	375.00
09/08/2021	Interest	24422ETV1	305,000.00	John Deere Capital Corp Note 2.15% Due 9/8/2022	0.00	3,278.75	3,278.75
09/10/2021	Interest	3130ADRG9	350,000.00	FHLB Note 2.75% Due 3/10/2023	0.00	4,812.50	4,812.50
09/11/2021	Interest	89114QCB2	200,000.00	Toronto Dominion Bank Note 3.25% Due 3/11/2024	0.00	3,250.00	3,250.00
09/12/2021	Interest	3135G0U43	350,000.00	FNMA Note 2.875% Due 9/12/2023	0.00	5,031.25	5,031.25
09/15/2021	Maturity	68389XBK0	200,000.00	Oracle Corp Callable Note Cont 8/15/2021 1.9% Due 9/15/2021	200,000.00	1,900.00	201,900.00
09/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	0.00	297.42	297.42
09/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,902.84	169.81	3,072.65
09/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	7,323.14	110.44	7,433.58
09/15/2021	Paydown	47788UAC6	60,000.00	John Deere Owner Trust 2021-A A3 0.36% Due 9/15/2025	0.00	18.00	18.00
09/15/2021	Paydown	89231PAD0	108,034.47	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,449.56	227.65	4,677.21
09/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,606.53	18.06	1,624.59
09/15/2021	Paydown	47789JAD8	319,425.71	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,655.71	550.01	19,205.72
09/18/2021	Interest	808513BN4	95,000.00	Charles Schwab Corp Callable Note Cont 2/18/2024 0.75% Due 3/18/2024	0.00	356.25	356.25
09/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
09/19/2021	Interest	459058GQ0	225,000.00	Intl. Bank Recon & Development Note 2.5% Due 3/19/2024	0.00	2,812.50	2,812.50
09/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	2,041.73	112.94	2,154.67

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
09/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,535.22	42.04	2,577.26
09/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
09/25/2021	Interest	3137BM6P6	134,222.00	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	345.62	345.62
09/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
09/30/2021	Interest	912828ZF0	350,000.00	US Treasury Note 0.5% Due 3/31/2025	0.00	875.00	875.00
09/30/2021	Interest	912828T26	300,000.00	US Treasury Note 1.375% Due 9/30/2023	0.00	2,062.50	2,062.50
SEP 2021					**239,514.73**	**30,829.49**	**270,344.22**
10/07/2021	Maturity	08173QBS4	248,000.00	Beneficial Bank Negotiable CD 1.55% Due 10/7/2021	248,000.00	1,927.27	249,927.27
10/08/2021	Interest	3133ELWD2	285,000.00	FFCB Note 0.375% Due 4/8/2022	0.00	534.38	534.38
10/15/2021	Paydown	47788UAC6	60,000.00	John Deere Owner Trust 2021-A A3 0.36% Due 9/15/2025	0.00	18.00	18.00
10/15/2021	Paydown	47789JAD8	319,425.71	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,699.86	504.77	19,204.63
10/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	7,059.48	99.57	7,159.05
10/15/2021	Paydown	89231PAD0	108,034.47	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,457.44	215.86	4,673.30
10/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	10,100.64	297.42	10,398.06
10/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,602.35	17.59	1,619.94
10/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,909.37	165.14	3,074.51
10/16/2021	Interest	3137EAEY1	225,000.00	FHLMC Note 0.125% Due 10/16/2023	0.00	140.63	140.63

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As of March 31, 2021

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
10/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
10/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,536.21	41.05	2,577.26
10/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	2,046.32	109.64	2,155.96
10/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
10/25/2021	Interest	3137BM6P6	134,222.00	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	345.62	345.62
10/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
OCT 2021					**297,411.67**	**5,219.69**	**302,631.36**
11/01/2021	Interest	78015K7C2	225,000.00	Royal Bank of Canada Note 2.25% Due 11/1/2024	0.00	2,531.25	2,531.25
11/03/2021	Interest	037833AK6	200,000.00	Apple Inc Note 2.4% Due 5/3/2023	0.00	2,400.00	2,400.00
11/05/2021	Interest	3137EAER6	305,000.00	FHLMC Note 0.375% Due 5/5/2023	0.00	571.88	571.88
11/06/2021	Interest	3137EAEZ8	335,000.00	FHLMC Note 0.25% Due 11/6/2023	0.00	418.75	418.75
11/06/2021	Interest	3133ELYR9	325,000.00	FFCB Note 0.25% Due 5/6/2022	0.00	406.25	406.25
11/07/2021	Interest	3135G06G3	350,000.00	FNMA Note 0.5% Due 11/7/2025	0.00	875.00	875.00
11/13/2021	Interest	459200JX0	200,000.00	IBM Corp Note 2.85% Due 5/13/2022	0.00	2,850.00	2,850.00
11/15/2021	Interest	912828WJ5	300,000.00	US Treasury Note 2.5% Due 5/15/2024	0.00	3,750.00	3,750.00
11/15/2021	Interest	912828VB3	250,000.00	US Treasury Note 1.75% Due 5/15/2023	0.00	2,187.50	2,187.50
11/15/2021	Paydown	47789JAD8	319,425.71	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,744.13	459.42	19,203.55

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
11/15/2021	Paydown	47788UAC6	60,000.00	John Deere Owner Trust 2021-A A3 0.36% Due 9/15/2025	0.00	18.00	18.00
11/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,915.91	160.47	3,076.38
11/15/2021	Paydown	89231PAD0	108,034.47	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,465.36	204.04	4,669.40
11/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,598.12	17.12	1,615.24
11/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	6,795.18	89.10	6,884.28
11/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	9,891.57	283.44	10,175.01
11/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
11/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	2,050.93	106.33	2,157.26
11/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,537.21	40.05	2,577.26
11/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
11/22/2021	Interest	3135G04Q3	245,000.00	FNMA Note 0.25% Due 5/22/2023	0.00	306.25	306.25
11/24/2021	Interest	459058JM6	165,000.00	Intl. Bank Recon & Development Note 0.25% Due 11/24/2023	0.00	206.25	206.25
11/25/2021	Interest	404280BA6	200,000.00	HSBC Holdings PLC Note 3.6% Due 5/25/2023	0.00	3,600.00	3,600.00
11/25/2021	Interest	3137BM6P6	134,222.00	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	345.62	345.62
11/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
11/30/2021	Interest	912828M80	300,000.00	US Treasury Note 2% Due 11/30/2022	0.00	3,000.00	3,000.00
11/30/2021	Interest	912828ZT0	365,000.00	US Treasury Note 0.25% Due 5/31/2025	0.00	456.25	456.25

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
11/30/2021	Interest	91282CAZ4	150,000.00	US Treasury Note 0.375% Due 11/30/2025	0.00	281.25	281.25
NOV 2021					**48,998.41**	**26,366.97**	**75,365.38**
12/08/2021	Interest	3134GVJ66	350,000.00	FHLMC Note 0.25% Due 6/8/2022	0.00	437.50	437.50
12/08/2021	Interest	3130A0F70	350,000.00	FHLB Note 3.375% Due 12/8/2023	0.00	5,906.25	5,906.25
12/14/2021	Interest	3130A1XJ2	155,000.00	FHLB Note 2.875% Due 6/14/2024	0.00	2,228.13	2,228.13
12/15/2021	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,922.47	155.78	3,078.25
12/15/2021	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	6,530.24	79.02	6,609.26
12/15/2021	Paydown	47788UAC6	60,000.00	John Deere Owner Trust 2021-A A3 0.36% Due 9/15/2025	0.00	18.00	18.00
12/15/2021	Paydown	47789JAD8	319,425.71	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,788.49	413.96	19,202.45
12/15/2021	Paydown	89231PAD0	108,034.47	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,473.27	192.21	4,665.48
12/15/2021	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,593.85	16.65	1,610.50
12/15/2021	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	9,681.60	269.76	9,951.36
12/18/2021	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
12/20/2021	Maturity	3130AHSR5	320,000.00	FHLB Note 1.625% Due 12/20/2021	320,000.00	2,600.00	322,600.00
12/20/2021	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,538.20	39.06	2,577.26
12/20/2021	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	2,055.53	103.02	2,158.55
12/21/2021	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
12/25/2021	Interest	3137BM6P6	134,222.00	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	345.62	345.62
12/25/2021	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
12/26/2021	Interest	3137EAES4	300,000.00	FHLMC Note 0.25% Due 6/26/2023	0.00	375.00	375.00
DEC 2021					**368,583.65**	**13,982.71**	**382,566.36**
01/10/2022	Interest	3135G05G4	250,000.00	FNMA Note 0.25% Due 7/10/2023	0.00	312.50	312.50
01/11/2022	Interest	89236TEL5	200,000.00	Toyota Motor Credit Corp Note 2.7% Due 1/11/2023	0.00	2,700.00	2,700.00
01/13/2022	Interest	037833DE7	200,000.00	Apple Inc Callable Note Cont 12/13/2022 2.4% Due 1/13/2023	0.00	2,400.00	2,400.00
01/13/2022	Maturity	3137EADB2	350,000.00	FHLMC Note 2.375% Due 1/13/2022	350,000.00	4,156.25	354,156.25
01/15/2022	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	9,470.75	256.37	9,727.12
01/15/2022	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	6,264.65	69.34	6,333.99
01/15/2022	Paydown	47789JAD8	319,425.71	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,832.96	368.40	19,201.36
01/15/2022	Paydown	89231PAD0	108,034.47	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,481.20	180.36	4,661.56
01/15/2022	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,589.52	16.19	1,605.71
01/15/2022	Paydown	47788UAC6	60,000.00	John Deere Owner Trust 2021-A A3 0.36% Due 9/15/2025	0.00	18.00	18.00
01/15/2022	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,929.04	151.08	3,080.12
01/18/2022	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
01/20/2022	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	2,060.17	99.69	2,159.86

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
01/20/2022	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,539.19	38.07	2,577.26
01/21/2022	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
01/24/2022	Interest	90331HNV1	250,000.00	US Bank NA Callable Note Cont 6/23/2023 3.4% Due 7/24/2023	0.00	4,250.00	4,250.00
01/25/2022	Interest	3137BM6P6	134,222.00	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	345.62	345.62
01/25/2022	Interest	3137EAET2	170,000.00	FHLMC Note 0.125% Due 7/25/2022	0.00	106.25	106.25
01/25/2022	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
01/30/2022	Interest	747525AR4	75,000.00	Qualcomm Inc Callable Note Cont 12/30/2022 2.6% Due 1/30/2023	0.00	975.00	975.00
01/31/2022	Interest	912828Y87	300,000.00	US Treasury Note 1.75% Due 7/31/2024	0.00	2,625.00	2,625.00
01/31/2022	Interest	912828V80	200,000.00	US Treasury Note 2.25% Due 1/31/2024	0.00	2,250.00	2,250.00
JAN 2022					**398,167.48**	**22,120.87**	**420,288.35**
02/06/2022	Interest	594918BX1	200,000.00	Microsoft Callable Note Cont 12/6/2023 2.875% Due 2/6/2024	0.00	2,875.00	2,875.00
02/14/2022	Maturity	29976D2F6	248,000.00	Everbank Negotiable CD 2.05% Due 2/14/2022	248,000.00	2,465.39	250,465.39
02/15/2022	Paydown	47788UAC6	60,000.00	John Deere Owner Trust 2021-A A3 0.36% Due 9/15/2025	0.00	18.00	18.00
02/15/2022	Paydown	47789JAD8	319,425.71	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,877.53	322.73	19,200.26
02/15/2022	Paydown	89231PAD0	108,034.47	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,489.15	168.48	4,657.63
02/15/2022	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	9,259.00	243.27	9,502.27
02/15/2022	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,585.15	15.73	1,600.88

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
02/15/2022	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	5,998.43	60.04	6,058.47
02/15/2022	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,935.64	146.36	3,082.00
02/16/2022	Interest	06406FAD5	200,000.00	Bank of NY Mellon Corp Callable Note Cont 6/16/2023 2.2% Due 8/16/2023	0.00	2,200.00	2,200.00
02/17/2022	Maturity	69353RFB9	250,000.00	PNC Bank Callable Note Cont 1/18/2022 2.625% Due 2/17/2022	250,000.00	3,281.25	253,281.25
02/18/2022	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	0.00	26.21	26.21
02/19/2022	Paydown	3137BM6P6	134,222.00	FHLMC K721 A2 3.09% Due 8/25/2022	1,278.71	2.63	1,281.34
02/20/2022	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	2,064.80	96.36	2,161.16
02/20/2022	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,540.19	37.07	2,577.26
02/21/2022	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00
02/24/2022	Interest	3137EAEV7	300,000.00	FHLMC Note 0.25% Due 8/24/2023	0.00	375.00	375.00
02/25/2022	Interest	3137BM6P6	134,222.00	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	342.33	342.33
02/25/2022	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
FEB 2022					**547,028.60**	**13,452.39**	**560,480.99**
03/01/2022	Interest	46647PAH9	210,000.00	JP Morgan Chase & Co Callable Note 2X 3/1/2024 3.22% Due 3/1/2025	0.00	3,381.00	3,381.00
03/08/2022	Interest	24422ETV1	305,000.00	John Deere Capital Corp Note 2.15% Due 9/8/2022	0.00	3,278.75	3,278.75
03/08/2022	Interest	3137EAEW5	300,000.00	FHLMC Note 0.25% Due 9/8/2023	0.00	375.00	375.00
03/10/2022	Interest	3130ADRG9	350,000.00	FHLB Note 2.75% Due 3/10/2023	0.00	4,812.50	4,812.50

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
03/11/2022	Interest	89114QCB2	200,000.00	Toronto Dominion Bank Note 3.25% Due 3/11/2024	0.00	3,250.00	3,250.00
03/12/2022	Interest	3135G0U43	350,000.00	FNMA Note 2.875% Due 9/12/2023	0.00	5,031.25	5,031.25
03/15/2022	Paydown	47788UAC6	60,000.00	John Deere Owner Trust 2021-A A3 0.36% Due 9/15/2025	0.00	18.00	18.00
03/15/2022	Paydown	47789JAD8	319,425.71	John Deere Owner Trust 2019-A A3 2.91% Due 7/17/2023	18,922.21	276.95	19,199.16
03/15/2022	Paydown	43815NAC8	115,000.00	Honda Auto Receivables Trust 2019-3 A3 1.78% Due 8/15/2023	5,731.55	51.15	5,782.70
03/15/2022	Paydown	89231PAD0	108,034.47	Toyota Auto Receivables Trust 2018-D A3 3.18% Due 3/15/2023	4,497.12	156.58	4,653.70
03/15/2022	Paydown	89236XAC0	70,000.00	Toyota Auto Receivables 2020-D A3 0.35% Due 1/15/2025	1,580.74	15.26	1,596.00
03/15/2022	Paydown	65479JAD5	120,000.00	Nissan Auto Receivables Owner 2019-C A3 1.93% Due 7/15/2024	2,942.25	141.64	3,083.89
03/15/2022	Paydown	89232HAC9	215,000.00	Toyota Auto Receivable Own 2020-A A3 1.66% Due 5/15/2024	9,046.36	230.46	9,276.82
03/18/2022	Interest	808513BN4	95,000.00	Charles Schwab Corp Callable Note Cont 2/18/2024 0.75% Due 3/18/2024	0.00	356.25	356.25
03/18/2022	Paydown	43813KAC6	85,000.00	Honda Auto Receivables Trust 2020-3 A3 0.37% Due 10/18/2024	4,035.15	26.21	4,061.36
03/19/2022	Interest	459058GQ0	225,000.00	Intl. Bank Recon & Development Note 2.5% Due 3/19/2024	0.00	2,812.50	2,812.50
03/19/2022	Paydown	3137BM6P6	134,222.00	FHLMC K721 A2 3.09% Due 8/25/2022	9,417.00	19.40	9,436.40
03/20/2022	Paydown	92348AAA3	80,000.00	Verizon Owner Trust 2019-C A1A 1.94% Due 4/22/2024	2,069.45	93.02	2,162.47
03/20/2022	Paydown	92290BAA9	120,000.00	Verizon Owner Trust 2020-B A 0.47% Due 2/20/2025	2,541.18	36.08	2,577.26
03/21/2022	Paydown	43813GAC5	80,000.00	Honda Auto Receivables Trust 2021-1 A3 0.27% Due 4/21/2025	0.00	18.00	18.00

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Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
03/25/2022	Interest	3137BM6P6	134,222.00	FHLMC K721 A2 3.09% Due 8/25/2022	0.00	318.08	318.08
03/25/2022	Paydown	3137B4GY6	275,000.00	FHLMC K032 A2 3.31% Due 5/25/2023	0.00	758.54	758.54
03/31/2022	Interest	912828ZF0	350,000.00	US Treasury Note 0.5% Due 3/31/2025	0.00	875.00	875.00
03/31/2022	Interest	912828T26	300,000.00	US Treasury Note 1.375% Due 9/30/2023	0.00	2,062.50	2,062.50
MAR 2022					**60,783.01**	**28,394.12**	**89,177.13**
TOTAL					**3,935,346.64**	**247,666.51**	**4,183,013.15**

Important Disclosures

Chandler Asset Management, Inc. (“Chandler”) is an SEC registered investment adviser. For additional information about our firm, please see our current disclosures (Form ADV). To obtain a copy of our current disclosures, you may contact your client service representative by calling the number on the front of this statement or you may visit our website at www.chandlerasset.com.

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Custody: Your qualified custodian bank maintains control of all assets reflected in this statement and we urge you to compare this statement to the one you receive from your qualified custodian. Chandler does not have any authority to withdraw or deposit funds from/to the custodian account.

Valuation: Prices are provided by IDC, an independent pricing source. In the event IDC does not provide a price or if the price provided is not reflective of fair market value, Chandler will obtain pricing from an alternative approved third party pricing source in accordance with our written valuation policy and procedures. Our valuation procedures are also disclosed in Item 5 of our Form ADV Part 2A.

Performance: Performance results are presented gross-of-advisory fees and represent the client’s Total Return. The deduction of advisory fees lowers performance results. These results include the reinvestment of dividends and other earnings. Past performance may not be indicative of future results. Therefore, clients should not assume that future performance of any specific investment or investment strategy will be profitable or equal to past performance levels. All investment strategies have the potential for profit or loss. Economic factors, market conditions or changes in investment strategies, contributions or withdrawals may materially alter the performance and results of your portfolio.

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Ratings: Ratings information have been provided by Moody’s, S&P and Fitch through data feeds we believe to be reliable as of the date of this statement, however we cannot guarantee its accuracy.

Security level ratings for U.S. Agency issued mortgage-backed securities (“MBS”) reflect the issuer rating because the securities themselves are not rated. The issuing U.S. Agency guarantees the full and timely payment of both principal and interest and carries a AA+/Aaa/AAA by S&P, Moody’s and Fitch respectively.

CITY of GARDENA

TO: THE HONORABLE MAYOR AND CITY COUNCIL

SUBJECT: PERSONNEL REPORT

1. Report the count of confirmed COVID-19 employee cases.
   Total Count: Seventy (70)
   a. Administrative Services Department: One (1)
   b. City Clerk's Office: One (1)
   c. Elected & Administrative Offices: One (1)
   d. Community Development Department: Two (2)
   e. Transportation Department: Nineteen (19)
   f. Police Department: Twenty-Five (25)
   g. Public Works Department: Nine (9)
   h. Recreation & Human Services Department: Twelve (12)

2. Report the Full-Time Appointment of ***ROMEO NEOU*** to the position of Transit Mechanic, Schedule 47 ($4,787 - $6,109/month) with the Transportation Department effective April 4, 2021.

3. Report the Full-Time Appointment of ***HAROLD ALLAN RIGG*** to the position of Director of Public Works, Schedule 330 ($13,104 - $16,742/month) with the Public Works Department effective April 26, 2021.

4. Report the Separation of the following individuals:

   a. Human Resources Manager, ***NORA VERCELES***, of the Elected & Administrative Offices effective April 9, 2021. Ms. Verceles provided 3 years and 1 month of service to the City.

   b. Police Officer, ***MICHAEL BERGERON***, of the Police Department effective April 16, 2021. Mr. Bergeron provided 14 years of service to the City.

5. Report that Custodian II, ***MORRIS HOWARD***, was placed on Paid Administrative Leave effective April 13, 2021.

6. Report that the following individuals are on leave under the Family Medical Leave Act / California Family Rights Act (FMLA/CFRA):

   a. Bus Operator, ***SHAVANYA DECURE,*** of the Transportation Department effective April 15, 2021 through May 16, 2021.

   b. Police Officer, ***PETER GRAFFEO***, of the Police Department effective April 12, 2021 through a date to be determined.

7. Report the following employee is on medical leave:

    a. Bus Operator, ***DENISE JEX,*** of the Transportation Department effective March 29, 2021, 2021 through June 29, 2021.

8. Report the recruitment for the Closed/Promotional position of Park Maintenance Lead (Public Works Department). This recruitment closed on April 16, 2021.

City of Gardena

Gardena City Council Meeting

AGENDA REPORT SUMMARY

Agenda Item No. 8.I
Section: CONSENT CALENDAR
Meeting Date: April 27, 2021

TO: THE HONORABLE MAYOR AND MEMBERS OF THE GARDENA CITY COUNCIL

AGENDA TITLE: APPROVAL OF EXTENSION AGREEMENT WITH JAS PACIFIC FOR BUILDING INSPECTOR SERVICES
CONTACT: COMMUNITY DEVELOPMENT

COUNCIL ACTION REQUIRED:

RECOMMENDATION AND STAFF SUMMARY:
JAS Pacific provides part-time contractual building inspector services to the City. The contract limit is $30,000 with authorization to exceed that subject to City Council approval. Current work performed is approaching $30,000 and the need for these services continues. Therefore. staff respectfully requests that the contract limit be extended another $20,000.
Funding for this use are from current year Community Development budget. No additional funds requested.

FINANCIAL IMPACT/COST:
General Fund budgeted expenditure for Fiscal Year 2020-2021 of $20,000.

ATTACHMENTS:
JAS Contractual Services Agreement - Building Inspector - 2018

APPROVED:



_____
Clint Osorio, City Manager

AGREEMENT BETWEEN THE
THE CITY OF GARDENA
AND
JASON ADDISON SMITH CONSULTING SERVICES, INC., DBA
JAS PACIFIC
FOR CONSULTING SERVICES

This contract, hereinafter referred to as Agreement, is entered into by and between THE CITY OF GARDENA ("City") and Jason Addison Smith Consulting Services, Inc., a California Corporation, dba JAS Pacific ("Consultant"). Based on the mutual promises and covenants contained herein, the Parties hereto agree as follows:

1. Recitals.

A. City has an immediate need for the services of a building inspector and desires to contract for such services.

B. Consultant is qualified by virtue of experience, training, education and expertise to provide these services and has previously provided such services to the City.

C. City has determined that the public interest, convenience and necessity require the execution of this Agreement.

2. Services.

A. Consultant shall provide the Services of an individual with the minimum certification to provide building inspection services for the City: Certified Building Inspector; Certified Plumbing Inspector; and Certified Mechanical Inspector. Services shall be provided at City Hall or in the field on an as-needed basis, and shall include inputting project data into the City's tracking system. Services shall not exceed 40 hours for week.

B. While performing the Services, the inspector assigned to City by Consultant shall exercise the reasonable professional care and skill customarily exercised by reputable members of Consultant's profession and shall use reasonable diligence and best judgement while exercising his profession skill and expertise.

3. Additional Services. If City determines that additional services are required to be provided by Consultant in addition to the Services set forth above, City shall authorize Consultant to perform such additional services in writing ("Additional Services"). Such Additional Services shall be specifically described and approved by City in writing prior to the performance thereof. Consultant shall be compensated for such Additional Services in accordance with the amount agreed upon in writing by the Parties. No

compensation shall be paid to Consultant for Additional Services which are not specifically approved by City in writing.

4. Agreement Administrator. For purposes of this Agreement, City designates Raymond Barragan as the Agreement Administrator who shall monitor Consultant's performance under this Agreement. All notices, invoices or other documents shall be addressed to the Agreement Administrator, as well as all substantive issues relating to this contract. City reserves the right to change this designation upon written notice to Consultant.

5. Consultant's Proposal. This Agreement shall include Consultant's proposal or bid which is incorporated herein. In the event of any inconsistency between the terms of the proposal and this Agreement, this Agreement shall govern.

6. Timing of Performance. Time is of the essence with respect to Consultant's performance of the Services required by this Agreement.

7. Compensation. City shall pay Consultant the rate of $79.00 per hour. Total compensation paid to Consultant shall not exceed $30,000 without the prior written approval of the City Council. The Compensation is inclusive of all costs that may be incurred by Consultant in performance of the Services, including but not limited to such items as travel, copies, delivery charges, phone charges, and facsimile charges.

8. Term of Agreement/Termination.

A. This Agreement shall be effective as of August 20, 2018 and shall remain in effect until the City successfully completes recruitment for a permanent building inspector.

B. City may terminate this Agreement without cause by providing written notice to Consultant not less than three days prior to an effective termination date.

C. Consultant may terminate this Agreement without cause by providing written notice to City not less than ten business days prior to an effective termination date.

D. Upon receipt of a termination notice, Consultant shall: (1) promptly discontinue all Services, unless the notice directs otherwise; and (2) within ten (10) days, deliver to City all files, data, reports, estimates, summaries, and such other information and materials as may have been accumulated or prepared to date by Consultant in performing the Services under this Agreement, whether completed or in progress. Consultant shall provide these documents by both hard copy and in electronic format if available. In the event of termination for other than cause attributable to Consultant, Consultant shall be entitled to reasonable compensation for

the services it performs up to the date of termination and shall be deemed released from liability for any work assigned but not completed as of the effective date of termination.

9. Invoices and Payments.

A. Payment shall be made upon receipt and approval of invoices for Services rendered. In order for payment to be made, Consultant's invoice must include an itemization as to the services rendered, date(s) of service, direct and/or subcontract costs, and be submitted on an official letterhead or invoice with Consultant's name, address, and telephone number referenced.

B. The Agreement Administrator shall review the invoices to determine whether services performed and documents submitted are consistent with this Agreement. Payment shall be made within forty-five (45) days following receipt of the invoice or the Agreement Administrator shall provide Consultant with a written statement objecting to the charges and stating the reasons therefore.

C. Payment by City under this Agreement shall not be deemed a waiver of defects, even if such defects were known to City at the time of payment.

10. Records/Audit.

A. Consultant shall be responsible for ensuring accuracy and propriety of all billings and shall maintain all supporting documentation for a minimum of three (3) years from the completion date of the Services under this agreement the following records:

1. All accounts and records, including personnel, property and financial, adequate to identify and account for all costs pertaining to this Agreement and assure proper accounting for all funds;

2. Records which establish that Consultant and any subconsultant who renders Services under this Agreement are in full compliance with the requirements of this Agreement and all federal, state and local laws and regulations

3. Any additional records deemed necessary by City to assume verification of full compliance with this Agreement.

B. City shall have the right to audit Consultant's invoices and all supporting documentation for purposes of compliance with this Agreement for a period of three years following the completion of Services under this Agreement.

C. Upon reasonable notice from City or any other governmental agency, Consultant shall cooperate fully with any audit of its billings conducted by, or of, City

and shall permit access to its books, records and accounts as may be necessary to conduct such audits.

11. Successors and Assignment. This Agreement covers professional services of a specific and unique nature. Except as otherwise provided herein, Consultant shall not assign or transfer its interest in this Agreement or subcontract any services to be performed without amending this Agreement. This Agreement shall be binding upon the heirs, executors, administrators, successors and assigns of the parties hereto.

12. Change in Name, Ownership or Control. Consultant shall notify the Agreement Administrator, in writing, of any change in name, ownership or control of Consultant's firm or subconsultant. Change of ownership or control of Consultant's firm may require an amendment to the Agreement.

13. Key Personnel. City has relied upon the professional training and ability of Consultant to perform the services hereunder as a material inducement to enter into this Agreement. Consultant shall provide properly skilled professional and technical personnel to perform all services under this Agreement. In the event that City, in its sole discretion, at any time during the Agreement, desires the removal of any person or persons assigned by Consultant to perform Services pursuant to this Agreement, Consultant shall remove any such person immediately upon receiving notice from City.

14. Use of Materials.

A. City shall make available to Consultant such materials from its files as may be required by Consultant to perform Services under this Agreement. Such materials shall remain the property of City while in Consultant's possession. Upon termination of this Agreement and payment of outstanding invoices of Consultant, or completion of work under this Agreement, Consultant shall return to City any property of City in its possession and any calculations, notes, reports, electronic files, or other materials prepared by Consultant in the course of performance of this Agreement.

B. City may utilize any material prepared or work performed by Consultant pursuant to this Agreement, including computer software, in any manner, which City deems proper without additional compensation to Consultant. Consultant shall have no responsibility or liability for any revisions, changes, or corrections made by City, or any use or reuse pursuant to this paragraph unless Consultant accepts such responsibility in writing.

15. Nonuse of Intellectual Property of Third Parties. Consultant shall not use, disclose or copy any intellectual property of any third parties in connection with work carried out under this Agreement, except for intellectual property for which Consultant has a license. Consultant shall indemnify and hold City harmless against all claims raised against City based upon allegations that Consultant has wrongfully used

intellectual property of others in performing work for City, or that City has wrongfully used intellectual property developed by Consultant pursuant to this Agreement.

16. Ownership of Work Product. All documents or other information created, developed, or received by Consultant shall, for purposes of copyright law, be deemed worked made for hire for City by Consultant and shall be the sole property of City. Consultant shall provide City with copies of these items upon demand, and in any event, upon termination of this Agreement.

17. Legal Requirements.

A. Consultant shall secure and maintain all licenses or permits required by law, including a City business license, and shall comply with all ordinances, laws, orders, rules, and regulations pertaining to the work.

B. Consultant warrants it fully complies with all laws regarding employment of aliens and others, and that all of its employees performing services hereunder meet the citizenship or alien status requirements contained in federal and state statutes and regulations.

C. Consultant covenants that thee shall be no discrimination based upon race, color, creed, religion, sex, marital status, age, handicap, national origin or ancestry, or any other category forbidden by law in performance of this Agreement.

18. Conflict of Interest and Reporting.

A. Consultant shall at all times avoid conflicts of interest or the appearance of a conflict of interest in the performance of this Agreement. If required, Consultant shall comply with the City's Conflict of Interest reporting requirements. Consultant understands that pursuant to Gardena Municipal Code sections 2.24.020H and 2.24.025G, it is forbidden to make any contribution to a candidate or committee of a candidate for a municipal office of the City, or to an officeholder, until the completion of services to be performed under this Agreement.

B. Consultant and its representatives shall refrain from lobbying City of Gardena officials, employees and representatives for the duration of this Agreement.

19. Guarantee and Warranty. Consultant warrants to City that the material, analysis, data, programs and SERVICES to be delivered or rendered hereunder will be of the kind and quality designated and will be performed by qualified personnel. Without waiver of City's other rights or remedies, City may require Consultant to re-perform any of said services, which were not performed in accordance with these standards. Consultant shall perform the remedial services at its sole expense.

20. Insurance.

A. Commencement of Work. Consultant shall not commence work under this Agreement until it has obtained City approved insurance. Before beginning work hereunder, during the entire period of this Agreement, for any extensions hereto, and for periods after the end of this Agreement as may be indicated below, Consultant must have and maintain in place all of the insurance coverage required in this Section. Consultant's insurance shall comply with all items specified by this Agreement. Any subcontractors shall be subject to all of the requirements of this Section and Consultant shall be responsible to obtain evidence of insurance from each subcontractor and provide it to City before the subcontractor commences work. Alternatively, Consultant's insurance may cover all subcontractors.

B. Insurance Company Requirements. All insurance policies used to satisfy the requirements imposed hereunder shall be issued by insurers admitted to do business in the State of California. Insurers shall have a current Best's rating of not less than A-:VII, unless otherwise approved by City.

C. Coverage, Limits and Policy Requirements. Consultant shall maintain the types of coverage and limits indicated below:

1. Commercial General Liability Insurance - a policy for occurrence coverage for bodily injury, personal injury and property damage, including all coverage provided by and to the extent afforded by Insurance Services Office Form CG 2010 ed. 10/93 or 11/85, with no special limitations affecting City. The limit for all coverage under this policy shall be no less than one million dollars ($1,000,000.00) per occurrence.

2. Commercial Auto Liability Insurance - a policy including all coverage provided by and to the extent afforded by Insurance Services Office form CA 0001, ed. 12/93, including Symbol 1 (any auto) with no special limitations affecting City. The limit for bodily injury and property damage liability shall be no less than one million dollars ($1,000,000.00) per accident.

3. Policy Requirements. The policies set forth above shall comply with the following, as evidenced by the policies or endorsements to the policies:

a. The City, its appointed and elected officers, employees, agents and volunteers shall be added as additional insured to the policy.

b. The insurer shall agree to provide City with thirty (30) days prior written notice, return receipt requested, of any cancellation, non-renewal or material change in coverage.

c. For any claims with respect to the Services covered by this

Agreement, Consultant's insurance coverage shall be primary insurance as respects the City, its elected and appointed officers, employees, agents and volunteers. Any insurance or self-insurance maintained by the City, its elected and appointed officers, employees, agents and volunteers shall be excess of Consultant's insurance and shall not contribute with it.

4. Worker's Compensation and Employer's Liability Insurance - a policy which meets all statutory benefit requirements of the Labor Code, or other applicable law, of the State of California. The minimum coverage limits for said insurance shall be no less than one million dollars per claim. The policy shall be issued by an insurance company which is admitted to do business in the State of California and shall contain a clause that the policy may not be canceled without thirty (30) days prior written notice, return receipt requested, is mailed to City.

5. Professional Errors & Omissions - a policy with minimum limits of one million dollars ($1,000,000.00) per claim and aggregate. This policy shall be issued by an insurance company which is admitted to do business in the State of California and shall contain a clause that the policy may not be canceled until thirty (30) days written notice, return receipt requested, is mailed to City.

D. Additional Requirements. The procuring of such required policies of insurance shall not be construed to limit Consultant's liability hereunder or to fulfill the indemnification provisions and requirements of this Agreement. There shall be no recourse against City for payment of premiums or other amounts with respect thereto. City shall notify Consultant in writing of changes in the insurance requirements. If Consultant does not deposit copies of acceptable insurance policies or endorsements with City incorporating such changes within sixty (60) days of receipt of such notice, Consultant shall be deemed in default hereunder.

E. Deductibles. Any deductible or self-insured retention over $25,000 per occurrence must be declared to and approved by City. Any deductible exceeding an amount acceptable to City shall be subject to the following changes: either the insurer shall eliminate or reduce such deductibles or self-insured retentions with respect to City, its officers, employees, agents and volunteers (with additional premium, if any, to be paid by Consultant); or Consultant shall provide satisfactory financial guarantee for payment of losses and related investigations, claim administration and defense expenses.

F. Verification of Compliance. Consultant shall furnish City with original policies or certificates and endorsements effecting coverage required by this Agreement. The endorsements are to be signed by a person authorized by the insurer to bind coverage on its behalf. All endorsements are to be received and approved by City before work commences. Not less than fifteen (15) days prior to the expiration date of any policy of insurance required by this Agreement, Consultant shall deliver to City a

binder or certificate of insurance with respect to each renewal policy, bearing a notation evidencing payment of the premium therefore, or accompanied by other proof of payment satisfactory to City. Consultant shall provide full copies of any requested policies to City within three (3) days of any such request by City.

G. Termination for Lack of Required Coverage. If Consultant, for any reason, fails to have in place, at all times during the term of this Agreement, including any extension hereto, all required insurance and coverage, City may immediately obtain such coverage at Consultant's expense and/or terminate this Agreement.

21. Indemnity.

A. Consultant assumes all risk of injury to its employees, agents, and contractors, including loss or damage to property.

B. Consultant shall defend, indemnify, and hold harmless the City, including its officials, officers, employees, and agents from and against all claims, suits, or causes of action for injury to any person or damage to any property arising out of any intentional or negligent acts or errors or omissions to act by Consultant or its agents, officers, employees, subcontractors, or independent contractor, in the performance of its obligations pursuant to this Agreement. This indemnity shall apply to all claims and liability regardless of whether any insurance policies are applicable. The policy limits do not act as a limitation upon the amount of indemnification to be provided by Consultant. This indemnity shall not apply if the claim arises out of the sole negligence or willful misconduct of City, its officers, agents, employees or volunteers.

C. No official, employee, agent or volunteer of City shall be personally liable for any default or liability under this Agreement.

22. Independent Contractor. Consultant agrees to furnish consulting services in the capacity of an independent contractor and neither Consultant nor any of its employees shall be considered to be an employee or agent of City.

23. Notices. Any notice or communication given under this Agreement shall be effective when deposited, postage prepaid, with the United States Postal Service and addressed to the contracting parties. Name, address, telephone and facsimile numbers of the parties are as follows:

City of Gardena:
1700 West 162nd Street
Gardena, California 90247-3732
Attn: Raymond Barragan
Telephone Number: 310/217-9546
E-mail: rbarragan@cityofgardena.org

Consultant:

Jason Addison Smith Consulting Services, Inc., DBA JAS Pacific
201 N. Euclid Avenue, Suite A
Upland, CA 91786
Attn: Christine Champany
Telephone Number: 909/605-7777
E-mail: christine@jaspacific.com

Either party may change the information to which notice or communication is to be sent by providing advance written notice to the other party.

24. Severability. If any provision of this Agreement shall be held illegal, invalid, or unenforceable, in whole or in part, such provision shall be modified to the minimum extent necessary to make it legal, valid, and enforceable, and the legality, validity, and enforceability of the remaining provisions shall not be affected thereby.

25. Jurisdiction and Venue. This Agreement shall be deemed a contract under the laws of the State of California and for all purposes shall be interpreted in accordance with such laws. Both parties hereby agree and consent to the exclusive jurisdiction of the courts of the State of California and that the venue of any action brought hereunder shall be Los Angeles County, California.

26. Waiver. No delay or failure by either Party to exercise or enforce at any time any right or provision of this Agreement shall be considered a waiver thereof or of such Party's right thereafter to exercise or enforce each and every right and provision of this Agreement. To be valid a waiver shall be in writing but need not be supported by consideration. No single waiver shall constitute a continuing or subsequent waiver.

27. Entire Agreement.

A. This writing contains the entire agreement of the Parties relating to the subject matter hereof; and the Parties have made no agreements, representations, or warranties either written or oral relating to the subject matter hereof which are not set forth herein. Except as provided herein, this Agreement may not be modified or altered without formal amendment thereto.

B. Notwithstanding the foregoing, and to realize the purpose of this Agreement, the Agreement Administrator may issue a written modification to the Scope of Work, if this modification will not require a change to any other term of this Agreement.

28. Joint Drafting. Both parties have participated in the drafting of this Agreement.

29. Public Record. This Agreement is a public record of the City.

30. Authority to Execute. The persons executing this Agreement on behalf of the

parties warrant that they are duly authorized to execute this Agreement.

31. Attorney's Fees. In the event that legal action is necessary to enforce the provisions of this Agreement, or to declare the rights of the parties hereunder, the parties agree that the prevailing party in the legal action shall be entitled to recover attorney's fees and court costs from the opposing party.

IN WITNESS WHEREOF, the parties have hereunto affixed their names as of the day and year written below.

CITY OF GARDENA

By _____
Ed Medrano, City Manager
City Manager

Date 8/21/18

CONSULTANT

By _____
[NAME] J. ADDISON SMITH
[Title] JAS PACIFIC

Date 8/20/2018

By _____
[NAME] CHRISTINE CHAMPANY
[Title] JAS PACIFIC

Date 8/20/2018

APPROVED AS TO FORM:

_____
Peter L. Wallin, City Attorney

City of Gardena

Gardena City Council Meeting

AGENDA REPORT SUMMARY

Agenda Item No. 8.J
Section: CONSENT CALENDAR
Meeting Date: April 27, 2021

TO: THE HONORABLE MAYOR AND MEMBERS OF THE GARDENA CITY COUNCIL

AGENDA TITLE: SECOND READING AND ADOPTION OF ORDINANCE NO. 1827 , AMENDING SECTION 8.08.035 (AMENDMENT OF SECTION 7802.3) OF CHAPTER 8.08 (FIRE CODE) AND AMENDING SECTIONS 8.16.010 (DEFINITIONS), 8.16.020 (PERMIT-REQUIRED), SECTION 8.16.130 (DATES AND HOURS OF SALE AND USE), SECTION 8.16.150 (PROHIBITIONS ON DISCHARGE), 8.16.170 (VIOLATION-PENALTY) AND ADDING SECTION 8.16.155 (SOCIAL HOST LIABILITY) OF CHAPTER 8.16 (FIREWORKS) OF TITLE 8 (HEALTH AND SAFETY) OF THE GARDENA MUNICIPAL CODE
CONTACT: CITY MANAGER

COUNCIL ACTION REQUIRED:

RECOMMENDATION AND STAFF SUMMARY:
At the April 13, 2021 City Council meeting Councilmember Henderson made a motion, seconded by Mayor Pro Tem Tanaka, to introduce Ordinance No. 1827. The motion unanimously passed, 5-0.

The Ordinance adds section 8.16.155 (Social Host Liability) to the Gardena Municipal Code, which allows for the issuance of an administrative citation and fine for the ignition of dangerous fireworks to the person responsible for the property or gathering, with exceptions. This ordinance also allows for the issuance of an administrative citation and fine to any person found to be in violation of any provision of Chapter 8.16 of the Gardena Municipal Code, without prior issuance of a notice of violation. In addition, this Ordinance provides for clean-up changes to Chapters 8.08 and 8.16 in order to repeal Ordinance 1785.

FINANCIAL IMPACT/COST:
N/A

ATTACHMENTS:
ORDINANCE_No._1827.pdf

APPROVED:



_____

Clint Osorio, City Manager

ORDINANCE NO. 1827

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF GARDENA, CALIFORNIA, AMENDING SECTION 8.08.035 (AMENDMENT OF SECTION 7802.3) OF CHAPTER 8.08 (FIRE CODE) AND AMENDING SECTIONS 8.16.010 (DEFINITIONS), 8.16.020 (PERMIT -REQUIRED), SECTION 8.16.130 (DATES AND HOURS OF SALE AND USE), 8.16.150 (PROHIBITIONS ON DISCHARGE), 8.16.170 (VIOLATION- PENALTY) AND ADDING SECTION 8.16.155 (SOCIAL HOST LIABILITY) OF CHAPTER 8.16 (FIREWORKS) OF TITLE 8 (HEALTH AND SAFETY) OF THE GARDENA MUNICIPAL CODE

WHEREAS, the City of Gardena (City) may adopt regulations to protect the health, safety, and welfare of the public under California Constitution Article XI, §7 and California Government Code §37100, and thereby is authorized to declare what use or condition constitutes a public nuisance; and

WHEREAS, the City has the authority under California Government Code §53069.4 to issue administrative citations for violations of the City's ordinances; and

WHEREAS, the City is authorized to regulate or prohibit the sale, use, or discharge of fireworks pursuant to California Health and Safety Code §12541; and

WHEREAS, pursuant to Chapter 8.16 (Fireworks) of the City of Gardena Municipal Code (GMC), the City currently prohibits the sale, possession and use of "dangerous fireworks," as defined by state law, within the City and permits the discharge of safe and sane fireworks, as defined by state law, within the City only during the hours between 12:00 noon and 10:00 p.m. on July 4th; and

WHEREAS, the City periodically reviews its ordinances to ensure that they are achieving their aims, while continuing to adhere to legal requirements; and

WHEREAS, City Council of the City of Gardena finds that the aims of Chapter 8.16 would be better achieved by penalizing not only those individuals who use fireworks in violation of the GMC, but also those individuals who allow such illegal use on property that they either own or control; and

WHEREAS, Chapter 8.16 of the Municipal Code, however, does not currently include a fireworks "social host" ordinance; and

WHEREAS, the City has experienced an increased use of illegal fireworks around the 4th of July and New Year's Eve celebrations each year and wishes to implement an ordinance in order to reduce the likelihood of injuries or property damage as a result of these illegal fireworks; and

WHEREAS, the City desires to implement a new "social host" regulation in order to ensure those who have possession of a residence or other property are held legally responsible for dangerous illegal firework possession and use on that property; and

WHEREAS the City Council finds that holding property owners responsible for illegal firework use is necessary to protect the public health, safety and welfare; and

WHEREAS the City Council desires to amend and update its Municipal Code to reflect the current needs of the City, and to ensure the health, safety and welfare of the public and law enforcement personnel.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF GARDENA, CALIFORNIA, DOES HEREBY ORDAIN, AS FOLLOWS:

SECTION 1. The forgoing recitals are true and correct and incorporated herein by this reference.

SECTION 2. Section 8.08.035 (Amendment of Section 7802.3) of Chapter 8.08 (Fire Code) of Title 8 (Health and Safety) of the Gardena Municipal Code is amended to read, as follows:

8.08.035 Amendment of Section 7802.3.

Section 7802.3 of the Uniform Fire Code as adopted by Section 8.08.010 of the Gardena Municipal Code is amended to read as follows:

Section 7802.3. Except as provided in Chapter 8.16 of Title 8 of this code, the storage, use and handling of fireworks are prohibited.

Any provision of the Uniform Fire Code or of any subsequent revised edition of the Uniform Fire Code, related to prohibiting the storage, sale, handling and discharge of fireworks, as adopted in accordance with Section 8.08.010 of the Gardena Municipal Code, is hereby amended to add an exception for safe and sane fireworks which shall be regulated in accordance with Chapter 8.16 of Title 8 of this Code, as that Chapter 8.16 may from time to time be amended by the city council to regulate, but not prohibit, the storage, sale, handling, and discharge of safe and sane fireworks in the city.

SECTION 3. Section 8.16.010 (Definitions) of Chapter 8.16 (Fireworks) of Title 8 (Health and Safety) of the Gardena Municipal Code is amended to read, as follows:

8.16.010 Definitions.

The following words and phrases, as used in this chapter, are defined as follows:

A. “Dangerous fireworks” means dangerous fireworks as set forth in California State Fireworks Law (Sections 12505 and 12561 of the Health and Safety Code and the relevant sections of Title 19, Code of Regulations, Subchapter 6) which are hereby incorporated by reference.

B. “Safe and sane fireworks” or “fireworks” (a.k.a. “state-approved fireworks) means safe and sane fireworks as set forth in California State Fireworks Law

(Sections 12529 and 12562 of the Health and Safety Code and the relevant sections of Title 19, Code of Regulations, Subchapter 6) which are hereby incorporated by reference.

C. “Person” means and includes ~~any individual, firm, partnership, joint venture, association, concern, corporation, state, trust, business trust, receiver, syndicate, or any other group of combination acting as a unit~~ a natural person or a legal entity that is also an owner, tenant, lessee and/or other person with any right to possession or control of the property.

D. “Nonprofit organization” means (1) any nonprofit association, charity, church, corporation, club, or society, organized primarily for veteran, patriotic, welfare, civic, benevolent, betterment, youth activities, or charitable purposes, or (2) a group which is an integral part of a recognized nonprofit national organization, or (3) an organization affiliated with and officially recognized by an elementary, junior high, high school, school district, and/or college that serves, in whole or in part, the residents of Gardena, and has obtained a nonprofit status with either the California Franchise Tax Board or the Internal Revenue Service.

E. “Principal and permanent meeting place” means and includes, but not be limited to, a permanent structure, playing field, geographic area, or service population which resides in or is located within the city of Gardena.

F. “Gardena city clerk” or “city clerk” means the Gardena city clerk and/or his or her designee or designees.

G. “Residents of the city” or “city residents” means and includes owners of businesses and/or property in the city as well as occupants of residential dwellings.

H. “Director” shall mean the community development director or his or her designee(s).

I. “Fire Chief” shall mean the Fire Chief of the County of Los Angeles and/or his or her designee or designees

J. "Property" means:

1. Private Property including: a home, yard, apartment, condominium, accessory dwelling unit, hotel, or motel room or other dwelling unit, a hall or meeting room, or commercial property, whether occupied on a temporary or permanent basis, whether occupied as a dwelling, party or other social function, and whether owned, leased, rented, or used with or without compensation.

2. Public Property such as rented or reserved public facilities including space at a public park.

K. "Social host" means any of the following:

1. Any owner of property as listed on the most recent assessment roll;

2. Any person who has the right to use, possess or occupy a property under a lease, permit, license, rental agreement, reservation or contract; or

3. Any person who hosts, organizes, supervises, officiates, conducts, or accepts responsibility for a gathering.

SECTION 4. Section 8.16.020 (Permit -Required) of Chapter 8.16 (Fireworks) of Title 8 (Health and Safety) of the Gardena Municipal Code is amended to read, as follows:

8.16.020 Permit – Required.

A. Except as provided in this chapter, it is unlawful to offer for sale or sell at retail "safe and sane fireworks" without having first applied for and been issued a permit therefor, in the manner set forth in this chapter.

B. Permits for the sale of safe and sane fireworks shall be issued only to Nonprofit organizations, and such safe and sane fireworks shall be sold only at the outdoor sales stands, as more specifically set forth hereinafter. No more than eight (8) such permits shall be issued and be outstanding at any time.

~~C. The City Council may, by resolution, suspend the issuance of permits for sale of safe and sane fireworks in the City in any given year.~~

SECTION 5. Section 8.16.130 (Dates and hours of sale and use) of Chapter 8.16 (Fireworks) of Title 8 (Health and Safety) of the Gardena Municipal Code is amended to read, as follows:

8.16.130 Dates and hours of sale and use.

~~Except in years in which sale of safe and sane fireworks is suspended in accordance with Section 8.16.020,~~ Safe and sane fireworks may be sold or displayed within Gardena between the hours of 9:00 a.m. and 10:00 p.m. during the period between June 28th and July 4th of each year. Safe and sane fireworks may be possessed during the period from June 28th to 10:00 p.m. on July 4th of each year. All sale, display and possession shall be conducted pursuant to the provisions of this chapter and not otherwise. It is unlawful for any person to discharge any safe and sane fireworks except during the hours between 12:00 noon and 10:00 p.m. on July 4th of each year in any area of the city.

SECTION 6. Section 8.16.150 (Prohibitions on Discharge) of Chapter 8.16 (Fireworks) of Title 8 (Health and Safety) of the Gardena Municipal Code is amended to read, as follows:

8.16.150 Prohibitions on discharge.

A. It is unlawful for any person to ignite, use, discharge, sell, offer for sale, or display for sale any dangerous fireworks, or take any action requiring a permit under Section 12640 of the California Health and Safety Code, without a permit from the fire chief.

B. It is unlawful for any person to ignite, explode, project, or otherwise fire or use any fireworks, or permit the ignition, explosion or projection thereof, upon or over onto the property of another without his/her consent, or to ignite, explode, project, or otherwise fire or make use of any fireworks within ten feet of any residence dwelling or other structure used as a place of habitation by human beings.

C. It is unlawful for individuals under eighteen years of age to sell, purchase, possess, use, or discharge safe and sane fireworks. Proof of age shall be required.

D. It is unlawful for any person having the care, custody or control of a minor (under eighteen years old) to permit such minor to discharge, explode, fire or set off any dangerous fireworks, at any time.

E. It is unlawful for any person having the care, custody or control of a minor (under eighteen years old) to permit such minor to discharge or set off any "safe and sane fireworks" unless such minor does so under the direct supervision of a person over eighteen years of age and during the hours and on the days permitted by this chapter.

~~It is unlawful, in any year in which the city council, by resolution, has suspended issuance of permits for sale of safe and sane fireworks, for any person to possess, use, or discharge safe and sane fireworks in the city. (Ord. 1785 § 4, 2018: Ord. 1671 § 1, 2005; Ord. 1564 § 2 (part), 1999. Formerly 8.16.160)~~

SECTION 7. Section 8.16.155 (Social Host Liability) of Chapter 8.16 (Fireworks) of Title 8 (Health and Safety) of the Gardena Municipal Code is added to read, as follows:

8.16.155 Social Host Liability

Any social host shall be strictly liable and subject to a fine for any unlawful ignition, use, discharge or display of any fireworks in violation of this Chapter at their property or gathering; except that:

1. No owner of private property shall be liable under this section for a violation of Sections 8.16.130, 8.16.140 or 8.16.150 on that property if the

owner can demonstrate that at the time of such violation they (i) had rented or leased the property to another, (ii) was not present, and (iii) had no prior knowledge of the violation.

2. No person who has the right to use, possess or occupy a unit in a multifamily residential property under a lease, rental agreement, contract or covenant shall be liable under this section for violations of Section 8.16.130, 8.16.140 or 8.16.150 occurring in the common areas of the property.

SECTION 8. Section 8.16.170 (Violation- Penalty) of Chapter 8.16 (Fireworks) of Title 8 (Health and Safety) of the Gardena Municipal Code is amended to read, as follows:

8.16.170 Violation – Penalty.

A. Any person found to be in violation of California Health and Safety Code Sections 12500 – 12726 shall be subject to the punishments, fines and penalties set forth in California Health and Safety Code Section 12700 – 12702, inclusive.

B. Any person found to be in violation of Section 8.16.140 or 8.16.150 of the chapter is guilty of a misdemeanor in accordance with the provisions of Chapter 1.16 of the Gardena Municipal Code.

C. Any person violating any other provisions of this chapter is guilty of an infraction which upon conviction thereof is punishable in accordance with the provisions of Chapter 1.16 of the Gardena Municipal Code.

D. Any person found to be in violation of any provision of this chapter is subject to the issuance of an administrative citation and fine in accordance with the provisions of Chapter 1.20 (Administrative Citations) of the Gardena Municipal Code, without prior issuance of a notice of violation.

E. Any person violating any of the provisions of state law or this chapter set forth in this section shall have his permit to sell fireworks revoked.

SECTION 9. Severability. If any section, subsection, subdivision, paragraph, sentence, clause or phrase of this ordinance, or any part thereof is for any reason held to be unconstitutional, such decision shall not affect the validity of the remaining portion of this ordinance or any part thereof. The City Council hereby declares that it would have passed each section, subsection, subdivision, paragraph, sentence, clause or phrase thereof, irrespective of the fact that any one or more section, subsection, subdivision, paragraph, sentence, clause or phrase be declared unconstitutional.

SECTION 10. Environmental Review. The City Council finds that this Ordinance is not subject to the California Environmental Quality Act (CEQA) pursuant to Section 15060(c)(2) of the CEQA Guidelines, California Code of Regulations, Article 5, Title 14, Chapter 3, as the activity will not result in a direct or reasonably foreseeable

indirect physical change in the environment and Section 15060(c)(3) of the CEQA Guidelines as it is not a project as defined by CEQA per Section 15378.

SECTION 11. Certification. The City Clerk shall certify the passage of this ordinance and shall cause the same to be entered in the book of original ordinances of said City; shall make a minute passage and adoption thereof in the records of the meeting at which time the same is passed and adopted; and shall, within fifteen (15) days after the passage and adoption thereof, cause the same to be published as required by law, in a publication of general circulation.

SECTION 12. Effective Date. This ordinance shall be in full force and effect thirty (30) days after its second reading and adoption.

Passed, approved, and adopted this _____ day of _____, 2021.

_____
TASHA CERDA, Mayor

ATTEST:

_____
MINA SEMENZA, City Clerk

APPROVED AS TO FORM:



_____
CARMEN VASQUEZ, City Attorney

City of Gardena

Gardena City Council Meeting

AGENDA REPORT SUMMARY

Agenda Item No. 8.K
Section: CONSENT CALENDAR
Meeting Date: April 27, 2021

TO: THE HONORABLE MAYOR AND MEMBERS OF THE GARDENA CITY COUNCIL

AGENDA TITLE: AUTHORIZATION TO PURCHASE PERSONAL PROTECTIVE EQUIPMENT, IN THE AMOUNT OF $70,185.00, UNDER THE 2018 HOMELAND SECURITY PROGRAM GRANT
CONTACT: POLICE

COUNCIL ACTION REQUIRED:

RECOMMENDATION AND STAFF SUMMARY:
Staff respectfully recommends that the City Council authorize the purchase of AVON PC50 Gas Masks, AVON 70501-156 Outsert Lenses, AVON CTCF 50 Riot Filters, and AVON 72601-29 Laser Outsert Lenses, totaling $70,185.00, under the 2018 State Homeland Security Grant.

The County of Los Angeles Board of Supervisors accepted the 2018 State Homeland Security Program (SHSP) grant funding from the California Governor's Office of Emergency Services (Cal OES), with a performance period of September 1, 2018 to May 31, 2021. As Subgrantee, the County of Los Angeles was authorized to proceed with the allocation of funds and entered into subrecipient agreements with program participants. As a participant, The City of Gardena was awarded $70,185.00 to purchase equipment approved by the funding authority and coordinated among other Los Angeles County law enforcement agencies, including the Cities of Redondo Beach, Hermosa Beach, Manhattan Beach, and the City of Hawthorne.

The Police Department will purchase the personal protective equipment to be used by first responders and field deployed assets for international/domestic terrorist incidents and civil unrest situations. The funds provided by this Grant will provide protection in dangerous and contaminated environments while responding to domestic and international threats.

FINANCIAL IMPACT/COST:
$70,185.00 to be funded through the 2018 State Homeland Security Program Grant.

ATTACHMENTS:
2018 SHSP Agreement Part I.pdf
2018 SHSP Agreement Part II.pdf
2018 SHSP Project Ledger.pdf

APPROVED:



_____

Clint Osorio, City Manager

County of Los Angeles
CHIEF EXECUTIVE OFFICE
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 713, Los Angeles, California 90012
(213) 974-1101
http://ceo.lacounty.gov

SACHI A. HAMAI
Chief Executive Officer

Board of Supervisors
HILDA L. SOLIS
First District

MARK RIDLEY-THOMAS
Second District

SHEILA KUEHL
Third District

JANICE HAHN
Fourth District

KATHRYN BARGER
Fifth District

May 28, 2020

Clint Osorio, City Manager
City of Gardena
1700 W. 162nd Street
Gardena, CA 90247

Dear Mr. Osorio:

2018 STATE HOMELAND SECURITY PROGRAM SUBRECIPIENT AGREEMENT

Enclosed for your files is an original executed 2018 State Homeland Security Program Agreement between the City of Gardena and the County of Los Angeles. This Agreement provides the framework for your City to make approved expenditures and request reimbursement under the Grant through this office. However, prior to your City moving forward and if applicable, request(s) for Non-competitive Procurement (e.g. sole source or failed bid), as well as Aviation, Watercraft, and Environmental approvals must be first secured from the State prior to your City awarding a Purchase Order.

Any questions regarding this Agreement or requests for sole source procurement, aviation, watercraft, and environmental approvals should be directed to Giles Quan at gquan@ceo.lacounty.gov or (213) 974-2319, or to me at chirakawa@ceo.lacounty.gov or (213) 974-1127.

Sincerely,

Craig Hirakawa, Grants Director
Homeland Security Grants Administration

Enclosure

c: Mike Saffell, Chief of Police, Gardena Police Department (w/o enclosure)

State Homeland Security Program
Subrecipient Agreement
Grant Year 2018

Between the

County of Los Angeles

and the

City of Gardena

SUBRECIPIENT AGREEMENT
BETWEEN THE
COUNTY OF LOS ANGELES
AND THE
CITY OF GARDENA

THIS AGREEMENT ("Agreement") is made and entered into by and between the County of Los Angeles, a political subdivision of the State of California (the "County of Los Angeles"), and the City of Gardena, a public agency (the "Subrecipient").

W I T N E S S E T H

WHEREAS, the U.S. Department of Homeland Security Title 2 Code of Federal Regulations (CFR) through the Office of Grants and Training (G&T), has provided financial assistance for the State Homeland Security Program (SHSP), Catalog of Federal Domestic Assistance (CFDA) 97.067 – Homeland Security Grant Program directly to the California Governor's Office of Emergency Services (Cal OES) for the 2018 SHSP, FAIN #EMW-2018-SS-00054, Federal Award dated October 1, 2018 with a performance period of September 1, 2018 to May 31, 2021. This Federal Award is not a R&D award; and

WHEREAS, the Cal OES provides said funds to the County of Los Angeles (DUNS #052238763) as its Subgrantee, and the Chief Executive Office (CEO) is responsible for managing and overseeing the SHSP funds that are distributed to other specified jurisdictions within Los Angeles County; and

WHEREAS, this financial assistance is being provided to the Subrecipient in order to address the unique equipment, training, organization, exercise and planning needs of the Subrecipient, and to assist the Subrecipient in building effective prevention and protection capabilities to prevent, respond to, and recover from threats or acts of terrorism; and

WHEREAS, the County of Los Angeles as Subgrantee has obtained approval of the 2018 SHSP grant from Cal OES in the total amount of $10,276,869.00; and

WHEREAS, the CEO now wishes to distribute 2018 SHSP grant funds to the Subrecipient in the amount of $70,199.00 as further detailed in this Agreement; and

WHEREAS, the CEO is authorized to enter into subrecipient agreements with cities providing for re-allocation and use of these funds; and to execute all future amendments, modifications, extensions, and augmentations relative to the subrecipient agreements, as necessary; and

WHEREAS, the County of Los Angeles and Subrecipient are desirous of executing this Agreement, and the County of Los Angeles Board of Supervisors July 30, 2019 authorized the CEO to prepare and execute this Agreement.

NOW, THEREFORE, the County of Los Angeles and Subrecipient agree as follows:

SECTION I

INTRODUCTION

§101. Parties to this Agreement

The parties to this Agreement are:

A. County of Los Angeles, a political subdivision of the State of California, having its principal office at Kenneth Hahn Hall of Administration, 500 West Temple Street, Los Angeles, CA 90012; and

B. City of Gardena, a public agency, having its principal office at 1700 W 162nd St., Gardena CA. 90247

§102. Representatives of the Parties and Service of Notices

A. The representatives of the respective parties who are authorized to administer this Agreement and to whom formal notices, demands and communications must be given are as follows:

1. The representative of the County of Los Angeles is, unless otherwise stated in this Agreement:

Craig Hirakawa, Grant Manager
Chief Executive Office, LAC
500 West Temple Street, Room B-79-2
Los Angeles, CA 90012
Phone: (213) 974-1127
Fax: (213) 687-3765
chirakawa@ceo.lacounty.gov

Giles Quan
Chief Executive Office, LAC
500 West Temple Street, Room B-79-2
Los Angeles, CA 90012
Phone: (213) 974-2319
Fax: (213) 687-3765
gquan@ceo.lacounty.gov

2. The representative of Subrecipient is:

Name and Title:	CLINT D. OSORIO, CITY MANAGER
Organizational DUNS Number	066635913
Address:	1700 W 162ND STREET
City/State/Zip:	GARDENA, CA 90247
Phone:	(310) 217-9503
FAX:	(310) 217-9116
Email:	cosorio@cityofgardena.org

With a copy to:

Name and Title:	MIKE SAFFELL, CHEIF OF POLICE
Address:	1700 W 162ND STREET
City/State/Zip:	GARDENA, CA 90247
Phone:	(310) 217-9601
FAX:	(310)
Email:	msaffell@gardenapd.org

B. Formal notices, demands and communications to be given hereunder by either party must be made in writing and may be effected by personal delivery, regular U.S. Postal mail service and/or e-mail. In the event of personal delivery or email, the message will be deemed communicated upon receipt by the County of Los Angeles. In the event of mail service, the message will be deemed communicated as of the date of mailing.

C. If the name and/or title of the person designated to receive the notices, demands or communications or the address of such person is changed, written notice must be given, in accord with this section, within five (5) business days of said change.

§103. Independent Party

Subrecipient is acting hereunder as an independent party, and not as an agent or employee of the County of Los Angeles. An employee of Subrecipient is not, and will not be deemed, an employee of the County of Los Angeles by virtue of this Agreement, and Subrecipient must so inform each employee organization and each employee who is hired or retained under this Agreement. Subrecipient must not represent or otherwise hold out itself or any of its directors, officers, partners, employees, or agents to be an agent or employee of the County of Los Angeles by virtue of this Agreement.

§104. Conditions Precedent to Execution of This Agreement

Subrecipient must provide the following signed documents to the County of Los Angeles, unless otherwise exempted:

A. Certification and Disclosure Regarding Lobbying, attached hereto as Exhibit A and made a part hereof, in accordance with §411.A.14 of this Agreement. Subrecipient must also file a Disclosure Form at the end of each calendar quarter in which there occurs any event requiring disclosure or which materially affects the accuracy of the information contained in any Disclosure Form previously filed by Subrecipient.

B. Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion Lower Tier Covered Transactions, attached hereto as Exhibit B and made a part hereof, as required by Executive Order 12549 in accordance with §411.A.12 of this Agreement.

C. Certification Regarding Drug-Free Workplace, attached hereto as Exhibit C and made a part hereof, in accordance with §411.A.13 of this Agreement.

D. Certification of Grant Assurances, attached hereto as Exhibit D and made a part hereof, in accordance with §411.C of this Agreement.

SECTION II

TERM AND SERVICES TO BE PROVIDED

§201. Performance Period

The performance period of this Agreement is from September 1, 2018 to February 28, 2021, unless the County of Los Angeles, with Cal OES approval, provides written notification to the Subrecipient that the performance period has been extended, in which case the performance period will be so extended by such written notification, as provided in §502, below.

§202. Use of Grant Funds

A. Subrecipient and the County of Los Angeles have previously completed a mutually approved budget/expenditure plan, hereinafter "Budget," for the 2018 SHSP, which has been approved by Cal OES. This information is contained in a copy of the Final Grant Award Letter and Project Worksheet, attached hereto as Exhibit E.

Any request by Subrecipient to modify the Budget must be made in writing with the appropriate justification and submitted to CEO for approval. If during the County of Los Angeles review process, additional information or documentation is required, the Subrecipient will have ten (10) business days to comply with the request. If the Subrecipient does not comply with the request, CEO will issue written notification indicating that the requested modification will not be processed. Modifications must be approved in writing by the County of Los Angeles and Cal OES during the term of this Agreement. Upon approval, all other terms of this Agreement will remain in effect.

Subrecipient must utilize grant funds in accordance with all Federal regulations and State Guidelines.

B. Subrecipient agrees that grant funds awarded will be used to supplement existing funds for program activities, and will not supplant (replace) non-Federal funds.

C. Subrecipient must review the Federal Debarment Listing at https://www.sam.gov/SAM/pages/public/searchRecords/search.jsf prior to the purchase of equipment or services to ensure the intended vendor is not listed and also maintain documentation that the list was verified.

D. Prior to the purchase of equipment or services utilizing a sole source contract or the receipt of single bid response of $250,000.00 or more, justification must be presented to CEO, who upon review will request approval from Cal OES. Such approval in writing must be obtained prior to the commitment of funds.

E. Subrecipient must provide any reports requested by the County of Los Angeles to the CEO indicating Subrecipient's performance under this Agreement, including progress on meeting program goals. Reports must be in the form requested by the County of Los Angeles, and must be provided by the fifteenth (15th) of the following month. Subrecipient is required to complete any survey requests requested by the County of Los Angeles. Subrecipient must also submit completed Project Claims for reimbursement immediately or a minimum on a quarterly basis, and no later than the date stated in §201, above.

F. Subrecipient must provide an electronic copy of their Annual Single Audit Report, as required by 2 CFR Part 200, to CEO no later than March 31st (fiscal year ending June 30) or June 30th (fiscal year ending September 30) of the year following the reporting period.

G. Subrecipient may be monitored by the County of Los Angeles on an annual basis to ensure compliance with Cal OES grant program requirements. The County of Los Angeles anticipates that said monitoring may include, at a minimum, one on-site visit during the term of this Agreement.

H. Subrecipient must provide a Corrective Action Plan to CEO within thirty (30) days of any audit finding.

I. Any equipment acquired pursuant to this Agreement must be authorized in the G&T Authorized Equipment List (AEL) available online at https://www.fema.gov/authorized-equipment-list and the Funding Guidelines of the 2018 SHSP Notice of Funding Opportunity, incorporated by reference, and attached hereto as Exhibit F. Subrecipient must provide the CEO a copy of its most current procurement guidelines and follow its own procurement requirements as long as they meet or exceed the minimum Federal requirements and any added Cal OES requirements. Federal procurement requirements for the 2018 SHSP can be found at Title 2 CFR Part 200.313.

   Any equipment acquired or obtained with Grant Funds:

   1. Will be made available under the California Disaster and Civil Defense Master Mutual Aid Agreement in consultation with representatives of the various fire, emergency medical, hazardous materials response services, and law enforcement agencies within the jurisdiction of the applicant;

   2. Will be consistent with needs as identified in the State Homeland Security Strategy and will be deployed in conformance with that plan;

   3. Will be made available pursuant to applicable terms of the California Disaster and Civil Defense Master Mutual Aid Agreement and deployed with personnel trained in the use of such equipment in a manner consistent with the California Law Enforcement Mutual Aid Plan or the California Fire Services and Rescue Mutual Aid Plan.

J. Equipment acquired pursuant to this Agreement will be subject to the requirements of Title 2 CFR Part 200.313. For the purposes of this subsection, "Equipment" is defined as tangible nonexpendable property, having a useful life of more than one year which costs $5,000.00 or more per unit. Items costing less than $5,000.00, but acquired under the "Equipment" category of the Grant must also be listed on any required Equipment Listing.

   1. Equipment must be used by Subrecipient in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by Federal funds. When no longer needed for the original program or project, the Equipment may be used in other activities currently or previously supported by a Federal agency.

2. Subrecipient must make Equipment available for use on other like projects or programs currently or previously supported by the Federal Government, providing such use will not interfere with the work on the projects or program for which it was originally acquired. First preference for other use must be given to other programs or projects supported by the awarding agency.

3. An Equipment Listing must be maintained listing each item of Equipment acquired with SHSP funds. The Equipment Listing must be kept up to date at all times. Any changes must be recorded in the Listing within ten (10) business days and the updated Listing is to be forwarded to the County of Los Angeles Auditor-Controller (A-C) Shared Services Division. The Equipment Property Records must be maintained that include: (a) a description of the property, (b) a serial number or other identification number, (c) the source of property, (d) who holds title, (e) the acquisition date, (f) and cost of the property, (g) percentage of Federal participation in the cost of the property, (h) the location, (i) use and condition of the property, (j) and any ultimate disposition data including the date of disposal and sale price of the property. Records must be retained by the subrecipient pursuant to Title 2, Part 200.313 (d) (1) of the CFR.

4. All Equipment obtained under this Agreement must have an appropriate identification decal affixed to it, and, when practical, must be affixed where it is readily visible.

5. A physical inventory of the Equipment must be taken by the Subrecipient and the results reconciled with the Equipment Listing at least once every two years or prior to any site visit by State or Federal auditors or County of Los Angeles monitors. The Subrecipient is required to have on file a letter certifying as to the accuracy of the Equipment Listing in the frequency as above, and provide to the CEO when requested.

K. Any Planning paid pursuant to this Agreement must conform to the guidelines as listed in 2018 SHSP, Notice of Funding Opportunity or subsequent grant year programs.

L. Any Training paid pursuant to this Agreement must conform to the guidelines as listed in 2018 SHSP, Notice of Funding Opportunity, and must be first submitted to CEO and then pre-authorized by Cal OES. A catalog of federally approved and sponsored training courses is available at https://www.firstrespondertraining.gov/frts/

M. Any Exercise paid pursuant to this Agreement must conform to the guidelines as listed in 2018 SHSP, Notice of Funding Opportunity. Detailed Homeland Security Exercise and Evaluation Program Guidance is available at https://www.fema.gov/hseep

N. Subrecipient must provide to CEO a spending plan detailing the required steps and timeframes required to complete the approved projects within the grant timeframe. Subrecipient must submit the spending plan to CEO prior to final execution of the Agreement.

O. Any Organization activities paid pursuant to this Agreement must conform to the guidelines as listed in 2018 SHSP, Notice of Funding Opportunity.

P. Any Personnel activities paid pursuant to this Agreement must conform to the guidelines as listed in 2018 SHSP, Notice of Funding Opportunity.

Q. Pursuant to this Agreement, indirect costs are not reimbursable.

SECTION III

PAYMENT

§301. Payment of Grant Funds and Method of Payment

A. The County of Los Angeles will reimburse Subrecipient up to the maximum grant amount of $70,199.00 as expenditures are incurred and paid by Subrecipient and all documentation is reviewed and approved by County of Los Angeles. All expenditures must be for the purchase of equipment, exercises, training, and planning as described in Section II of this Agreement. The grant amount represents the amount allocated to Subrecipient in the 2018 SHSP Grant Award Letter from Cal OES.

B. Subrecipient must submit reimbursement requests to the County of Los Angeles A-C Shared Services Division requesting payment as soon as a Project is completed and expenses are incurred and paid with the required supporting documentation; submission can be sent immediately or at a minimum on a quarterly basis, and no later than the date stated in §201, above. Each reimbursement request must be accompanied by the Reimbursement Form (attached hereto as Exhibit G). All appropriate back-up documentation must be attached to the reimbursement form, including the method of procurement, purchase orders, invoices, report of goods received, and proof of payment.

For Training reimbursements, Subrecipient must include a copy of the class roster verifying training attendees, proof that prior approval was obtained from Cal OES and that a Cal OES tracking number has been assigned to the course, and timesheets and payroll registers for all training attendees.

For Exercise reimbursements, Subrecipient must enter the After Action Report (AAR) and Improvement Plan on the State Office of Domestic Preparedness

secure portal within sixty (60) days following completion of the exercise and submit proof of prior State approval of the AAR with the reimbursement request.

For Planning reimbursements, Subrecipient must include a copy of the final tangible product as a result of the Planning Project.

C. The County of Los Angeles may, at its discretion, reallocate unexpended grant funds to another subrecipient. Said reallocation may occur upon approval by the County of Los Angeles of a Subrecipient reimbursement submission, inquiry from the County of Los Angeles to the Subrecipient regarding fund utilization, or by written notification from the Subrecipient to the County of Los Angeles that a portion of the grant funds identified in §301.A., above, will not be utilized. As provided in §502, below, any increase or decrease in the grant amount specified in §301.A., above, may be effectuated by a written notification by the County of Los Angeles to the Subrecipient.

D. Payment of reimbursement request will be withheld by the County of Los Angeles until the County of Los Angeles has determined that Subrecipient has turned in all supporting documentation and completed the requirements of this Agreement.

E. It is understood that the County of Los Angeles makes no commitment to fund this Agreement beyond the terms set forth herein.

F. 1. Funding for all periods of this Agreement is subject to continuing Federal appropriation of grant funds for this program. In the event of a loss or reduction of Federal appropriation of grant funds for this program, the Agreement may be terminated, or appropriately amended, immediately upon notice to Subrecipient of such loss or reduction of Federal grant funds.

2. County of Los Angeles will make a good-faith effort to notify Subrecipient, in writing, of such non-appropriation at the earliest time.

SECTION IV

STANDARD PROVISIONS

§401. Construction of Provisions and Titles Herein

All titles or subtitles appearing herein have been inserted for convenience and do not, and will not be deemed to, affect the meaning or construction of any of the terms or provisions hereof. The language of this Agreement will be construed according to its fair meaning and not strictly for or against either party.

§402. Applicable Law, Interpretation and Enforcement

Each party's performance hereunder must comply with all applicable laws of the United States of America, the State of California, and the County of Los Angeles. This Agreement will be enforced and interpreted, as applicable, under the laws of the United States of America, the State of California and the County of Los Angeles.

If any part, term or provision of this Agreement is held void, illegal, unenforceable, or in conflict with any law of a Federal, State or Local Government having jurisdiction over this Agreement, the validity of the remainder of the Agreement will not be affected thereby.

Applicable Federal or State requirements that are more restrictive will be followed.

§403. Integrated Agreement

This Agreement sets forth all of the rights and duties of the parties with respect to the subject matter hereof, and replaces any and all previous agreements or understandings, whether written or oral, relating thereto. This Agreement may be amended only as provided for herein.

§404. Breach

If any party fails to perform, in whole or in part, any promise, covenant, or agreement set forth herein, or should any representation made by it be untrue, any aggrieved party may avail itself of all rights and remedies, at law or equity, in the courts of law. Said rights and remedies are cumulative of those provided for herein except that in all events, no party may recover more than once, suffer a penalty or forfeiture, or be unjustly compensated.

§405. Prohibition Against Assignment or Delegation

Subrecipient may not do any of the following, unless it has first obtained the written permission of the County of Los Angeles:

A. Assign or otherwise alienate any of its rights hereunder, including the right to payment; or

B. Delegate, subcontract, or otherwise transfer any of its duties hereunder.

§406. Permits

Subrecipient and its officers, agents and employees must obtain and maintain all permits and licenses necessary for Subrecipient's performance hereunder and must pay any fees required therefor. Subrecipient further certifies that it will

immediately notify the County of Los Angeles of any suspension, termination, lapse, non-renewal or restriction of licenses, certificates, or other documents.

§407. Nondiscrimination and Affirmative Action

Subrecipient must comply with the applicable nondiscrimination and affirmative action provisions of the laws of the United States of America, the State of California, and the County of Los Angeles. In performing this Agreement, Subrecipient must not discriminate in its employment practices against any employee or applicant for employment because of such person's race, religion, national origin, ancestry, sex, sexual orientation, age, physical handicap, mental disability, marital status, domestic partner status or medical condition. Subrecipient must comply with Executive Order 11246, entitled "Equal Employment Opportunity," as amended by Executive Order 11375, and as supplemented in Department of Labor regulations (41 CFR Part 60).

If required, Subrecipient must submit an Equal Employment Opportunity Plan to the Department of Justice Office of Civil Rights in accordance with guidelines listed at https://www.justice.gov/crt.

Any subcontract entered into by the Subrecipient relating to this Agreement, to the extent allowed hereunder, will be subject to the provisions of this §407 of this Agreement.

§408. Indemnification

Each of the parties to this Agreement is a public entity. This indemnity provision is written in contemplation of the provisions of Section 895.2 of the Government Code of the State of California, which impose certain tort liability jointly upon public entities, solely by reason of such entities being parties to an agreement, and the parties agree that this indemnity provision will apply and will be enforceable regardless of whether Section 895 et seq. is deemed to apply to this Agreement. The parties hereto, as between themselves, consistent with the authorization contained in Government Code Sections 895.4 and 895.6 agree to each assume the full liability imposed upon it or upon any of its officers, agents, or employees by law, for injury caused by a negligent or wrongful act or omission occurring in the performance of this Agreement, to the same extent that such liability would be imposed in the absence of Government Code Section 895.2. To achieve the above-stated purpose, each party agrees to indemnify and hold harmless the other party for any liability arising out of its own negligent acts or omissions in the performance of this Agreement (i.e., the Subrecipient agrees to indemnify and hold harmless the County of Los Angeles for liability arising out of the Subrecipient's negligent or wrongful acts or omissions and the County of Los Angeles agrees to indemnify and hold harmless the Subrecipient for liability arising out of the County of Los Angeles' negligent or wrongful acts or omissions). Each party further agrees to indemnify and hold harmless the other party for liability that is imposed on the other party solely by virtue of Government

Code Section 895.2. The provisions of Section 2778 of the California Civil Code are made a part hereof as if fully set forth herein. Subrecipient certifies that it has adequate self-insured retention of funds to meet any obligation arising from this Agreement.

§409. Conflict of Interest

A. The Subrecipient covenants that none of its directors, officers, employees, or agents may participate in selecting, or administrating, any subcontract supported (in whole or in part) by Federal funds where such person is a director, officer, employee or agent of the subcontractor; or where the selection of subcontractors is or has the appearance of being motivated by a desire for personal gain for themselves or others such as family business, etc.; or where such person knows or should have known that:

1. A member of such person's immediate family, or domestic partner or organization has a financial interest in the subcontract;

2. The subcontractor is someone with whom such person has or is negotiating any prospective employment; or

3. The participation of such person would be prohibited by the California Political Reform Act, California Government Code §87100 et seq. if such person were a public officer, because such person would have a "financial or other interest" in the subcontract.

B. Definitions:

1. The term "immediate family" means domestic partner and/or those persons related by blood or marriage, such as husband, wife, father, mother, brother, sister, son, daughter, father in law, mother in law, brother in law, sister in law, son in law, daughter in law.

2. The term "financial or other interest" means:

a. Any direct or indirect financial interest in the specific contract, including but not limited to, a commission or fee, a share of the proceeds, prospect of a promotion or of future employment, a profit, or any other form of financial reward.

b. Any of the following interests in the subcontractor ownership: partnership interest or other beneficial interest of five percent or more; ownership of five percent or more of the stock; employment in a managerial capacity; or membership on the board of directors or governing body.

C. The Subrecipient further covenants that no officer, director, employee, or agent may solicit or accept gratuities, favors, or anything of monetary value from any

actual or potential subcontractor, supplier, a party to a sub agreement, (or persons who are otherwise in a position to benefit from the actions of any officer, employee, or agent).

D. The Subrecipient may not subcontract with a former director, officer, or employee within a one year period following the termination of the relationship between said person and the Subrecipient.

E. Prior to obtaining the County of Los Angeles' approval of any subcontract, the Subrecipient must disclose to the County of Los Angeles any relationship, financial or otherwise, direct or indirect, of the Subrecipient or any of its officers, directors or employees or their immediate family with the proposed subcontractor and its officers, directors or employees.

F. For further clarification of the meaning of any of the terms used herein, the parties agree that references are made to the guidelines, rules, and laws of the County of Los Angeles, State of California, and Federal regulations regarding conflict of interest.

G. The Subrecipient warrants that it has not paid or given and will not pay or give to any third person any money or other consideration for obtaining this Agreement.

H. The Subrecipient covenants that no member, officer or employee of Subrecipient may have interest, direct or indirect, in any contract or subcontract or the proceeds thereof for work to be performed in connection with this project during his/her tenure as such employee, member or officer or for one year thereafter.

I. The Subrecipient must incorporate the foregoing subsections of this Section into every agreement that it enters into in connection with this grant and must substitute the term "subcontractor" for the term "Subrecipient" and "sub subcontractor" for "Subcontractor".

§410. Restriction on Disclosures

Any reports, analyses, studies, drawings, information, or data generated as a result of this Agreement are to be governed by the California Public Records Act (California Government Code Sec. 6250 et seq.).

§411. Statutes and Regulations Applicable To All Grant Contracts

A. Subrecipient must comply with all applicable requirements of State, Federal, and County of Los Angeles laws, executive orders, regulations, program and administrative requirements, policies and any other requirements governing this Agreement. Subrecipient must comply with applicable State and Federal laws and regulations pertaining to labor, wages, hours, and other conditions of employment. Subrecipient must comply with new, amended, or revised laws,

regulations, and/or procedures that apply to the performance of this Agreement. These requirements include, but are not limited to:

1. CFR

   Subrecipient must comply with Title 2 CFR Part 200.

2. Single Audit Act

   Since Federal funds are used in the performance of this Agreement, Subrecipient must, as applicable, adhere to the rules and regulations of the Single Audit Act (31 USC Sec. 7501 et seq.), 2 CFR Part 200 and any administrative regulation or field memos implementing the Act.

3. Americans with Disabilities Act

   Subrecipient hereby certifies that, as applicable, it will comply with the Americans with Disabilities Act 42, USC §§12101 et seq., and its implementing regulations. Subrecipient will provide reasonable accommodations to allow qualified individuals with disabilities to have access to and to participate in its programs, services and activities in accordance with the provisions of the Americans with Disabilities Act. Subrecipient will not discriminate against persons with disabilities nor against persons due to their relationship to or association with a person with a disability. Any subcontract entered into by Subrecipient, relating to this Agreement, to the extent allowed hereunder, will be subject to the provisions of this paragraph.

4. Political and Sectarian Activity Prohibited

   None of the funds, materials, property or services provided directly or indirectly under this Agreement may be used for any partisan political activity, or to further the election or defeat of any candidate for public office. Neither may any funds provided under this Agreement be used for any purpose designed to support or defeat any pending legislation or administrative regulation. None of the funds provided pursuant to this Agreement may be used for any sectarian purpose or to support or benefit any sectarian activity.

   Subrecipient must file a Disclosure Form at the end of each calendar quarter in which there occurs any event requiring disclosure or which materially affects the accuracy of any of the information contained in any Disclosure Form previously filed by Subrecipient. Subrecipient must require that the language of this Certification be included in the award documents for all sub-awards at all tiers and that all subcontractors certify and disclose accordingly.

5. Records Inspection

At any time during normal business hours and as often as either the County of Los Angeles, the U.S. Comptroller General or the Auditor General of the State of California may deem necessary, Subrecipient must make available for examination all of its records with respect to all matters covered by this Agreement. The County of Los Angeles, the U.S. Comptroller General and the Auditor General of the State of California have the authority to audit, examine and make excerpts or transcripts from records, including all Subrecipient's method of procurement, invoices, materials, payrolls, records of personnel, conditions of employment and other data relating to all matters covered by this Agreement.

Subrecipient agrees to provide any reports requested by the County of Los Angeles regarding performance of this Agreement.

6. Records Maintenance

Records, in their original form, must be maintained in accordance with requirements prescribed by the County of Los Angeles with respect to all matters specified in this Agreement. Original forms are to be maintained on file for all documents specified in this Agreement. Such records must be retained for a period five (5) years after termination of this Agreement and after final disposition of all pending matters. "Pending matters" include, but are not limited to, an audit, litigation or other actions involving records. The County of Los Angeles may, at its discretion, take possession of, retain and audit said records. Records, in their original form pertaining to matters covered by this Agreement, must at all times be retained within the County of Los Angeles unless authorization to remove them is granted in writing by the County of Los Angeles.

7. Subcontracts and Procurement

Subrecipient must, as applicable, comply with the Federal, State and County of Los Angeles standards in the award of any subcontracts. For purposes of this Agreement, subcontracts include but are not limited to purchase agreements, rental or lease agreements, third party agreements, consultant service contracts and construction subcontracts.

Subrecipient must, as applicable, ensure that the terms of this Agreement with the County of Los Angeles are incorporated into all Subcontractor agreements. The Subrecipient must submit all Subcontractor agreements to the County of Los Angeles for review prior to the release of any funds to the Subcontractor. The Subrecipient must withhold funds to any Subcontractor agency that fails to comply with the terms and conditions of this Agreement and their respective Subcontractor agreement.

8. Labor

Subrecipient must, as applicable, comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed requirements for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System Personnel Administration (5 CFR 900, Subpart F).

Subrecipient must, as applicable, comply with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7); the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874); the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements; and the Hatch Act (5 USC §§1501-1508 and 7324-7328).

Subrecipient must, as applicable, comply with the Federal Fair Labor Standards Act (29 U.S.C. §201) regarding wages and hours of employment.

None of the funds may be used to promote or deter union/labor organizing activities. CA Gov't Code Sec. 16645 et seq.

9. Civil Rights

Subrecipient must, as applicable, comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352), which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681- 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of disabilities; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to non-discrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; (j) the requirements of any other nondiscrimination statute(s) that may apply to the application; and (k) P.L. 93-348 regarding the protection

of human subjects involved in research, development, and related activities supported by this award of assistance.

10. Environmental

Subrecipient must, as applicable, comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646), which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

Subrecipient must, as applicable, comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93205); and (i) Flood Disaster Protection Act of 1973 §102(a) (P.L. 93-234).

Subrecipient must, as applicable, comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

Subrecipient must, as applicable, comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.), which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.

Subrecipient must, as applicable, comply with the Federal Water Pollution Control Act (33 U.S.C. §1251 et seq.), which restores and maintains the chemical, physical and biological integrity of the Nation's waters.

Subrecipient must, as applicable, ensure that the facilities under its ownership, lease or supervision that are utilized in the accomplishment of this project are not listed in the Environmental Protection Agency's (EPA) list of Violating Facilities and that it will notify the Federal Grantor agency

of the receipt of any communication from the Director of the EPA Office of Federal Activities indicating that a facility to be used in the project is under consideration for listing by the EPA.

By signing this Agreement, Subrecipient warrants and represents that it will, as applicable, comply with the California Environmental Quality Act (CEQA), Public Resources Code §21000 et seq.

Subrecipient must, as applicable, comply with the Energy Policy and Conservation Act (P.L. 94-163, 89 Stat. 871).

Subrecipient must, as applicable, comply with the provision of the Coastal Barrier Resources Act (P.L. 97-348) dated October 19, 1982 (16 U.S.C. 3501 et. seq.) which prohibits the expenditure of most new Federal funds within the units of the Coastal Barrier Resources System.

11. Preservation

Subrecipient must, as applicable, comply with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).

12. Suspension, Debarment, Ineligibility and Voluntary Exclusion

Subrecipient must, as applicable, comply with Title 2 CFR Part §3000, regarding Suspension and Debarment, and Subrecipient must submit a Certification Regarding Debarment, attached hereto as Exhibit B, required by Executive Order 12549 and any amendment thereto. Said Certification must be submitted to the County of Los Angeles concurrent with the execution of this Agreement and must certify that neither Subrecipient nor its principals are presently debarred, suspended, proposed for debarment, declared ineligible or voluntarily excluded from participation in this transaction by any Federal department head or agency. Subrecipient must require that the language of this Certification be included in the award documents for all sub-award at all tiers and that all subcontractors certify accordingly.

13. Drug-Free Workplace

Subrecipient must, as applicable, comply with the federal Drug-Free Workplace Act of 1988, 41 USC §701, Title 44 Code of Federal Regulations (CFR) Part §17; the California Drug-Free Workplace Act of 1990, CA Gov't Code §§8350-8357, and Subrecipient must complete the Certification Regarding Drug-Free Workplace Requirements, attached hereto as Exhibit C, and incorporated herein by reference. Subrecipient must require that the language of this Certification be included in the

award documents for all sub-award at all tiers and that all subcontractors certify accordingly.

14. Lobbying Activities

Subrecipient must, as applicable, comply with 31 U.S.C.1352 and complete the Disclosure of Lobbying Activities, (OMB 0038-0046), attached hereto as Exhibit A, and incorporated herein by reference.

15. Miscellaneous

Subrecipient must, as applicable, comply with the Laboratory Animal Welfare Act of 1966, as amended (P.L. 89-544, 7 USC §§2131 et seq.).

B. Statutes and Regulations Applicable To This Particular Grant Agreement

Subrecipient must comply with all applicable requirements of State and Federal laws, executive orders, regulations, program and administrative requirements, policies and any other requirements governing this particular grant program. Subrecipient must, as applicable, comply with new, amended, or revised laws, regulations, and/or procedures that apply to the performance of this Agreement. These requirements include, but are not limited to:

Title 2 CFR Part 200; EO 12372; U.S. Department of Homeland Security, Office of State and Local Government Coordination and Preparedness, Office for Domestic Preparedness, ODP WMD Training Course Catalogue; and DOJ Office for Civil Rights.

Standardized Emergency Management System (SEMS) requirements as stated in the California Emergency Services Act, Government Code Chapter 7 of Division 1 of Title 2, §8607.1(e) and CCR Title 19, §§2445-2448.

Provisions of Title 2, 6, 28, 44 CFR applicable to grants and cooperative agreements, including Part 18, Administrative Review Procedures; Part 20, Criminal Justice Information Systems; Part 22, Confidentiality of Identifiable Research and Statistical Information; Part 23, Criminal Intelligence Systems Operating Policies; Part 30, Intergovernmental Review of Department of Justice Programs and Activities; Part 35, Nondiscrimination on the Basis of Disability in State and Local Government Services; Part 38, Equal Treatment of Faith-based Organizations; Part 42, Nondiscrimination/Equal Employment Opportunities Policies and Procedures; Part 61, Procedures for Implementing the National Environmental Policy Act; Part 63, Floodplain Management and Wetland Protection Procedures; Part 64, Floodplain Management and Wetland Protection Procedures; Federal laws or regulations applicable to Federal Assistance Programs; Part 69, New Restrictions on Lobbying; Part 70, Uniform Administrative Requirements for Grants and Cooperative Agreements (including sub-awards) with Institutions of Higher Learning, Hospitals and other Non-Profit

Organizations; and Part 83, Government-Wide Requirements for a Drug Free Workplace (grants).

Nondiscrimination requirements of the Omnibus Crime Control and Safe Streets Act of 1968, as amended, 42 USC 3789(d), or the Juvenile Justice and Delinquency Prevention Act, or the Victims of Crime Act, as appropriate; the provisions of the current edition of the Office of Justice Programs Financial and Administrative Guide for Grants, M7100.1, and all other applicable Federal laws, orders, circulars, or regulations.

1. Travel Expenses

Subrecipient, as provided herein, will be compensated for Subrecipient's reasonable travel expenses incurred in the performance of this Agreement, to include travel and per diem, unless otherwise expressed. Subrecipient's total travel for in-State and/or out-of-State and per diem costs must be included in the contract budget(s). All travel, including out-of-State travel, that is not included in the budget(s) will not be reimbursed without prior written authorization from the County of Los Angeles.

Subrecipient's administrative-related travel and per diem reimbursement costs will not be reimbursed. For programmatic-related travel costs, Subrecipient's reimbursement rates may not exceed the amounts established under the grant.

C. Compliance With Grant Requirements

To obtain the grant funds, the State required an authorized representative of the County of Los Angeles to sign certain promises regarding the way the grant funds would be spent. These requirements are included in the 2018 Notice of Funding Opportunity and in the State's "Grant Assurances". By signing these Grant Assurances and accepting the Notice of Funding Opportunity, the County of Los Angeles became liable to the State for any funds that are used in violation of the grant requirements. The State's Grant Assurances are incorporated into this Agreement through Exhibit D. Subrecipient will be liable to the Grantor for any funds the State determines the Subrecipient used in violation of these Grant Assurances.

Pursuant to this Agreement, Subrecipient shall execute the 2018 Certification of Grant Assurances in Exhibit D, accepting and agreeing to abide by all provisions, assurances, and requirements therein. Subrecipient agrees to indemnify and hold harmless the County of Los Angeles for any sums the State or Federal government determines Subrecipient used in violation of the Grant Assurances.

To the extent Exhibit D conflicts with language or provisions contained in this Agreement, or contains more restrictive requirements under Federal and State law, Exhibit D shall control.

D. Noncompliance With Grant Requirements

Subrecipient understands that failure to comply with any of the above assurances and requirements, including Exhibit D, may result in suspension, termination or reduction of grant funds, and repayment by the Subrecipient to the County of Los Angeles of any unauthorized expenditures.

§412. Federal, State and Local Taxes

Federal, State and local taxes are the responsibility of the Subrecipient as an independent party and not of the County of Los Angeles and must be paid prior to requesting reimbursement. However, these taxes are an allowable expense under the grant program.

§413. Inventions, Patents and Copyrights

A. Reporting Procedure for Inventions

If any project produces any invention or discovery ("Invention") patentable or otherwise under Title 35 of the U.S. Code, including, without limitation, processes and business methods made in the course of work under this Agreement, the Subrecipient must report the fact and disclose the Invention promptly and fully to the County of Los Angeles. The County of Los Angeles will report the fact and disclose the Invention to the State. Unless there is a prior agreement between the County of Los Angeles and the State, the State will determine whether to seek protection on the Invention. The State will determine how the rights in the Invention, including rights under any patent issued thereon, will be allocated and administered in order to protect the public interest consistent with the policy ("Policy") embodied in the Federal Acquisition Regulations System, which is based on Ch. 18 of Title 35 U.S.C. Sections 200 et seq. (Pub. L. 95-517, Pub. L. 98-620, Title 37 CFR Part 401); Presidential Memorandum on Government Patent Policy to the Heads of the Executive Departments and Agencies, dated 2/18/1983); and Executive Order 12591, 4/10/87, 52 FR 13414, Title 3 CFR, 1987 Comp., p. 220 (as amended by Executive Order 12618, 12/22/87, 52 FR 48661, Title 3 CFR, 1987 Comp., p. 262). Subrecipient hereby agrees to be bound by the Policy, and will contractually require its personnel to be bound by the Policy.

B. Rights to Use Inventions

As applicable, County of Los Angeles will have an unencumbered right, and a non-exclusive, irrevocable, royalty-free license to use, manufacture, improve upon, and allow others to do so for all government purposes, any Invention developed under this Agreement.

C. Copyright Policy

1. Unless otherwise provided by the State or the terms of this Agreement, when copyrightable material ("Material") is developed under this Agreement, the County of Los Angeles, at its discretion, may copyright the Material. If the County of Los Angeles declines to copyright the Material, the County of Los Angeles will have an unencumbered right, and a non-exclusive, irrevocable, royalty-free license, to use, manufacture, improve upon, and allow others to do so for all government purposes, any Material developed under this Agreement.

2. The State will have an unencumbered right, and a non-exclusive, irrevocable, royalty-free license, to use, manufacture, improve upon, and allow others to do so for all government purposes, any Material developed under this Agreement or any Copyright purchased under this Agreement.

3. Subrecipient must comply with Title 24 CFR 85.34.

D. Rights to Data

The State and the County of Los Angeles will have unlimited rights or copyright license to any data first produced or delivered under this Agreement. "Unlimited rights" means the right to use, disclose, reproduce, prepare derivative works, *distribute* copies to the public, and perform and display publicly, or permit others to do so; as required by Title 48 CFR 27.401. Where the data are not first produced under this Agreement or are published copyrighted data with the notice of 17 U.S.C. Section 401 or 402, the State acquires the data under a copyright license as set forth in Title 48 CFR 27.404(f)(2) instead of unlimited rights. (Title 48 CFR 27.404(a)).

E. Obligations Binding on Subcontractors

Subrecipient must require all subcontractors to comply with the obligations of this section by incorporating the terms of this section into all subcontracts.

§414. Child Support Assignment Orders

Under the terms of this Agreement, Subrecipient must, as applicable, comply with California Family Code Section 5230 et seq.

§415. Minority, Women, And Other Business Enterprise Outreach Program

It is the policy of the County of Los Angeles to provide Minority Business Enterprises, Women Business Enterprises and all other business enterprises an equal opportunity to participate in the performance of all Subrecipient's contracts, including procurement, construction and personal services. This policy applies to all of the Subrecipient's contractors and sub-contractors.

§416. Compliance with Fair Chance Employment Practices

Subrecipient shall comply with fair chance employment hiring practices set forth in California Government Code Section 12952, Employment Discrimination: Conviction History. Subrecipient's violation of this paragraph of the Agreement t may constitute a material breach of the Agreement. In the event of such material breach, County of Los Angeles may, in its sole discretion, terminate the Agreement.

§417. Method of Payment and Required Information

The County of Los Angles may, at its sole discretion, determine the most appropriate, efficient, secure, and timely form of payment provided under this Agreement. Subrecipient further agrees that the default form of payment shall be Electronic Funds Transfer (EFT) or Direct Deposit, unless an alternative method of payment is deemed appropriate by the A-C.

Subrecipient shall provide the A-C with electronic banking and related information for the Subrecipient and/or any other payee that the Subrecipient designates to receive payment pursuant to this Agreement at https://directdeposit.lacounty.gov/. Such electronic banking and related information includes, but is not limited to: bank account number and routing number, legal business name, valid taxpayer identification number or TIN, a working e-mail address capable of receiving remittance advices and other payment related correspondence, and any other information that the A-C determines is reasonably necessary to process the payment and comply with all accounting, record keeping, and tax reporting requirements.

Any provision of law, grant, or funding agreement requiring a specific form or method of payment other than EFT or Direct Deposit shall supersede this requirement with respect to those payments. At any time during the duration of this Agreement, the Subrecipient may submit a written request for an exemption to this requirement and must be based on specific legal, business or operational needs and explain why the payment method designated by the A-C is not feasible and an alternative is necessary. The A-C, in consultation with CEO, shall decide whether to approve exemption requests.

SECTION V

DEFAULTS, SUSPENSION, TERMINATION, AND AMENDMENTS

§501. Defaults

Should either party fail for any reason to comply with the contractual obligations of this Agreement within the time specified by this Agreement, the non-breaching

party reserves the right to terminate the Agreement, reserving all rights under State and Federal law.

§502. Termination

This Agreement may be terminated, in whole or in part, from time to time, when such action is deemed by the County of Los Angeles, in its sole discretion, to be in its best interest. Termination of work hereunder shall be effected by notice of termination to the Subrecipient specifying the extent to which performance of work is terminated and the date upon which such termination becomes effective. The date upon which such termination becomes effective shall be no less than ten (10) days after the notice is sent.

§503. Amendments

Except as otherwise provided in this paragraph, any change in the terms of this Agreement, including changes in the services to be performed by Subrecipient, that are agreed to by the Subrecipient and the County of Los Angeles must be incorporated into this Agreement by a written amendment properly signed by persons who are authorized to bind the parties. Notwithstanding the foregoing, any increase or decrease of the grant amount specified in §301.A., above, or any extension of the performance period specified in §201, above, does not require a written amendment, but may be effectuated by a written notification by the County of Los Angeles to the Subrecipient.

SECTION VI

ENTIRE AGREEMENT

§601. Complete Agreement

This Agreement contains the full and complete Agreement between the two parties. Neither verbal agreement nor conversation or other communication with any officer or employee of either party will affect or modify any of the terms and conditions of this Agreement.

§602. Number of Pages and Attachments

This Agreement may be executed in two (2) duplicate originals utilizing wet and electronic signatures, each of which is deemed to be an original. This Agreement includes (25) pages and (7) Exhibits which constitute the entire understanding and agreement of the parties.

IN WITNESS WHEREOF, the Subrecipient and County of Los Angeles have caused this Agreement to be executed by their duly authorized representatives.

COUNTY OF LOS ANGELES

BY _____ May 21, 2020
FOR SACHI A. HAMAI
Chief Executive Officer

BY _____
CELIA ZAVALA
Executive Officer, Board of Supervisors

BY _____
ARLENE BARRERA
Auditor-Controller

APPROVED AS TO FORM

MARY C. WICKHAM
County Counsel

BY _____
Senior Deputy County Counsel

BY _____ CITY MANAGER _____ CLINT D. OSORIO _____ 2/20/20
City Representative/Title (Signature) (Print Name) Date

APPROVED AS TO FORM

BY _____ _____ _____
City Attorney (Signature) (Print Name) Date

ATTEST

BY _____ _____ _____
City Clerk (Signature) (Print Name) Date

EXHIBITS

Exhibit A	Certification and Disclosure Regarding Lobbying
Exhibit B	Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion Lower Tier Covered Transactions
Exhibit C	Certification Regarding Drug-Free Workplace
Exhibit D	Certification of Grant Assurances
Exhibit E	Final Grant Award Letter and Project Worksheet
Exhibit F	2018 Notice of Funding Opportunity
Exhibit G	Reimbursement Form and Instructions

INSTRUCTIONS FOR COMPLETION OF SF-LLL, DISCLOSURE OF LOBBYING ACTIVITIES

This disclosure form shall be completed by the reporting entity, whether sub-awardee or prime Federal recipient, at the initiation or receipt of a covered Federal action, or a material change to a previous filing, pursuant to *Title 31 U.S.C. Section 1352*. The filing of a form is required for each payment or agreement to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action. Use the SF-LLL-A Continuation Sheet for additional information if the space on the form is inadequate. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

1. Identify the type of covered Federal action for which lobbying activity is and/or has been secured to influence the outcome of a covered Federal action.

2. Identify the status of the covered Federal action.

3. Identify the appropriate classification of this report. If this is a follow-up report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.

4. Enter the full name, address, city, state and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or sub-award recipient. Identify the tier of the subawardee, e.g., the first subawardee of the prime is the 1st tier. Subawards include but are not limited to subcontracts, subgrants and contract awards under grants.

5. If the organization filing the report in item 4 checks "Subawardee," then enter the full name, address, city, state and zip code of the prime Federal recipient. Include Congressional District, if known.

6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizational level below agency name, if known. For example, Department of Transportation, United States Coast Guard.

7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loans, and loan commitments.

8. Enter the most appropriate Federal identifying number available for the Federal action identified in item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; sub-grant announcement number; the contract, subgrant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g.,"RFP-DE-90-001."

9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.

10. (a.) Enter the full name, address, city, state and zip code of the lobbying entity engaged by the reporting entity identified in item 4 to influence the covered Federal action.
    (b.) Enter the full names of the individual(s) performing services, and include full address if different from 10 (a). Enter Last Name, First Name, and Middle Initial (MI).

11. Enter the amount of compensation paid or reasonably expected to be paid by the reporting entity (item 4) to the lobbying entity (item 10). Indicate whether the payment has been made (actual) or will be made (planned). Check all boxes that apply. If this is a material change report, enter the cumulative amount of payment made or planned to be made.

12. Check the appropriate box(es). Check all boxes that apply. If payment is made through an in-kind contribution, specify the nature and value of the in-kind payment.

13. Check the appropriate box(es). Check all boxes that apply. If other, specify nature.

14. Provide a specific and detailed description of the services that the lobbyist has performed, or will be expected to perform, and the date(s) of any services rendered. Include all preparatory and related activity, not just time spent in actual contact with Federal officials. Identify the Federal official(s) or employee(s) contacted or the officer(s), employee(s), or Member(s) of Congress that were contacted.

15. Check whether or not a SF-LLL-A Continuation Sheet(s) is attached.

16. The certifying official shall sign and date the form, print his/her name, title, and telephone number.

Public reporting burden for this collection of information is estimated to average 30 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0046), Washington, D.C. 20503.

EXHIBIT A

Cal OES 2-232
Approved by OMB 0348-0046

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

1. Type of Federal Action:

[b] a. contract
b. grant
c. cooperative agreement
d. loan
e. loan guarantee
f. loan insurance

2. Status of Federal Action:

[b] a. bid/offer/application
b. initial award
c. post-award

3. Report Type:

[a] a. initial filing
b. material change

For Material Change Only:

Year _____ Quarter _____

date of last report _____

4. Name and Address of Reporting Entity:

CITY OF GARDENA 1700 W 162ND ST, GARDENA CA 90247

[ ] Prime [X] Subawardee

Tier, *If known:* _____

Congressional District, *if known:* _____

5. If Reporting Entity in No. 4 is Subawardee, Enter Name and Address of Prime:

COUNTY OF LOS ANGELES
CHIEF EXECUTIVE OFFICE
HOMELAND SECURITY GRANTS ADMINISTRATION
500 WEST TEMPLE STREET, ROOM B-79-2
LOS ANGELES, CA 90012

Congressional District, *if known:* _____

6. Federal Department/Agency:

OFFICE OF GRANTS & TRAINING

7. Federal Program Name/Description:

STATE HOMELAND SECURITY GRANT

CFDA Number, if applicable: 97.067

8. Federal Action Number, *if known:* _____

9. Award Amount, *if known:* _____

10. a. Name and Address of Lobbying Entity
(if individual, last name, first name, MI):
(attach Continuation Sheet(s) SF-LLL-A, if necessary)

b. Individuals Performing Services
(last name, first name, MI - include address if different from 10a)

11. Amount of Payment (check all that apply) :

_____ [ ] Actual [ ] Planned

12. Form of Payment *(check all that apply):*

[ ] a. cash
[ ] b. in-kind; specify:

nature _____ value _____

13. Type of Payment *(check all that apply):*

[ ] a. retainer
[ ] b. one-time fee
[ ] c. commission
[ ] d. contingent fee
[ ] e. deferred
[ ] f. other; specify: _____

14. Brief Description of Services Performed or to be Performed and Date(s) of Service, including officer(s), employee(s), or Member(s) contacted, for Payment indicated in item 11: (attach Continuation Sheet(s) SF-LLL-A, if necessary)

15. Continuation Sheet(s) SF-LLL-A attached: (•) Yes ( ) No

16. Information requested through this form is authorized by *Title 31 U.S.C. Section 1352.* This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to *31 U.S.C. 1352.* This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Signature: [signature]
Name: CLINT D OSORIO
Title: CITY MANAGER
Telephone: (310) 217-9503 (area code)
Date: 2-20-20

Federal Use Only:

Authorized for Local Reproduction
Standard Form – LLL

DISCLOSURE OF LOBBYING ACTIVITIES
CONCONTINUATION SHEET

Continuation of 10 a-b: additional sheets may be added if necessary

Reporting Entity:

Last Name	First Name	MI
Address	City	Zip
Last Name	First Name	MI
Address	City	Zip
Last Name	First Name	MI
Address	City	Zip
Last Name	First Name	MI
Address	City	Zip

Continuation of 14: (additional sheets may be added if necessary)

Brief Description of Services and Payments indicated in item 11:

Authorized for Local Reproduction
Standard Form – LLL-A

INSTRUCTIONS FOR CERTIFICATION

1. By signing and submitting this document, the prospective recipient of Federal assistance is providing the certification as set out below.

2. The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective recipient of Federal assistance funds knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

3. The prospective recipient of Federal assistance funds shall provide immediate written notice to the person to which this agreement is entered, if at any time the prospective recipient of Federal assistance funds learns that its certification was erroneous, when submitted or has become erroneous by reason of changed circumstances.

4. The terms "covered transaction," "debarred," "suspended," "ineligible," "lower tier covered transaction," "participant," "person," " primary covered transaction," 'principal," "proposal," and "voluntarily excluded," as used in this clause, have the meanings set out in the Definitions and Coverage sections of rules implementing Executive Order 12549.

5. The prospective recipient of Federal assistance funds agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is debarred, suspended, declared ineligible, or voluntarily excluded from participation on this covered transaction, unless authorized by the department or agency with which this transaction originated.

6. The prospective recipient of Federal assistance funds further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion Lower Tier Covered Transactions," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

7. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Procurement or Non Procurement Programs.

8. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

9. Except for transactions authorized under Paragraph 5 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is suspended, debarred, ineligible, or voluntary excluded form participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

EXHIBIT B

CERTIFICATION REGARDING DEBARMENT, SUSPENSION, INELIGIBILITY AND VOLUNTARY EXCLUSION LOWER TIER COVERED TRANSACTIONS

This certification is required by the regulations implementing Executive Order 12549, Debarment and Suspension, 24 CFR Part 24 Section 24.510, Participants' responsibilities.

(READ ATTACHED INSTRUCTIONS FOR CERTIFICATION BEFORE COMPLETING)

1. The prospective recipient of Federal assistance funds certifies that neither it nor its principals are presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.

2. Where the prospective recipient of Federal assistance funds is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

FAIN # EMW-2018-SS-00054
AGREEMENT NUMBER

CITY OF GARDENA
CONTRACTOR/BORROWER/AGENCY

CLINT D. OSORIO / CITY MANAGER
NAME AND TITLE OF AUTHORIZED REPRESENTATIVE

[signature] 2/20/20
SIGNATURE DATE

EXHIBIT C

STATE OF CALIFORNIA
DRUG-FREE WORKPLACE CERTIFICATION
STD. 21

COMPANY/ORGANIZATION NAME:

The contractor or grant recipient named above hereby certifies compliance with *Government Code Section 8355* in matters relating to providing a drug-free workplace. The above-named contractor or recipient will:

1. Publish a statement notifying employees that unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance is prohibited and specifying actions to be taken against employees for violations, as required by *Government Code Section 8355(a)*.

2. Establish a Drug-Free Awareness Program as required by *Government Code Section 8355(b)*, to inform employees about all of the following:

   (a) The dangers of drug abuse in the workplace,

   (b) The person's or organization's policy of maintaining a drug-free workplace,

   (c) Any available counseling, rehabilitation and employee assistance programs, and

   (d) Penalties that may be imposed upon employees for drug abuse violations.

3. Provide as required by *Government Code Section 8355(c)*, that every employee who works on the proposed contract or subgrant:

   (a) Will receive a copy of the company's drug-free policy statement, and

   (b) Will agree to abide by the terms of the company's statement as a condition of employment on the contract or subgrant.

CERTIFICATION

I, the official named below, hereby swear that I am duly authorized legally to bind the contractor or Recipient to the above described certification. I am fully aware that this certification, executed on the date and in the county below, is made under penalty of perjury under the laws of the State of California.

CLINT D. OSORIO
OFFICAL'S NAME

2/20/20
DATE EXECUTED

LOS ANGELES
EXECUTED IN THE COUNTY OF

CONTRACTOR or RECEIPEINT SIGNATURE

CITY MANAGER
TITLE

95-6000713
FEDERAL I.D. NUMBER

STATEMENT ON THE DRUG-FREE WORKPLACE

To comply with the enactment of Senate Bill 1120, *(Chapter 1170, Statutes of 1990),* which established the Drug-Free Workplace Act of 1990, the CITY OF GARDENA *(your agency)* accordingly provides this statement of compliance.

In order to maintain funding eligibility, state agencies, along with those in receipt of grant and contractual awards, must certify that they provide drug-free workplaces and have issued drug-free workplace statements to their employees *[Section 8355(a) of the Government Code].* Consequently, in accordance with this directive, this statement is issued to meet this requirement.

The CITY OF GARDENA *(your agency)*, an agency within the State of California has adopted this statement in compliance with legislation which addresses issues to avoid the dangers arising from drug and alcohol abuse in the workplace. These dangers include death and injury to the employee, co-workers, or the public resulting from accidents, dereliction of duty, poor judgment and carelessness. Substance abuse also results in lost productivity, reduced efficiency, and increased absenteeism by the substance abuser and interferes with the job performance of employees who do not use illegal or unauthorized substances. *[Section 8355(b)(1)]*

California law prohibits the unlawful manufacture, dispensation, possession, or illegal use of a controlled substance. That prohibition extends to all places and includes the worksite of California state employees. *[Section 8355(a)]*

Employees convicted of a violation of criminal drug statute, when the violation occurred at an employee's worksite, shall report the conviction to the granting and monitoring State agency upon conviction. *[Section 8356(a)(1)(2)]*

In the event of the unlawful manufacture, distribution, dispensation, possession or illegal use of a controlled substance at a State worksite, the State may take disciplinary action pursuant to the law and/or require the satisfactory completion of a drug abuse assistance or rehabilitation program. *[Section 8355(b)(4)]*

The Employee Assistance Program (EAP) provides drug problem assessment and referral to appropriate counseling and rehabilitation services. The EAP is available to all agency employees. Procedures exist to ensure the confidentiality of EAP records. Contact your personnel office for further information.

It is the intent of the CITY OF GARDENA *(your agency)* to ensure by execution of this statement of compliance that each employee shall abide by the terms of this drug-free workplace statement. *[Section 8355(c)]*

Cal OES
GOVERNOR'S OFFICE
OF EMERGENCY SERVICES

Standard Assurances
For All Cal OES Federal Grant Programs

As the duly authorized representative of the Applicant, I hereby certify that the Applicant has the legal authority to apply for federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay any non-federal share of project cost) to ensure proper planning, management, and completion of the project described in this application, within prescribed timelines.

I further acknowledge that the Applicant is responsible for reviewing and adhering to all requirements within the:

(a) Applicable Federal Regulations (see below);
(b) Federal Program Notice of Funding Opportunity (NOFO);
(c) California Supplement to the NOFO; and
(d) Federal and State Grant Program Guidelines.

Federal Regulations
Government cost principles, uniform administrative requirements, and audit requirements for federal grant programs are set forth in Title 2, Part 200 of the Code of Federal Regulations (C.F.R.). Updates are issued by the Office of Management and Budget (OMB) and can be found at http://www.whitehouse.gov/omb/.

Significant state and federal grant award requirements (some of which appear in the documents listed above) are set forth below. The Applicant hereby agrees to comply with the following:

1. **Proof of Authority**
   The Applicant will obtain written authorization from the city council, governing board, or authorized body in support of this project. This written authorization must specify that the Applicant and the city council, governing board, or authorized body agree:

   (a) To provide all matching funds required for the grant project and that any cash match will be appropriated as required;
   (b) Any liability arising out of the performance of this agreement shall be the responsibility of the Applicant and the city council, governing board, or authorized body;
   (c) Grant funds shall not be used to supplant expenditures controlled by the city council, governing board, or authorized body, and
   (d) The official executing this agreement is, in fact, authorized to do so.

   This Proof of Authority must be maintained on file and readily available upon request.

2. **Period of Performance**
The Applicant will initiate work after approval of the award and complete all work within the period of performance specified in the grant.

3. **Lobbying and Political Activities**
As required by Section 1352, Title 31 of the United States Code (U.S.C.), for persons entering into a contract, grant, loan, or cooperative agreement from an agency or requests or receives from an agency a commitment providing for the United States to insure or guarantee a loan, the Applicant certifies that:

(a) No federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any federal grant, the making of any federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement.
(b) If any funds other than federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying", in accordance with its instructions.
(c) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

The Applicant will also comply with provisions of the Hatch Act (5 U.S.C. §§ 1501-1508 and §§ 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with federal funds.

Finally, the Applicant agrees that federal funds will not be used, directly or indirectly, to support the enactment, repeal, modification or adoption of any law, regulation or policy without the express written approval from the California Governor's Office of Emergency Services (Cal OES) or the federal awarding agency.

4. **Debarment and Suspension**
As required by Executive Orders 12549 and 12689, and 2 C.F.R. § 200.213 and codified in 2 C.F.R. Part 180, Debarment and Suspension, the Applicant will provide protection against waste, fraud, and abuse by debarring or suspending those persons deemed irresponsible in their dealings with the federal government. The Applicant certifies that it and its principals, subgrantees, recipients or subrecipients:

(a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department or agency;
(b) Have not within a three-year period preceding this application been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state, or local) transaction or contract under a public transaction; violation of federal or state antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
(c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (federal, state, or local) with commission of any of the offenses enumerated in paragraph (2)(b) of this certification; and
(d) Have not within a three-year period preceding this application had one or more public transaction (federal, state, or local) terminated for cause or default.

Where the Applicant is unable to certify to any of the statements in this certification, he or she shall attach an explanation to this application.

5. Non-Discrimination and Equal Employment Opportunity

The Applicant will comply with all federal statutes relating to non-discrimination. These include, but are not limited to, the following:

(a) Title VI of the Civil Rights Act of 1964 (Public Law (P.L.) 88-352 and 42 U.S.C. § 2000d et. seq.) which prohibits discrimination on the basis of race, color, or national origin and requires that recipients of federal financial assistance take reasonable steps to provide meaningful access to persons with limited English proficiency (LEP) to their programs and services;
(b) Title IX of the Education Amendments of 1972, (20 U.S.C. §§ 1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex in any federally funded educational program or activity;
(c) Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794), which prohibits discrimination against those with disabilities or access and functional needs;
(d) Americans with Disabilities Act (ADA) of 1990, which prohibits discrimination on the basis of disability and requires buildings and structures be accessible to those with disabilities and access and functional needs (42 U.S.C. §§ 12101-12213);
(e) Age Discrimination Act of 1975, (42 U.S.C. §§ 6101-6107), which prohibits discrimination on the basis of age;
(f) Public Health Service Act of 1912 (42 U.S.C. §§ 290 dd—2), relating to confidentiality of patient records regarding substance abuse treatment;
(g) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. § 3601 et seq.), relating to nondiscrimination in the sale, rental or financing of housing as implemented by the Department of Housing and Urban Development at 24 C.F.R. Part 100. The prohibition on disability discrimination includes the requirement that new multifamily housing with four or more dwelling units—i.e., the public and common use areas and individual apartment units (all units in buildings with elevators and ground-floor units in buildings without elevators)— be designed and constructed with certain accessible features (See 24 C.F.R. § 100.201);

(h) Executive Order 11246, which prohibits federal contractors and federally assisted construction contractors and subcontractors, who do over $10,000 in Government business in one year from discriminating in employment decisions on the basis of race, color, religion, sex, sexual orientation, gender identification or national origin;
(i) Executive Order 11375, which bans discrimination on the basis of race, color, religion, sex, sexual orientation, gender identification, or national origin in hiring and employment in both the United States federal workforce and on the part of government contractors;
(j) California Public Contract Code § 10295.3, which prohibits discrimination based on domestic partnerships and those in same sex marriages;
(k) DHS policy to ensure the equal treatment of faith-based organizations, under which all applicants and recipients must comply with equal treatment policies and requirements contained in 6 C.F.R. Part 19;
(l) Any other nondiscrimination provisions in the specific statute(s) under which application for federal assistance is being made; and
(m) The requirements of any other nondiscrimination statute(s) which may apply to the application.

In addition to the items listed in (a) through (m), the Applicant will comply with California's Fair Employment and Housing Act (FEHA). FEHA prohibits harassment and discrimination in employment because of ancestry, familial status, race, color, religious creed (including religious dress and grooming practices), sex (which includes pregnancy, childbirth, breastfeeding and medical conditions related to pregnancy, childbirth or breastfeeding), gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, mental and physical disability, genetic information, medical condition, age, pregnancy, denial of medical and family care leave, or pregnancy disability leave (California Government Code §§12940, 12945, 12945.2), military and veteran status, and/or retaliation for protesting illegal discrimination related to one of these categories, or for reporting patient abuse in tax supported institutions.

6. Drug-Free Workplace

As required by the Drug-Free Workplace Act of 1988 (41 U.S.C. § 701 et seq.), the Applicant certifies that it will maintain a drug-free workplace and a drug-free awareness program as outlined in the Act.

7. Environmental Standards

The Applicant will comply with state and federal environmental standards, which may be prescribed pursuant to the following, as applicable:

(a) California Environmental Quality Act (CEQA) (California Public Resources Code §§ 21000- 21177), to include coordination with the city or county planning agency;
(b) CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, §§ 15000- 15387);
(c) Federal Clean Water Act (CWA) (33 U.S.C. § 1251 et seq.), which establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters;
(d) Federal Clean Air Act of 1955 (42 U.S.C. § 7401) which regulates air emissions from stationary and mobile sources;

(e) Institution of environmental quality control measures under the National Environmental Policy Act (NEPA) of 1969 (P.L. 91-190); the Council on Environmental Quality Regulations for Implementing the Procedural Provisions of NEPA; and Executive Order 12898 which focuses on the environmental and human health effects of federal actions on minority and low-income populations with the goal of achieving environmental protection for all communities;
(f) Evaluation of flood hazards in floodplains in accordance with Executive Order 11988;
(g) Executive Order 11514 which sets forth national environmental standards;
(h) Executive Order 11738 instituted to assure that each federal agency empowered to enter into contracts for the procurement of goods, materials, or services and each federal agency empowered to extend federal assistance by way of grant, loan, or contract shall undertake such procurement and assistance activities in a manner that will result in effective enforcement of the Clean Air Act and the Federal Water Pollution Control Act Executive Order 11990 which requires preservation of wetlands;
(i) The Safe Drinking Water Act of 1974, (P.L. 93-523);
(j) The Endangered Species Act of 1973, (P.L. 93-205);
(k) Assurance of project consistency with the approved state management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.);
(l) Conformity of Federal Actions to State (Clear Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.);
(m) Wild and Scenic Rivers Act of 1968 (16 U.S.C. § 1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

The Applicant shall not be: 1) in violation of any order or resolution promulgated by the State Air Resources Board or an air pollution district; 2) subject to a cease and desist order pursuant to § 13301 of the California Water Code for violation of waste discharge requirements or discharge prohibitions; or 3) determined to be in violation of federal law relating to air or water pollution.

8. Audits

For subrecipients expending $750,000 or more in federal grant funds annually, the Applicant will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and Title 2 of the Code of Federal Regulations, Part 200, Subpart F Audit Requirements.

9. Access to Records

In accordance with 2 C.F.R. § 200.336, the Applicant will give the awarding agency, the Comptroller General of the United States and, if appropriate, the state, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award. The Applicant will require any subrecipients, contractors, successors, transferees and assignees to acknowledge and agree to comply with this provision.

10. Conflict of Interest

The Applicant will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

11. Financial Management

False Claims for Payment

The Applicant will comply with 31 U.S.C §§ 3729-3733 which sets forth that no subgrantee, recipient, or subrecipient shall submit a false claim for payment, reimbursement or advance.

12. Reporting - Accountability

The Applicant agrees to comply with applicable provisions of the Federal Funding Accountability and Transparency Act (FFATA) (P.L. 109-282), specifically (a) the reporting of subawards obligating $25,000 or more in federal funds and (b) executive compensation data for first-tier subawards. This includes the provisions of FFATA, which includes requirements for executive compensation, and also requirements implementing the Act for the non-federal entity at 2 C.F.R. Part 25 Financial Assistance Use of Universal Identifier and Central Contractor Registration and 2 C.F.R. Part 170 Reporting Subaward and Executive Compensation Information.

13. Whistleblower Protections

The Applicant also must comply with statutory requirements for whistleblower protections at 10 U.S.C. § 2409, 41 U.S.C. § 4712, and 10 U.S.C. § 2324, 41 U.S.C. § 4304 and § 4310.

14. Human Trafficking

The Applicant will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act of 2000, as amended (22 U.S.C. § 7104) which prohibits grant award recipients or a subrecipient from: (1) engaging in trafficking in persons during the period of time that the award is in effect; (2) procuring a commercial sex act during the period of time that the award is in effect; or (3) using forced labor in the performance of the award or subawards under the award.

15. Labor Standards

The Applicant will comply with the following federal labor standards:

(a) The Davis-Bacon Act (40 U.S.C. §§ 276a to 276a-7), as applicable, and the Copeland Act (40 U.S.C. § 3145 and 18 U.S.C. § 874) and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§ 327-333), regarding labor standards for federally-assisted construction contracts or subcontracts, and

(b) The Federal Fair Labor Standards Act (29 U.S.C. § 201 et al.) as they apply to employees of institutes of higher learning (IHE), hospitals and other non-profit organizations.

16. Worker's Compensation

The Applicant must comply with provisions which require every employer to be insured to protect workers who may be injured on the job at all times during the performance of the work of this Agreement, as per the workers compensation laws set forth in California Labor Code §§ 3700 et seq.

17. Property-Related

If applicable to the type of project funded by this federal award, the Applicant will:

(a) Comply with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of federal participation in purchase;

(b) Comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires subrecipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more;

(c) Assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. § 470), Executive Order 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §469a-1 et seq.); and

(d) Comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. § 4831 and 24 CFR Part 35) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.

18. Certifications Applicable Only to Federally-Funded Construction Projects

For all construction projects, the Applicant will:

(a) Not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with federal assistance funds to assure nondiscrimination during the useful life of the project;

(b) Comply with the requirements of the awarding agency with regard to the drafting, review and approval of construction plans and specifications; and

(c) Provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.

19. Use of Cellular Device While Driving is Prohibited

Applicants are required to comply with California Vehicle Code sections 23123 and 23123.5. These laws prohibit driving motor vehicle while using an electronic wireless communications device to write, send, or read a text-based communication. Drivers are also prohibited from the use of a wireless telephone without hands-free listening and talking, unless to make an emergency call to 911, law enforcement, or similar services.

20. California Public Records Act and Freedom of Information Act

The Applicant acknowledges that all information submitted in the course of applying for funding under this program, or provided in the course of an entity's grant management activities that are under Federal control, is subject to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, and the California Public Records Act, California Government Code section 6250 et seq. The Applicant should consider these laws and consult its own State and local laws and regulations regarding the release of information when reporting sensitive matters in the grant application, needs assessment, and strategic planning process.

HOMELAND SECURITY GRANT PROGRAM - PROGRAM SPECIFIC ASSURANCES / CERTIFICATIONS

21. Reporting Accusations and Findings of Discrimination

If during the past three years the recipient has been accused of discrimination on any basis the recipient must provide a list of all such proceedings, pending or completed, including outcome and copies of settlement agreements to the DHS Financial Assistance Office and the DHS Office for Civil Rights and Civil Liberties (CRCL) by e-mail at CRCL@hq.dhs.gov or by mail at U.S. Department of Homeland Security, Office for Civil Rights and Civil Liberties, Building 410, Mail Stop #0190, Washington, D.C. 20528.

In the courts or administrative agencies make a finding of discrimination on grounds of race, color, national origin (including LEP), sex, age, disability, religion, or familial status against the recipient, or the recipients settle a case or matter alleging such discrimination, recipients must forward a copy of the complaint and findings to the DHS Financial Assistance Office and the CRCL by e-mail or mail at the addresses listed above.

The United States has the right to seek judicial enforcement of these obligations.

22. Acknowledgment of Federal Funding from DHS

All recipients must acknowledge their use of federal funding when issuing statements, press releases, requests for proposals, bid invitations, and other documents describing projects or programs funded in whole or in part with federal funds.

23. Activities Conducted Abroad

All recipients must ensure that project activities carried on outside the United States are coordinated as necessary with appropriate government authorities and that appropriate licenses, permits, or approvals are obtained.

24. Best Practices for Collection and Use of Personally Identifiable Information (PII)

DHS defines personally identifiable information (PII) as any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual. All recipients who collect PII are required to have a publically-available privacy policy that describes standards on the usage and maintenance of PII they collect. Recipients may also find the DHS Privacy Impact Assessments: Privacy Guidance and Privacy template a useful resource respectively.

25. Copyright

All recipients must affix the applicable copyright notices of 17 U.S.C. §§ 401 or 402 and an acknowledgement of U.S. Government sponsorship (including the award number) to any work first produced under federal financial assistance awards.

26. Duplication of Benefits

Any cost allocable to a particular federal financial assistance award provided for in 2 C.F.R. Part 200, Subpart E may not be charged to other federal financial assistance awards to overcome fund deficiencies, to avoid restrictions imposed by federal statutes, regulations, or federal financial assistance award terms and conditions, or for other reasons. However, these prohibitions would not preclude recipients from shifting costs that are allowable under two or more awards in accordance with existing federal statutes, regulations, or the federal financial assistance award terms and conditions.

27. Energy Policy and Conservation Act

All recipients must comply with the requirements of 42 U.S.C. § 6201 which contain policies relating to energy efficiency that are defined in the state energy conservation plan issued in compliance with this Act.

28. Federal Debt Status

All recipients are required to be non-delinquent in their repayment of any federal debt. Examples of relevant debt include delinquent payroll and other taxes, audit disallowances, and benefit overpayments. See OMB Circular A-129.

29. Fly America Act of 1974

All recipients must comply with Preference for U.S. Flag Air Carriers: (air carriers holding certificates under 49 U.S.C. § 41102) for international air transportation of people and property to the extent that such service is available, in accordance with the International Air Transportation Fair Competitive Practices Act of 1974 (49 U.S.C. § 40118) and the interpretative guidelines issued by the Comptroller General of the United States in the March 31, 1981, amendment to Comptroller General Decision B-138942.

30. Hotel and Motel Fire Safety Act of 1990

In accordance with Section 6 of the Hotel and Motel Fire Safety Act of 1990, all Applicants must ensure that all conference, meeting, convention, or training space funded in whole or in part with federal funds complies with the fire prevention and control guidelines of the Federal Fire Prevention and Control Act of 1974, as amended, 15 U.S.C. § 2225a.

31. Non-supplanting Requirement

All recipients who receive federal financial assistance awards made under programs that prohibit supplanting by law must ensure that federal funds do not replace (supplant) funds that have been budgeted for the same purpose through non-federal sources.

32. Patents and Intellectual Property Rights

Unless otherwise provided by law, recipients are subject to the Bayh-Dole Act, Pub. L. No. 96-517, as amended, and codified in 35 U.S.C. § 200 et seq. All recipients are subject to the specific requirements governing the development, reporting, and disposition of rights to inventions and patents resulting from financial assistance awards located at 37 C.F.R. Part 401 and the standard patent rights clause located at 37 C.F.R. § 401.14.

33. SAFECOM

All recipients who receive federal financial assistance awards made under programs that provide emergency communication equipment and its related activities must comply with the SAFECOM Guidance for Emergency Communication Grants, including provisions on technical standards that ensure and enhance interoperable communications.

34. Terrorist Financing

All recipients must comply with Executive Order 13224 and U.S. law that prohibit transactions with, and the provisions of resources and support to, individuals and organizations associated with terrorism. Recipients are legally responsible to ensure compliance with the Order and laws.

35. Reporting of Matters Related to Recipient Integrity and Performance

If the total value of the recipient's currently active grants, cooperative agreements, and procurement contracts from all federal assistance offices exceeds $10,000,000 for any period of time during the period of performance of this federal financial assistance award, you must comply with the requirements set forth in the government-wide Award Term and Condition for Recipient Integrity and Performance Matters located at 2 C.F.R. Part 200, Appendix XII, the full text of which is incorporated here by reference in the award terms and conditions.

36. USA Patriot Act of 2001

All recipients must comply with requirements of the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act (USA PATRIOT Act), which amends 18 U.S.C. §§ 175–175c.

37. Use of DHS Seal, Logo, and Flags

All recipients must obtain permission from their DHS Financial Assistance Office, prior to using the DHS seal(s), logos, crests or reproductions of flags or likenesses of DHS agency officials, including use of the United States Coast Guard seal, logo, crests or reproductions of flags or likenesses of Coast Guard officials.

IMPORTANT

The purpose of the assurance is to obtain federal and state financial assistance, including any and all federal and state grants, loans, reimbursement, contracts, etc. The Applicant recognizes and agrees that state financial assistance will be extended based on the representations made in this assurance. This assurance is binding on the Applicant, its successors, transferees, assignees, etc. Failure to comply with any of the above assurances may result in suspension, termination, or reduction of grant funds.

All appropriate documentation, as outlined above, must be maintained on file by the Applicant and available for Cal OES or public scrutiny upon request. Failure to comply with these requirements may result in suspension of payments under the grant or termination of the grant or both and the subrecipient may be ineligible for award of any future grants if the Cal OES determines that any of the following has occurred: (1) the recipient has made false certification, or (2) violates the certification by failing to carry out the requirements as noted above.

All of the language contained within this document must be included in the award documents for all subawards at all tiers. All recipients are bound by the Department of Homeland Security Standard Terms and Conditions 2018, Version 8.1, hereby incorporated by reference, which can be found at: https://www.dhs.gov/publication/fy15-dhs-standard-terms-and-conditions.

The undersigned represents that he/she is authorized to enter into this agreement for and on behalf of the Applicant.

Subrecipient: _____

Signature of Authorized Agent: **Signature Required on the Next Page**

Printed Name of Authorized Agent: _____

Title: _____ Date: _____

EXHIBIT D

COUNTY OF LOS ANGELES

2018 CERTIFICATION OF GRANT ASSURANCES

As the duly authorized representative of the Subrecipient, I hereby certify Subrecipient's complete acceptance of Exhibit D, and agreement to abide by all provisions, assurances, conditions and requirements of the Grant Assurances therein.

BY [signature] /CITY MANAGER CLINT D. OSORIO 2/20/20
City Representative/Title (Signature) (Print Name) Date

APPROVED AS TO FORM

BY _____ _____ _____
City Attorney (Signature) (Print Name) Date

ATTEST

BY _____ _____ _____
City Clerk (Signature) (Print Name) Date

EXHIBIT E

EDMUND G. BROWN JR.
GOVERNOR

MARK S. GHILARDUCCI
DIRECTOR

Cal OES
GOVERNOR'S OFFICE
OF EMERGENCY SERVICES

RECEIVED
2018 OCT 16 PM 5:03
CHIEF EXECUTIVE OFFICE

October 1, 2018

Sachi Hamai
Chief Executive Office
Los Angeles County
500 West Temple Street, Room 713
Los Angeles, CA 90012

SUBJECT: **NOTIFICATION OF SUBRECIPIENT AWARD APPROVAL**
Fiscal Year (FY) 2018 Homeland Security Grant Program (HSGP)
Grant Subaward #2018-0054, Cal OES ID# 037-00000
Grant Subaward Performance Period: September 1, 2018, to May 31, 2021

Dear Ms. Hamai:

The California Governor's Office of Emergency Services (Cal OES) approved your FY 2018 HSGP award in the amount of $10,276,869. Once your completed application is received and approved, you may request reimbursement of eligible Grant Subaward expenditures using the Cal OES Financial Management Forms Workbook available at https://www.caloes.ca.gov/.

During the review process, a Cal OES Program Representative will examine and evaluate your FY 2018 HSGP Grant Subaward application. Throughout the Grant Subaward cycle, Cal OES will use performance milestones set in the Department of Homeland Security/Federal Emergency Management Agency Grants Reporting Tool (GRT) as indicators of performance and grant management capacity and this information may be used in assessing future competitive Grant Subaward applications. All activities funded with this Grant Subaward must be completed within the Subrecipient performance period.

You are required to comply with all applicable federal, state, and local Environmental Planning and Historic Preservation (EHP) requirements. Additionally, Aviation/ Watercraft requests, Establish/Enhance Emergency Operations Center projects, projects requiring EHP review, and noncompetitive procurement requests require additional approvals from Cal OES. Subrecipients must obtain written approval for these activities **prior** to incurring any costs, in order to be reimbursed for any related costs under this Grant Subaward. Subrecipients are also required to obtain a performance bond prior to the purchase of any equipment item over $250,000, including any aviation

or watercraft financed with homeland security dollars. Performance bonds must be submitted to your Program Representative no later than the time of reimbursement.

Following acceptance of this Grant Subaward, you must enter your Grant Subaward information into the GRT for the Biannual Strategy Implementation Report (BSIR) period. The GRT can be accessed online at https://www.reporting.odp.dhs.gov/. Your agency must prepare and submit the BSIR to Cal OES via the GRT semi-annually for the duration of the Grant Subaward performance period or until you complete all activities and the Grant Subaward is formally closed. Failure to submit required reports could result in Grant Subaward reduction, suspension, or termination.

This Grant Subaward is subject to all provisions of 2 CFR Part 200, Subpart F – Audit Requirements. Any funds received in excess of current needs, approved amounts, or those found owed as a result of a final review or audit, must be refunded to the State within 30 days upon receipt of an invoice from Cal OES.

Your dated signature is required on this letter. Please sign and return the original to your Cal OES Program Representative within 20 days of receipt and keep a copy for your files. For further assistance, please feel free to contact your Cal OES Program Representative.

Sincerely,

MARK S. GHILARDUCCI
Director

Sachi Hamai
Los Angeles County

10/19/18
Date

The U.S. Department of Homeland Security (DHS)
Notice of Funding Opportunity (NOFO)
Fiscal Year (FY) 2018 Homeland Security Grant Program (HSGP)

NOTE: If you are going to apply for this funding opportunity and have not obtained a Data Universal Numbering System (DUNS) number and/or are not currently registered in the System for Award Management (SAM), please take immediate action to obtain a DUNS Number, if applicable, and then to register immediately in SAM. It may take 4 weeks or more after you submit your SAM registration before your registration is active in SAM, then an additional 24 hours for Grants.gov to recognize your information. Information on obtaining a DUNS number and registering in SAM is available from Grants.gov at: http://www.grants.gov/web/grants/register.html. Detailed information regarding DUNS and SAM is also provided in Section D – Application and Submission Information of this NOFO, subsection, Content and Form of Application Submission.

A. Program Description

Issued By
U.S. Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA), Grant Programs Directorate (GPD)

Catalog of Federal Domestic Assistance (CFDA) Number
97.067

CFDA Title
Homeland Security Grant Program (HSGP)

Notice of Funding Opportunity Title
Fiscal Year 2018 Homeland Security Grant Program

- State Homeland Security Program (SHSP)
- Urban Area Security Initiative (UASI)
- Operation Stonegarden (OPSG)

NOFO Number
DHS-18-GPD-067-00-01

Authorizing Authority for Program
Section 2002 of the Homeland Security Act of 2002 (Pub. L. No. 107-296, as amended) (6 U.S.C. § 603)

Appropriation Authority for Program
Department of Homeland Security Appropriations Act, 2018 (Pub. L. No. 115-141)

Program Type
New

Program Overview, Objectives and Priorities

Overview

The FY 2018 Homeland Security Grant Program (HSGP) is set against the backdrop of a year in which the United States faced numerous and unprecedented homeland security challenges. These included the three major hurricanes that devastated parts of Texas, Florida, and much of Puerto Rico and the U.S. Virgin Islands, as well as massive wildfires across the State of California. In addition to these natural disasters, the Nation also responded to multiple incidents as part of the evolving threat landscape, including witnessing the first known terrorist attack against mass transportation on our soil; cyberattacks against critical port infrastructure; and mass casualty events involving both vehicles and active shooters.

The National Preparedness Goal (the Goal) defines what it means to be prepared for such diverse and complicated events. The National Preparedness System is the instrument the Nation employs to build, sustain, and deliver the core capabilities needed to achieve the goal of a more secure and resilient Nation. The development and sustainment of these core capabilities is not exclusive to any single level of government or organization, but rather requires the combined effort of the whole community. To that end, the FY 2018 HSGP represents one part of a comprehensive set of measures authorized by Congress and implemented by the Administration. Among the five basic homeland security missions noted in the DHS Quadrennial Homeland Security Review, HSGP supports the goal to Strengthen National Preparedness and Resilience.

The recently released 2018-2022 FEMA Strategic Plan creates a shared vision for the field of emergency management and sets an ambitious, yet achievable, path forward to unify and further professionalize emergency management across the country. The Homeland Security Grant Program supports the goal of Readying the Nation for Catastrophic Disasters. We invite all of our stakeholders and partners to also adopt these priorities and join us in building a stronger Agency and a more prepared and resilient Nation.

Objectives

Within this broader construct, the objective of the FY2018 HSGP is to provide funds to eligible entities to support state, local, tribal, and territorial efforts to prevent terrorism and other catastrophic events and to prepare the Nation for the threats and hazards that pose the greatest risk to the security of the United States.

State Homeland Security Program (SHSP): The SHSP supports state, tribal, territorial, and local preparedness activities that address high priority preparedness gaps across all core capabilities that support terrorism preparedness.

Urban Area Security Initiative (UASI): The UASI program assists high-threat, high-density Urban Areas in efforts to build, sustain, and deliver the capabilities necessary to prevent, protect against, mitigate, respond to, and recover from acts of terrorism.

Operation Stonegarden (OPSG): The OPSG Program supports enhanced cooperation and coordination among Customs and Border Protection (CBP), United States Border Patrol (USBP), and Federal, state, local, tribal, and territorial law enforcement agencies. The OPSG Program provides funding to support joint efforts to secure the United States' borders along routes of ingress from international borders to include travel corridors in states bordering Mexico and Canada, as well as states and territories with international water borders.

Performance metrics for this program are as follows:

SHSP and UASI:

- Percent improvement in Stakeholder Preparedness Review (SPR) capabilities against Threat and Hazard Identification and Risk Assessment (THIRA) targets.
- Percent of states and territories with a THIRA and SPR that meet current DHS/FEMA guidance.

OPSG:

- Percent of funding that provides intelligence-based operational support.
- Percent of funding that provides force multiplier activities across two or more state, local, or tribal law enforcement agencies.

Priorities

The 2017 National Preparedness Report identified the following subset of core capabilities as national areas for improvement:

- Cybersecurity;
- Infrastructure Systems;
- Economic Recovery;
- Housing;
- Supply Chain Integrity and Security;
- Natural and Cultural Resources; and
- Risk Management for Protection Programs and Activities.

In developing applications for the FY 2018 HSGP, recipients should consider funding projects that address core capability gaps within the NPR national areas for improvement to the extent that they relate to terrorism preparedness.

For purposes of SHSP and UASI, DHS/FEMA requires states, territories, and Urban Areas to complete a Threat and Hazard Identification and Risk Assessment (THIRA) and Stakeholder Preparedness Review (SPR) (formerly known as the State Preparedness Report) and prioritize grant funding to support closing capability gaps or sustaining capabilities identified in this process. Additional information on the THIRA/SPR process, including other NPS tools and resources, can be found at https://www.fema.gov/national-preparedness-system.

B. Federal Award Information

Award Amounts, Important Dates, and Extensions

Available Funding for the HSGP NOFO: $1,067,000,000

HSGP Programs	FY 2018 Allocation
State Homeland Security Program	$402,000,000
Urban Area Security Initiative	$580,000,000
Operation Stonegarden	$85,000,000
Total	**$1,067,000,000**

For details on program-specific funding amounts, refer to Appendix A – FY 2018 Program Allocations.

Period of Performance: Thirty-six (36) months

Extensions to the Period of Performance (PoP) are allowed. For additional information on PoP extensions, refer to Section H - Additional Information, of this NOFO, subsection, Period of Performance Extensions.

Projected Period of Performance Start Date: September 1, 2018

Projected Period of Performance End Date: August 31, 2021

Funding Instrument: Grant

C. Eligibility Information

Eligible Applicants

All 56 states and territories, which includes any state of the United States, the District of Columbia, the Commonwealth of Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands, are eligible to apply for SHSP funds. The State Administrative Agency (SAA) is the only entity eligible to submit HSGP applications to DHS/FEMA, including those applications submitted on behalf of UASI and OPSG applicants. A list of eligible Urban Areas and OPSG States can be found in Appendix A - FY 2018 HSGP Program Allocations. Tribal governments may not apply directly for HSGP funding; however, funding may be available to tribes under the SHSP and OPSG through the SAA.

Eligibility Criteria

Eligible high-risk Urban Areas for the FY 2018 UASI program have been determined through an analysis of relative risk of terrorism faced by the 100 most populous Metropolitan Statistical Areas (MSAs) in the United States. Sub-awards will be made by the SAA to the designated Urban Areas identified in Appendix A - FY 2018 Program Allocations.

Eligible subrecipients under the FY 2018 OPSG Program are local units of government at the county level or equivalent level of government and Federally-recognized tribal governments in

states bordering Canada or Mexico and states and territories with international water borders. All applicants must have active ongoing USBP operations coordinated through a CBP sector office to be eligible for OPSG funding.

Under the FY 2018 OPSG Program, subrecipients eligible to apply for and receive a subaward directly from the SAA are divided into three Tiers. Tier 1 entities are local units of government at the county level or equivalent and Federally-recognized tribal governments that are on a physical border in states bordering Canada, states bordering Mexico, and states and territories with international water borders. Tier 2 eligible subrecipients are those not located on the physical border or international water but are contiguous to a Tier 1 county. Tier 3 eligible subrecipients are those not located on the physical border or international water but are contiguous to a Tier 2 eligible subrecipient. Tier 2 and Tier 3 eligible subrecipients may be eligible to receive funding based on border security risk as determined by the USBP, as described in Section E of the NOFO.

Other Eligibility Criteria

National Incident Management System (NIMS) Implementation
Prior to allocation of any Federal preparedness awards in FY 2018, recipients must ensure and maintain adoption and implementation of NIMS. FEMA describes the specific activities involved in NIMS implementation in the NIMS Implementation Objectives (https://www.fema.gov/implementation-guidance-and-reporting).

Incident management activities require carefully managed resources (personnel, teams, facilities, equipment and/or supplies). Utilization of the standardized resource management concepts such as typing, credentialing and inventorying promote a strong national mutual aid capability needed to support delivery of core capabilities. Recipients should manage resources purchased or supported with FEMA grant funding according to NIMS resource management guidance.

Additional information on resource management and NIMS resource typing definitions and job titles/position qualifications is on DHS/FEMA's website under http://www.fema.gov/resource-management-mutual-aid.

Emergency Management Assistance Compact (EMAC) Membership
In support of the Goal, recipients must belong to, be located in, or act as a temporary member of EMAC, except for American Samoa and the Commonwealth of the Northern Mariana Islands, which are not required to belong to EMAC at this time. All assets supported in part or entirely with FY 2018 HSGP funding must be readily deployable and NIMS-typed when possible to support emergency or disaster operations per existing EMAC agreements. In addition, funding may be used for the sustainment of core capabilities that, while they may not be physically deployable, support national response capabilities such as

Geographic/Geospatial Information Systems (GIS), interoperable communications systems, capabilities as defined under the mitigation mission area of the Goal, and fusion centers.

Law Enforcement Terrorism Prevention Activities (LETPA)
Per section 2006 of the Homeland Security Act of 2002, as amended (6 U.S.C. § 607), DHS/FEMA is required to ensure that at least 25 percent of grant funding appropriated for grants awarded under HSGP's authorizing statute are used for law enforcement terrorism prevention activities. DHS/FEMA meets this requirement, in part, by requiring all SHSP and UASI recipients to ensure that at least 25 percent of the combined HSGP funds allocated under SHSP and UASI are dedicated towards law enforcement terrorism prevention activities, as defined in 6 U.S.C. § 607. The LETPA allocation can be from SHSP, UASI, or both. This requirement does not include award funds from OPSG. Please refer to Appendix A – FY 2018 Program Allocations for LETPA minimum allocations for SHSP and UASI by jurisdiction. The 25 percent LETPA allocation is in addition to the 80 percent pass through requirement to local units of government and Tribes, referenced below.

The National Prevention Framework describes those activities that should be executed upon the discovery of intelligence or information regarding an imminent threat to the homeland, in order to thwart an initial or follow-on terrorist attack, and provides guidance to ensure the Nation is prepared to prevent, avoid, or stop a threatened or actual act of terrorism. Activities outlined in the National Prevention Framework are eligible for use as LETPA-focused funds. Also, where capabilities are shared with the protection mission area, the National Protection Framework activities are also eligible. Other terrorism prevention activities proposed for funding under LETPA must be approved by the FEMA Administrator.

Cost Share or Match
There is no cost share or match requirement for the FY 2018 HSGP.

D. Application and Submission Information

Key Dates and Times

Date Posted to Grants.gov:	**May 21, 2018**
Application Submission Deadline:	**June 20, 2018, 5:00 p.m. ET**

All applications **must** be received by the established deadline. The Non-Disaster (ND) Grants System has a date stamp that indicates when an application is submitted. Applicants will receive an electronic message confirming receipt of the full application. In general, DHS/FEMA will not review applications that are received after the deadline or consider them for funding. DHS/FEMA may, however, extend the application deadline on request for an applicant who can demonstrate that good cause exists to justify extending the deadline. Good cause for an extension may include technical problems outside of the applicant's control that prevent submission of the application by the deadline, or other exigent or emergency circumstances.

If there are technical issues, please notify the respective FEMA Headquarters (HQ) Program Analyst before the application deadline. Applicants should contact the Centralized Scheduling and Information Desk (CSID) for FEMA HQ Program Analyst contact

information. CSID can be reached by phone at (800) 368-6498 or by e-mail at askcsid@fema.gov, Monday through Friday, 9:00 a.m. – 5:00 p.m. ET.

Anticipated Funding Selection Date: **August 27, 2018**

Anticipated Award Date: **No later than September 30, 2018**

Address to Request Application Package
Application forms and instructions are available on Grants.gov (hard copies of the NOFO and associated application materials are not available). To access the application package, select "Applicants" then "Apply for Grants" followed by "Get Application Package." Enter the Funding Opportunity Number located on the first page of this NOFO. Select "Apply" and then "Create Workspace." Follow the prompts to download the instructions and begin the application.

In addition, the following Telephone Device for the Deaf (TDD) and/or Federal Information Relay Service (FIRS) number available for this Notice is (800) 462-7585.

Initial applications are processed through the Grants.gov portal. Final applications are completed and submitted through FEMA's Non-Disaster Grants (ND Grants) System.

Content and Form of Application Submission
Applying for an award under this program is a multi-step process. To ensure that an application is submitted on time applicants are advised to start the required steps well in advance of their submission. Failure of an applicant to comply with any of the required steps before the deadline for submitting their application may disqualify their application from funding.

The steps involved in applying for an award under this program are:

1. Applying for, updating, or verifying their Data Universal Numbering System (DUNS) Number and Employer ID Number (EIN);
2. Updating or verifying their System for Award Management (SAM) Registration;
3. Establishing an Authorized Organizational Representative (AOR) in Grants.gov;
4. Submitting an initial application in Grants.gov; and
5. Submitting the final application in the ND Grants system.

Unique Entity Identifier and System for Award Management (SAM)
All applicants for this award must:

1. Be registered in SAM before submitting its application;
2. Provide a valid DUNS number in its application; and
3. Continue to maintain an active SAM registration with current information at all times during which it has an active federal award or an application or plan under consideration by DHS/FEMA.

DHS/FEMA may not make a federal award to an applicant until the applicant has complied with all applicable DUNS and SAM requirements and if an applicant has not fully complied with the requirements by the time DHS/FEMA is ready to make a federal award. DHS/FEMA may

determine that the applicant is not qualified to receive a federal award and use that determination as a basis for making a federal award to another applicant.

Electronic Delivery
DHS/FEMA is participating in the Grants.gov initiative to provide the grant community with a single site to find and apply for grant funding opportunities. DHS/FEMA requires applicants to submit their initial applications online through Grants.gov and to submit final applications through ND Grants.

How to Register to Apply through Grants.gov

1. *Instructions:* Read the instructions below about registering to apply for DHS/FEMA funds. Applicants should read the registration instructions carefully and prepare the information requested before beginning the registration process. Reviewing and assembling the required information before beginning the registration process will alleviate last-minute searches for required information.

   The registration process can take up to four weeks to complete. Therefore, registration should be done in sufficient time to ensure it does not impact your ability to meet required application submission deadlines.

   Organizations must have a DUNS Number, active SAM registration, and Grants.gov account to apply for grants.

   If individual applicants are eligible to apply for this grant funding opportunity, refer to https://www.grants.gov/web/grants/applicants/registration.html.

   Organization applicants can find complete instructions here: https://www.grants.gov/web/grants/applicants/organization-registration.html.

2. *Obtain a DUNS Number*: All entities applying for funding, including renewal funding, must have a DUNS number from Dun & Bradstreet (D&B). Applicants must enter the DUNS number in the data entry field labeled "Organizational DUNS" on the SF-424 form. For more detailed instructions for obtaining a DUNS number, refer to https://www.grants.gov/web/grants/applicants/organization-registration/step-1-obtain-duns-number.html.

3. *Register with SAM*: In addition to having a DUNS number, all organizations applying online through Grants.gov must register with the System for Award Management (SAM). Failure to register with SAM will prevent your organization from applying through Grants.gov. SAM registration must be renewed annually.

   For more detailed instructions for registering with SAM, refer to https://www.grants.gov/web/grants/applicants/organization-registration/step-2-register-with-sam.html.

4. *Create a Grants.gov Account*: The next step in the registration process is to create an account with Grants.gov. Applicants must know their organization's DUNS number to complete this process.

   For more information, follow the on-screen instructions or refer to https://www.grants.gov/web/grants/applicants/registration.html.

5. *Add a Profile to a Grants.gov Account*: A profile in Grants.gov corresponds to a single applicant organization the user represents (i.e., an applicant) or an individual applicant. If you work for or consult with multiple organizations and have a profile for each, you may log in to one Grants.gov account to access all of your grant applications. To add an organizational profile to your Grants.gov account, enter the DUNS Number for the organization in the DUNS field while adding a profile.

   For more detailed instructions about creating a profile on Grants.gov, refer to https://www.grants.gov/web/grants/applicants/registration/add-profile.html.

6. *EBiz POC Authorized Profile Roles*: After you register with Grants.gov and create an Organization Applicant Profile, the organization applicant's request for Grants.gov roles and access is sent to the EBiz POC. The EBiz POC will then log in to Grants.gov and authorize the appropriate roles, which may include the AOR role, thereby giving you permission to complete and submit applications on behalf of the organization. You will be able to submit your application online any time after you have been assigned the AOR role.
   For more detailed instructions about creating a profile on Grants.gov, refer to https://www.grants.gov/web/grants/applicants/registration/authorize-roles.html.

7. *Track Role Status*: To track your role request, refer to https://www.grants.gov/web/grants/applicants/registration/track-role-status.html.

8. *Electronic Signature*: When applications are submitted through Grants.gov, the name of the organization applicant with the AOR role that submitted the application is inserted into the signature line of the application, serving as the electronic signature. The EBiz POC **must** authorize individuals who are able to make legally binding commitments on behalf of the organization as an AOR; **this step is often missed, and it is crucial for valid and timely submissions.**

How to Submit an Initial Application to DHS/FEMA via Grants.gov
Grants.gov applicants apply online using Workspace. Workspace is a shared, online environment where members of a grant team may simultaneously access and edit different web forms within an application. For each Notice of Funding Opportunity (NOFO), you can create individual instances of a Workspace. **Applicants are encouraged to submit their initial application in Grants.gov at least seven days before the June 20, 2018, application deadline.**

Below is an overview of applying on Grants.gov. For access to complete instructions on how to apply for opportunities using Workspace, refer to: https://www.grants.gov/web/grants/applicants/workspace-overview.html

1. *Create a Workspace*: Creating a workspace allows you to complete it online and route it through your organization for review before submitting.

2. *Complete a Workspace*: Add participants to the workspace to work on the application together, complete all the required forms online or by downloading PDF versions, and check for errors before submission.

3. *Adobe Reader*: If you decide not to apply by filling out web forms you can download individual PDF forms in Workspace so that they will appear similar to other Standard or DHS/FEMA forms. The individual PDF forms can be downloaded and saved to your local device storage, network drive(s), or external drives, then accessed through Adobe Reader. NOTE: Visit the Adobe Software Compatibility page on Grants.gov to download the appropriate version of the software at https://www.grants.gov/web/grants/applicants/adobe-software-compatibility.html.

4. *Mandatory Fields in Forms:* In the forms, you will note fields marked with an asterisk and a different background color. These fields are mandatory fields that must be completed to successfully submit your application.

5. *Complete SF-424 Fields First*: The forms are designed to fill in common required fields across other forms, such as the applicant name, address, and DUNS number. To trigger this feature, an applicant must complete the SF-424 information first. Once it is completed, the information will transfer to the other forms.

6. *Submit a Workspace*: An application may be submitted through workspace by clicking the "Sign and Submit" button on the Manage Workspace page, under the Forms tab. Grants.gov recommends submitting your application package at least seven days prior to the close date to provide you with time to correct any potential technical issues that may disrupt the application submission.

7. *Track a Workspace*: After successfully submitting a workspace package, a Grants.gov Tracking Number (GRANTXXXXXXXX) is automatically assigned to the application. The number will be listed on the Confirmation page that is generated after submission. Using the tracking number, access the Track My Application page under the Applicants tab or the Details tab in the submitted workspace.

For additional training resources, including video tutorials, refer to https://www.grants.gov/web/grants/applicants/applicant-training.html.

Applicant Support: Grants.gov provides applicants 24/7 support via the toll-free number 1-800-518-4726 and email at support@grants.gov. For questions related to the specific grant

opportunity, contact the number listed in the application package of the grant for which you are applying.

If you are experiencing difficulties with your submission, it is best to call the Grants.gov Support Center and get a ticket number. The Support Center ticket number will assist the DHS/FEMA with tracking your issue and understanding background information on the issue.

Submitting the Final Application in Non-Disaster Grants System (ND Grants)
After submitting the initial application in Grants.gov, eligible applicants will be notified by DHS/FEMA and asked to proceed with submitting their complete application package in ND Grants. Applicants can register early with ND Grants and are encouraged to begin their ND Grants registration at the time of this announcement or the latest, seven days before the application deadline. Early registration will allow applicants to have adequate time to start and complete their application.

In ND Grants applicants will be prompted to submit all of the information contained in the following forms. Applicants should review these forms before applying to ensure they have all the information required:

- Standard Form 424A, Budget Information (Non-construction);
- Standard Form 424B, Standard Assurances (Non-construction); and
- Standard Form LLL, Disclosure of Lobbying Activities.

In addition, applicants must submit copies of the following in ND Grants:

- Investment Justification (located on https://www.fema.gov/preparedness-non-disaster-grants);
- List of Urban Area Working Group (UAWG) and Senior Advisory Committee (SAC) members;
- SAC charter; and
- Indirect Cost Agreement, if requesting indirect costs. If there is no current indirect cost agreement, then the applicant must contact the Federal Cognizant Agency to negotiate a rate and notify the relevant HQ Program Analyst or Grant Management Specialist.

Applicants must submit copies of the following in ND Grants if applying for construction projects. The forms may be accessed in the Forms tab under SF-424 Family on Grants.gov:

- Standard Form 424C, Budget Information (Construction); and
- Standard Form 424D, Standard Assurances (Construction).

Applicants needing assistance registering for the ND Grants system should contact ndgrants@fema.gov or (800) 865-4076.

Timely Receipt Requirements and Proof of Timely Submission
All applications must be received in ND Grants by **5:00 PM Eastern Time on June 20, 2018**. Proof of timely submission is automatically recorded by ND Grants. An electronic date/time stamp is generated within the system when the application is successfully received by ND Grants. The applicant with the AOR role who submitted the application will receive an acknowledgment of receipt and a tracking number (GRANTXXXXXXXX) from Grants.gov

with the successful transmission of their initial application. This applicant with the AOR role will also receive the official date/time stamp and Grants.gov Tracking number in an email serving as proof of their timely submission.

Applicants using slow internet, such as dial-up connections, should be aware that transmission can take some time before Grants.gov and ND Grants receive your application. Again, Grants.gov will provide either an error or a successfully received transmission in the form of an email sent to the applicant with the AOR role. The Grants.gov Support Center reports that some applicants end the transmission because they think that nothing is occurring during the transmission process. Please be patient and give the systems time to process the application. Applicants needing assistance with the ND Grants system should contact ndgrants@fema.gov or (800) 865-4076.

HSGP Specific Application Instructions

Development of the Investment Justification (SHSP and UASI)
As part of the FY 2018 HSGP application process for SHSP and UASI funds, applicants must develop formal investment justifications (IJs) that address the proposed investments.

Each IJ must *demonstrate* how proposed investments:

- Support terrorism preparedness;
- Support closing capability gaps or sustaining capabilities identified in the 2017 THIRA/SPR process and national priorities as outlined in the National Preparedness Report; and
- Engage and/or impact the whole community, including children, older adults, pregnant women, and individuals with limited English proficiency, individuals with disabilities and others with access and functional needs, and ensure the protection of civil rights in the building, sustainment, and delivery of core capabilities.

Each IJ must *explain* how the proposed investments will support the applicant's efforts to:

- Prevent a threatened or an actual act of terrorism;
- Prepare for all hazards and threats, while explaining the nexus to terrorism preparedness;
- Protect citizens, residents, visitors, and assets against the greatest threats and hazards, relating to acts of terrorism; and/or
- Respond quickly to save lives, protect property and the environment, and meet basic human needs in the aftermath of an act of terrorism or other catastrophic incidents.

Development of Investments and Projects (SHSP)

- Applicants must propose at least one, and may include up to 10 investments.
- Within each investment in their IJ, applicants must propose at least one project to describe the activities they plan to implement with SHSP funds. There is no limit to the number of projects that may be submitted.
- Any projects funded with SHSP funds that are not included in the application must subsequently be included in the first Biannual Strategy Implementation Report (BSIR).

For further information on the BSIR, refer to Section F – Federal Award Administration Information, subsection Additional Programmatic Requirements and Information.

- Of the proposed SHSP-funded investments, one (1) single investment must be in support of a designated fusion center. Recipients must coordinate with the fusion center when developing a fusion center investment prior to submission. See additional information on how to develop fusion center investments below.
- Of the proposed SHSP-funded investments, at least one (1) investment must be in support of the state or territory's cybersecurity efforts. Recipients must limit the use of SHSP funds for projects that support the security and functioning of critical infrastructure and core capabilities as they relate to terrorism preparedness and may simultaneously support enhanced preparedness for other hazards unrelated to acts of terrorism. The investment name must include the word "Cybersecurity" to easily identify the required cybersecurity investment.
- All emergency communications investments must describe how such activities align with their Statewide Communication Interoperable Plan (SCIP). Recipients must coordinate with their Statewide Interoperability Coordinator (SWIC) and/or Statewide Interoperability Governance Body (SIGB) when developing an emergency communications investment prior to submission to ensure the project supports the statewide strategy to improve emergency communications and is compatible and interoperable with surrounding systems. The investment name must include the words "emergency communications" to easily identify any emergency communications investments.
- Projects should describe how the proposed investment supports closing capability gaps or sustaining capabilities identified in the THIRA/SPR process.

Development of Investments and Projects (UASI)

- Applicants must propose at least one, and may include up to 10 investments.
- Within each investment in their IJ, Urban Areas must propose at least one project to describe the activities they are planning to implement with UASI funds. There is no limit to the number of projects that may be submitted. Any projects funded with UASI funds that are not included in the application must subsequently be included in the first BSIR.
- Of the proposed 10 investments, Urban Areas are required to propose one (1) single investment in support of a designated fusion center within the Urban Area, if applicable. Recipients must coordinate with the fusion center when developing a fusion center investment prior to submission. See additional information on how to develop fusion center investments below.
- Of the proposed UASI-funded investments, at least one (1) investment must be in support of the urban area's cybersecurity efforts. Recipients must limit the use of UASI funds for projects that support the security and functioning of critical infrastructure and core capabilities as they relate to terrorism preparedness and may simultaneously support enhanced preparedness for other hazards unrelated to acts of terrorism. The investment name must include the word "Cybersecurity" to easily

identify the required cybersecurity investment.

- If UASI funds are used by the State in support of the Urban Area, the SAA must, as part of the list of proposed investments, describe how those funds will directly support the Urban Area.
- All emergency communications investments must describe how such activities align to the SCIP. Recipients must coordinate with the SWIC and/or SIGB when developing an emergency communications investment prior to submission to ensure the project supports the statewide strategy to improve emergency communications and is compatible and interoperable with surrounding systems. The investment name must include the words "emergency communications" to easily identify any emergency communications investments.
- Projects should describe how the proposed investment supports building or sustaining capabilities to meet their 2017 THIRA targets.

Development of Fusion Center Investments (SHSP and UASI)

If applicable, each IJ must include and identify a fusion center investment that will:

- Indicate alignment to a designated Fusion Center.
- Provide both a brief narrative description and funding itemization of the project activities relating to the proposed resources that directly support the designated Fusion Center. This descriptive narrative should align with both the financial itemization and improvement or sustainment of performance measures as a result of receiving the proposed funding. If the project description and funding itemization do not directly support the fusion center and the relationship to the fusion center is not identified, then the investment may be conditionally approved until a Fusion Center Addendum is submitted and approved. Note: A sample project description and funding itemization are below.
- Identify the expected improvement or sustainment of performance measures as a result of receiving the proposed funding for the itemized projects.
- Effectively address performance measures identified in each fusion center's individual assessment data found in the HSIN-Intel Fusion Center Profile. A list of the 2018 Performance Measures can be found in Appendix H-Fusion Center Performance Measures.

Sample Fusion Center Project Description

The following is an example of a sample fusion center project description that could be included in a SHSP or UASI investment:

The X Fusion enhancement project will fund salaries, benefits, and training for X number of Fusion Center intelligence analysts, maintenance and support for the center's enabling systems, travel costs associated with training, and the replacement of X computer monitors within the Fusion Center. The project will directly sustain the Center's achieved abilities and work to close the gap of any current capabilities through the sustained funding of its current analytical staff and enabling systems. This project is in direct alignment with performance measures 2018.1-2018.23. We anticipate seeing an

improvement of the quality and quantity of reporting as a direct result of the funding of this project.

Sample Fusion Center Funding Itemization
The funding itemization for a fusion center investment should include the amount and percent of each relevant solution area. As an example:

Solution Area and Amount of Proposed Funding		***Percent of Proposed Funding***
Planning:	*$10,000.00*	*2%*
Organization:	*$200,000*	*48%*
Equipment:	*$200,000*	*48%*
Training:	*$10,000*	*2%*
Exercises:	*$0*	*0%*
Total:	*$420,000*	*100%*

Completing IJs in the Grant Reporting Tool (GRT) (SHSP and UASI)
The IJ Planning Guide contains the IJ template and instructions for collecting the required information for investments and projects. A fillable version of the IJ template can be obtained from the FEMA HQ Program Analyst. Applicants should contact the Centralized Scheduling and Information Desk (CSID) for FEMA HQ Program Analyst contact information. CSID can be reached by phone at 800-368-6498 or by e-mail at askcsid@fema.gov, Monday through Friday, 9:00 a.m. – 5:00 p.m. ET. Additionally, applicants should utilize the Project Worksheet to assemble the information required for each project, which will facilitate the input of that information into the GRT.

For more information on how to complete IJs, refer to the Investment Justification Planning Guide located on fema.gov/grants.

Development of Concept of Operations for OPSG
As part of the FY 2018 OPSG application process, each eligible local unit of government at the county or Federally-recognized tribal government level must develop a strategic plan called a Concept of Operations (CONOP)/Application, which is a formal proposal of action to address a specific situation and forms the basis for Operations Orders, in coordination with state and Federal law enforcement agencies, to include, but not limited to CBP/USBP. CONOPs that are developed at the county level should be inclusive of city, county, tribal, and other local law enforcement agencies that are eligible to participate in OPSG operational activities, and the CONOP/Application should describe participating agencies in the Executive Summary. CONOP/Application details should include the names of the agencies, points of contact, and individual funding requests. All CONOPs/Applications must be developed in collaboration with the local USBP sector office, the SAA and the local unit of government. Requests for funding in CONOPs/Applications must be based on risks and the operational enforcement support requirements of its corresponding USBP Sector. Sector offices will forward the CONOPs to USBP Headquarters for vetting and coordination. Applicants will forward corresponding OPSG Applications to the SAA for submission to FEMA. USBP Headquarters will reconcile all submitted CONOPs with the OPSG

Applications. For more information, refer to Appendix D – FY 2018 OPSG Operations Order Template and Instructions and Appendix E – OPSG Operational Guidance.

Intergovernmental Review
An intergovernmental review may be required. Applicants must contact their state's Single Point of Contact (SPOC) to comply with the state's process under Executive Order 12372 (See http://www.fws.gov/policy/library/rgeo12372.pdf).

Funding Restrictions
Federal funds made available through this award may be used only for the purpose outlined in this award and must be consistent with the statutory authority for the award. Award funds may not be used for matching funds for any other Federal award, lobbying, or intervention in Federal regulatory or adjudicatory proceedings. In addition, Federal funds may not be used to sue the Federal Government or any other government entity.

Environmental Planning and Historic Preservation (EHP) Compliance
As a Federal agency, DHS/FEMA is required to consider the effects of its actions on the environment and/or historic properties to ensure that all activities and programs funded by the agency, including grant-funded projects, comply with federal EHP regulations, laws and Executive Orders as applicable. Recipients and subrecipients proposing projects that have the potential to impact the environment, including but not limited to the construction of communication towers, modification or renovation of existing buildings, structures and facilities, or new construction including replacement of facilities, must participate in the DHS/FEMA EHP review process. The EHP review process involves the submission of a detailed project description along with supporting documentation so that DHS/FEMA may determine whether the proposed project has the potential to impact environmental resources and/or historic properties. In some cases, DHS/FEMA is also required to consult with other regulatory agencies and the public in order to complete the review process. The EHP review process must be completed before funds are released to carry out the proposed project; otherwise, DHS/FEMA may not be able to fund the project due to non-compliance with EHP laws, executive order, regulations, and policies.

Additionally, all recipients are required to comply with DHS/FEMA EHP Policy Guidance, FEMA Policy #108-023-1. The EHP screening form is located here, and further EHP guidance can be found at https://www.fema.gov/media-library/assets/documents/85376.

Emergency Communications and Resilience
All entities using HSGP funding to support emergency communications investments are required to comply with the SAFECOM Guidance on Emergency Communications Grants (SAFECOM Guidance). The SAFECOM Guidance provides current information on emergency communications policies, eligible costs, best practices, and technical standards for State, local, tribal, and territorial grantees investing Federal funds in emergency communications projects. It is also designed to promote and align with the National Emergency Communications Plan (NECP). Conformance with the SAFECOM Guidance helps ensure that Federally-funded investments are compatible, interoperable, resilient, and support national goals and objectives for improving emergency communications. Additional information on this topic can be found in

Requirements Applicable to Emergency Communications Investments

If an entity uses HSGP funding to support emergency communications investments, the following requirements shall apply to all such grant-funded communications investments in support of the emergency communications priorities and recognized best practices:

- Applicants must describe in the investment how proposed communications investments align to needs identified in their Statewide Communication Interoperability Plan (SCIP). Effective project alignment will require advance coordination with the SWIC and consultation with governing bodies such as the Statewide Interoperability Governing Body (SIGB) or Statewide Interoperability Executive Committee (SIEC), as they serve as the primary steering group for the statewide interoperability strategy. Additionally, grantees should consult subject matter experts serving on governance bodies such as broadband experts, chief information officers, representatives from utilities, or legal and financial experts when developing proposals.
- The signatory authority for the SAA must certify in writing to DHS/FEMA their compliance with the *SAFECOM Guidance*. The certification letter should be coordinated with the SWIC for each State and must be uploaded to ND Grants at the time of the first Program Performance Report (PPR) submission.
- All states and territories must designate a full-time SWIC who has the authority and resources to actively improve interoperability with emergency management and response agencies across all levels of government, to include establishing statewide plans, policies, and procedures, and coordinating decisions on communications investments funded through Federal grants. SWIC status information will be maintained by the DHS Office of Emergency Communications and will be verified by FEMA GPD through programmatic monitoring activities.
- By the period of performance end date, all states and territories must update their SCIP, with a focus on communications resilience/continuity, to include assessment and mitigation of all potential risks identified in the SCIP: natural disasters, accidental damage (human failures), intentional damage (sabotage, terrorism), cybersecurity, etc. Following the initial update, the SCIP should be updated on an annual basis. SCIP status information will be maintained by the DHS Office of Emergency Communications and will be verified by FEMA GPD through programmatic monitoring activities.
- All states and territories must test their emergency communications capabilities and procedures (as outlined in their operational communications plans) in conjunction with regularly planned exercises (separate/addition emergency communications exercises are not required) and must submit an After Action Report/Improvement Plan (AAR/IP) to the Homeland Security Exercise and Evaluation Program's (HSEEP) electronic message inbox at hseep@fema.dhs.gov within 90 days of exercise completion (see Appendix B – FY 2018 HSGP Program Priorities). Exercises should be used to both demonstrate and validate skills learned in training and to identify gaps in capabilities. Resilience and continuity of communications should be tested during training and exercises to the extent possible. Further, exercises should include participants from multiple jurisdictions, disciplines, and levels of government and

include emergency management, emergency medical services, law enforcement, interoperability coordinators, public health officials, hospital officials, officials from colleges and universities, and other disciplines and private sector entities, as appropriate. Findings from exercises should be used to update programs to address gaps in emergency communications as well as emerging technologies, policies, and partners. Recipients are encouraged to increase awareness and availability of emergency communications exercise opportunities across all levels of government.

States, territories, and other eligible grant recipients are advised that HSGP funding may be used to support communications planning (including the cost of hiring a SWIC, participation in governance bodies and requirements delineated above), training, exercises, and equipment costs. Costs for transitioning to the FirstNet network may also be eligible. More information regarding FirstNet can be found in Appendix I – Supplemental Emergency Communications Guidance. Details regarding allowable costs are provided in Appendix C – FY 2018 HSGP Funding Guidelines.

Funds Transfer Restriction

The recipient is prohibited from transferring funds between programs (includes SHSP, UASI, and OPSG). Recipients are allowed to submit an investment/project where funds come from multiple funding sources (i.e., SHSP/UASI); however, recipients are not allowed to divert funding from one program to another due to the risk-based funding allocations, which were made at the discretion of DHS/FEMA. For additional details on restrictions on the use of funds, refer to Appendix C – Funding Guidelines.

Indirect (Facilities & Administrative [F&A]) Costs

Indirect costs are allowable under this program as described in 2 C.F.R. § 200.414. With the exception of recipients who have never received a negotiated indirect cost rate as described in 2 C.F.R. § 200.414(f), recipients must have an approved indirect cost rate agreement with their cognizant federal agency to charge indirect costs to this award. A copy of the approved rate (a fully executed, agreement negotiated with the applicant's cognizant federal agency) is required at the time of application and must be provided to DHS/FEMA before indirect costs are charged to the award.

Pre-Award Costs

Pre-award costs are allowable only with the prior written approval of DHS/FEMA and as included in the award agreement. To request pre-award costs, a written request must be included with the application, signed by the Authorized Representative of the entity. The letter must outline what the pre-award costs are for, including a detailed budget break-out of pre-award costs from the post-award costs, and a justification for approval.

Cost Principles

Costs charged to this award must be consistent with the Cost Principles for Federal Awards located at 2 C.F.R. Part 200, Subpart E.

Direct Costs

Planning

Planning related costs are allowed under this program only as described in this NOFO.

Organization

Organization related costs are allowed under this program only as described in this NOFO.

Equipment

Equipment-related costs are allowed under this program only as described in this NOFO.

Training

Training related costs are allowed under this program only as described in this NOFO.

Exercises

Exercise related costs are allowed under this program only as described in this NOFO.

Personnel

Personnel hiring, overtime, and backfill expenses are permitted under this grant in order to perform allowable HSGP planning, training, exercise, and equipment activities. Under the OPSG Program, overtime costs are allowable only in so far as they meet the intent of the program. Recipients and subrecipients may not use more than 50 percent of their awards to pay for personnel activities unless a waiver is approved by FEMA. For more information on the 50 percent personnel cap, please see FEMA Policy (FP) 207-093-1, *Clarification on the Personnel Reimbursement for Intelligence Cooperation and Enhancement of Homeland Security Act of 2008* (Public Law 110-412 – the PRICE Act) at https://www.fema.gov/media-library/assets/documents/85384.

Operational Overtime

Operational Overtime costs are allowed under this program only as described in this NOFO. Prior to use of funds for operational overtime, recipients must receive approval from DHS/FEMA.

Travel

Domestic travel costs are allowed under this program, as provided for in this NOFO. International travel is not an allowable cost under this program unless approved in advance by DHS/FEMA.

Construction and Renovation

Construction and renovation costs to achieve capability targets related to preventing, preparing for, protecting against, or responding to acts of terrorism are allowed under this program. For construction costs to be allowed, they must be specifically approved by DHS/FEMA in writing prior to the use of any program funds for construction or renovation. Limits on the total amount of grant funding that may be used for construction or renovation may apply. See Appendix C - Funding Guidelines for additional details. Additionally, recipients are required to submit Standard Form 424C.

Maintenance and Sustainment
Maintenance and Sustainment related costs, such as maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable as described in FP 205-402-125-1, Maintenance Contracts and Warranty Coverage Funded by Preparedness Grants Policy (http://www.fema.gov/media-library/assets/documents/32474).

Management and Administration (M&A) Costs
Management and administration (M&A) activities are those directly relating to the management and administration of HSGP funds, such as financial management and monitoring. A maximum of up to five percent of HSGP funds awarded may be retained by the state, and any funds retained are to be used solely for M&A purposes associated with the HSGP award. Subrecipients may also retain a maximum of up to five percent of funding passed through by the state solely for M&A purposes associated with the HSGP award.

A state's HSGP funds for M&A calculation purposes includes the sum total of its SHSP, UASI, and, where applicable, OPSG awards. While the SAA may retain up to five percent of this total for M&A, the state must still ensure that all subrecipient award amounts meet the mandatory minimum pass-through requirements which are applicable to each HSGP program. To meet this requirement, the percentage of SHSP, UASI and OPSG funds passed through to local jurisdictions must be based on the state's total HSGP award prior to withholding any M&A. For additional information on SHSP and UASI M&A, refer to Information Bulletin (IB) 365: Management and Administration Costs in the Homeland Security Grant Program. For additional clarification on OPSG M&A, refer to DHS/FEMA Policy207-087-1, which can be found at http://www.fema.gov/library/viewRecord.do?id=7837.

Critical Emergency Supplies
Critical emergency supplies are allowed under this program only as described in this NOFO.

Secure Identification
Secure Identification costs are allowed under this program only as described in this NOFO.

General Purpose Equipment
HSGP allows expenditures on general purpose equipment if it aligns to and supports one or more core capabilities identified in the Goal and has a nexus to terrorism preparedness. General purpose equipment, like all equipment funded under HSGP, must be sharable through the Emergency Management Assistance Compact (EMAC)[1] and allowable under 6 U.S.C. § 609, and any other applicable provision of the *Homeland Security Act of 2002*, as amended. Examples of such general purpose equipment may include:

- Law enforcement vehicles;
- Emergency medical services (EMS) equipment and vehicles;
- Fire service equipment and vehicles, to include hose, pump accessories, and foam concentrate for specialized chemical, biological, radiological, nuclear, and explosives

[1] Except for American Samoa and the Commonwealth of the Northern Mariana Islands which are not required to belong to EMAC at this time.

(CBRNE) response; and
- Office equipment for staff[2] engaged in homeland security program activity.

Equipment allowability is based on the Authorized Equipment List (AEL) but exceptions may be considered on a case-by-case basis if (1) the equipment identified to be purchased directly maps to a core capability contained within the Goal, and (2) the equipment's purpose (when operational) falls under the permitted use of funds in accordance with 6 U.S.C. §609, and any other applicable provision of the *Homeland Security Act of 2002*, as amended.

E. Application Review Information

Allocations

Risk Methodology

Based upon the requirements of the *Homeland Security Act of 2002*, as amended, DHS/FEMA continues to use risk to determine final HSGP allocations. DHS/FEMA defines risk as: "potential for an unwanted outcome resulting from an incident, event, or occurrence, as determined by its likelihood and the associated consequences" (see http://www.dhs.gov/xlibrary/assets/dhs-risk-lexicon-2010.pdf). The DHS/FEMA risk methodology is focused on three elements:

- *Threat* – the likelihood of an attack being attempted by an adversary;
- *Vulnerability* – the likelihood that an attack is successful, given that it is attempted; and
- *Consequence* – the effect of an event, incident or occurrence.

The risk methodology determines the relative risk of terrorism faced by a given area taking into account the potential risk of terrorism to people, critical infrastructure, and economic security. The analysis includes threats from violent domestic extremists, international terrorist groups, and individuals inspired by terrorists abroad.

NOTE: The THIRA/SPR process is separate from the risk methodology, and its results do not affect grant allocations.

SHSP Allocations

FY 2018 SHSP funds will be allocated based on two factors: minimum amounts as legislatively mandated, and DHS/FEMA's risk methodology. THIRA/SPR results do not impact grant allocation or award.

Each state and territory will receive a minimum allocation under SHSP using thresholds established in the Homeland Security Act of 2002, as amended. All 50 States, the District of Columbia, and the Commonwealth of Puerto Rico will receive 0.35 percent of the total funds allocated for grants under Section 2003 and Section 2004 of the Homeland Security Act of 2002, as amended. Each of the four territories (American Samoa, Guam, the Northern Mariana Islands, and the U.S. Virgin Islands) will receive a minimum allocation of 0.08

[2] This applies to all homeland security personnel, and is not limited to management and administration staff, and costs are to be captured outside the cap on management and administration costs.

percent of the total funds allocated for grants under Section 2003 and 2004 of the Homeland Security Act of 2002, as amended. For details on program-specific funding amounts, refer to Appendix A – FY 2018 Program Allocations.

UASI Allocations
FY 2018 UASI funds will be allocated based on DHS/FEMA's risk methodology. THIRA/SPR results do not impact grant allocation or award.

Eligible candidates for the FY 2018 UASI program have been determined through an analysis of relative risk of terrorism faced by the 100 most populous Metropolitan Statistical Areas (MSAs) in the United States, in accordance with the Homeland Security Act of 2002, as amended. Detailed information on MSAs is publicly available from the United States Census Bureau at https://www.census.gov/programs-surveys/metro- micro.html. For details on program-specific funding amounts, refer to Appendix A – FY 2018 Program Allocations.

OPSG Allocations
The FY 2018 OPSG Risk Assessment is designed to identify the risk to border security and to assist with the distribution of funds for the grant program. Funding under OPSG is distributed based on the risk to the security of the border. Entities eligible for funding are the state, local and tribal law enforcement agencies that are located along the border of the United States. The THIRA/SPR process is not required for OPSG.

For the purposes of OPSG, the risk is defined as the potential for an adverse outcome assessed as a function of threats, vulnerabilities, and consequences associated with an incident, event, or occurrence.

Based upon ongoing intelligence analysis and extensive security reviews, DHS/CBP continues to focus the bulk of OPSG funds based upon risk analyses. The risk model used to allocate OPSG funds considers the potential risk that certain threats pose to border security and estimate the relative risk faced by a given area. In evaluating risk, DHS/CBP considers intelligence, situational awareness, criminal trends, and statistical data specific to each of the border sectors, and the potential impacts that these threats pose to the security of the border area. For vulnerability and consequence, DHS/CBP considers the expected impact and consequences of successful border events occurring in specific areas.

Threat and vulnerability are evaluated based on specific operational data from DHS/CBP. Threat components present in each of the Sectors are used to determine the overall threat score. These components are terrorism, criminal aliens, drug trafficking organizations, and alien smuggling organizations.

Application Evaluation Criteria
Prior to making a federal award, FEMA is required by 31 U.S.C. § 3321 note, 41 U.S.C. § 2313, and 2 C.F.R. § 200.205 to review information available through any OMB-designated repositories of government-wide eligibility qualification or financial integrity information. Therefore, application evaluation criteria may include the following risk-based considerations of the applicant: (1) financial stability; (2) quality of management systems and ability to meet

management standards; (3) history of performance in managing federal award; (4) reports and findings from audits; and (5) ability to effectively implement statutory, regulatory, or other requirements.

FEMA will evaluate FY 2018 HSGP applications for completeness, adherence to programmatic guidelines, and anticipated effectiveness of the proposed investments. FEMA's review will include verification that each IJ or project:

- Aligns with at least one core capability identified in the Goal;
- Demonstrates how investments support closing capability gaps or sustaining capabilities identified in the THIRA/SPR process; and
- Supports a NIMS-typed resource and whether those assets are deployable/shareable to support emergency or disaster operations per existing EMAC agreements.

In addition to the above, FEMA will evaluate whether proposed projects are: 1) both feasible and effective at reducing the risks for which the project was designed; and 2) able to be fully completed within the three-year PoP. FEMA will use the information provided in the application and after the submission of the first BSIR to determine the feasibility and effectiveness of a grant project. To that end, IJs should include:

- An explanation of how the proposed project will achieve objectives as identified in the SPR, including expected long-term impact where applicable, and which core capability gap(s) it helps to close and how;
- A summary of the status of planning and design efforts accomplished to date (e.g., included in a capital improvement plan); and
- A project schedule with clear milestones.

Recipients are expected to conform, as applicable, with accepted engineering practices, established codes, standards, modeling techniques, and best practices, and participate in the development of case studies demonstrating the effective use of grant funds, as requested.

Review and Selection (SHSP and UASI)

To ensure the effectiveness of proposed investments and projects, all applications will undergo a federal review. The federal review will be conducted by FEMA HQ Program Analysts. FEMA HQ Program Analysts will use a checklist to verify compliance with all administrative and eligibility criteria identified in the NOFO. Recipients must be able to demonstrate how investments support closing capability gaps or sustaining capabilities identified in the THIRA/SPR process. IJs will be reviewed at both the investment and project level. A program hold may be placed on any investment which is found to be noncompliant.

Fusion center investments will be jointly reviewed by FEMA and the DHS Office of Intelligence and Analysis (I&A) for compliance with HSGP NOFO requirements to prioritize the alignment of requests with results from the annual Fusion Center Assessment Program. If a fusion center investment does not meet the requirements, a Fusion Center Addendum must be completed and submitted for review and approval prior to expending funds allocated to fusion center activities.

Emergency communications investments will be jointly reviewed by FEMA and the DHS Office of Emergency Communications (OEC) to verify compliance with SAFECOM guidance. FEMA and OEC will coordinate directly with the recipient on any compliance concerns and will provide technical assistance as necessary to help ensure full compliance.

OPSG

Applications will be reviewed by the SAA and USBP Sector Headquarters for completeness and adherence to programmatic guidelines and evaluated for anticipated feasibility, need, and impact of the Operations Orders. For more information on Operations Orders and other requirements of OPSG see Appendix E – OPSG Operational Guidance.

DHS/FEMA will verify compliance with all administrative and eligibility criteria identified in the NOFO and required submission of Operations Orders and Inventory of Operations Orders by the established due dates. DHS/FEMA and USBP will use the results of both the risk analysis and the federal review by DHS/FEMA to make recommendations for funding to the Secretary of Homeland Security.

FY 2018 OPSG funds will be allocated competitively based on risk-based prioritization using the OPSG Risk Assessment described above. Final funding allocations are determined by the Secretary, who may consider information and input from various law enforcement offices or subject-matter experts within the Department. Factors considered include, but are not limited to threat, vulnerability, miles of the border, and other border-specific law enforcement intelligence, as well as the feasibility of FY 2018 Operation Orders to designated localities within Border States and territories. For details on program-specific funding amounts, refer to Appendix A – FY 2018 Program Allocations.

Supplemental Financial Integrity Review

Prior to making a Federal award where the Federal share is expected to exceed the simplified acquisition threshold, currently $150,000, DHS/FEMA is required to review and consider any information about the applicant in the Federal Awardee Performance and Integrity Information System (FAPIIS), which is also accessible through the SAM website.

- An applicant, at its option, may review information in FAPIIS and comment on any information about itself that a Federal awarding agency previously entered.
- DHS/FEMA will consider any comments by the applicant, in addition to the FAPIIS information, in making a judgment about the applicant's integrity, business ethics, and record of performance under Federal awards when completing the review of risk posed by applicants, as described in 2 CFR § 200.205.

F. Federal Award Administration Information

Notice of Award

Notification of award approval is made through the ND Grants system through an automatic electronic mail to the awardee authorized official listed in the initial application. The "award date" for HSGP will be the date that DHS/FEMA approves the award. The awardee should follow the directions in the notification to confirm acceptance of the award.

Funds will remain on hold until the recipient accepts the award through the ND Grants system and all other conditions of the award have been satisfied, or the award is otherwise rescinded. Failure to accept the grant award within the 90-day timeframe may result in a loss of funds.

Recipients must accept their awards no later than 90 days from the award date. The recipient shall notify the awarding agency of its intent to accept and proceed with work under the award through the ND Grants system. For instructions on how to accept or decline an award in the ND Grants system, please see the ND Grants Recipient Training Manual.

Administrative and National Policy Requirements
All successful applicants for all DHS grant and cooperative agreements are required to comply with DHS Standard Administrative Terms and Conditions, which are available online at: DHS Standard Terms and Conditions. The applicable DHS Standard Administrative Terms and Conditions will be those in effect at the time the award was made.

Before accepting the award, the AOR should carefully review the award package. The award package includes instructions on administering the grant award and the terms and conditions associated with responsibilities under Federal Awards. Recipients must accept all conditions in this NOFO as well as any Special Terms and Conditions in the Notice of Award to receive an award under this program.

SHSP and UASI Pass-Through Requirements
Awards made to the SAA for HSGP carry additional pass-through requirements. Pass- through is defined as an obligation on the part of the SAA to make funds available to local units of government, combinations of local units, tribal governments, or other specific groups or organizations. Four requirements must be met to pass-through grant funds:

- The SAA must make a firm written commitment to passing through grant funds to subrecipients;
- The SAA's commitment must be unconditional (i.e., no contingencies for the availability of SAA funds);
- There must be documentary evidence (i.e., award document, terms, and conditions) of the commitment; and
- The award terms must be communicated to the subrecipient.

Timing and Amount
The SAA must pass-through at least 80 percent of the funds awarded under SHSP and UASI to local or tribal units of government within 45 calendar days of receipt of the funds. "Receipt of the funds" occurs either when the SAA accepts the award or 15 calendar days after the SAA receives notice of the award, whichever is earlier.

SAAs are sent notification of their HSGP awards via the GPD's ND Grants system. If an SAA accepts its award within 15 calendar days of receiving notice of the award in the ND Grants system, the 45-calendar days pass-through period will start on the date the SAA accepted the award. Should an SAA not accept their HSGP award within 15 calendar days of receiving notice of the award in the ND Grants system, the 45-calendar days pass-through

period will begin 15 calendar days after the award notification is sent to the SAA via the ND Grants system.

It is important to note that the PoP start date does not directly affect the start of the 45-calendar days pass-through period. For example, an SAA may receive notice of their HSGP award on August 20, 2018, while the PoP dates for that award are September 1, 2018, through August 31, 2019. In this example, the 45-day pass-through period will begin on the date the SAA accepts their HSGP award or September 4, 2018 (15 calendar days after the SAA was notified of the award), whichever date occurs first. The PoP start date of September 1, 2018, would not affect the timing of meeting the 45 calendar day pass-through requirement.

Other SHSP and UASI Pass-Through Requirements
The signatory authority of the SAA must certify in writing to DHS/FEMA that pass-through requirements have been met. A letter of intent (or equivalent) to distribute funds is not considered sufficient. The pass-through requirement does not apply to SHSP awards made to the District of Columbia, Guam, American Samoa, the U.S. Virgin Islands, and the Commonwealth of the Northern Mariana Islands. The Commonwealth of Puerto Rico is required to comply with the pass-through requirement, and its SAA must also obligate at least 80 percent of the funds to local units of government within 45 calendar days of receipt of the funds. Any UASI funds retained by the SAA must be used to directly support the designated Urban Areas in the state. The SAA must propose an investment describing how such UASI funds it retains will be used to directly support the Urban Area.

Under SHSP, the SAA may retain more than 20 percent of funding for expenditures made by the state on behalf of the local unit(s) of government. This may occur only with the written consent of the local unit of government, specifying the amount of funds to be retained and the intended use of funds. States shall review their written consent agreements yearly and ensure that they are still valid. If a written consent agreement is already in place from previous fiscal years, DHS/FEMA will continue to recognize it for FY 2018, unless the written consent review indicates the local government is no longer in agreement. If modifications to the existing agreement are necessary, the SAA should contact their assigned FEMA HQ Program Analyst.

Additional OPSG Requirements
The recipient must pass through 100 percent of OPSG allocations to eligible jurisdictions. The recipient is prohibited from obligating or expending funds provided through this award until each unique and specific county-level or equivalent Operational Order/Fragmentary Operations Order budget has been reviewed and approved through an official electronic mail notice issued by DHS/FEMA removing this special programmatic condition.

Reporting
Recipients are required to submit various financial and programmatic reports as a condition of award acceptance. Future awards and funds drawdown may be withheld if these reports are delinquent.

Federal Financial Reporting Requirements

Federal Financial Reporting (FFR)

Recipients must report obligations and expenditures on a quarterly basis through the FFR (SF-425) to DHS/FEMA. Recipients must file the FFR electronically using the Payment and Reporting Systems (PARS). A FFR must be submitted quarterly throughout the PoP, including partial calendar quarters, as well as for periods where no grant award activity occurs. Future awards and fund drawdowns may be withheld if these reports are delinquent, demonstrate lack of progress, or are insufficient in detail.

Recipients may review the Federal Financial Reporting Form (FFR) (SF-425) at https://www.grants.gov/web/grants/forms/post-award-reporting-forms.html#sortby=1, SF-425 OMB #4040-0014.

Financial Reporting Periods and Due Dates

The following reporting periods and due dates apply for the FFR:

Reporting Period	Report Due
October 1 – December	January 30
January 1 – March 31	April 30
April 1 – June 30	July 30
July 1 – September 30	October 30

Financial and Compliance Audit Report

For audits of fiscal years beginning on or after December 26, 2014, recipients that expend $750,000 or more from all federal funding sources during their fiscal year are required to submit an organization-wide financial and compliance audit report. The audit must be performed in accordance with the requirements of Government and Accountability Office's (GAO) Government Auditing Standards, located at http://www.gao.gov/govaud/ybk01.htm, and the requirements of Subpart F of 2 C.F.R. Part 200, located at http://www.ecfr.gov/cgi-bin/text-idx?node=sp2.1.200.f.

Program Performance Reporting Requirements

Performance Progress Reports (PPRs)

Recipients are responsible for providing updated performance reports on a biannual basis as an attachment in ND Grants.

The PPR should include the following:

- A brief narrative of the overall project status;
- A summary of project expenditures; and
- A description of any potential issues that may affect project completion.

As part of the PPR, recipients will be required to report the following information related to fusion center projects:

- Progress toward addressing shortfalls identified by their annual Fusion Center

Assessment results.

Program Performance Reporting Periods and Due Dates
The following reporting periods and due dates apply for the PPR:

Reporting Period	Report Due Date
January 1 – June 30	July 30
July 1 – December 31	January 30

Additional Programmatic Reporting Requirements and Information

Biannual Strategy Implementation Report (BSIR)
In addition to the quarterly financial and biannual performance progress reports, recipients are responsible for completing and submitting BSIRs through the Grants Reporting Tool (GRT). The BSIR is due within 30 days after the end of the reporting period (July 30 for the reporting period of January 1 through June 30 (the summer BSIR report); and January 30 for the reporting period of July 1 through December 31 (winter BSIR report). All required attributes of each project must be included. Updated obligations, expenditures, and significant developments must be provided within the BSIR to show the progress of implementation for every project, as well as how expenditures support Planning, Organization, Equipment, Training, and Exercises (POETE). The first BSIR will be due January 30, 2019 (30 days after the end of the first reporting period for the award). Subsequent BSIR reports will require recipients to report on a project-by-project basis.

2018/2019 Threat and Hazard Identification and Risk Assessment (THIRA) and Stakeholder Preparedness Review (SPR) Process
By December 31, 2018, FY 2018 recipients are required to submit a THIRA/SPR, using an updated methodology that assesses only the response, recovery, and cross-cutting capabilities. In FY 2019, all core capabilities will be required and the SPR will still be submitted annually. However the THIRA requirement will be reduced to every three years.

Also beginning with the FY 2018 award cycle, the State Preparedness Report will be known as the Stakeholder Preparedness Review. The acronym SPR will continue to be used. States, territories, and Urban Areas will be required to submit a SPR annually.

Further details on the THIRA as it relates to HSGP Program requirements can be found in Appendix B – FY 2018 HSGP Program Priorities. For additional guidance on THIRA, please refer to CPG 201, Third Edition, available at http://www.fema.gov/threat-and-hazard-identification-and-risk-assessment.

2017 Threat and Hazard Identification and Risk Assessment (THIRA)
Although the THIRA/SPR process is changing this year, as discussed later in this section, grant investment justifications for FY 2018 applications should be based on previously submitted 2017 THIRA results. The THIRA is a grant requirement for all States,

territories, and Urban Areas. The THIRA is a risk-informed assessment of capability requirements that helps jurisdictions identify, understand, and plan for its worst most plausible threats and hazards.

2017 Stakeholder Preparedness Review (SPR) [formerly State Preparedness Report]
The SPR is a grant requirement for all States, territories, and UASIs. It is an annual capability assessment that helps jurisdictions identify capability gaps and prioritize investment requirements to reach the targets set in their THIRA. Completing the SPR and tying the results to funding requests creates a stronger investment justification. Additional information on the THIRA/SPR process can be found at https://www.fema.gov/national-preparedness-system.

Supplemental Information Reporting Systems
In addition to ND Grants, the following information systems are used for the submission of required reports:

Grant Reporting Tool (GRT)
The Grant Reporting Tool (GRT) is the system in which HSGP recipients will submit their BSIR information. HSGP recipients are responsible for filing a semi-annual BSIR report in the GRT and should register to create an account as soon as possible. Recipients should go to the following link and follow the links to create a new account: https://www.reporting.odp.dhs.gov/. This report is used to track the progress toward the completion of projects.

FY 2018 Unified Reporting Tool (URT)
The URT is DHS/FEMA's collection mechanism for THIRA, SPR, and related preparedness information. The FY 2018 URT includes questions related to NIMS adoption and implementation, CPG 101v2 compliance, and other preparedness questions, as appropriate. Information on the URT, including when recipients will receive the tool and how to use the tool, will be sent to recipients later in 2018.

Closeout Reporting Requirements
Within 90 days after the end of the PoP, or after an amendment has been issued to close out a grant, whichever comes first, recipients must submit a final FFR and final progress report detailing all accomplishments and a qualitative summary of the impact of those accomplishments throughout the PoP, as well as the following documentation:

1) The final request for payment, if applicable;
2) SF-425 –Final FFR;
3) Final Performance Progress Report;
4) A qualitative narrative summary of the impact of those accomplishments throughout the entire PoP submitted to the respective FEMA HQ Program Analyst, and
5) Other documents required by program guidance or terms and conditions of the award.

After these reports have been reviewed and approved by DHS/FEMA, a close-out notice will be completed. The notice will indicate the PoP as closed, list any remaining funds that will be de-obligated, and address the requirement of maintaining the grant records for three years from the

date of the final FFR.

In addition, any HSGP recipient that issues sub-awards to any subrecipient is responsible for closing out those sub-awards as described in 2 C.F.R. § 200.343. HSGP recipients must ensure that they complete the closeout of their sub-awards in time to submit all necessary documentation and information to DHS/FEMA during the closeout of their grant award.

The recipient is responsible for returning any funds that have been drawn down but remain as unliquidated on recipient financial records.

Disclosing Information per 2 C.F.R. § 180.335
This reporting requirement pertains to disclosing information related to government-wide suspension and debarment requirements. Before a recipient enters into a grant award with FEMA, the recipient must notify FEMA if it knows if any of the recipient's principals under the award fall under one or more of the four criteria listed at 2 C.F.R. § 180.335. At any time after accepting the award, if the recipient learns that any of its principals falls under one or more of the criteria listed at 2 C.F.R. § 180.335, the recipient must provide immediate written notice to FEMA in accordance with 2 C.F.R. § 180.350.

G. DHS/FEMA Awarding Agency Contact Information

Contact and Resource Information

Centralized Scheduling and Information Desk (CSID)
CSID is a non-emergency comprehensive management and information resource developed by DHS/FEMA for grant stakeholders. CSID provides general information on all DHS/FEMA grant programs and maintains a comprehensive database containing key personnel contact information at the federal, state, and local levels. When necessary, recipients will be directed to a Federal point of contact who can answer specific programmatic questions or concerns. CSID can be reached by phone at (800) 368-6498 or by e-mail at askcsid@fema.gov, Monday through Friday, 9:00 a.m. – 5:00 p.m. ET.

GPD Grant Operations Division
GPD's Grant Operations Division Business Office provides support regarding financial matters and budgetary, technical assistance. Additional guidance and information can be obtained by contacting the FEMA Call Center at 866-927-5646 or via e-mail to ASK-GMD@fema.gov.

FEMA Regional Offices
FEMA Regional Offices may also provide fiscal support, including pre- and post-award administration and technical assistance such as conducting cash analysis, financial monitoring, and audit resolution to the grant programs included in this solicitation. GPD will provide programmatic support and technical assistance. FEMA Regional Office contact information is available here.

GPD Environmental Planning and Historic Preservation (EHP)
The DHS/FEMA GPD EHP Team provides guidance and information about the EHP review process to recipients and subrecipients. All inquiries and communications about GPD projects or the EHP review process, including the submittal of EHP review materials, should

be sent to gpdehpinfo@fema.gov. EHP Technical Assistance, including the EHP Screening Form, can be found online at https://www.fema.gov/media-library/assets/documents/90195.

Systems Information

Grants.gov

For technical assistance with Grants.gov, call the customer support hotline 24 hours per day, 7 days per week (except Federal holidays) at (800) 518-4726 or e-mail at support@grants.gov.

Non-Disaster (ND) Grants

For technical assistance with the ND Grants system, please contact the ND Grants Helpdesk at ndgrants@fema.gov or (800) 865-4076, Monday through Friday, 9:00 a.m. – 5:00 p.m. ET.

Payment and Reporting System (PARS)

DHS/FEMA uses the Payment and Reporting System (PARS) for financial reporting, invoicing and tracking payments. DHS/FEMA uses the Direct Deposit/Electronic Funds Transfer (DD/EFT) method of payment to recipients. To enroll in the DD/EFT, recipients must complete a Standard Form 1199A, Direct Deposit Form.

H. Additional Information

Monitoring and Evaluation

Recipients will be monitored on an annual and as needed basis by DHS/FEMA staff, both programmatically and financially, to ensure that the project goals, objectives, performance requirements, timelines, milestone completion, budgets, and other related program criteria are being met.

Monitoring may be accomplished through desk-based reviews, on-site monitoring visits, or both. Monitoring will involve the review and analysis of the financial, programmatic, performance, compliance and administrative processes, policies, activities, and other attributes of each Federal assistance award and will identify areas where technical assistance, corrective actions, and other support may be needed.

Case Studies and Use of Grant-Funded Resources during Real-World Incident Operations

Analyzing the use of grant-funded investments in real-world event (RWE) operations will improve the ability of FEMA and its state and local partners to assess the effectiveness of these investments and to better understand how grant funds support improvements in nationwide capability levels. Currently, FEMA conducts case studies with a limited number of grant recipients each year to explore how jurisdictions prioritize grant investments based on risk and capability assessments and the ways specific investments improve state and local preparedness. Recipients will be required to submit information on how they use grant funds in real-world incident operations in the URT with the implementation of the new THIRA/SPR methodology.

Conflicts of Interest in the Administration of Federal Awards or Subawards

For conflicts of interest under grant-funded procurements and contracts, refer to the section on Procurement Integrity in this NOFO and 2 C.F.R. §§ 200.317 – 200.326.

To eliminate and reduce the impact of conflicts of interest in the subaward process, recipients and sub-recipients must follow their policies and procedures regarding the elimination or reduction of conflicts of interest when making subawards. Recipients and pass-through entities are also required to follow any applicable Federal, state, local, tribal, or territorial statutes or regulations governing conflicts of interest in the making of sub-awards.

The recipient or subrecipient must disclose to the respective Program Analyst, in writing, any real or potential conflict of interest as defined by the Federal, state, local, tribal or territorial statutes or regulations or their own existing policies, which may arise during the administration of the Federal award within five days of learning of the conflict of interest. Similarly, subrecipients must disclose any real or potential conflict of interest to the pass-through entity as required by the recipient's conflict of interest policies, or any applicable Federal, state, local, tribal, or territorial statutes or regulations.

Conflicts of interest may arise during the process of DHS/FEMA making a Federal award in situations where an employee, officer, or agent, any members of his or her immediate family, his or her partner has a close personal relationship, a business relationship, or a professional relationship, with an applicant, sub-applicant, recipient, subrecipient, or DHS/FEMA employees.

Period of Performance Extensions

Extensions to the period of performance for this program are allowed. Extensions to the initial PoP identified in the award will only be considered through formal, written requests to the recipient's FEMA HQ Program Analyst and must contain specific and compelling justifications as to why an extension is required. SAAs are advised to coordinate with the FEMA HQ Program Analyst as needed when preparing an extension request. All extension requests must address the following:

1) The grant program, fiscal year, and award number;
2) Reason for the delay – this must include details of the legal, policy, or operational challenges being experienced that prevent the final outlay of awarded funds by the applicable deadline;
3) Current status of the activity/activities;
4) Approved PoP termination date and new project completion date;
5) Amount of funds drawn down to date;
6) Remaining available funds, both Federal and non-federal;
7) Budget outlining how remaining Federal and non-federal funds will be expended;
8) Plan for completion, including milestones and timeframes for achieving each milestone and the position/person responsible for implementing the plan for completion; and
9) Certification that the activity/activities will be completed within the extended PoP without any modification to the original Statement of Work, as described in the investment justification and approved by DHS/FEMA.

Extension requests will be granted only due to compelling legal, policy, or operational challenges. Extension requests will only be considered for the following reasons:

- Contractual commitments by the grant recipient with vendors or subrecipients prevent completion of the project within the existing PoP;
- The project must undergo a complex environmental review that cannot be completed

within this timeframe;
- Projects are long-term by design, and therefore acceleration would compromise core programmatic goals; and
- Where other special circumstances exist.

Recipients must submit all proposed extension requests to DHS/FEMA for review and approval no later than 120 days prior to the end of the PoP. In accordance with GPD policy, extensions are typically granted for no more than a six month period.

Procurement Integrity
Through audits conducted by DHS Office of Inspector General (OIG) and FEMA grant monitoring, findings have shown that some FEMA recipients have not fully adhered to the proper procurement requirements when spending grant funds. Anything less than full compliance with Federal procurement policies jeopardizes the integrity of the grant as well as the grant program.

The below highlights the Federal procurement requirements for FEMA recipients when procuring goods and services with Federal grant funds. DHS will include a review of recipients' procurement practices as part of the normal monitoring activities. **All procurement activity must be conducted in accordance with Federal Procurement Standards at 2 C.F.R. §§ 200.317 – 200.326.** Select requirements under these standards are listed below. The recipient must comply with all requirements, even if they are not listed below.

Under 2 C.F.R. § 200.317, when procuring property and services under a Federal award, states must follow the same policies and procedures they use for procurements from their non-Federal funds; additionally, states must follow 2 C.F.R. § 200.322 regarding procurement of recovered materials, and 2 C.F.R. § 200.326 regarding required contract provisions.

All other non-Federal entities, such as tribes, must use their own documented procurement procedures that reflect applicable state, local, territorial, and tribal laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in 2 C.F.R. Part 200. These standards include, but are not limited to providing for full and open competition consistent with the standards of 2 C.F.R. § 200.319.

Competition and Conflicts of Interest
Among the requirements of 2 C.F.R. § 200.319(a) applicable to all non-Federal entities other than States, in order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements. **FEMA considers this an organizational conflict of interest and interprets this restriction as applying to contractors that help a recipient develop its grant application, project plans, or project budget. This prohibition also applies to the use of former employees to manage the grant or carry out a contract when such former employees worked on such activities while they were employees of the non-Federal entity.**

Under this prohibition, unless the non-Federal entity solicits for and awards a contract covering both development and execution of specifications (or similar elements as described above), and this contract was procured in compliance with 2 C.F.R. §§ 200.317 – 200.326, Federal funds cannot be used to pay a contractor to carry out the work if that contractor also worked on the development of such specifications. This rule applies to all contracts funded with Federal grant funds, including pre-award costs, such as grant writer fees, as well as post-award costs, such as grant management fees.

Additionally, some of the situations considered to be restrictive of competition include, but are not limited to:

- Placing unreasonable requirements on firms in order for them to qualify to do business;
- Requiring unnecessary experience and excessive bonding;
- Noncompetitive pricing practices between firms or between affiliated companies;
- Noncompetitive contracts to consultants that are on retainer contracts;
- Organizational conflicts of interest;
- Specifying only a "brand name" product instead of allowing "an equal" product to be offered and describing the performance or other relevant requirements of the procurement; and
- Any arbitrary action in the procurement process.

Pursuant to 2 C.F.R. § 200.319(b), non-Federal entities other than states must conduct procurements in a manner that prohibits the use of statutorily or administratively imposed state, local, territorial or tribal geographical preferences in the evaluation of bids or proposals, except in those cases where applicable Federal statutes expressly mandate or encourage geographic preference. Nothing in this section preempts state licensing laws. When contracting for architectural and engineering services, geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.

Pursuant to 2 C.F.R. § 200.318(c)(1), non-Federal entities other than states are required to maintain written standards of conduct covering conflicts of interest and governing the actions of their employees engaged in the selection, award, and administration of contracts. **No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest.** Such conflicts of interest would arise when the employee, officer or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.

The officers, employees, and agents of the non-Federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, non-Federal entities may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-Federal entity.

If the recipient or subrecipient (other than states) has a parent, affiliate, or subsidiary organization that is not a state, local government, territory, or Indian tribe, the non-Federal entity must also maintain written standards of conduct covering organizational conflicts of interest. In this context, organizational conflict of interest means that because of a relationship with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization. The non-Federal entity must disclose in writing any potential conflicts of interest to FEMA or the pass-through entity in accordance with applicable FEMA policy.

Supply Schedules

Generally, a non-Federal entity may seek to procure goods or services from a Federal supply schedule, state supply schedule, or group purchasing agreement. State and local governments may procure goods and services from a General Services Administration (GSA) schedule. Information about GSA programs for state and local governments can be found at https://www.gsa.gov/resources-for/programs-for-state-and-local-governments. For local governments that purchase off a GSA schedule, this will satisfy the Federal requirements for full and open competition provided that the recipient follows the GSA ordering procedures; however, local governments will still need to follow the other rules under 2 C.F.R. §§ 200.317 – 200.326, such as contract cost and price (§ 200.323) and solicitation of minority, women-owned, or small businesses (§ 200.321).

For non-Federal entities other than states, such as tribes, that want to procure goods or services from a state supply schedule, cooperative purchasing program, or other similar program, in order for such procurements by to be permissible, the following must be true:

- The procurement of the original contract or purchasing schedule and its use by the recipient complies with state and local law, regulations, and written procurement procedures.
- The state or other entity that originally procured the original contract or purchasing schedule entered into the contract or schedule with the express purpose of making it available to the recipient and other similar types of entities.
- The contract or purchasing schedule specifically allows for such use, and the work to be performed for the non-Federal entity falls within the scope of work under the contract as to type, amount, and geography.
- The procurement of the original contract or purchasing schedule complied with all of the procurement standards applicable to a non-Federal entities other than states under at 2 C.F.R. §§ 200.317 – 200.326.
- With respect to the use of a purchasing schedule, the recipient must follow ordering procedures that adhere to state and local laws and regulations and the minimum requirements of full and open competition under 2 C.F.R. Part 200.

If a non-Federal entity other than a state seeks to use such a state supply schedule, cooperative purchasing program, or other similar type of arrangement, it is recommended that recipients discuss their procurement plans with the FEMA Grant Programs Directorate.

Documentation

Non-Federal entities are required to maintain and retain the following:

- Backup documentation, such as bids and quotes.
- Cost/price analyses on file for review by Federal personnel, if applicable.
- Other documents required by Federal regulations applicable at the time a grant is awarded to a recipient.

FEMA requires that non-Federal entities maintain the following documentation for federally funded purchases:

- Specifications
- Solicitations
- Competitive quotes or proposals
- Basis for selection decisions
- Purchase orders
- Contracts
- Invoices
- Cancelled checks

Non-Federal entities should keep detailed records of all transactions involving the grant. FEMA may at any time request copies of purchasing documentation along with copies of cancelled checks for verification.

Non-Federal entities who fail to fully document all purchases will find their expenditures questioned and subsequently disallowed.

Active Shooter Preparedness

DHS aims to enhance national preparedness through a whole community approach by providing the necessary products, tools, and resources to help all stakeholders prepare for and respond to an active shooter incident. To that end, DHS has developed a comprehensive Active Shooter Preparedness website, which includes informational resources. The website address is: https://www.dhs.gov/active-shooter-preparedness.

In addition, within the Homeland Security Information Network (HSIN), the Joint DHS and FBI Countering Violent Extremism (CVE) and Active Shooter Web Portal provides a restricted-access forum to share Unclassified for Official Use Only (FOUO), Sensitive but Unclassified (SBU), and Law Enforcement Sensitive (LES) Information. The portal provides users and training practitioners with accurate, appropriate, and relevant CVE and Active Shooter training development resources, subject matter expert information, and outreach initiatives. It also has forums to provide feedback, products useful to others, and allows participants to ask questions concerning CVE or the Active Shooter Program. Persons with a job-related duty, public service interest, or who support a CVE and/or Active Shooter program can request access into this Portal. Additional information can be found at: https://www.dhs.gov/cveas-portal#.

States and Urban Areas are encouraged to review the referenced active shooter guidance, evaluate their preparedness needs, and consider applying for HSGP funding to address any needs identified in this area (see Appendix C – FY 2018 HSGP Funding Guidelines for allowable

costs). To address training needs associated with active shooter incidents, FEMA's Emergency Management Institute provides a free, web-based training course entitled *IS-907: Active Shooter: What You Can Do*, available at the following website: https://training.fema.gov/is/courseoverview.aspx?code=IS-907.

Soft Targets and Crowded Places

There are continued and growing threats facing Soft Targets and Crowded Places (ST-CP) throughout the nation. ST-CPs are those locations or environments that are easily accessible to large numbers of people on a predictable or semi-predictable basis that have limited security or protective measures in place. These locations are vulnerable to attack using simple tactics and readily accessible weapons such as small arms, edged weapons, and vehicles as a weapon, improvised explosive devices, and unmanned aerial systems. ST-CPs can include places such as town centers, shopping malls, open-air venues, outside hard targets/venues perimeters, and other places of meeting and gathering. DHS is committed to reducing the risk of attacks against ST-CPs and the impact of attacks if they do occur. However, the protection and security of ST-CPs is a shared responsibility among whole community partners including: the public, ST-CP owners and operators, security industry partners, the Federal Government, and State, local, tribal, and territorial (SLTT) government partners. States, territories, urban areas, and public and private sector partners are encouraged to identify security gaps and build capabilities that address security needs of ST-CP, understanding the unique challenges related to protecting locations that are open to the public. States, territories, urban areas, and public and private sector partners are also encouraged to use resources to instill a culture of awareness, vigilance, and preparedness. For more information and additional resources, see the Department of Homeland Security's Hometown Security Program.

Appendix A – FY 2018 HSGP Program Allocations

FY 2018 SHSP Allocations

State/Territory	FY 2018 Allocation
Alabama	$3,980,000
Alaska	$3,980,000
American Samoa	$1,000,000
Arizona	$3,980,000
Arkansas	$3,980,000
California	$59,235,000
Colorado	$3,980,000
Connecticut	$3,980,000
Delaware	$3,980,000
District of Columbia	$3,980,000
Florida	$10,566,000
Georgia	$6,508,000
Guam	$1,000,000
Hawaii	$3,980,000
Idaho	$3,980,000
Illinois	$15,712,000
Indiana	$3,980,000
Iowa	$3,980,000
Kansas	$3,980,000
Kentucky	$3,980,000
Louisiana	$3,980,000
Maine	$3,980,000
Maryland	$5,882,000
Massachusetts	$5,395,000
Michigan	$6,368,000
Minnesota	$3,980,000
Mississippi	$3,980,000
Missouri	$3,980,000
Montana	$3,980,000
Nebraska	$3,980,000
Nevada	$3,980,000
New Hampshire	$3,980,000
New Jersey	$7,993,000
New Mexico	$3,980,000
New York	$76,930,000
North Carolina	$5,246,000
North Dakota	$3,980,000
Northern Mariana Islands	$1,000,000

FY 2018 SHSP Allocations

State/Territory	FY 2018 Allocation
Ohio	$7,364,000
Oklahoma	$3,980,000
Oregon	$3,980,000
Pennsylvania	$9,622,000
Puerto Rico	$3,980,000
Rhode Island	$3,980,000
South Carolina	$3,980,000
South Dakota	$3,980,000
Tennessee	$3,980,000
Texas	$20,591,000
U.S. Virgin Islands	$1,000,000
Utah	$3,980,000
Vermont	$3,980,000
Virginia	$7,120,000
Washington	$6,208,000
West Virginia	$3,980,000
Wisconsin	$3,980,000
Wyoming	$3,980,000
Total	**$402,000,000**

FY 2018 UASI Allocations

State/Territory	Funded Urban Area	FY 2018 UASI Allocation
Arizona	Phoenix Area	$4,000,000
California	Anaheim/Santa Ana Area	$5,000,000
	Bay Area	$27,500,000
	Los Angeles/Long Beach Area	$68,000,000
	Riverside Area	$3,000,000
	Sacramento Area	$2,500,000
	San Diego Area	$16,700,000
Colorado	Denver Area	$3,000,000
District of Columbia	National Capital Region	$52,750,000
Florida	Miami/Fort Lauderdale Area	$6,000,000
	Orlando Area	$1,500,000
	Tampa Area	$3,000,000
Georgia	Atlanta Area	$6,000,000
Hawaii	Honolulu Area	$1,500,000
Illinois	Chicago Area	$68,000,000
Maryland	Baltimore Area	$4,000,000
Massachusetts	Boston Area	$17,500,000
Michigan	Detroit Area	$5,000,000
Minnesota	Twin Cities Area	$5,000,000
Missouri	St. Louis Area	$3,000,000
Nevada	Las Vegas Area	$5,000,000
New Jersey	Jersey City/Newark Area	$22,750,000
New York	New York City Area	$178,750,000
North Carolina	Charlotte Area	$2,500,000
Oregon	Portland Area	$2,500,000
Pennsylvania	Philadelphia Area	$17,500,000
	Pittsburgh Area	$2,500,000
Texas	Dallas/Fort Worth/Arlington Area	$14,800,000
	Houston Area	$22,750,000
	San Antonio Area	$1,500,000
Virginia	Hampton Roads Area	$1,500,000
Washington	Seattle Area	$5,000,000
Total		**$580,000,000**

FY 2018 SHSP and UASI LETPA Minimums

State/Territory	Funded Urban Area(s)	UASI Allocation	Total UASI Allocation	SHSP Allocation	Total Allocation by State	LETPA
Alabama				$3,980,000	$3,980,000	$995,000
Alaska				$3,980,000	$3,980,000	$995,000
American Samoa				$1,000,000	$1,000,000	$250,000
Arizona	Phoenix Area	$4,000,000	$4,000,000	$3,980,000	$7,980,000	$1,995,000
Arkansas				$3,980,000	$3,980,000	$995,000
California	Anaheim/Santa Ana Area	$5,000,000	$122,700,000	$59,235,000	$181,935,000	$45,483,750
	Bay Area	$27,500,000				
	Los Angeles/Long Beach Area	$68,000,000				
	Riverside Area	$3,000,000				
	Sacramento Area	$2,500,000				
	San Diego Area	$16,700,000				
Colorado	Denver Area	$3,000,000	$3,000,000	$3,980,000	$6,980,000	$1,745,000
Connecticut				$3,980,000	$3,980,000	$995,000
Delaware				$3,980,000	$3,980,000	$995,000
District of Columbia	National Capital Region	$52,750,000	$52,750,000	$3,980,000	$56,730,000	$14,182,500
Florida	Miami/Fort Lauderdale Area	$6,000,000	$10,500,000	$10,566,000	$21,066,000	$5,266,500
	Orlando Area	$1,500,000				
	Tampa Area	$3,000,000				
Georgia	Atlanta Area	$6,000,000	$6,000,000	$6,508,000	$12,508,000	$3,127,000
Guam				$1,000,000	$1,000,000	$250,000
Hawaii	Honolulu Area	$1,500,000	$1,500,000	$3,980,000	$5,480,000	$1,370,000
Idaho				$3,980,000	$3,980,000	$995,000
Illinois	Chicago Area	$68,000,000	$68,000,000	$15,712,000	$83,712,000	$20,928,000
Indiana				$3,980,000	$3,980,000	$995,000
Iowa				$3,980,000	$3,980,000	$995,000
Kansas				$3,980,000	$3,980,000	$995,000
Kentucky				$3,980,000	$3,980,000	$995,000
Louisiana				$3,980,000	$3,980,000	$995,000
Maine				$3,980,000	$3,980,000	$995,000
Maryland	Baltimore Area	$4,000,000	$4,000,000	$5,882,000	$9,882,000	$2,470,500
Massachusetts	Boston Area	$17,500,000	$17,500,000	$5,395,000	$22,895,000	$5,723,750
Michigan	Detroit Area	$5,000,000	$5,000,000	$6,368,000	$11,368,000	$2,842,000
Minnesota	Twin Cities Area	$5,000,000	$5,000,000	$3,980,000	$8,980,000	$2,245,000
Mississippi				$3,980,000	$3,980,000	$995,000
Missouri	St. Louis Area	$3,000,000	$3,000,000	$3,980,000	$6,980,000	$1,745,000
Montana				$3,980,000	$3,980,000	$995,000

FY 2018 SHSP and UASI LETPA Minimums

State/Territory	Funded Urban Area(s)	UASI Allocation	Total UASI Allocation	SHSP Allocation	Total Allocation by State	LETPA
Nebraska				$3,980,000	$3,980,000	$995,000
Nevada	Las Vegas Area	$5,000,000	$5,000,000	$3,980,000	$8,980,000	$2,245,000
New Hampshire				$3,980,000	$3,980,000	$995,000
New Jersey	Jersey City/Newark Area	$22,750,000	$22,750,000	$7,993,000	$30,743,000	$7,685,750
New Mexico				$3,980,000	$3,980,000	$995,000
New York	New York City Area	$178,750,000	$178,750,000	$76,930,000	$255,680,000	$63,920,000
North Carolina	Charlotte Area	$2,500,000	$2,500,000	$5,246,000	$7,746,000	$1,936,500
North Dakota				$3,980,000	$3,980,000	$995,000
Northern Mariana Islands				$1,000,000	$1,000,000	$250,000
Ohio				$7,364,000	$7,364,000	$1,841,000
Oklahoma				$3,980,000	$3,980,000	$995,000
Oregon	Portland Area	$2,500,000	$2,500,000	$3,980,000	$6,480,000	$1,620,000
Pennsylvania	Philadelphia Area	$17,500,000	$20,000,000	$9,622,000	$29,622,000	$7,405,500
	Pittsburgh Area	$2,500,000				
Puerto Rico				$3,980,000	$3,980,000	$995,000
Rhode Island				$3,980,000	$3,980,000	$995,000
South Carolina				$3,980,000	$3,980,000	$995,000
South Dakota				$3,980,000	$3,980,000	$995,000
Tennessee				$3,980,000	$3,980,000	$995,000
Texas	Dallas/Fort Worth/Arlington Area	$14,800,000	$39,050,000	$20,591,000	$59,641,000	$14,910,250
	Houston Area	$22,750,000				
	San Antonio Area	$1,500,000				
U.S. Virgin Islands				$1,000,000	$1,000,000	$250,000
Utah				$3,980,000	$3,980,000	$995,000
Vermont				$3,980,000	$3,980,000	$995,000
Virginia	Hampton Roads Area	$1,500,000	$1,500,000	$7,120,000	$8,620,000	$2,155,000
Washington	Seattle Area	$5,000,000	$5,000,000	$6,208,000	$11,208,000	$2,802,000
West Virginia				$3,980,000	$3,980,000	$995,000
Wisconsin				$3,980,000	$3,980,000	$995,000
Wyoming				$3,980,000	$3,980,000	$995,000
Total		**$580,000,000**	**$580,000,000**	**$402,000,000**	**$982,000,000**	**$245,500,000**

FY 2018 OPSG Eligible States and Territories

States and Territories		
Alabama	Massachusetts	Pennsylvania
Alaska	Michigan	Rhode Island
Arizona	Minnesota	South Carolina
California	Mississippi	Texas
Connecticut	Montana	Vermont
Delaware	New Hampshire	Virginia
Florida	New Jersey	Washington
Georgia	New Mexico	Wisconsin
Hawaii	New York	Puerto Rico
Idaho	North Carolina	U.S. Virgin Islands
Louisiana	North Dakota	American Samoa
Maine	Ohio	Guam
Maryland	Oregon	Northern Mariana Islands

Note: Not all applicants are guaranteed to receive funding under the FY 2018 OPSG.

Appendix B – FY 2018 HSGP Program Priorities

Alignment of HSGP to the National Preparedness System

The Nation uses the National Preparedness System to build, sustain, and deliver core capabilities to achieve the National Preparedness Goal (the Goal). Recipients will use the components of the National Preparedness System to support building, sustaining, and delivering these core capabilities. The components of the National Preparedness System are: Identifying and Assessing Risk; Estimating Capability Requirements; Building and Sustaining Capabilities; Planning to Deliver Capabilities; Validating Capabilities; and Reviewing and Updating. Additional information on the National Preparedness System is available at http://www.fema.gov/national-preparedness-system.

The FY 2018 HSGP contributes to the implementation of the National Preparedness System by financially supporting the ability of States and local jurisdictions to build, sustain, and deliver core capabilities identified in the Goal. A key focus and requirement of the HSGP is to prevent terrorism and other catastrophic events and to prepare the Nation for the threats and hazards that pose the greatest risk to the security of the United States, and the greatest risks along the Nation's Borders. When applicable, funding should support deployable assets that can be used anywhere in the Nation through automatic assistance and mutual aid agreements, including but not limited to the Emergency Management Assistance Compact (EMAC).

The FY 2018 HSGP supports investments that improve the ability of jurisdictions nationwide to:

- Prevent a threatened or an actual act of terrorism;
- Protect citizens, residents, visitors, and assets against the greatest threats that pose the greatest risk to the security of the United States;
- Mitigate the loss of life and property by lessening the impact of future catastrophic events;
- Respond quickly to save lives, protect property and the environment, and meet basic human needs in the aftermath of a catastrophic incident; and/or
- Recover through a focus on the timely restoration, strengthening, accessibility and revitalization of infrastructure, housing, and a sustainable economy, as well as the health, social, cultural, historic, and environmental fabric of communities affected by a catastrophic incident; and do so in a manner that engages the whole community while ensuring the protection of civil rights.

The core capabilities contained in the Goal are highly interdependent and require the use of existing preparedness networks and activities, improved training and exercise programs, innovation, and appropriate administrative, finance, and logistics systems.

DHS/FEMA requires recipients to prioritize grant funding to demonstrate how investments support closing capability gaps or sustaining capabilities identified in the THIRA/SPR process. Recipients are also expected to consider national areas for improvement identified in the 2017 National Preparedness Report as they relate to terrorism preparedness. These include cybersecurity; economic recovery; housing; infrastructure systems; natural and cultural resources; and supply chain integrity and security. Addressing these areas for improvement will enhance preparedness nation-wide. Minimum funding amounts are not prescribed by the Department for these priorities; however, recipients are expected to support state, local, regional, and national efforts in achieving the desired outcomes of these priorities.

Reporting on the Implementation of the National Preparedness System

Identifying Plausible, Worst Case, Threats, and Hazards and Estimating Capability Requirements
By December 31, 2018, FY 2018 recipients are required to submit a THIRA/SPR, using an updated methodology that assesses only the response, recovery, and cross-cutting capabilities. In FY 2019, all core capabilities will be required and the SPR will still be submitted annually. However the THIRA requirement will be reduced to every three years.

Reporting

- States, territories, and urban areas will submit their THIRA/SPR through the URT no later than December 31, 2018. States, territories and Urban Areas should work collaboratively to create the most accurate THIRA/SPR possible. Jurisdictions and Urban Areas may share scenarios, targets, and assessed capabilities when appropriate.

Building and Sustaining Capabilities
States are required to prioritize grant funding for building and sustaining capabilities in areas with capability gaps identified through the THIRA and SPR process.

Reporting

- In each HSGP recipient's BSIR, as part of programmatic monitoring, the recipient will be required to describe how expenditures support closing capability gaps or sustaining capabilities identified in the THIRA/SPR process. HSGP recipients will, on a project-by-project basis, check one of the following:
  - Building a capability with HSGP funding; or
  - Sustaining a capability with HSGP funding.

Planning to Deliver Capabilities
Recipients shall develop and maintain, jurisdiction-wide, all threats and hazards EOPs consistent with (CPG 101 Version 2.0 (v2), Developing and Maintaining Emergency Operations Plans. Recipients must update their EOP at least once every two years.

Reporting

- Recipients report EOP compliance with CPG 101 v2 in the URT.

Validating Capabilities
Recipients should engage elected and appointed officials and other whole community stakeholders to identify long-term training and exercise priorities. Recipients must be able to demonstrate how investments support closing capability gaps or sustaining capabilities identified in the THIRA/SPR, areas for improvement identified from real-world incidents and preparedness exercises, and national areas for improvement identified in the most recent National Preparedness Report.

Recipients should document these priorities and use them to deploy a schedule of exercise events and supporting training activities in a Multi-Year Training and Exercise Plan (TEP).

Information related to Multi-year TEPs and Training and Exercise Planning Workshops (TEPWs) can be found on the HSEEP website at https://www.fema.gov/exercise.and https://preptoolkit.fema.gov/web/hseep-resources/program-management.

All recipients will develop and maintain a progressive exercise program consistent with HSEEP. A progressive, multi-year exercise program is a series of increasingly complex exercises linked to a set of common program priorities with each successive exercise building upon the previous one until proficiency is achieved.

The National Exercise Program (NEP) serves as the principal exercise mechanism for examining national preparedness and measuring readiness. Recipients are strongly encouraged to nominate exercises into the NEP. For additional information on the NEP, please refer to http://www.fema.gov/national-exercise-program.

Reporting

- Recipients are required to develop a multi-year TEP that identifies training and exercise priorities and activities. The multi-year TEP shall be submitted to hseep@fema.dhs.gov no later than 90 days after the completion of the TEPW. Recipients are encouraged to enter their exercise information in the Preparedness Toolkit at https://www.fema.gov/national-exercise-program. DHS/FEMA will release additional guidance on Preparedness Toolkit, including how to enter exercise data, later in 2018.
- Recipients shall submit their AAR/IPs to hseep@fema.dhs.gov and indicate for exercises that use HSGP funds, indicating which year's funds were used. If the recipient submits a single AAR/IP to cover a HSGP progressive exercise series, the recipient must then specify the applicable HSGP grant year and the dates of the exercises in their submission to hseep@fema.dhs.gov. Submission of the AAR/IP shall be no later than 90 days after completion of the single exercise or progressive series. This link provides access to a sample AAR/IP template: https://preptoolkit.fema.gov/web/hseep-resources/improvement-planning. Recipients are encouraged to enter their AAR/IP in the Preparedness Toolkit at https://preptoolkit.fema.gov. DHS/FEMA will release additional guidance on Preparedness Toolkit, including how to develop and enter an AAR/IP, later in 2018.

Recipients are reminded of the importance of implementing corrective actions iteratively throughout the progressive exercise cycle. This link provides access to a sample AAR/IP template: https://preptoolkit.fema.gov/web/hseep-resources/improvement-planning.

Improving Cybersecurity

The cybersecurity of our Nation's critical infrastructure is a top priority. National preparedness, and more specifically the protection of critical infrastructure, requires an ability to prevent and respond to cyber incidents. FEMA strongly encourages preparedness grant recipients and subrecipients to assess their cybersecurity risks and consider the use of preparedness grants for funding cybersecurity investments that will effectively address those risks.

Cybersecurity investments are permissible under HSGP. Recipients must limit the use of SHSP funds for projects that support the security and functioning of critical infrastructure and core capabilities as they relate to terrorism preparedness and may simultaneously support enhanced preparedness for other hazards unrelated to acts of terrorism. Additionally, grant-funded cybersecurity investments must support or otherwise be associated with the systems and equipment that are considered allowable costs under HSGP.

When requesting funds for cybersecurity, applicants are encouraged to propose projects that would aid in the implementation of the Framework for Improving Critical Infrastructure Cybersecurity ("The Framework") developed by the National Institute of Standards and Technology (NIST). The Framework gathers existing international standards and practices to help organizations understand, communicate, and manage their cyber risks. For organizations that do not know where to start in developing a cybersecurity program, the Framework provides initial guidance. For organizations with more advanced practices, the Framework offers a way to further improve cyber risk management practices.

The Department of Homeland Security's Critical Infrastructure Cyber Community C^3 Voluntary Program also provides resources to support critical infrastructure owners and operators in the adoption of the Framework to more effectively manage cyber risk. Additional information on the C^3 Program can be found at www.dhs.gov/ccubedvp.

Mass Casualty Incident Preparedness and Individual Preparedness
Although the Citizen Corps Program (CCP) and Metropolitan Medical Response System (MMRS) are no longer funded as discrete grant programs within HSGP, SAAs may include IJs funding to support CCP and MMRS activities/programs. Activities funded under these projects must meet the allowability requirements of the SHSP and UASI programs. The following coordination requirements will remain in place for proposed activities that support mass casualty incident preparedness, as well as citizen preparedness.

Mass casualty preparedness must be conducted in collaboration with state/city/local health departments that administer federal funds from HHS to enhance the integration of local emergency management, public health, emergency medical services, and health care systems into a coordinated, sustained local capability to respond effectively to a mass casualty incident or a response to catastrophic events and acts of terrorism. The Federal Interagency Committee on Emergency Medical Services (FICEMS) has recommended that State and local EMS systems improve their mass casualty incident triage capabilities through adoption of triage protocols and systems that are based on the Model Uniform Core Criteria. Recipients must also demonstrate how their investments will increase the effectiveness of emergency preparedness planning and response for the whole community by integrating and coordinating activities including under-represented diverse populations that may be more impacted by disasters including children, seniors, individuals with disabilities or access and functional needs, individuals with diverse culture and language use, individuals with lower economic capacity and other underserved populations. Further, recipients are strongly encouraged to collaborate with local, regional, and state public health and health care partners, including Medical Reserve Corps Units Community Emergency Response Teams (CERTs) Citizen Corps Whole Community Councils, as well as

leverage other federal programs, such as the HHS ASPR Hospital Preparedness Program and Emergency Systems for Advance Registration of Volunteer Health Professionals, CDC Cities Readiness Initiative, PHEP, and Strategic National Stockpile Programs.

Fusion Centers

A critical component of the national response to the 9/11 terrorist attacks was the development of a national-level, decentralized, and coordinated terrorism-related information sharing environment (ISE). State and local governments, supported by federal investments from DHS, DOJ, HHS, and other federal agencies, established the National Network of Fusion Centers (National Network), which became the backbone of the national ISE. This National Network, comprised of 79 state and major Urban Area fusion centers, collaborates and shares information with partners from all levels of government, and the private sector, as well as other field-based information sharing partners, including HIDTAs, RISS Centers, JTTFs, and major city/county intelligence units, among others.

The National Network is a national asset that contributes to protecting the Homeland by providing a national capacity to identify, collect, analyze, and share information. State and local agencies that own and operate fusion centers have access to unique sources of information and maintain unique partnerships with local communities that cannot be replicated by federal agencies. These factors, combined with their operational independence from the federal government, allow fusion centers to provide partners with a distinct perspective on threats within their jurisdictions, contributing to a more comprehensive understanding of the threats facing our nation. National Network participation in the Nationwide Suspicious Activity Reporting (SAR) Initiative enables fusion centers to receive and analyze suspicious activity reporting from frontline public safety personnel, the private sector, and the public, and ensure the sharing of SAR with the Federal Bureau of Investigation's Joint Terrorism Task Forces for further investigation. In addition to those activities identified in the National Prevention Framework, fusion centers are also encouraged to collaborate with those analytic, investigative, and information-sharing focused entities to combat transnational criminal organizations in support of efforts to enhance capabilities for detecting, deterring, disrupting, and preventing acts of terrorism. Such entities include, but are not limited to Joint Terrorism Task Forces (JTTFs), Area Maritime Security Committees, Border Enforcement Security Task Forces, Integrated Border Enforcement Teams, High-Intensity Drug Trafficking Areas (HIDTAs), and Regional Information Sharing Systems (RISS) Centers.

Today's threats – to include terrorism, drugs, active shooters, transnational organized crime, and cyber – require federal, state, and local governments to leverage this national capacity to effectively respond to the evolving nature of the various national and homeland security threats confronting our Nation. Ultimately, timely analysis of key indicators from local, state, and federal partners will enable all stakeholders to identify emerging trends and develop and implement data-driven strategies to prevent, protect against, mitigate, and respond effectively.

To underscore the importance of the National Network as a critical component of our Nation's distributed homeland security and counterterrorism architecture, DHS/FEMA preparedness grants will continue to prioritize support for designated fusion centers (http://www.dhs.gov/fusion-center-locations-and-contact-information) and the maturation of the Information Sharing Environment (ISE).

Consistent with the designation as a high priority area in FY 2018, DHS/FEMA requires that all fusion center-related funding requests be consolidated into a single (1) investment for SHSP and a single (1) investment for UASI for states or Urban Areas in which designated fusion centers reside, as described in Section D in this NOFO regarding development of investments. The single investment provides states and Urban Areas a means to centrally manage and report on fusion center related activities. Recipients must coordinate with the fusion center when developing the fusion center investment prior to application submission. Further, any jurisdiction or agency that leverages HSGP funds to support intelligence- or fusion process-related activities (e.g., intelligence unit, real-time crime information and analysis centers) must ensure efforts are integrated and/or coordinated with the state or major Urban Area fusion center(s). The fusion center must utilize its assessment data when developing the investment. Each proposed project included in the fusion center investment must align to, and reference, specific performance areas of the Assessment that the funding is intended to support. Specific investment development instructions and a sample project description are available in Section D – Application and Submission Information.

Fusion centers should prioritize the following capabilities to further enable and mature this national asset and strengthen the collective capacity to identify, collect, analyze, and share information, and disseminate actionable and strategic intelligence to key stakeholders.

- **Addressing Emerging Threats**: Fusion centers provide a national-level, decentralized, and coordinated information sharing environment across all levels of government and disciplines that can be leveraged and applied to address emerging threats to homeland security, national security, public safety, and/or public health, and especially those threats that may have little or no warning. Fusion centers should leverage and build upon their terrorism-focused analytic and information sharing capabilities so they can be applied to address threats across the DHS mission space, to include transitional organized criminal activity, cyber threats, and/or natural hazards, among others that require close collaboration with DHS operational entities such as CBP, ICE, USCG, and FEMA.
- **Analytic Capability**: Fusion centers should maintain a strong analytic capability at both tactical and strategic levels to address a wide array of threats or hazards that could have implications for homeland security and/or national security. This capability includes building and sustaining a capable workforce of analysts that have the necessary experience and training, access to open source, unclassified, classified information, products, data, and suspicious activity reporting, as well as necessary services and technology to facilitate analytic capabilities. This capability also includes the ability to plan appropriately, assess/forecast, prioritize, and execute against both known and emerging threat vectors, while protecting privacy, civil rights, and civil liberties. Fusion centers should also consider their operational capacity when aligning manpower and resources in support of this capability (i.e., the ability to maintain watch and analytic support functions over a 24/7 operational tempo).
- **Technological Integration**: Access to data, information, and products is essential for fusion centers to effectively identify, collect, analyze, and share information. Just as threats do not stop at jurisdictional borders, fusion centers must be able to effectively access and share appropriate information and data across jurisdictions, agencies, and

disciplines. Fusion centers should ensure they have the necessary technological capacity to access, analyze, and share information, including criminal intelligence, both within their jurisdictions, as well as with other fusion centers across the country through a variety of systems, databases, tools, and technologies that allow for federated searching and data/information analysis that protects PII and includes appropriate privacy, civil rights, and civil liberties protections. Such approaches should also address the evaluation and use of emerging capabilities, including social network analysis, federated search technology, complex data indexing, social media, open source, facial recognition, unmanned aircraft systems, geographic information systems (GIS), and license plate reader technologies.

State and major Urban Area fusion centers receiving SHSP or UASI grant funds will be evaluated based on compliance with the guidance and requirements for the National Network as set forth by DHS I&A through the annual Fusion Center Assessment.

- FY 2018 Fusion Center Grant requirements are listed at http://www.dhs.gov/homeland-security-grant-program-hsgp.
- DHS/FEMA approved analyst courses that meet the grant requirement are listed at http://www.dhs.gov/fema-approved-intelligence-analyst-training-courses.

Through the PPR, fusion centers will report on the compliance with measurement requirements within the fusion centers through the annual Fusion Center Assessment managed by DHS Office of Intelligence & Analysis and reported to FEMA.

Continuity of Operations

Continuity planning and operations are an inherent element of each core capability and the coordinating structures that provide them. Continuity operations increase resilience and the probability that organizations can perform essential functions in the delivery of core capabilities that support the mission areas. FEMA is responsible for coordinating the implementation and development, execution, and assessment of continuity capabilities among executive departments and agencies. To support this role, FEMA develops and promulgates Federal Continuity Directives (FCDs) to establish continuity program and planning requirements for executive departments and agencies and Continuity Guidance Circulars (CGCs) for state, local, tribal, and territorial governments, non-governmental organizations, and private sector critical infrastructure owners and operators. This direction and guidance assists in developing capabilities for continuing the essential functions of federal and state, local, tribal, and territorial governmental entities as well as the public/private critical infrastructure owners, operators, and regulators enabling them.

Presidential Policy Directive 40, FCD 1, FCD 2, CGC 1, and CGC 2 outline the overarching continuity requirements and guidance for organizations and provides methodology and checklists. For additional information on continuity programs, guidance, and directives, visit http://www.fema.gov/guidance-directives and https://www.fema.gov/national-continuity-programs.

NIMS Implementation

Recipients receiving HSGP funding are required to implement NIMS. NIMS defines a national, interoperable approach for sharing resources, coordinating and managing incidents, and communicating information. Incident management refers to how incidents are managed across all

homeland security activities, including prevention, protection, mitigation, response, and recovery. FY 2018 HSGP recipients must use standardized resource management concepts for resource typing, credentialing, and an inventory to facilitate the effective identification, dispatch, deployment, tracking, and recovery of resources.

Reporting

- Recipients report on NIMS implementation through the URT.

Governance

In keeping with the guiding principles of governance for all DHS/FEMA preparedness programs, recipients must coordinate activities across preparedness disciplines and levels of government, including state, territorial, local, and tribal governments. A cohesive planning framework should incorporate DHS/FEMA resources, as well as those from other Federal, state, local, tribal, territorial, the private sector, and faith-based community organizations. Specific attention should be paid to how available preparedness funding sources can effectively support a whole community approach to emergency preparedness and management and the enhancement of core capabilities. To ensure this, the SAA must establish or reestablish a unified Senior Advisory Committee (SAC). Additionally, Urban Areas are required to establish Urban Area Working Groups (UAWGs) representative of the counties, cities, towns, and tribes within the high-risk urban area, including, as appropriate, representatives of rural jurisdictions, high-population jurisdictions, and high-threat jurisdictions.

Senior Advisory Committee (SAC)

The SAC builds upon previously established advisory bodies under the SHSP and UASI programs, Nonprofit Security Grant Program (NSGP), Transit Security Grant Program (TSGP), and Port Security Grant Program (PSGP). Examples of advisory bodies that should be included on the SAC include UAWGs, Statewide Interoperability Governing Board (SIGB), Area Maritime Security Committees (AMSCs), Regional Transportation Security Working Groups (RTSWGs), Citizen Corps Whole Community Councils, Disability Inclusion Working Groups, and Children's Working Groups. The membership of the SAC must reflect the state's unique risk profile and the interests of the five mission areas as outlined in the Goal. Further, the SAC must include representatives that were involved in the production of the state's THIRA/SPR.

SAC Composition and Scope

SAC membership shall include at least one representative from relevant stakeholders including:

- Individuals from the counties, cities, towns, and Indian tribes within the State or high-risk urban area, including, as appropriate, representatives of rural, high-population, and high-threat jurisdictions of UASI-funded Urban Areas;
- Representatives that were involved in the production of the state's THIRA/SPR;
- State and Urban Area Chief Information Officers (CIOs) and Chief Information Security Officers (CISOs);
- Statewide Interoperability Coordinator (SWIC) and Statewide Interoperability Governing Body (SIGB) members;
- Citizen Corps Whole Community Councils;
- Local or tribal government officials;
- Tribal organizations;

- Emergency response providers, including representatives of the fire service, law enforcement, emergency medical services, and emergency managers;
- Public health officials and other appropriate medical practitioners;
- Hospitals;
- Individuals representing educational institutions, including elementary schools, community colleges, and other institutions of higher education;
- State and regional interoperable communications coordinators, as appropriate;
- State and major urban area fusion centers, as appropriate; and
- Nonprofit, faith-based, and other voluntary organizations such as the American Red Cross.

Additionally, program representatives from the following entities should be members of the SAC (as applicable): State Primary Care Association, State Homeland Security Advisor (HSA) (if this role is not also the SAA), State Emergency Management Agency (EMA) Director, State Public Health Officer, State Awardee for HHS' Hospital Preparedness Program, State Public Safety Officer (and SAA for Justice Assistance Grants, if different), State Coordinator for the DoD 1033 Program (also known as the Law Enforcement Support Office (LESO) Program), State Court Official, State Emergency Medical Services (EMS) Director, State Trauma System Manager, Statewide Interoperability Coordinator, State Citizen Corps Whole Community Council, the State Emergency Medical Services for Children (EMSC) Coordinator, State Education Department, State Human Services Department, State Child Welfare Services, State Juvenile Justice Services, Urban Area POC, Senior Members of AMSCs, Senior Members of the RTSWG, Senior Security Officials from Major Transportation Systems, and the Adjutant General.

SACs are encouraged to develop subcommittee structures, as necessary, to address the issue or region-specific considerations. The SAC must include whole community intrastate and interstate partners as applicable and have balanced representation among entities with operational responsibilities for terrorism/disaster prevention, protection, mitigation, response, and recovery activities within the state, and include representation from the stakeholder groups and disciplines identified above.

The above membership requirement does not prohibit states, Urban Areas, regional transit and port entities, or other recipients of DHS/FEMA preparedness funding from retaining their existing structure under separate programs; however, at a minimum, those bodies must support and feed into the larger SAC. The composition, structure, and charter of the SAC should reflect this focus on building core capabilities, instead of simply joining previously existing advisory bodies under other grant programs.

For designated Urban Areas, the SAA POCs are responsible for identifying and coordinating with the POC for the UAWG, who should be a member of the SAC. The POC's contact information must be provided to DHS/FEMA with the grant application. SAAs must work with existing Urban Areas to ensure that information for current POCs is on file with DHS/FEMA.

Finally, DHS/FEMA recommends that organizations advocating on behalf of youth, older adults and individuals with disabilities, individuals with limited English proficiency and others with access and functional needs, socio-economic factors and cultural diversity, be invited to participate in the SAC.

Applicants must submit the list of SAC members and the SAC charter at the time of application as an attachment in ND Grants. Additionally, SAAs will use the URT to verify compliance with SAC charter requirements.

SAC Responsibilities

The responsibilities of a SAC include:

- Integrating preparedness activities across disciplines, the private sector, non-profit organizations, faith-based and community organizations, and all levels of government, including local, state, tribal, and territorial, with the goal of maximizing coordination and reducing duplication of effort;
- Creating a cohesive planning network that builds and implements preparedness initiatives using DHS/FEMA resources, as well as other Federal, state, local, tribal, territorial, the private sector, and faith-based community resources;
- Management of all available preparedness funding sources to ensure their effective use and to minimize duplication of effort;
- Ensuring applications for SHSP and UASI funds align with the capability gaps identified in the THIRA/SPR process;
- Assist in preparation and revision of the State, regional, or local homeland security plan or the threat and hazard identification and risk assessment, as the case may be; and
- Assist in determining effective funding priorities for SHSP grants.

SAC Charter

The governance of the SHSP and UASI programs through the SAC should be directed by a charter. All members of the SAC should sign and date the charter showing their agreement with its content and their representation on the Committee. Revisions to the governing charter must be sent to the recipient's assigned FEMA HQ Program Analyst. The SAC charter must at a minimum address the following:

- A detailed description of the SAC's composition and an explanation of key governance processes, including how the SAC is informed by the State's and UASI's THIRA/SPR data;
- A description of the frequency at which the SAC will meet;
- How the committee will leverage existing governance bodies;
- A detailed description of how decisions on programmatic priorities funded by SHSP and UASI are made and how those decisions will be documented and shared with its members and other stakeholders, as appropriate; and
- A description of defined roles and responsibilities for financial decision making and meeting administrative requirements.

To ensure ongoing coordination efforts, SAAs are encouraged to share community preparedness information submitted in the state's BSIR with members of the SAC. SAAs are also encouraged to share their THIRA/SPR data with members of the SAC applying for other FEMA preparedness grants in order to enhance their understanding of statewide capability gaps. The charter should be made available upon request to promote transparency in decision-making related to SHSP and UASI activities.

To manage this effort and to further reinforce collaboration and coordination across the stakeholder community, a portion of the 20 percent holdback of a state or territory award may be utilized by the SAA to support the SAC and to ensure representation and active participation of SAC members. Funding may be used for hiring and training planners, establishing and maintaining a program management structure, identifying and managing projects, conducting research necessary to inform the planning process, and developing plans that bridge mechanisms, documents, protocols, and procedures.

Urban Area Working Group (UAWG)

UASI program implementation and governance must include regional partners and should have balanced representation among entities with operational responsibilities for prevention, protection, mitigation, response, and recovery activities within the region. In some instances, Urban Area boundaries cross state borders. States must ensure that the identified Urban Areas take an inclusive regional approach to the development and implementation of the UASI program and involve the contiguous jurisdictions, mutual aid partners, port authorities, rail and transit authorities, state agencies, state-wide Interoperability Coordinators, Citizen Corps Whole Community Council(s), and campus law enforcement in their program activities.

UAWG Composition and Scope

Pursuant to provisions of the Homeland Security Act of 2002, as amended, eligible Urban Areas were determined based on an analysis of relative risk of the 100 most populous Metropolitan Statistical Areas (MSAs), as defined by the Office of Management and Budget (OMB). MSAs are used by DHS/FEMA to determine eligibility for participation in the program. Geographical areas queried do not equate to minimum mandated membership representation of an Urban Area, nor does this guarantee funding for geographical areas queried. UAWGs are not required to expand or contract existing Urban Area participation to conform to MSA composition. Detailed information on MSAs is publicly available from the United States Census Bureau at https://www.census.gov/programs-surveys/metro-micro.html.

The SAA must confirm a specific POC with the designated Urban Area. The SAA POC is responsible for identifying and coordinating with the POC for the UAWG. This information must be provided to DHS/FEMA with the grant application. SAAs must work with existing Urban Areas to ensure that information for current POCs is on file with DHS/FEMA.

Membership in the UAWG must provide either direct or indirect representation for all relevant jurisdictions and response disciplines (including law enforcement, fire service, EMS, hospitals, public health, and emergency management) that comprise the defined Urban Area. It must also be inclusive of local Whole Community Citizen Corps Council and tribal representatives.

The UAWG should also include at least one representative from each of the following significant stakeholders:

- Local or tribal government officials;
- Chief Information Officer (CIO) and Chief Information Security Officer (CISO);
- Emergency response providers, which shall include representatives of the fire service, law enforcement, emergency medical services, and emergency managers;
- Public health officials and other appropriate medical practitioners, including HCCs;

- Individuals representing educational institutions, including elementary schools, community colleges, and other institutions of higher education;
- State and regional interoperable communications coordinators, as appropriate; and
- State and major urban area fusion centers, as appropriate.

In addition to representatives from the local jurisdictions and tribes within the State or high-risk urban area, the UAWG should include officials responsible for the administration of Centers for Disease Control and Prevention (CDC) and Assistant Secretary for Preparedness and Response's (ASPR) cooperative agreements. Finally, it must be inclusive of members advocating on behalf of youth, older adults, individuals with disabilities, individuals with limited English proficiency and others with access and functional needs, socio-economic factors and cultural diversity.

The SAA POC must ensure that appropriate representation for the defined Urban Area is included per this guidance. DHS/FEMA strongly encourages that, wherever possible, previously established local working groups should be leveraged for this purpose to ensure that UASI funded resources are managed in the most efficient and effective manner possible. The UAWG should support state efforts to develop the SPR, particularly as it relates to UASI funded activities. UASI recipients must also complete an SPR and should coordinate with the respective state(s). States and UASIs should work collaboratively to create the most accurate THIRA and SPR possible. Jurisdictions and UASIs may share scenarios, targets, and assessed capabilities when appropriate. Completing an SPR helps to identify capability gaps and to prioritize investments required to reach the THIRA targets, resulting in a stronger investment justification.

Urban Areas will use the URT to verify UAWG structure and membership. The list of UAWG members must also be submitted at the time of application as an attachment in ND Grants. Urban Areas must notify the SAA and the FEMA HQ Program Analyst of any updates to the UAWG structure or membership.

UAWG Responsibilities

The UAWG will be responsible for coordinating the development and implementation of all program initiatives. Members of the UAWG should be involved in the development of an Urban Area THIRA and SPR coordinated with the State THIRA and SPR, and subsequent updates.

UAWGs must ensure that applications for funding under the UASI program support closing capability gaps or sustaining capabilities identified in the Urban Area THIRA and SPR.

The UAWG, in coordination with the SAA POC, must develop a methodology for allocating funding available through the UASI program. The UAWG must reach consensus on all UASI funding allocations. If consensus cannot be reached within the 45-day period allotted for the state to obligate funds to subrecipients, the SAA must make the allocation determination. The SAA must provide written documentation verifying the consensus of the UAWG, or the failure to achieve otherwise, on the allocation of funds and submit it to DHS/FEMA immediately after the 45-day period allotted for the state to obligate funds to subrecipients. Any UASI funds retained by the state must be used in direct support of the Urban Area. States must provide documentation to the UAWG, and DHS/FEMA upon request demonstrating how any UASI funds retained by the state are directly supporting the Urban Area. If the SAA intends to retain any UASI funds, the SAA

must prepare an investment that demonstrates how the retained funds will be used to directly support the designated Urban Area in the state. This investment should be included in the designated Urban Area's IJ.

UAWG Charter

In keeping with sound project management practices, the UAWG must ensure that its approach to critical issues such as membership, governance structure, voting rights, grant management and administration responsibilities, and funding allocation methodologies are formalized in a working group charter or another form of standard operating procedure related to the UASI program governance. The charter must also outline how decisions made in UAWG meetings will be documented and shared with UAWG members. The UAWG charter must be submitted at the time of application in ND Grants and must be on file with DHS/FEMA prior to drawing down UASI funding and must be available to all UAWG members to promote transparency in decision-making related to the UASI program.

Supplemental SHSP and UASI Guidance

Collaboration

Collaboration with Other Federal Preparedness Programs

DHS/FEMA strongly encourages states, Urban Areas, and regions to understand other federal preparedness programs in their jurisdictions and to work with them in a collaborative manner to leverage all available resources and avoid duplicative activities. For example, the U.S. Department of Health and Human Services (HHS) has two robust preparedness programs – Centers Disease Control and Prevention (CDC) Public Health Emergency Preparedness (PHEP) cooperative agreement program and Assistant Secretary for Preparedness and Response's (ASPR) Hospital Preparedness Program (HPP) cooperative agreement program – that focus on preparedness capabilities. CDC's 15 public health preparedness capabilities and ASPR's four healthcare preparedness capabilities serve as operational components for many of the core capabilities, and collaboration with the PHEP directors and HPP coordinators can build capacity around shared interests and investments that fall in the scope of these HHS cooperative agreements and the HSGP. States and Urban Areas should coordinate among the entire scope of federal partners, national initiatives and grant programs to identify opportunities to leverage resources when implementing their preparedness programs. These may include but are not limited to: Medical Reserve Corps; Emergency Medical Services for Children grants; ASPR HPP; CDC PHEP; CDC Cities Readiness Initiative; Strategic National Stockpile Programs; EMS; Department of Justice grants; the Department of Defense 1033 Program (also known as the Law Enforcement Support Office (LESO) Program); and NPPD/Office of Infrastructure Protection's Regional Resilience Assessment Program (RRAP). However, coordination is not limited to grant funding. It also includes leveraging assessments such a TSA's Baseline Assessment and Security Enhancement (BASE); reporting from the Intelligence Community, risk information such as U.S. Coast Guard's Maritime Security Risk Analysis Model (MSRAM), and USBP Sector Analysis.

Each SHSP and UASI funded investment that addresses biological risk, patient care or health systems preparedness should be implemented in a coordinated manner with other Federal programs that support biological and public health incident preparedness such as those administered by the

HHS ASPR, the CDC, and the U.S. Department of Transportation's (DOT) National Highway Traffic Safety Administration.

Federal agencies participating in the Emergency Preparedness Grant Coordination process are working to identify current preparedness activities and areas for collaboration across federal grants with public health and healthcare preparedness components. The participating federal agencies include:

- Department of Health and Human Services (HHS) Assistant Secretary for Preparedness and Response (ASPR)
- Department of Homeland Security (DHS) Federal Emergency Management Agency (FEMA)
- HHS Centers for Disease Control and Prevention (CDC)
- HHS Health Resources and Services Administration (HRSA)
- Department of Transportation (DOT) National Highway Traffic Safety Administration (NHTSA)

Federal agencies are actively coordinating guidance and technical assistance and encourage all recipients to actively coordinate preparedness activities for their jurisdictions. More information on the Emergency Preparedness Grant Coordination process can be found here.

Collaboration with Health Care Coalitions (HCCs)

HCCs are regional entities comprised of health care, public health, emergency management and emergency medical services organizations that plan and respond together, leverage resources, and address challenges in health care delivery brought on by public health and medical incidents. Given that many of the risks being mitigated include the potential for a range of mass casualties, including those across the CBRNE spectrum, planning efforts should include the participation of HCCs, and should take into account the elements and capabilities articulated in the 2017-2022 Health Care Preparedness and Response Capabilities (https://www.phe.gov/Preparedness/planning/hpp/reports/Documents/2017-2022-healthcare-pr-capablities.pdf).

Collaboration with Nonprofit Organizations

SHSP and UASI recipients are encouraged to work with the nonprofit community to address terrorism and all hazards prevention concerns, seek input on the needs of the nonprofit sector and support the goals of their investments.

Collaboration with Tribes

DHS/FEMA strongly encourages states, Urban Areas, and regions to work with tribal nations in overall initiatives such as whole community preparedness and emergency management planning.

Ensuring the Protection of Civil Rights

As the Nation works towards achieving the Goal, it is important to continue to protect the civil rights of individuals. Recipients must carry out their programs and activities, including those related to the building, sustainment, and delivery of core capabilities, in a manner that respects and ensures the protection of civil rights for protected populations. These populations include but are not limited to individuals with disabilities and others with access and functional needs, individuals with limited

English proficiency, and other diverse racial and ethnic populations in accordance with Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964, and related statutes. The DHS Standard Terms and Conditions include the civil rights provisions that apply to recipients. These terms and conditions can be found at DHS Standard Terms and Conditions. Additional information on civil rights provisions is available at https://www.fema.gov/office-equal-rights.

Whole Community Preparedness

SHSP and UASI recipients should engage with the whole community to advance community and individual preparedness and to work as a nation to build and sustain resilience. Recipients should have a coordinating body to serve as their Citizen Corps or Whole Community Council, with membership that may include, but is not limited to: representatives from emergency management, homeland security, law enforcement, fire service, EMS, public health, hospitals, HCCs, or their designee, elected officials, the private sector (especially privately owned critical infrastructure), private nonprofits, nongovernmental organizations (including faith-based, community-based, and voluntary organizations), advocacy groups for under-represented diverse populations that may be more impacted by disasters including children, seniors, individuals with disabilities or access and functional needs, individuals with diverse culture and language use, individuals with lower economic capacity and other underserved populations. Recipients must also integrate program design and delivery practices that ensure representation and services for under-represented diverse populations that may be more impacted by disasters including children, seniors, individuals with disabilities or access and functional needs, individuals with diverse culture and language use, individuals with lower economic capacity and other underserved populations.

Individual preparedness must be coordinated by an integrated body of government and nongovernmental representatives. Recipients must have a coordinating body to serve as their Citizen Corps Whole Community Council, with membership that includes, but is not limited to: representatives from emergency management, homeland security, law enforcement, fire service, EMS, public health, hospitals, HCCs, or their designee, elected officials, the private sector (especially privately owned critical infrastructure), private nonprofits, nongovernmental organizations (including faith-based, community-based, and voluntary organizations), advocacy groups for under- represented diverse populations that may be more impacted by disasters including children, seniors, individuals with disabilities or access and functional needs, individuals with diverse culture and language use, individuals with lower economic capacity and other underserved populations.

In addition to the Citizen Corps Whole Community Councils and CERT programs, the following preparedness programs are allowable expenses:

- **PrepareAthon:** FEMA's Individual and Community Preparedness Division (ICPD) launched PrepareAthon™ (formerly America's PrepareAthon!) in 2013, with the goal of empowering individuals and communities to take action to improve their preparedness and resilience. The purpose of PrepareAthon is to motivate people and communities to take action to prepare for and protect themselves against disasters. Supported by FEMA, communities conduct PrepareAthon events year-round with a focus on encouraging participants to take specific actions to protect themselves from the disasters most likely to affect them and their community. PrepareAthon events are unique to each community and may be aligned with a particular theme in the Ready Campaign's National Seasonal

Preparedness Messaging Calendar (www.ready.gov/prepare). PrepareAthon is a critical part of FEMA's overarching mission to support citizens and first responders to ensure that as a Nation we work together to build, sustain and improve our capability to prepare for, protect against, respond to, recover from, and mitigate all hazards.

- **Youth Preparedness Resources** to support practitioners as they create and run programs in their communities are available at www.ready.gov/youth-preparedness. One of these resources, the Youth Preparedness Catalog, identifies over 200 existing programs, curricula, and resources that may be of interest to those seeking an introduction to, or learning more about, youth preparedness programs. The Catalog describes national, regional, and state-level programs. The Catalog can be found at http://www.fema.gov/media-library/assets/documents/94775.

Supplemental OPSG Guidance

OPSG provides funding to designated localities to enhance cooperation and coordination between Federal, State, local, tribal, and territorial law enforcement agencies in a joint mission to secure the United States Borders along routes of ingress from international borders to include travel corridors in states bordering Mexico and Canada, as well as states and territories with international water borders.

OPSG is intended to support Border States and territories of the United States in accomplishing the following objectives:

- Increase capability to prevent, protect against, and respond to border security issues;
- Increase coordination and collaboration among Federal, state, local, tribal, and territorial law enforcement agencies;
- Continue the distinct capability enhancements required for border security and border protection;
- Provide intelligence-based operations through USBP Sector Level experts to ensure safety and operational oversight of Federal, state, local, tribal, and territorial law enforcement agencies participating in OPSG operational activities;
- Support a request to any Governor to activate, deploy, or redeploy specialized National Guard Units/Packages and/or elements of state law enforcement to increase or augment specialized/technical law enforcement elements operational activities; and
- Continue to increase operational, material and technological readiness of state, local, tribal, and territorial law enforcement agencies.

OPSG funds must be used to provide an enhanced law enforcement presence and to increase operational capabilities of Federal, state, local, tribal, and territorial law enforcement, promoting a layered, coordinated approach to law enforcement within Border States and territories of the United States.

- **Federal, State, Local, Tribal, and Territorial OPSG Integrated Planning Team (IPT).** It is required that Federal, state, local, tribal, and territorial partners establish and maintain a formalized OPSG IPT with representation from all participating law enforcement agencies, co-chaired by representatives from USBP, the SAA, and participating law enforcement agencies' OPSG program representatives.

- **No less than two IPT meetings must take place during every funding year:**
  - Prior to submitting the Concept of Operations (application)
  - Prior to submitting the Campaign Plan

Coordination Requirements
All operational plans should be crafted in cooperation and coordination among Federal, state, local, tribal, and territorial partners. Consideration will be given to applications that are coordinated across multiple jurisdictions. All applicants must coordinate with the USBP Sector Headquarters with geographic responsibility for the applicant's location in developing and submitting an Operations Order with an embedded budget to the SAA.

After awards are announced, prospective recipients will re-scope the draft Operations Order and resubmit as a final Operations Order with an embedded budget, based on actual dollar amounts awarded. The appropriate Sector Headquarters will approve final Operations Orders and forwarded to Headquarters, Office of Border Patrol, Washington, D.C., before funding is released.

Recipients may not begin operations, obligate, or expend any funds until FEMA GPD has approved the final Operations Order and the embedded budget and USBP Headquarters and any existing special conditions and/or restrictions are removed.

Appendix C – FY 2018 HSGP Funding Guidelines

Recipients must comply with all the requirements in 2 C.F.R. Part 200 (*Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*).

In general, recipients should consult with their FEMA HQ Program Analyst prior to making any investment that does not clearly meet the allowable expense criteria established by this NOFO. Funding guidelines established within this section support the five mission areas—Prevention, Protection, Mitigation, Response, and Recovery—and associated core capabilities within the Goal.

Allowable investments made in support of the HSGP priorities as well as other capability-enhancing projects must have a nexus to terrorism preparedness and fall into the categories of planning, organization, exercises, training, or equipment aligned to capability gaps identified during the THIRA/SPR process. Recipients are encouraged to use grant funds for evaluating grant-funded project effectiveness and return on investment FEMA encourages recipients to provide the results of that analysis to FEMA.

Multiple Purpose or Dual-Use of Funds
For both SHSP and UASI, many activities which support the achievement of target capabilities related to terrorism preparedness may simultaneously support enhanced preparedness for other hazards unrelated to acts of terrorism. However, all SHSP and UASI funded projects must assist recipients and subrecipients in achieving target capabilities related to preventing, preparing for, protecting against, or responding to acts of terrorism.

Planning (SHSP and UASI)
SHSP and UASI funds may be used for a range of emergency preparedness and management planning activities and such as those associated with the development, and review and revision of the THIRA, SPR, continuity of operations plans and other planning activities that support the Goal and placing an emphasis on updating and maintaining a current EOP that conforms to the guidelines outlined in CPG 101 v 2.0.

Organization (SHSP and UASI)
Organizational activities include:

- Program management;
- Development of whole community partnerships, through groups such as Citizen Corp Councils;
- Structures and mechanisms for information sharing between the public and private sector;
- Implementing models, programs, and workforce enhancement initiatives to address ideologically-inspired radicalization to violence in the homeland;
- Tools, resources, and activities that facilitate shared situational awareness between the public and private sectors;
- Operational Support;
- Utilization of standardized resource management concepts such as typing, inventorying, organizing, and tracking to facilitate the dispatch, deployment, and recovery of resources before, during, and after an incident;

- Responding to an increase in the threat level under the National Terrorism Advisory System (NTAS), or needs in resulting from a National Special Security Event; and
- Paying salaries and benefits for personnel to serve as qualified intelligence analysts.

States and Urban Areas must justify proposed expenditures of SHSP or UASI funds to support organization activities within their IJ submission. All SAAs are allowed to utilize up to 50 percent of their SHSP funding, and all Urban Areas are allowed up to 50 percent of their UASI funding for personnel costs. Personnel hiring, overtime, and backfill expenses are permitted under this grant only to the extent that such expenses are for the allowable activities within the scope of the grant. Personnel expenses may include but are not limited to: training and exercise coordinators, program managers and planners, intelligence analysts, and statewide interoperability coordinators (SWIC).

At the request of a recipient, the FEMA Administrator may grant a waiver of this 50 percent limitation. Requests for waivers to the personnel cap must be submitted by the authorized representative of the SAA to GPD in writing on official letterhead, with the following information:

- Documentation explaining why the cap should be waived;
- Conditions under which the request is being submitted; and
- A budget and method of calculation of personnel costs both in percentages of the grant award and in total dollar amount.

Organizational activities under SHSP and UASI include:

- **Intelligence Analysts.** Per the Personnel Reimbursement for Intelligence Cooperation and Enhancement (PRICE) of Homeland Security Act (Pub. L. No. 110-412), SHSP and UASI funds may be used to hire new staff and/or contractor positions to serve as intelligence analysts to enable information/intelligence sharing capabilities, as well as support existing intelligence analysts previously covered by SHSP or UASI funding. In order to be hired as an intelligence analyst, staff and/or contractor personnel must meet at least one of the following criteria:
  - Complete training to ensure baseline proficiency in intelligence analysis and production within six months of being hired; and/or,
  - Previously served as an intelligence analyst for a minimum of two years either in a Federal intelligence agency, the military, or state and/or local law enforcement intelligence unit.

All fusion center analytic personnel must demonstrate qualifications that meet or exceed competencies identified in the Common Competencies for State, Local, and Tribal Intelligence Analysts, which outlines the minimum categories of training needed for intelligence analysts. A certificate of completion of such training must be on file with the SAA and must be made available to the recipient's respective FEMA HQ Program Analyst upon request.

Operational Overtime Costs. In support of efforts to enhance capabilities for detecting, deterring, disrupting, and preventing acts of terrorism and other catastrophic events, operational overtime costs are allowable for increased protective security measures at critical infrastructure sites or other high-risk locations and to enhance public safety during mass gatherings and high-profile events. In that regard, HSGP recipients are urged to consider using grant funding to support soft target preparedness activities. SHSP or UASI funds may be used to support select operational expenses

associated with increased security measures in the authorized categories cited in the table below, but this table is not exhaustive. DHS/FEMA retains the discretion to approve other types of requests that do not fit within one of the categories of the table.

Table 1: Authorized Operational Overtime Categories

	Category	Description
1	**National Terrorism Advisory System (NTAS)**	Security measures in response to an increase in the threat level under the NTAS to an "elevated" or "imminent" alert status. GPD Information Bulletin No. 367, *Impact of National Terrorism Advisory System on Homeland Security Grant Programs*, remains applicable; therefore, advance authorization from FEMA is not required. Refer to https://www.dhs.gov/topic/ntas for additional information on the NTAS.
2	**National Security Special Event (NSSE)**	Security measures for a designated NSSE. NSSEs are events of national or international significance deemed by DHS to be a potential target for terrorism or other criminal activity.
3	**Special Event Assessment Rating (SEAR) Level 1 through Level 4 Events**	Security measures required for SEAR Level 1 through Level 4 events as designated by the Department of Homeland Security (DHS) and included in the DHS National Special Events List, as defined below: • SEAR 1: A significant event with national and/or international importance that may require extensive Federal interagency support; • SEAR 2: A significant event with national and/or international importance that may require some level of Federal interagency support. • SEAR 3: An event of national and/or international importance that requires only limited Federal support. • SEAR 4: An event with limited national importance that is managed at state and local level. NOTE: In cases where a threat of terrorism can be associated with a SEAR Level 5 event, the event planners should coordinate with their state or territory Homeland Security Advisor to seek re-adjudication of the SEAR rating. Operational overtime for security measures associated with such events will be considered for approval by FEMA if re-adjudication results in a SEAR 1 through 4 rating.
4	**States of Emergency**	Declarations of states of emergency by the Governor associated with a terrorism-related threat or incident. This excludes Presidentially-declared major disasters or emergencies where federal funding support for the proposed grant-funded activity is made available through the FEMA Public Assistance program or other Federal disaster grants.
5	**National Critical Infrastructure Prioritization Program (NCIPP)**	Protection of Level 1 and Level 2 facilities identified through the Department of Homeland Security's NCIPP based on a terrorism-related threat to critical infrastructure.

	Category	Description
6	**Directed Transit Patrols**	Targeted security patrols in airports and major transit hubs based on a terrorism-related threat to transportation systems.
7	**Other Related Personnel Overtime Costs**	Overtime costs may be authorized for personnel assigned to directly support any of the security activities relating to the categories above. Examples include firefighters and emergency medical services personnel; public works employees who may be responsible for installing protective barriers and fencing; public safety personnel assigned to assist with event access and crowd control; emergency communications specialists; fusion center analysts; National Guard; contract security services; etc.
8	**Operational Support to a Federal Agency**	Overtime costs are allowable for personnel to participate in information, investigative, and intelligence sharing activities related to homeland security/terrorism preparedness and specifically requested by a federal agency. Allowable costs are limited to overtime associated with federally requested participation in eligible activities, including anti-terrorism task forces, Joint Terrorism Task Forces (JTTFs), Area Maritime Security Committees (as required by the Maritime Transportation Security Act of 2002), DHS Border Enforcement Security Task Forces, and Integrated Border Enforcement Teams. In addition, reimbursement for operational overtime law enforcement activities related to combating transnational crime organizations in support of efforts to enhance capabilities for detecting, deterring, disrupting, and preventing acts of terrorism is an allowable expense under SHSP and UASI on a case by case basis. Grant funding can only be used in proportion to the federal man-hour estimate, and only after funding for these activities from other federal sources (i.e., FBI JTTF payments to state and local agencies) has been exhausted.

All allowable operational overtime costs are also subject to the administration requirements outlined in the following subsection.

Administration of Operational Overtime Requests

- With the exception of an elevated NTAS alert, SHSP or UASI funds may only be spent for operational overtime costs upon prior written approval by FEMA. The State Administrative Agency (SAA) must submit operational overtime requests in writing, to its assigned FEMA Grant Programs Directorate (GPD) Program Analyst (PA). FEMA GPD will consider requests for special event activities up to one year in advance. However such requests must be within the award's current period of performance and not result in the need for a request to extend the period of performance. SAAs should contact the Centralized Scheduling and Information Desk (CSID) for PA contact information. CSID can be reached by phone at (800) 368-6498 or by e-mail at askcsid@fema.dhs.gov, Monday through Friday, 9:00 a.m. – 5:00 p.m. ET.
- All operational overtime requests must clearly explain how the request meets the criteria of one or more of the categories listed in the table above. Requests must address the threat

environment as it relates to the event or activity requiring operational overtime support and explains how the overtime activity is responsive to the threat. Request letters sent to FEMA GPD must be UNCLASSIFIED but may be labeled "For Official Use Only." If explaining the threat will require the sharing of classified information, the letter should state as such. FEMA GPD will then make arrangements for the sharing of classified information through official channels.

- Post-event operational overtime requests will only be considered on a case-by-case basis, where it is demonstrated that exigent circumstances prevented submission of a request in advance of the event or activity.
- Under no circumstances may DHS/FEMA grant funding be used to pay for costs already supported by funding from another federal source.
- States with UASI jurisdictions can use funds retained at the state level to reimburse eligible operational overtime expenses incurred by the state (per the above guidance limitations). Any UASI funds retained by the state must be used in direct support of the Urban Area. States must provide documentation to the UAWG and DHS/FEMA upon request demonstrating how any UASI funds retained by the state would directly support the Urban Area.
- FEMA will consult and coordinate with appropriate DHS components as necessary to verify information used to support operational overtime requests. For example, the review of operational overtime requests for the protection of critical infrastructure will be coordinated with DHS Office of Cyber and Infrastructure Analysis to verify the Level I or Level II NCIPP designation. Also, DHS Office of Intelligence and Analysis will be consulted to validate reported threat information associated with the event or activity.

Personnel Costs. Personnel hiring, overtime, and backfill expenses are permitted under this grant in order to perform allowable HSGP planning, training, exercise, and equipment activities. Personnel may include but are not limited to: training and exercise coordinators, program managers for activities directly associated with SHSP and UASI funded activities, intelligence analysts, and statewide interoperability coordinators (SWIC).

For further details, SAAs should refer to FP 207-093-1, Clarification on the Personnel Reimbursement for Intelligence Cooperation and Enhancement of Homeland Security Act of 2008 (Public Law 110–412 – the PRICE Act), or contact their FEMA HQ Program Analyst.

HSGP funds may not be used to support the hiring of any personnel to fulfil traditional public health and safety duties or to supplant traditional public health and safety positions and responsibilities.

The following are definitions as it relates to personnel costs:

- *Hiring.* State and local entities may use grant funding to cover the salary of newly hired personnel who are exclusively undertaking allowable DHS/FEMA grant activities as specified in this guidance. This may not include new personnel who are hired to fulfill any non-DHS/FEMA program activities under any circumstances. Hiring will always result in a net increase of Full Time Equivalent (FTE) employees.
- *Overtime.* These expenses are limited to the additional costs which result from personnel working over and above 40 hours of weekly work time as a direct result of their

performance of DHS/FEMA-approved activities specified in this guidance. Overtime associated with any other activity is not eligible.

- *Backfill-related Overtime*. Also called "Overtime as Backfill," these expenses are limited to overtime costs which result from personnel who are working overtime (as identified above) to perform the duties of other personnel who are temporarily assigned to DHS/FEMA-approved activities outside their core responsibilities. Neither overtime nor backfill expenses are the result of an increase of FTE employees.
- *Supplanting*. Grant funds will be used to supplement existing funds, and will not replace (supplant) funds that have been appropriated for the same purpose. Applicants or recipients may be required to supply documentation certifying that a reduction in non-federal resources occurred for reasons other than the receipt or expected receipt of federal funds.

Organization (OPSG)

Operational Overtime Costs. OPSG funds should be used for operational overtime costs associated with law enforcement activities, in support of border law enforcement agencies for increased border security enhancement. Overtime pay is for enhanced patrol for certified public safety officers, along with limited support for other law enforcement direct support personnel (i.e., Communication Officers/Dispatchers, non-sworn patrol pilots). Overtime shall be reimbursed consistent with the non-Federal entity's overtime policy and the requirements as stated below:

a) Overtime is time worked that exceeds the required number of hours during an employee's designated shift.
b) Overtime must be worked to increase patrol capacity and in support of identified and approved USBP border security operations.
c) The OPSG overtime hourly rate of pay will be no more than the approved overtime rate per local law and policy and in accordance with applicable state and federal regulations.
d) Exempt salaried employees may not be reimbursed for overtime unless the non-Federal entity's policy specifically allows for overtime reimbursement.
e) The non-Federal entity may not utilize OPSG funding to pay for an employee's overtime hours or pay that exceeds 16-hours worked in any 24-hour period.

Personnel Costs.

- Up to 50 percent of an OPSG award may be used to pay for all personnel costs (only to the extent that such expenses are for the allowable activities within the scope of the grant). At the request of a recipient, the FEMA Administrator may waive the 50 percent personnel cap. Waiver decisions are at the discretion of the FEMA Administrator and will be considered on a case-by-case basis. A formal OPSG personnel waiver request should:
  - Be requested on official letterhead, include a written justification, and be signed by the local jurisdiction;
  - Include a budget and method of calculation of personnel costs both in the percentage of the grant award and in total dollar amount;
  - Include an approved Operations Order from the USBP Sector office which supports the local jurisdiction's written justification; and

- Be coordinated with the USBP Sector, SAA, and the DHS/CBP Office of the Border Patrol (OBP).

- OPSG funds may be used to pay additional current part-time law enforcement personnel salaries in order to bring them to temporary full-time status.
- OPSG funds may support a Governor's request to activate, deploy, or redeploy specialized National Guard Units/Package and/or elements of state law enforcement to increase or augment specialized/technical law enforcement elements' operational activities.
- Costs associated with backfill for personnel supporting operational activities are allowable.
- As with all OPSG personnel costs, OPSG grant funds will be used to supplement existing funds, and will not replace (supplant) funds that have been appropriated for the same purpose. Applicants or recipients may be required to supply documentation certifying that a reduction in non-federal resources occurred for reasons other than the receipt or expected receipt of federal funds.
- Temporary or Term Appointments
  - Subrecipients may utilize temporary or term appointments to augment the law enforcement presence on the borders. However, applying funds toward hiring full-time or permanent sworn public safety officers is unallowable.
  - For OPSG purposes, temporary appointments are non-status appointments for less than one year.
  - For OPSG purposes, term appointments are non-status appointments for one year, extendable for one year as necessary.
  - OPSG-funded temporary or term appointments may not exceed the approved period of performance.
  - OPSG funding for temporary or term appointments may pay for salary only. Benefits are not allowable expenses for term or temporary employees.
  - OPSG remains a non-hiring program. Appropriate uses of temporary or term appointments include:
    - To carry out specific enforcement operations work for ongoing OPSG funded patrols throughout the Sector Area of Operation;
    - To staff operations of limited duration; such as OPSG enhanced enforcement patrols targeting specific locations or criminal activity; and,
    - To fill OPSG positions in activities undergoing transition or personnel shortages and local backfill policies (medical/military deployments)
    - OPSG term and temporary appointments must have all necessary certifications and training to enforce state and local laws. OPSG funds will not be used to train or certify term or temporary appointments except as otherwise stated in the OPSG section of this NOFO.
    - DHS provides no guarantee of funding for temporary or term appointments. In addition to the terms of this NOFO, subrecipients must follow their own applicable policies and procedures regarding temporary or term appointments.

Travel, Per Diem, and Lodging Costs. OPSG funds may be used for domestic travel and per diem, including costs associated with the deployment/redeployment of personnel to border areas and for travel associated with law enforcement entities assisting other local

jurisdictions in law enforcement activities. In addition, allowable costs include supporting up to six-month deployment of law enforcement personnel to critical Southwest Border locations for operational activities (travel costs must be in accordance with applicable travel regulations).

Management and Administration (M&A)
Management and administration (M&A) activities are those directly relating to the management and administration of OPSG funds, such as financial management and monitoring. Sub- recipients and friendly forces may retain funding for M&A purposes; however, the total amount retained by both the subrecipient and friendly forces cannot exceed 5 percent of the subrecipient award.

Friendly forces are local law enforcement entities that are second tier subrecipients under OPSG. In other words, friendly forces are entities that receive a subaward from a subrecipient under the OPSG program. Friendly forces must comply with all requirements of subrecipients under 2 C.F.R. Part 200.

Equipment (SHSP and UASI)
The 21 allowable prevention, protection, mitigation, response, and recovery equipment categories for HSGP are listed on the Authorized Equipment List (AEL). The AEL is available at http://www.fema.gov/authorized-equipment-list. Some equipment items require prior approval before the obligation or purchase of the items. Please reference the grant notes for each equipment item to ensure prior approval is not required.

Unless otherwise stated, equipment must meet all mandatory regulatory and/or DHS/FEMA-adopted standards to be eligible for purchase using these funds. In addition, agencies will be responsible for obtaining and maintaining all necessary certifications and licenses for the requested equipment.

Investments in emergency communications systems and equipment must meet applicable SAFECOM Guidance. Such investments must be coordinated with the SWIC and the State Interoperability Governing Body (SIGB) to ensure interoperability and long-term compatibility.

Grant funds may be used for the procurement of medical countermeasures. Procurement of medical countermeasures must be conducted in collaboration with state, city, or local health departments that administer Federal funds from HHS for this purpose and with existing MMRS committees where available, in order to sustain their long-term planning for appropriate, rapid, and local medical countermeasures, including antibiotics and antidotes for nerve agents, cyanide, and other toxins. Procurement must have a sound threat based justification with an aim to reduce the consequences of mass casualty incidents during the first crucial hours of a response. Prior to procuring pharmaceuticals, recipients must have in place an inventory management plan to avoid large periodic variations in supplies due to coinciding purchase and expiration dates. Recipients are encouraged to enter into rotational procurement agreements with vendors and distributors. Purchases of pharmaceuticals must include a budget for the disposal of expired drugs within each fiscal year's PoP for HSGP. The cost of disposal cannot be carried over to another DHS/FEMA grant or grant period.

EMS electronic patient care data systems should comply with the most current data standard of the National Emergency Medical Services Information System (www.NEMSIS.org).

Equipment (OPSG)

- **Equipment Marking.** Because equipment purchased with OPSG funding is intended to be used to support Operation Stonegarden activities, it must be appropriately marked to ensure its ready identification and primary use for that purpose. When practicable, any equipment purchased with OPSG funding shall be prominently marked as follows:

  "***Purchased with DHS funds for Operation Stonegarden Use***"

- **Fuel Cost and/or Mileage Reimbursement.** There is no cap for reimbursement of fuel and mileage costs in support of operational activities.

- **Vehicle and Equipment Rentals.** Allowable purchases under OPSG include patrol cars and other mission-specific vehicles whose primary use is to increase operational activities/patrols on or near a border nexus in support of approved border security operations. A detailed justification must be submitted to the respective FEMA HQ Program Analyst prior to purchase.

Requirements for Small Unmanned Aircraft System (SHSP, UASI, and OPSG)
All requests to purchase Small Unmanned Aircraft Systems (SUAS) with FEMA grant funding must comply with IB 426 and also include a description of the policies and procedures in place to safeguard individuals' privacy, civil rights, and civil liberties of the jurisdiction that will purchase, take title to or otherwise use the SUAS equipment.

Training (SHSP and UASI)
Allowable training-related costs under HSGP include the establishment, support, conduct, and attendance of training specifically identified under the SHSP and UASI programs and/or in conjunction with emergency preparedness training by other Federal agencies (e.g., HHS and DOT). Training conducted using HSGP funds should address a performance gap identified through a TEP or other assessments (e.g., National Emergency Communications Plan NECP Goal Assessments) and contribute to building a capability that will be evaluated through a formal exercise. Any training or training gaps, including training related to under-represented diverse populations that may be more impacted by disasters, including children, seniors, individuals with disabilities or access and functional needs, individuals with diverse culture and language use, individuals with lower economic capacity and other underserved populations, should be identified in a TEP and addressed in the state or Urban Area training cycle. Recipients are encouraged to use existing training rather than developing new courses. When developing new courses, recipients are encouraged to apply the Analyze, Design, Develop, Implement, and Evaluate (ADDIE) model of instructional design.

Recipients are also encouraged to utilize the National Training and Education Division's National Preparedness Course Catalog. Trainings include programs or courses developed for and delivered by institutions and organizations funded by DHS/FEMA/NTED. This includes the Center for Domestic Preparedness (CDP), the Emergency Management Institute (EMI), and NTED's Training Partner

Programs, including the Continuing Training Grants (CTG), the National Domestic Preparedness Consortium (NDPC), the Rural Domestic Preparedness Consortium (RDPC), and other partners.

The catalog features a wide range of course topics in multiple delivery modes to meet FEMA's mission scope as well as the increasing training needs of Federal, state, local, territorial, and tribal audiences. All courses have been approved through NTED's course review and approval process. The catalog can be accessed at http://www.firstrespondertraining.gov.

Exercises (SHSP and UASI)
Exercises conducted with grant funding should be managed and conducted consistent with HSEEP. HSEEP guidance for exercise design, development, conduct, evaluation, and improvement planning is located at https://www.fema.gov/exercise.

Maintenance and Sustainment (SHSP, UASI, and OPSG)
The use of DHS/FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable, as described in FEMA Policy FP 205-402-125-1 under all active and future grant awards, unless otherwise noted. With the exception of maintenance plans purchased incidental to the original purchase of the equipment, the period covered by maintenance or warranty plan must not exceed the PoP of the specific grant funds used to purchase the plan or warranty.

Grant funds are intended to support the Goal by funding projects that build and sustain the core capabilities necessary to prevent, protect against, mitigate the effects of, respond to, and recover from those threats that pose the greatest risk to the security of the Nation. In order to provide recipients the ability to meet this objective, the policy set forth in GPD's IB 379: Guidance to State Administrative Agencies to Expedite the Expenditure of Certain DHS/FEMA Grant Funding allows for the expansion of eligible maintenance and sustainment costs which must be in 1) direct support of existing capabilities; (2) must be an otherwise allowable expenditure under the applicable grant program; (3) be tied to one of the core capabilities in the five mission areas contained within the Goal, and (4) shareable through the Emergency Management Assistance Compact. Additionally, eligible costs may also be in support of equipment, training, and critical resources that have previously been purchased with either federal grant or any other source of funding other than DHS/FEMA preparedness grant program dollars.

Law Enforcement Terrorism Prevention Activities Allowable Costs (SHSP and UASI)
Activities eligible for the use of LETPA focused funds include but are not limited to:

- Maturation and enhancement of designated state and major Urban Area fusion centers, including information sharing and analysis, threat recognition, terrorist interdiction, and training/ hiring of intelligence analysts;
- Coordination between fusion centers and other analytical and investigative efforts including, but not limited to Joint Terrorism Task Forces (JTTFs), Field Intelligence Groups (FIGs), High-Intensity Drug Trafficking Areas (HIDTAs), Regional Information Sharing Systems (RISS) Centers, criminal intelligence units, and real-time crime analysis centers;
- Implementation and maintenance of the Nationwide SAR Initiative, including training for front-line personnel on identifying and reporting suspicious activities;
- Implementation of the "If You See Something, Say Something®" campaign to raise public

awareness of indicators of terrorism and terrorism-related crime and associated efforts to increase the sharing of information with public and private sector partners, including nonprofit organizations. Note: DHS requires that all public and private sector partners wanting to implement and/or expand the DHS "If You See Something, Say Something®" campaign using grant funds work directly with the DHS Office of Partnership and Engagement (OPE) to ensure all public awareness materials (e.g., videos, posters, tri-folds, etc.) are consistent with the Department's messaging and strategy for the campaign and compliant with the initiative's trademark, which is licensed to DHS by the New York Metropolitan Transportation Authority. Coordination with OPE, through the Campaign's Office (seesay@hq.dhs.gov), must be facilitated by the FEMA HQ Program Analyst;

- Increase physical security, through law enforcement personnel and other protective measures, by implementing preventive and protective measures at critical infrastructure site or at-risk nonprofit organizations; and
- Building and sustaining preventive radiological and nuclear detection capabilities, including those developed through the Securing the Cities initiative.

Law Enforcement Readiness (SHSP, UASI, and OPSG)

OPSG grant funds may be used to increase operational, material, and technological readiness of state, local, tribal, and territorial law enforcement agencies. The Delegation of Immigration Authority, Section 287(g) of the Immigration and Nationality Act (INA) program allows a state or local law enforcement entity to enter into a partnership with Immigration and Customs Enforcement (ICE), under a joint Memorandum of Agreement (MOA), in order to receive delegated authority for immigration enforcement within their jurisdictions. SHSP, UASI, or OPSG grant funds may be requested and may be approved on a case by case basis for immigration enforcement training in support of the border security mission. Requests for training will be evaluated on a case by case basis and can only be used for certification in the 287 (g) program provided by DHS/ICE. SHSP, UASI, or OPSG subrecipients with agreements under Section 287(g) of the INA (8 U.S.C. 1357(g)) to receive delegated authority for immigration enforcement within their jurisdictions may also be reimbursed for 287(g) related operational activities with approval from FEMA on a case by case basis. For OPSG, subrecipients must be authorized by USBP Headquarters and Sectors and operational activities must be coordinated through a USBP Sector.

Regional Border Projects (OPSG)

Recipients are encouraged to prioritize the acquisition and development of regional projects on the borders to maximize interoperability and coordination capabilities among federal agencies and with state, local, and tribal law enforcement partners.

Such regional projects include:

- Communications equipment:
- Radio systems and repeaters
- Situational Awareness equipment:
  - License Plate Reader Networks
  - Visual detection and surveillance systems
  - Sensor Systems
  - Radar Systems (for air incursions)

Critical Emergency Supplies (SHSP and UASI)
Critical emergency supplies, such as shelf stable products, water, and medical equipment and supplies are an allowable expense under SHSP and UASI. Prior to the allocation of grant funds for stockpiling purposes, each state must have DHS/FEMA's approval of a five-year viable inventory management plan, which should include a distribution strategy and related sustainment costs if planned grant expenditure is over $100,000.

If grant expenditures exceed the minimum threshold, the five-year inventory management plan will be developed by the recipient and monitored by FEMA GPD with the assistance of the FEMA Logistics Management Directorate (LMD). FEMA GPD will coordinate with LMD and the respective FEMA Region to provide program oversight and technical assistance as it relates to the purchase of critical emergency supplies under UASI. FEMA GPD and LMD will establish guidelines and requirements for the purchase of these supplies under UASI and monitor development and status of the state's inventory management plan.

SAAs (through their Emergency Management Office) are strongly encouraged to consult with their respective FEMA Regional Logistics Chief regarding disaster logistics- related issues.
States are further encouraged to share their DHS/FEMA approved plan with local jurisdictions and Tribes.

Construction and Renovation (SHSP and UASI)
Project construction using SHSP and UASI funds may not exceed the greater of $1,000,000 or 15 percent of the grant award. For the purposes of the limitations on funding levels, communications towers are not considered construction. See guidance on communication towers below.

Written approval must be provided by DHS/FEMA prior to the use of any HSGP funds for construction or renovation. When applying for construction funds, recipients must submit evidence of approved zoning ordinances, architectural plans, and any other locally required planning permits. Additionally, recipients are required to submit a SF-424C Budget and Budget detail citing the project costs.

Recipients using funds for construction projects must comply with the *Davis-Bacon Act* (40 U.S.C. § 3141 *et seq.*). Recipients must ensure that their contractors or subcontractors for construction projects pay workers no less than the prevailing wages for laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the state in which the work is to be performed. Additional information regarding compliance with the *Davis-Bacon Act*, including Department of Labor (DOL) wage determinations, is available online at https://www.dol.gov/whd/govcontracts/dbra.htm.

OPSG funds may not be used for any construction.

Communications Towers. When applying for funds to construct communication towers, recipients and subrecipients must submit evidence that the FCC's Section 106 review process has been completed and submit all documentation resulting from that review to GPD using the guidelines in EHP Supplement prior to submitting materials for EHP review. Completed EHP review materials for construction and communication tower projects must be submitted as soon as possible to get approved by the end of the PoP. EHP review materials should be sent to

gpdehpinfo@fema.dhs.gov.

Western Hemispheric Travel Initiative (SHSP)
In addition to the expenditures outlined above, SHSP funds may be used to support the implementation activities associated with the Western Hemisphere Travel Initiative (WHTI), including the issuance of WHTI-compliant tribal identification cards. More information on the WHTI may be found at http://www.dhs.gov/files/programs/gc_1200693579776.shtm.

Other Secure Identification Initiatives (SHSP)
SHSP funds may also be used to support the Department's additional efforts to enhance secure identification, including driver's license and identification security enhancements. Activities that facilitate secure identification, including IT enhancements for identification management and verification systems, are a priority. DHS is currently developing and implementing a number of screening programs in which secure identification credentials figure prominently. These include the Transportation Worker Identification Credential (TWIC) program which promotes tamper-resistant biometric credentials for workers who require unescorted access to secure areas of ports, vessels, outer continental shelf facilities, and all credentialed merchant mariners; and the credentialing of first responders which entails enhancing real-time electronic authentication of identity and attribute(s) (qualification, certification, authorization, and/or privilege) of emergency response/critical government personnel responding to terrorist attacks or other catastrophic events.

States may continue implementing activities previously funded through the Driver's License Security Grant Program (DLSGP) that focus on securing driver's license and identification card issuance processes. Initiatives related to securing identification should:

- Have the greatest impact on reducing the issuance and use of fraudulent driver's license and identification cards;
- Reduce the cost of program implementation for individuals, states, and the Federal Government;
- Satisfy driver's license identification material requirements;
- Expedite state progress toward meeting minimum security standards; and
- Plan and expedite state-specific activities to support federal data and document verification requirements and standards.

Emergency Management Accreditation Program
With funds provided through FY 2018 HSGP, states have the opportunity to encourage their local jurisdictions to pursue assessment and accreditation under the Emergency Management Accreditation Program (EMAP).

EMAP's assessment and accreditation of emergency management organizations against consensus-based, American National Standards Institute (ANSI)-certified standards allows for standardized benchmarking of critical functions necessary for an emergency management organization to meet the core capabilities identified in the Goal. Additional information on the EMAP Standard is available at http://www.emap.org.

National Information Exchange Model (NIEM)
DHS/FEMA requires all grant recipients to use the latest NIEM specifications and guidelines when

using HSGP funds to develop, procure, or implement homeland security information exchanges, including systems and databases. This includes, but is not limited to the use of Extensible Markup Language (XML) and Java Script Object Notation (JSON). Further information about NIEM specifications and guidelines is available at http://www.niem.gov. More information on the purpose of NIEM is located in Appendix G – FY 2018 HSGP Supplemental Material of this NOFO.

28 C.F.R. Part 23 Guidance
DHS/FEMA requires that any information technology system funded or supported by these funds comply with 28 C.F.R. Part 23, Criminal Intelligence Systems Operating Policies if this regulation is determined to be applicable.

Unallowable Costs (OPSG)
OPSG unallowable costs include costs associated with staffing and general IT computing equipment and hardware, such as personal computers, faxes, copy machines, modems, etc. OPSG is not intended as a hiring program. Therefore, applying funds toward hiring full-time or permanent sworn public safety officers is unallowable. OPSG funding shall not be used to supplant inherent routine patrols and law enforcement operations or activities not directly related to providing enhanced coordination between local and federal law enforcement agencies. Finally, construction and/or renovation costs are prohibited under OPSG. Applicants should refer to FP 207-093-1 at https://www.fema.gov/media-library/assets/documents/85384, or contact their FEMA HQ Program Analyst at (800) 368-6498 for guidance and clarification.

Due to the nature of OPSG, exercise expenses are not allowable costs under OPSG.

Unallowable Costs (SHSP, UASI, and OPSG)

- Per FEMA policy, the purchase of weapons and weapons accessories, including ammunition, is not allowed with HSGP funds.
- Grant funds may not be used for the purchase of equipment not approved by DHS/FEMA. Grant funds must comply with IB 426 and may not be used for the purchase of the following equipment: firearms; ammunition; grenade launchers; bayonets; or weaponized aircraft, vessels, or vehicles of any kind with weapons installed.
- Unauthorized exercise-related costs include:
    - Reimbursement for the maintenance and/or wear and tear costs of general use vehicles (e.g., construction vehicles), medical supplies, and emergency response apparatus (e.g., fire trucks, ambulances).
    - Equipment that is purchased for permanent installation and/or use, beyond the scope of the conclusion of the exercise (e.g., electronicmessaging sign).

Resources for Planning, Training, and Exercising

Planning Assistance
FEMA's National Preparedness Directorate (NPD) offers technical assistance (TA) that is designed to provide recipients and subrecipients with specialized expertise to improve and enhance the continuing development of state and local emergency management across the five mission areas of the Goal and across all core capabilities. TA provides the opportunity to engage emergency managers, emergency planners, and appropriate decision-makers in open discussion of

options to improve plans and planning in light of their jurisdiction's needs. Although there is no direct cost to approved jurisdictions for DHS/FEMA TA, jurisdictions are expected to invest staff resources and take ownership of the resulting products and tools.

TA deliveries combine current emergency management best practices with practical consideration of emerging trends, through discussion facilitated by DHS/FEMA contract specialists and with the support of FEMA Region operational specialists. Additionally, peer-to-peer representation may also be included from other jurisdictions that have recently addressed the same planning issue.

The TA request form can be accessed at http://www.fema.gov/national-incident-management-system/fema-technical-assistance-division.

Training Information

Per DHS/FEMA Grant Programs Directorate Policy FP 207-008-064-1, Review and Approval Requirements for Training Courses Funded Through Preparedness Grants, issued on September 9, 2013, states, territories, tribal entities and Urban Areas are no longer required to request approval from FEMA for personnel to attend non-DHS FEMA training as long as the training is coordinated with and approved by the state, territory, tribal or Urban Area Training Point of Contact (TPOC) and falls within the FEMA mission scope and the jurisdiction's Emergency Operations Plan (EOP). The only exception to this policy is for Countering Violent Extremism courses, which must be approved in advance by the DHS Office for Civil Rights and Civil Liberties. For additional information on review and approval requirements for training courses funded with preparedness grants, please refer to the following policy: http://www.fema.gov/media-library/assets/documents/34856.

DHS/FEMA will conduct periodic reviews of all state, local, territory, and Urban Area training funded by DHS/FEMA. These reviews may include requests for all course materials and physical observation of, or participation in, the funded training. If these reviews determine that courses are outside the scope of this guidance, recipients will be asked to repay grant funds expended in support of those efforts.

For further information on developing courses using the instructional design methodology and tools that can facilitate the process, SAAs and TPOCs are encouraged to review the NTED Responder Training Development Center (RTDC) website.

DHS/FEMA/National Training and Education Division (NTED) Provided Training

Trainings include programs or courses developed for and delivered by institutions and organizations funded by DHS/FEMA/NTED. This includes the Center for Domestic Preparedness (CDP), the Emergency Management Institute (EMI), and NTED's Training Partner Programs, including the Continuing Training Grants (CTG), the National Domestic Preparedness Consortium (NDPC), the Rural Domestic Preparedness Consortium (RDPC), and other partners.

NTED's National Preparedness Course Catalog

This online searchable catalog features a compilation of courses managed by the three primary FEMA training organizations: the CDP, EMI, and NTED. The catalog features a wide range of course topics in multiple delivery modes to meet FEMA's mission scope as well as the increasing training needs of Federal, state, local, territorial, and tribal audiences. All courses have been

approved through NTED's course review and approval process. The catalog can be accessed at http://www.firstrespondertraining.gov.

Training Not Provided by DHS/FEMA. These trainings include courses that are either state-sponsored or federal sponsored (non-DHS/FEMA), coordinated and approved by the SAA or their designated TPOC, and fall within the DHS/FEMA mission scope to prepare state, local, tribal, and territorial personnel to prevent, protect against, mitigate, respond to, and recover from acts of terrorism or catastrophic events.

- *State Sponsored Courses.* These courses are developed for and/or delivered by institutions or organizations other than federal entities or DHS/FEMA and are sponsored by the SAA or their designated TPOC.
- *Joint Training and Exercises with the Public and Private Sectors.* These courses are sponsored and coordinated by private sector entities to enhance public-private partnerships for training personnel to prevent, protect against, mitigate, respond to, and recover from acts of terrorism or catastrophic events. In addition, states, territories, Tribes, and Urban Areas are encouraged to incorporate the private sector in government- sponsored training and exercises.

Additional information on both DHS/FEMA provided training and other Federal and state training can be found at http://www.firstrespondertraining.gov.

Training Information Reporting System ("Web-Forms")
Web-Forms is an electronic data management system built to assist SAA TPOCs and Federal agencies with submitting non-NTED provided training courses for inclusion in the State/Federal-Sponsored Course Catalog through electronic forms. The information collected is used in a two-step review process to ensure the training programs adhere to the intent of the HSGP guidance and the course content is structurally sound and current. As these programs may be delivered nationwide, it is vital to ensure each training program's viability and relevance to the Homeland Security mission. Reporting training activities through Web-Forms is not required under FY 2018 HSGP. However, the system remains available and can be accessed through the DHS/FEMA Toolkit located at https://www.firstrespondertraining.gov/frt/ to support recipients in their own tracking of training deliveries.

Exercise Information
Recipients that use HSGP funds to conduct an exercise(s) are encouraged to complete a progressive exercise series. Exercises conducted by states and Urban Areas may be used to fulfill similar exercise requirements required by other grant programs. Recipients are encouraged to invite representatives/planners involved with other Federally-mandated or private exercise activities. States and Urban Areas are encouraged to share, at a minimum, the multi- year training and exercise schedule with those departments, agencies, and organizations included in the plan.

- *Validating Capabilities.* Exercises examine and validate capabilities-based planning across the Prevention, Protection, Mitigation, Response, and Recovery mission areas. The extensive engagement of the whole community, including but not limited to examining the needs and requirements for individuals with disabilities, individuals with limited English proficiency and others with access and functional needs, is essential to the development of

an effective and comprehensive exercise program. Exercises are designed to be progressive – increasing in scope and complexity and drawing upon results and outcomes from prior exercises and real-world incidents – to challenge participating communities. Consistent with Homeland Security Exercise and Evaluation Program guidance and tools, the National Exercise Program (NEP) serves as the principal exercise mechanism for examining national preparedness and measuring readiness.
Exercises should align with priorities and capabilities identified in a multi-year TEP.

- *Special Event Planning.* If a state or Urban Area will be hosting a special event (e.g., Super Bowl, G-8 Summit), the special event planning should be considered as a training or exercise activity for the purpose of the multi-year TEP. States must include all confirmed or planned special events in the Multi-year TEP. The state or Urban Area may plan to use SHSP or UASI funding to finance training and exercise activities in preparation for those events. States and Urban Areas should also consider exercises at major venues (e.g., arenas, convention centers) that focus on evacuations, communications, and command and control.
- *Regional Exercises.* States should also anticipate participating in at least one regional exercise annually.
- *Role of Non-Governmental Entities in Exercises.* Non-governmental participation in all levels of exercises is strongly encouraged. Leaders from non-governmental entities should be included in the planning, design, and evaluation of an exercise. State, local, tribal, and territorial jurisdictions are encouraged to develop exercises that test the integration and use of resources provided by non-governmental entities, defined as the private sector and private non-profit, faith-based, and community organizations. Participation in exercises should be coordinated with local Citizen Corps Whole Community Council(s) or their equivalents and other partner agencies.

Appendix D –
FY 2018 OPSG Operations Order Template and Instructions

Operations Order Template Instructions
The OPSG Operations Order Template can be found by selecting the link for the FY 2018 HSGP NOFO on FEMA's preparedness grants page (https://www.fema.gov/preparedness-non-disaster-grants).

Executive Summary Overview
Operations Order Executive Summary must:

- Identify the organization name, point of contact, committees, and other structures accountable for implementing OPSG in the jurisdiction (typically this will be a program lead or manager overseeing operations and individuals assigned to that agency).
- Describe how Federal, state, local, tribal, and territorial law enforcement agencies will work together to establish and enhance coordination and collaboration on border security issues.

Budget Requirements Overview
Operations Order Detailed Annual Budget must:

- Explain how costs and expenses were estimated.
- Provide a narrative justification for costs and expenses. Supporting tables describing cost and expense elements (e.g., equipment, fuel, vehicle maintenance costs) may be included.

Submission Requirements
Operations Orders must meet the following submission requirements:

- Must be created and submitted in Microsoft Word (*.doc)
- Must be submitted using the following file naming convention: "FY 20XX OPSG <State Abbreviation> - <Local Unit of Government Name>"
- OO must be reviewed by the Sector and the SAA prior to submission into the CBP Operation Stonegarden Data Management System.

Due to the competitive nature of this program, separate attachments will not be accepted or reviewed.

Appendix E – FY 2018 OPSG Operational Guidance

Appendix E is intended to provide operational guidance to OPSG applicants on the development of a concept of operations and campaign planning, the tactical operation period, and reporting procedures. This guidance also delineates specific roles and responsibilities, expectations for operations, and performance measures. Successful execution of these objectives will promote situational awareness among participating agencies and ensure a rapid, fluid response to emerging border-security conditions.

OPSG uses an integrated approach to address transnational criminal activity. Federal, state, local, tribal, and territorial partners are required to establish and maintain an OPSG Integrated Planning Team (IPT) with representation from all participating law enforcement agencies, co- chaired by representatives from USBP, the SAA, and participating local law enforcement agencies' OPSG program representatives. USBP will provide routine monitoring and technical expertise to each participating agency. The content of each operational plan, to include the requested items will be reviewed for border-security value and approved by the corresponding sector's Chief Patrol Agent or his/her designee.

All operational plans should be crafted in cooperation and coordination with federal, state, local, tribal, and territorial partners, to meet the needs of the USBP Sector. Consideration will be given to applications that are coordinated across multiple jurisdictions. All applicants must coordinate with the CBP/USBP Sector Headquarters with geographic responsibility for the applicant's location in developing and submitting an Operations Order with an embedded budget to the SAA.

As OPSG continues to evolve, several proven practices are being recognized, centered on short-term, periodic operations in support of overarching near and long-term goals. A multi-step process will be established through the area IPT, including a campaign plan and a cycle of operations to ensure that OPSG partners maintain synergism and have a coordinated impact on reducing border-security risk.

I. Concept of Operations and Campaign Planning (Post-Allocation Announcement/Pre-Award)

The overarching operational cycle involves three stages: 1) application, 2) concept of operations to formulate a Campaign Plan, and 3) one or more tactical operational periods, which are all developed by the IPT. All Operations Orders: Concept of Operations (CONOPS), Operation Orders (OO) or Campaign Plans and Fragmentary Orders (FRAGOs) shall be submitted through the CBP Stonegarden Data Management System. All OPSG grant Application packages shall be submitted to the SAA for entry into Grants.gov.

Application: Please refer to Section D – Application and Submission Information of this NOFO.

Campaign Plan: After awards are announced participants will create and submit an operations order that forms a campaign plan and captures the initial, generalized-budgetary intent to their IPT.

The campaign plan should articulate the participant agency's long-term border security objectives and goals designed to mitigate border-security risk.

Funds should be obligated as needed to target specific threats or vulnerabilities and ensure that OPSG usage is commensurate to the unique risk of each border region. This may require several short-term operations that combine to form an ongoing operational cycle, ensuring that USBP commanders and state, local, tribal, and territorial agency partners reserve the flexibility to respond to the ever-changing elements of border security.

The operations plan also will articulate the budgetary intent of how funds are to be used throughout the performance period. The operations plan will project planned expenditures in the following categories: overtime, equipment, travel, maintenance, fuel, and administrative funds. The subrecipient can initiate the procurement of equipment, as well as state how much the county intends to use for M&A while keeping funds for overtime or residual equipment funds available for use as needed. If the subrecipient intends to spend more than 50 percent of its award on overtime over the course of the performance period, a PRICE Act waiver request must be submitted in accordance with IB 379: Guidance to State Administrative Agencies to Expedite the Expenditure of Certain DHS/FEMA Grant Funding. The operations plan will meet both the SAA expectations to obligate the funds within 45 days of the award announcement and the demands of the grant's operational intent. **Sector approved campaign plans must be submitted to USBP Headquarters no later than four months after the official awards announcement has been made.**

Tactical Operational Periods: Once the subrecipient is ready to conduct operations, the area IPT will begin planning tactical operations. The operation order tracking number for each operational plan will be assigned by CBP/USBP. The operation order number will remain intact for the duration of the grant's PoP.

In the event that changes or additional funding requests to the original operational plan must be made, a Fragmentary Order (FRAGO) will be created. These modifications will be annotated in the annex section of the FRAGO.

II. Tactical Operational Period

Operational discipline is necessary for the success of OPSG. Deliberate, adaptive, integrated, and intelligence-driven planning is critical to conducting targeted enforcement operations consistent with the objectives of the OPSG. By participating in the OPSG, the state, local, tribal, and territorial agencies agree to conduct operations designed to reduce border-security risk.

Tactical operations will be conducted on a periodic basis meeting the criteria outlined below. Tactical operational periods are composed of six critical elements: 1) a pre-planning meeting with the IPT; 2) specified beginning and ending dates; 3) the integration of intelligence and border security; 4) use of targeted enforcement techniques; 5) clearly stated objectives; and 6) an after-action meeting. A campaign should involve several tactical operational periods. These periods require deliberate on-going planning to ensure command, staff, and unit activities synchronize to current and future operations. The cyclical nature of the process will ensure OPSG activities align with the fluctuating border-security threats and vulnerabilities. Planners should recognize that

shorter, frequent tactical operational periods increase the flexibility and leverage gained through OPSG funding.

The IPT should leverage information provided by the fusion center, Border Intelligence Centers or other local intelligence center, when possible, and establish a common operational vision. The USBP sector's Chief Patrol Agent, or his/her designee, will ensure that the information or intelligence has a clear nexus to border security. Intelligence will be shared and vetted for border security value, driving the focus of operations. The tactical operational period should focus on specific targets of interest or specific areas of interest identified by the IPT. Once intelligence-driven targets are identified, the IPT will decide on operational objectives that reflect the intended impact of operations. The objectives should outline how the operation will deter, deny, degrade, or dismantle the operational capacity of the targeted transnational criminal organizations.

Local risk factors should predicate the frequency and duration of each tactical operational period. The tactical periods may be broken-down into three, six or twelve-month increments. The tactical operational period may combine to develop an operational cycle that is synchronous or asynchronous, connected, or unconnected, depending on security conditions and the IPT's intent. Each tactical operational period will begin on a predetermined date and end on a predetermined date, but the dates may be subject to change commensurate with emerging security conditions. The starting date of the operational period should be established to allow sufficient time for the order to be submitted and approved by the corresponding USBP Sector and in concurrence with its SAA and USBP Headquarters. The USBP Sectors will upload copies of tactical period operations in the corresponding campaign plan folder in the CBP Stonegarden Data Management System.

The following diagrams illustrate two different approaches for conducting operations:[4]

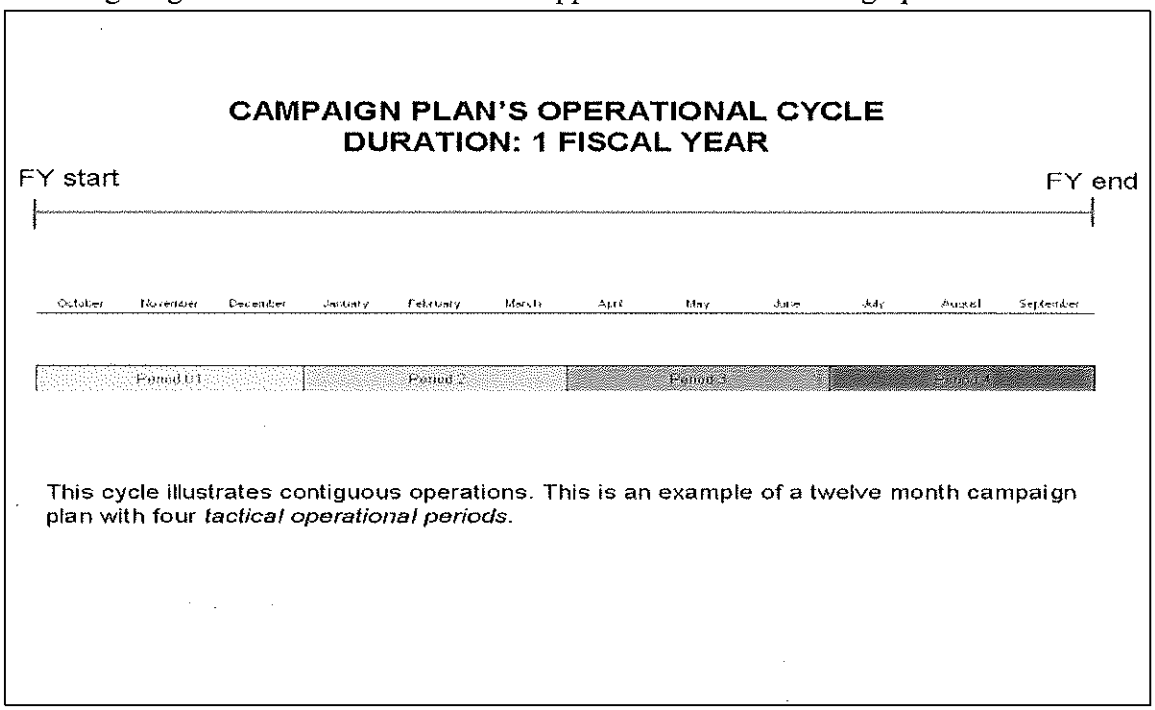


Figure 1: Example of an Ongoing Synchronized Operational Cycle

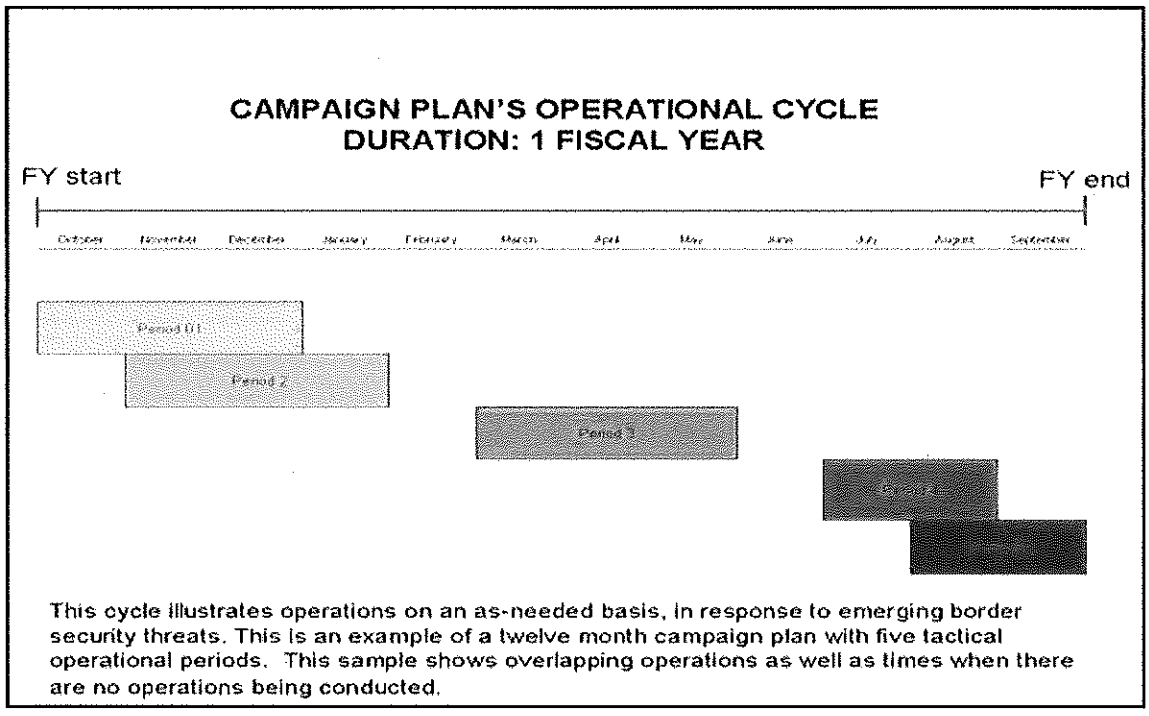


Figure 2: Example of a Dynamic, Unsynchronized Operational Cycle

[4] These illustrations reflect a twelve month campaign plan. A campaign plan should be written to encompass the performance period. Performance periods vary from state to state, please contact the State Administrative Agency for clarification.

III. Reporting Procedures

Participation in OPSG requires accurate, consistent, and timely reporting of how funds are used, and how the state, local and tribal agencies' operations have impacted border security through the mitigation of threat or vulnerability and the overall reduction of risk. Reporting will focus on: monitoring program performance; determining the level of integration and information sharing; and developing best practices for future operations. To ensure consistent reporting each state, local and tribal agency will identify a single point of contact to represent their agency as a member of the IPT and to coordinate the submission of reports or execute other aspects of the grant.

The Daily Activity Report, which can be found by selecting the link for the FY 2018 HSGP NOFO on FEMA's preparedness grants page (https://www.fema.gov/preparedness-non-disaster-grants), is to be used to submit the ongoing results and outputs from OPSG operations conducted. The information and statistics included in the DAR will be delineated by agency (friendly forces). The Daily Activity Report must be submitted to the USBP sector, or the participating agency's OPSG coordinator within 48-hours of the conclusion of each OPSG shift. Subrecipients and Sectors are responsible to ensure that DARs are submitted in the proper format and in a timely manner. DARs will be submitted using the CBP Stonegarden Data Management System. Friendly Forces receiving funding through a subrecipient will submit DARs within 48 hours. Border Patrol Sectors and OPSG subrecipients will implement internal protocols to ensure operational data from subrecipients and friendly force DARs are properly collected following the established guidelines. USBP Sector Coordinators will compile the results from each Daily Activity Report at the end of the month and reconcile with the OPSG subrecipients by the 10th day of the following month. The USBP sector will compile the reconciled results from the participating agencies and submit the results to USBP Headquarters by the 15th of each following month.

In addition to the ongoing reporting of outputs, subrecipient participants will be required to submit After Action Reports to USBP sectors within 10 days of closing the operational PoP for that funding year. The After Action Report should carefully articulate outcomes and outputs, as well as how the results of the operation compare with the objectives identified during the pre-planning meeting. Failure to submit the After Action report in a timely manner may prevent the approval of future operations requests. All AARs and other OPSG reporting requirements will be submitted through the CBP Stonegarden Data Management System. Sectors are responsible for submitting AARs into Border Patrol Enforcement Tracking System (BPETS) as applicable.

IV. Operational Roles and Responsibilities

In order to achieve unity of effort, it is essential that each participant know the roles and responsibilities within the IPT.

The USBP sector's Chief Patrol Agent, or his/her designee, will:

- Coordinate and chair the area Integrated Planning Team's meetings;
- Coordinate with all interested and eligible state, local, tribal, and territorial agencies in the sector's area of operation during the open period of the OPSG application process by:
    - Assisting applicants in completing the operations planning portion of the

application, which is similar to the Operations Order used by the Border Patrol
    - Forwarding the approved operation portion of the application to CBP/USBP Headquarters, as well as to the SAA to complete the application process set by DHS/FEMA/GPD
    - Detailing what operational support the USBP Sector anticipates for specific periods and matching the capabilities of partners to fill those gaps; and
- Following the announcement of grant awards, coordinate and chair a meeting with state, local, tribal, and territorial agencies that received OPSG awards to develop an individualized campaign plan. This includes:
    - Working with state, local, tribal, and territorial agencies, along with other federal law enforcement agencies to determine the dates, focus, and needs of each tactical operational period, ensuring that each operation has a nexus to border security;
    - Receiving the first periodic operations order from the state, local, tribal, and territorial agencies and ensuring that the operation is conducted as outlined in Section I;
    - Monitoring and supporting the Operational Cycle throughout the performance period;
    - Ensuring Daily Activity and After Action Reports are submitted by state, local and tribal agencies in the proper format and within the established timeframes;
    - Providing instruction, when possible, to state, local and tribal agencies regarding techniques, methods, and trends used by transnational criminal organizations in the area;
    - Providing a single point of contact to participants as a subject-matter expert in OPSG that can coordinate, collect, and report operational activities within the established reporting procedures;
    - Providing verification that operations are conducted;
    - Documenting and conducting random, on-site operational verification of OPSG patrols by subrecipients and friendly forces;
    - Verifying that subrecipients are performing OPSG enforcement duties in accordance with the applicable grant, statute, regulatory guidance, and instructions; and
    - Ensuring that grant funds are appropriately expended to meet sector border enforcement operational requirements and assist in enhancing subrecipient/friendly force capabilities in order to provide for enhanced enforcement presence, operational integration, and intelligence sharing in border communities.

The state, local or tribal agency lead, or their designee, will:

- Coordinate with the SAA on all grant management matters, including but not limited to the development and review of operations orders, expenditure of funds, allowable costs, reporting requirements;
- Upon receiving a grant award, coordinate and meet as a member of the Integrated Planning team to develop an individualized campaign plan that

covers the length of the grant performance period;

- Work within the Integrated Planning team to develop an initial Operational Cycle and determine the duration of the first operational period based on the tactical needs specific to the area;
- Submit all operations orders to the SAA for review, and submit the first periodic operations order to the Border Patrol and ensure the operation meets the six criteria established in Section II;
- Conduct operations, on an as-needed basis throughout the length of the grant performance period;
- Integrate law enforcement partners from contiguous counties and towns into their tactical operations to expand the layer of security beyond existing areas;
- Ensure all required reports, including reports from friendly forces, are submitted to the Border Patrol and the SAA, when applicable, in the proper format and within established timeframes;
- Ensure applicable Operation Stonegarden derived data is shared with the designated fusion center in the state and/or Urban Areas.
- Request instruction and information from the SAA, when applicable, and/or Border Patrol and other federal law enforcement agencies regarding techniques, methods, and trends used by transnational criminal organizations in the area; and
- Provide the SAA and Border Patrol a single point of contact that maintains subject-matter expertise in OPSG who can coordinate, collect, and report operational activities within the established reporting procedures.

The SAA will:

- Actively engage in the IPT meetings;
- Work in direct coordination and communication with the local or tribal agency lead on all grant management matters;
- Review all operations orders created by the local or tribal agency;
- Acts as the fiduciary agent for the program and provide expertise in state policy and regulations;
- Enter into a sub-award agreement to disburse the allocated funding awarded through DHS/FEMA/GPD;
- Generate biannual reports to DHS/FEMA capturing the subrecipients' obligation and expenditure of funds;
- Determine if the grant's performance period requires additional refinement over the federally established 36-month period; and
- Conduct audits of the program to ensure that the subrecipients are in compliance with program guidance.

V. Definitions (OPSG only)

Area of Interest: A specific area, areas, or facilities known to be used by transnational criminal organizations in furtherance of their criminal activity.

Campaign Plan: The first Operational Order based on the CONOP aimed at accomplishing a strategic or operational objective within a given time and space.

Concept of Operations (CONOP): A written statement that clearly and concisely expresses what the state, local or tribal commander intends to accomplish and how it will be done using available resources (and funding). It is also the operational equivalent of the OPSG grant application.

Fragmentary Order (FRAGO): A fragmentary order is a modification of the approved campaign plan. After an operation order has been approved, any changes to a campaign plan will be submitted as a FRAGO. Subsequent FRAGO's are permissible.

Friendly Forces: Local law enforcement entities with whom OPSG subrecipients provide funding to support border security operations.

Integrated Planning Team: Group that coordinates on all aspects of OPSG application, planning, and de-briefings.

Operational Cycle: A deliberate on-going cycle of command, staff, and unit activities intended to synchronize current and future operations (driven by current intelligence and short-term goals that support the campaign).

Operational Discipline: The organized manner in which an organization plans, coordinates, and executes the OPSG mission with common objectives toward a particular outcome.

Operation/Operational Order (OO): A formal description of the action to be taken to accomplish or satisfy a CONOP, Campaign Plan, or FRAGO. The OO includes a detailed description of actions to be taken and required logistical needs to execute an operation.

Performance Measure: A numerical expression that quantitatively conveys how well the organization is doing against an associated performance goal, objective, or standard.

Risk: Potential for an adverse outcome assessed as a function of threats, vulnerabilities, and consequences associated with an incident, event, or occurrence.

Tactical Operational Period: An operational segment that meets the following six criteria: 1) specified beginning and ending dates; 2) begins with pre-planning; 3) is intelligence-driven; 4) uses targeted enforcement techniques; 5) has clearly stated objectives; and 6) concludes with an after-action meeting.

Targeted Enforcement: The leveraging of all available assets against a specific action, area, individual, or organization and using those deemed most appropriate to mitigate risk.
Target of Interest: A specific person, group of persons, or conveyance known to be part

of, or used by transnational criminal organizations to advance their criminal activity.

Threat: Information expressing intent to conduct illegal activity often derived from intelligence sources, the overall context, a specific event or series of events, or observation of suspicious activity.

Tier: Tier refers to the geographical location of a municipality, county or tribe with respect to the border, i.e., Tier 1 is a county located on the border; a Tier 2 county is a county contiguous to a Tier 1 county. A Tier 3 is a county not located on the physical border; a Tier 3 county is a county contiguous to a Tier 2 county.

Unity of Effort: Coordination and cooperation among all organizational elements, even though they may not be part of the same "command" structure, to achieve success.

Vulnerability: The protective measures in place are less than the protective measures needed to mitigate risk.

Appendix F – FY 2018 HSGP Allowable Cost Matrix

Allowable Program Activities [6]	SHSP	UASI	OPSG
Allowable Planning Costs			
Developing hazard/threat-specific annexes that incorporate the range of prevention, protection, response, and recovery activities	Y	Y	N
Developing and implementing homeland security support programs and adopting ongoing DHS/FEMA national initiatives	Y	Y	N
Developing related terrorism and other catastrophic event prevention activities	Y	Y	N
Developing and enhancing plans and protocols	Y	Y	N
Developing or conducting assessments	Y	Y	N
Hiring of full- or part-time staff or contract/consultants to assist with planning activities only to the extent that such expenses are for allowable activities within the scope of the grant (not for the purpose of hiring public safety	Y	Y	N
Materials required to conduct planning activities	Y	Y	N
Travel/per diem related to planning activities	Y	Y	Y
Overtime and backfill costs (in accordance with operational Cost Guidance)	Y	Y	Y
Issuance of WHTI-compliant Tribal identification cards	Y	N	N
Activities to achieve planning inclusive of people with disabilities and others with access and functional needs and limited English proficiency.	Y	Y	N
Coordination with Citizen Corps Councils for public information/education and development of volunteer programs	Y	Y	N
Update governance structures and processes and plans for emergency communications	Y	Y	N
Activities to achieve planning inclusive of people with limited English proficiency	Y	Y	Y
Allowable Organizational Activities Note: Personnel hiring, overtime, and backfill expenses are permitted under this grant only to the extent that such expenses are for the allowable activities within the scope of the grant.			
Reimbursement for select operational expenses associated with increased security measures at critical infrastructure sites incurred (up to 50 percent of the allocation)	Y	Y	N
Overtime for information, investigative, and intelligence sharing activities (up to 50 percent of the allocation)	Y	Y	Y
Hiring of new staff positions/contractors/consultants for participation in information/intelligence analysis and sharing groups or fusion center activities (up to 50 percent of the allocation).	Y	Y	N
Allowable Equipment Categories			
Personal Protective Equipment	Y	Y	Y
Explosive Device Mitigation and Remediation Equipment	Y	Y	N
CBRNE Operational Search and Rescue Equipment	Y	Y	N
Information Technology	Y	Y	Y
Cybersecurity Enhancement Equipment	Y	Y	N
Interoperable Communications Equipment	Y	Y	Y
Detection	Y	Y	Y
Decontamination	Y	Y	N
Medical	Y	Y	Y
Power (e.g., generators, batteries, power cells)	Y	Y	Y
CBRNE Reference Materials	Y	Y	N
CBRNE Incident Response Vehicles	Y	Y	N
Terrorism Incident Prevention Equipment	Y	Y	Y
Physical Security Enhancement Equipment	Y	Y	Y

[6] Current as of publication for FY 2018 Programs. This list is not all-inclusive. See the respective program guidance for additional details and/or requirements

Allowable Program Activities [6]	SHSP	UASI	OPSG
Inspection and Screening Systems	Y	Y	Y
Animal Care and Foreign Animal Disease	Y	Y	N
CBRNE Prevention and Response Watercraft	Y	Y	N
CBRNE Aviation Equipment	Y	Y	N
CBRNE Logistical Support Equipment	Y	Y	N
Intervention Equipment (e.g., tactical entry, crime scene processing)	Y	Y	Y
Other Authorized Equipment	Y	Y	Y
Allowable Training Costs			
Overtime and backfill for emergency preparedness and response personnel attending DHS/FEMA-sponsored and approved training classes	Y	Y	Y
Overtime and backfill expenses for part-time and volunteer emergency response personnel participating in DHS/FEMA training	Y	Y	Y
Training workshops and conferences	Y	Y	Y
Activities to achieve training inclusive of people with disabilities and others with access and functional needs and limited English proficiency	Y	Y	N
Full- or part-time staff or contractors/consultants	Y	Y	Y
Travel	Y	Y	Y
Supplies	Y	Y	N
Instructor certification/re-certification	Y	Y	N
Coordination with Citizen Corps Councils in conducting training exercises	Y	Y	N
Interoperable communications training	Y	Y	N
Activities to achieve planning inclusive of people with limited English proficiency.	Y	Y	N
Allowable Exercise Related Costs			
Design, Develop, Conduct, and Evaluate an Exercise	Y	Y	N
Full- or part-time staff or contractors/consultants	Y	Y	N
Overtime and backfill costs, including expenses for part-time and volunteer emergency response personnel participating in DHS/FEMA exercises	Y	Y	N
Implementation of HSEEP	Y	Y	N
Activities to achieve exercises inclusive of people with disabilities and others with access and functional needs.	Y	Y	N
Travel	Y	Y	N
Supplies	Y	Y	N
Interoperable communications exercises	Y	Y	N
Activities to achieve planning inclusive of people with limited English proficiency.	Y	Y	N
Allowable Management & Administrative Costs			
Hiring of full- or part-time staff or contractors/consultants to assist with the management of the respective grant program, application requirements, and compliance with reporting and data collection requirements	Y	Y	Y
Development of operating plans for information collection and processing necessary to respond to DHS/FEMA data calls	Y	Y	Y
Overtime and backfill costs	Y	Y	Y
Travel	Y	Y	Y
Meeting related expenses	Y	Y	Y
Authorized office equipment	Y	Y	N
Recurring expenses such as those associated with cell phones and faxes during the PoP of the grant program	Y	Y	N
Leasing or renting of space for newly hired personnel during the PoP of the grant program	Y	Y	N

Appendix G – FY 2018 HSGP Supplemental Material

GPD collaborates with various subject-matter experts and acknowledges the value and expertise these federal partner agencies provide to help shape the development and implementation of the HSGP. This continued partnership and collaboration helps provide recipients with the greatest number of resources required to effectively manage and implement funds as well as promote transparency. Therefore, GPD is providing hyperlinks to information on various subjects and policies that are relevant to the mission and intent of the DHS/FEMA and its preparedness grant programs.

Radiological/Nuclear Detection
The Domestic Nuclear Detection Office (DNDO) is charged with coordinating the development of the global nuclear detection and reporting architecture for a managed and coordinated response to radiological and nuclear threats. This is achieved through planning and coordination efforts with partners from federal, state, local, tribal, territorial, and international governments and the private sector. To support these efforts, DNDO has developed a Radiological/Nuclear Detection Supplemental Resource to provide guidance to stakeholders seeking to build or sustain preventive radiological and nuclear detection capabilities using DHS/FEMA preparedness grants. The guidance outlines integrating these capabilities with broader national preparedness initiatives, including PPD-8 and THIRA, as well as the Global Nuclear Detection Architecture using POETE-aligned activities. For more information, refer to http://www.dhs.gov/publication/homeland-security-grant-program-hsgp-supplemental-resource-radiologicalnuclear-detection.

National Information Exchange Model (NIEM)
NIEM is a common vocabulary that enables efficient information exchange across diverse public and private organizations. NIEM can save time and money by providing consistent, reusable data terms and definitions and repeatable processes. To support information sharing, all recipients of grants for projects implementing information exchange capabilities are required to use NIEM and to adhere to the NIEM conformance rules. Got to https://niem.gov/grants for guidance on how to utilize DHS/FEMA award funding for information sharing, exchange, and interoperability activities.

The NIEM Emergency Management domain supports emergency-related services (including preparing first responders and responding to disasters), information sharing, and activities such as homeland security and resource and communications management. The Emergency Management domain has an inclusive governance structure that includes federal, state, local, industry, and, where necessary, international partnerships. The NIEM Emergency Management domain is committed to community support via technical assistance and NIEM training. For more information on the NIEM Emergency Management domain, to request training or technical assistance or to just get involved, go to https://niem.gov/EM.

Integrated Public Alert and Warning System (IPAWS)
The 2018 IPAWS Supplemental Guidance on Public Alert and Warning provides guidance on eligible public alert and warning activities and equipment standards for prospective state, local, tribal, and territorial recipients. The intent of this document is to promote consistency in policy across federal grant programs and to ensure compatibility among federally-funded projects. For

more information on the IPAWS, go to https://www.fema.gov/informational-materials.

Homeland Security Information Network
HSIN is a user-driven, web-based, information sharing platform that connects all homeland security professionals including the Department of Homeland Security (DHS) and its federal, state, local, tribal, territorial, international, and private sector partners across all homeland security mission areas. HSIN is used to support daily operations, events, exercises, natural disasters, and incidents. To support user mission needs, HSIN provides three sets of services for secure information sharing. The first service provides a shared place for communities to securely collaborate on homeland security issues and includes core functions such as a web conferencing and instant messaging tools with white boarding, video, and chat services for real-time communication and situational awareness. The second set provides secure dissemination and sharing capabilities for homeland security alerts, reports, and products. The third set allows users to access and query a variety of shared data and services from all homeland security mission areas and trusted federal partners. Preparedness grant funds may be used to support planning, training and development costs associated with developing and managing, mission-critical, HSIN communities of interest and sites. Learn more about HSIN at http://www.dhs.gov/hsin-hsgp-guidance.

GSA's State and Local Purchasing Programs
The U.S. General Services Administration (GSA) offers two efficient and effective procurement programs for State and local and governments and certain other non-Federal entities, to purchase products and services directly from pre-vetted contractors, to fulfill homeland security and technology needs. The GSA Schedules (also referred to as the Multiple Award Schedules and the Federal Supply Schedules) are long-term government-wide contracts with commercial firms that provide access to millions of commercial products and services at volume discount pricing. For further information, refer to the section on Procurement Integrity in this NOFO and 2 C.F.R. §§ 200.317 – 200.326.

Cooperative Purchasing (www.gsa.gov/cooperativepurchasing)
Cooperative Purchasing, authorized by statute, allows state and local governments to purchase under specific GSA Federal Supply Schedule (also known as Multiple Award Schedules (MAS) and Schedules) contracts to save time, money, and meet their everyday needs and mission. State and local governments are authorized to purchase IT products, software and services found under **Federal Supply Schedule 70** and the IT-related categories under the Consolidated Schedule through the introduction of Cooperative Purchasing, and state and local governments may purchase alarm and signal systems, facility management systems, firefighting and rescue equipment, law enforcement and security equipment, marine craft and related equipment, special purpose clothing, and related services as contained in **Federal Supply Schedule 84** (or any amended or subsequent version of that Federal supply classification group).

Disaster Purchasing (www.gsa.gov/disasterpurchasing)
Disaster Purchasing, authorized by statute, allows state and local governments access to all Federal Supply Schedules, for the purchase of products and services to facilitate disaster preparedness or response or recovery from major disasters declared by the

president under the Robert T. Stafford Disaster Relief and Emergency Assistance Act OR to facilitate recovery from terrorism, or nuclear, biological, chemical, or radiological attack.

State, Local, Tribal and Territorial (SLTT) Cybersecurity Engagement Program
The DHS Office of Cybersecurity and Communications (CS&C), within the National Protection and Programs Directorate, is responsible for enhancing the security, resilience, and reliability of the Nation's cyber and communications infrastructure. CS&C works to prevent or minimize disruptions to critical information infrastructure in order to protect the public, the economy, and government services. CS&C leads efforts to protect the federal ".gov" domain of civilian government networks and to collaborate with the private sector—the ".com" domain—to increase the security of critical networks.

The DHS SLTT Cybersecurity Engagement Program within CS&C was established to help non-federal public stakeholders and associations manage cyber risk. The program provides appointed and elected SLTT government officials with cybersecurity risk briefings, information on available resources, and partnership opportunities to help protect their citizens online. Through these and related activities, the program coordinates the Department's cybersecurity efforts with its SLTT partners to enhance and protect their cyber interests. More information on all of the DHS CS&C resources available to support SLTT governments is available at https://www.us-cert.gov/ccubedvp.

Regional Resiliency Assessment Program (RRAP)
The Regional Resiliency Assessment Program (RRAP) is a cooperative assessment of specific critical infrastructure within a designated geographic area and a regional analysis of the surrounding infrastructure that address a range of infrastructure resilience issues that could have regionally and nationally significant consequences. These voluntary, non-regulatory RRAP projects are led by the Office of Infrastructure Protection (IP), within the Department of Homeland Security's National Protection and Programs Directorate, and are selected each year by the Department with input and guidance from Federal, State, and local partners. For additional information on the RRAP, visit https://www.dhs.gov/regional-resiliency- assessment-program.

Law Enforcement Support Office, or 1033 Program
LESO facilitates a law enforcement support program, which originated from the National Defense Authorization Act of Fiscal Year 1997. This law allows the transfer of excess Department of Defense property that might otherwise be destroyed by law enforcement agencies across the United States and its territories.

No equipment is purchased for distribution. All items were excess which had been turned in by military units or had been held as part of reserve stocks until no longer needed. Requisitions cover the gamut of items used by America's military -- clothing and office supplies, tools, and rescue equipment, vehicles, small arms, and more. There is no fee for the equipment itself, however, the law enforcement agencies are responsible for the shipping costs.

For additional information on the LESO, please visit
http://www.dla.mil/DispositionServices/Offers/Reutilization/LawEnforcement.aspx

Appendix H – Fusion Center Performance Measures

Reference Number	Performance Measures
2018.1	Percentage of federal Information Intelligence Reports (IIRs) originating from fusion center information that address a specific Intelligence Community need
2018.2	Percentage of evaluation federal IIRs originating from fusion center information that the Intelligence Community otherwise used in performing its mission (e.g., contained first-time reporting; corroborated existing information; addressed a critical intelligence gaps; or helped define an issue or target).
2018.3	Percentage of fusion center distributable analytic products that address a specific Intelligence Community need
2018.4	Number of Suspicious Reports (SAR) vetted and submitted by fusion centers that result in the initiation or enhancement of an investigation by the Federal Bureau of Investigation (FBI)
2018.5	Number of SAR vetted and submitted by fusion centers that involve an individual on the TSC Watchlist
2018.6	Percentage of Requests for Information (RFIs) from the Terrorist Screening Center (TSC) for which fusion centers provided information for a TSC case file
2018.7	Percentage of I&A Watchlist nominations that were initiated or updated existing case files based on information provided by fusion centers
2018.8	Number of distributable analytic products co-authored by one or more fusion centers and/or federal agencies
2018.9	Percentage of fusion center distributable analytic products that address Homeland Security topics
2018.10	Percentage of fusion center distributable analytic products that address state/local customer information needs
2018.11	Percentage of key customers reporting that they are satisfied with fusion center products and services
2018.12	Percentage of key customers reporting that fusion center products and services are relevant
2018.13	Percentage of key customers reporting that fusion center products and services are timely for mission needs
2018.14	Percentage of key customers reporting that fusion center products and services influenced their decision making related to threat response activities within their AOR
2018.15	Percentage of key customers reporting that fusion center products and services resulted in increased situational awareness of threats within their AOR
2018.16	Number of tips and leads vetted by the fusion center
2018.17	Number of tips and leads vetted by the fusion center that were provided to other F/SLTT agencies for follow up action
2018.18	Number of responses to RFIs from all sources
2018.19	Number of situational awareness products developed and disseminated by fusion centers
2018.20	Number of case support and/or tactical products developed and disseminated by fusion centers
2018.21	Percentage of federally designated special events in which fusion centers played a direct role
2018.22	Percentage of federally declared disasters in which fusion centers played a direct role
2018.23	Number of public safety incidents in which fusion centers played a direct role

Appendix I – Supplemental Emergency Communications Guidance

Lessons learned from recent major disasters, unplanned events, and full-scale exercises have identified a need for greater coordination of emergency communications among senior elected officials, emergency management agencies, and first responders at all levels of government. Federal responders arriving on the scene of a domestic incident are not always able to communicate with state, local, tribal and territorial response agencies, as well as key government officials. State and local first responders sometimes experience similar problems, particularly when the incident requires a multi-agency, regional response effort, or when primary communications capabilities fail. This lack of operability and interoperability between Federal, state, local, tribal, and territorial agencies – further complicated by problems with communications survivability and resilience – has hindered the ability to share critical information, which can compromise the unity-of-effort required for an effective incident response.

Departments and agencies at all levels of government have identified a need for improvement in a number of high-priority areas, including: Governance, Planning, Training and Exercises, Operational Coordination, and Technology. In addition, communications resilience and continuity should be viewed as a critical component within each of these areas. These priorities are explained in detail in Section 2 of the FY 2018 SAFECOM Guidance on Emergency Communications Grants *(SAFECOM Guidance)*. By addressing these priorities, which are reflective of proven best practices, emergency communications can be significantly improved at all levels of government. The end goal is to ensure operable, interoperable, and resilient communications that maintain a continuous flow of critical information, under all conditions, among multi-jurisdictional and multi-disciplinary emergency responders, command posts, agencies, critical infrastructure sectors, and government officials for the duration of an emergency response operation, and in accordance with the National Incident Management System (NIMS) and the National Emergency Communications Plan (NECP), which describes goals and objectives for improving emergency communications nationwide.

To help meet this goal, the *SAFECOM Guidance* outlines requirements for grant applications, including alignment to national, regional, and state communications plans (e.g., NECP, Statewide Communications Interoperability Plan (SCIP), Tactical Interoperability Communications Plan (TICP), FEMA Regional Emergency Communications Plan (RECP), project coordination, and technical standards for emergency communications technologies. SCIPs define the current and future direction for interoperable and emergency communications within a state or territory, while TICPs are designed to allow urban areas, counties, regions, states/territories, tribes, or Federal Departments/Agencies to document interoperable communications governance structures, technology assets, and usage policies and procedures. In addition, FEMA's formal planning process has produced 10 RECPs and their associated State and/or Tribal/Territorial Annexes that identify emergency communications capability shortfalls and potential resource requirements. Grant recipients are encouraged to leverage these planning resources as a source of input and reference for all emergency communications grant applications and investment justifications.

In addition, DHS/FEMA formally recognizes several statewide emergency communications governance bodies (e.g., Statewide Interoperability Coordinator (SWIC), Statewide Interoperability Governing Body [SIGB], Statewide Interoperability Executive Committee (SIEC), FirstNet State

Single Point of Contact (SPOC)), and strongly encourages grant recipients to closely coordinate with these entities when developing an emergency communications investment to ensure projects support the state or territory's strategy to improve their communications capabilities with the goal of achieving fully operable, interoperable, and resilient communications. In addition, grantees should work with public and private entities, and across jurisdictions and disciplines, to demonstrate engagement with the Whole Community in accordance with Presidential Policy Directive-8 (PPD-8).

For regional, cross-border initiatives, DHS/FEMA requires applicants to coordinate projects with national level emergency communications coordination bodies, such as the National Committee of Statewide Interoperability Coordinators (NCSWIC) and the Regional Emergency Communications Coordination Working Groups (RECCWGs). The NCSWIC promotes and coordinates state level activities designed to ensure the highest level of public safety communications across the nation. RECCWGs are congressionally mandated planning and coordination bodies located in each FEMA Region that and provide a collaborative forum to assess and address the survivability, sustainability, operability, and interoperability of emergency communications systems at all levels of government. Grant-funded investments that are coordinated with these bodies will help ensure that Federally-funded emergency communications investments are interoperable and support national policies.

Resilient Communications Guidance

Nothing better demonstrates a modern nation than its ability to effectively communicate. The risk imposed by the reliance on communication systems by government and the private sector can be reduced by understanding dependencies, analyzing effects, and taking action. Entities planning to use HSGP funding for communications investments are encouraged to work with State Emergency Management Agencies, SWICs, SIGBs, and appropriate stakeholders at the regional, state, local, territorial, and tribal levels to:

- Establish robust, resilient, reliable and interoperable communications capabilities. Account for the mission impact of communication system disruptions in your planning.
- Ensure mission-related communications (voice, video, data and network security requirements) are adequately planned for and understood. It is important to maintain current documentation of your communication systems architecture and perform regular audits. Your ability to continue operations is dependent on the availability of and access to communications systems with sufficient resiliency, redundancy, and accessibility to perform essential functions and provide critical services during a disruption.
- Ensure critical communication systems connectivity among key government leadership, internal elements, other supporting organizations, and the public under all conditions. As such, organizations should ensure current copies of vital records, including electronic files and software, are backed-up and maintained off-site.
- Ensure all communications systems/networks are traced from end to end to identify all Single Points of Failure (SPF). In doing so, grantees should work with communication service providers to add redundancy at key critical infrastructure facilities as needed.
- Ensure key communication systems resiliency through:
    - Ensuring availability of backup systems;
    - Ensuring diversity of network element components and routing;
    - Ensuring geographic separation of primary and alternate transmission media;

- Ensuring availability of back-up power sources;
- Ensuring availability and access to systems that are not dependent on commercial infrastructure;
- Maintain spares for designated critical communication systems; and
- Work with commercial suppliers to remediate communication Single Points of Failure.

- All communications system owners are encouraged to address the following issues:
  - Integrate communications needs into continuity planning efforts by incorporating mitigation options to ensure uninterrupted communications support;
  - Establish a cybersecurity plan that includes continuity of a communications component such as Radio Frequency (RF)-based communications that do not rely on public infrastructure.
  - Maintain communications capabilities to ensure their readiness when needed;
  - Frequently train and exercise personnel required to operate communications capabilities;
  - Test and exercise communications capabilities; and
  - Consider Electromagnetic Pulse (EMP) protective measures for communications systems where practical.

DHS/FEMA Communications Support Services

DHS Office of Emergency Communications (OEC) and FEMA offer a variety of technical assistance and other support services to assist state and local entities in their efforts to comply with the above requirements, including the *SAFECOM Guidance*, with the goal of ensuring interoperable and resilient emergency communications. A summary of DHS/FEMA support services is provided below. Grant recipients are encouraged to refer to the respective websites for additional information.

DHS OEC Support:

To assist in these efforts, DHS established OEC, which assists agencies through a myriad of services, to include direct technical assistance and training provided at no cost to the jurisdiction. The TA offerings include (but are not limited to):

- Enhanced Governance Structure – Enhanced SCIP Workshop
- Communications Unit (COMU) Policy and Planning Development at the State and County Level
- COMU Assistance under Emergency Management Assistance Compact (EMAC)
- Next Generation 9-1-1 (NG9-1-1)
- Alerts and Warnings
- Continuity Planning

Information on these services is available at https://www.dhs.gov/ictapscip-resources and https://www.dhs.gov/oec-technical-assistance-program.

FEMA Disaster Emergency Communications Division (DEC) Support:

DEC has developed State Communications Annexes for all of the 56 States and Territories. DEC provides technical assistance, coordinated through the FEMA Region, Regional Emergency Communications Coordinator (RECC) in scheduling with the State and Territories major updates to

the Annexes. Major updates are scheduled on a 3-5 year cycle. FEMA DEC supports the major update with a team of communications and emergency management specialists that facilitate a process of interaction with state representatives. This process is coordinated through the SWICC or State designated representative. All documentation is the responsibility of the FEMA support team and validated through state interaction.

Minor yearly updates to the State Annexes is accomplished through the RECCWG process. FEMA DEC support staff, working in coordination with the Region Specific RECC, incorporate pertinent update information provided by State and local Representatives. Additionally, operational information identified through exercises and incident response activities is a source of update data. The FEMA RECC, with the support of the DEC team, is responsible for maintaining the State Annexes – changes and modifications to the Annexes are validated with the State through RECC coordination with the SWIC or designated state representative.

FEMA National Preparedness Directorate (NPD) Support:
NPD provides training, exercises, and technical assistance to state, local, tribal and territorial (SLTT) stakeholders that support operational and emergency communications. Descriptions and resources specific to operational communication are available on FEMA's website (https://www.fema.gov/core-capability-development-sheets) within the Response Mission Area and include the following information to support jurisdictions:

- Description of the operational communications core capability
- Training for building and sustaining operational communication with specific course titles
    - Trainings can also be found at https://www.firstrespondertraining.gov/frt/.
- Example capability targets to complete a Threat and Hazard Identification and Risk Assessment
    - Help in developing targets can be requested at FEMA-SPR@fema.dhs.gov
- Resources Types that support operational communications
    - Additional resource types and position qualifications can be found at https://rlt.preptoolkit.fema.gov
- Tools to validate capabilities through exercises
    - Technical assistance and support from subject matter experts can be requested through www.fema.gov/national-exercise-program

FEMA National Continuity Programs (NCP) Support:
NCP's support services focus on holistic continuity planning, of which communications continuity is an important component. Currently, continuity communications training and technical assistance is limited to the FEMA National Radio System (FNARS) and the Integrated Public Alert and Warning System (IPAWS), and is delivered either on an ad hoc basis at the request of the State entity, through a FEMA Region, or via a requirement for terms of use. Entities interested in NCP support services should contact FEMA-CGC@fema.dhs.gov or consult NCP's Continuity Resources Toolkit webpage at https://www.fema.gov/continuity-resource-toolkit.

FirstNet
The Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, as amended (codified in part at 47 U.S.C. §§ 1401-1473) established the First Responder Network Authority (hereinafter FirstNet Authority) as an independent authority within the National

Telecommunications and Information Administration ("NTIA").[1] The FirstNet Authority's statutory mission to establish a nationwide public safety broadband network (FirstNet).[2] FirstNet uses the 700 MHz D block spectrum to provide Long-Term Evolution (LTE)-based broadband services and applications to public safety entities.[3] FirstNet became operational in March 2018 and is based on a single, national network architecture that will evolve with technological advances and initially consist of a core network and radio access network (RAN).

FirstNet will provide public safety entities with mission-critical broadband data capabilities and services including, but not limited to messaging, image sharing, video streaming, group text, voice, data storage, application, location-based services, and Quality of Service, Priority, and Preemption. Public safety entities seeking to enhance their operational capabilities using broadband technology may seek grant funding to support the following:

- **Planning for integration** of information technology (IT) infrastructure, software, and site upgrades necessary to connect to FirstNet.
- **Handheld broadband devices** including smartphones, feature phones, tablets, wearables, push-to-talk (PTT) devices.
- **Vehicle-mounted or otherwise field operated data devices** such as ruggedized laptops.
- **Network access devices** including portable Wi-Fi devices, Universal Serial Bus (USB) modems/dongles, trunk-mounted modems, routers.
- **Customer Owned and Managed (COAM) broadband deployable equipment**, enabling public safety to own and dispatch coverage expansion or capacity enhancement equipment within their jurisdiction.
- **Broadband device accessories** that enable efficient and safe public safety operations such as headsets, belt clips, earpieces, remote Bluetooth sensors, ruggedized cases.
- **Subscriber Identification Modules (SIMs)/Universal Integrated Circuit Cards (UICCs)** to allow public safety users to update existing devices to operate on public safety prioritized services.
- **One-time purchase and subscription-based applications** for public safety use which could include, among a number of other options, enterprise mobility management (EMM), mobile device management (MDM), mobile Virtual Private Network (VPN), identify services, or cloud service tools.

As FirstNet is built out in all 56 states and territories and coverage and capacity for first responders expands, recipients are strongly encouraged to coordinate with the Statewide Interoperability Coordinator (SWIC) and FirstNet on (1) the planning, deployment timelines, and operational availability of the network deployment within a specific state or territory; (2) to ensure the project does not conflict with network planning efforts; and (3) that the project complies with all technical requirements. FirstNet requires participating agencies to demonstrate a subscription to public safety-prioritized broadband services to purchase FirstNet broadband devices or applications. **Information Bulletin #386 is hereby rescinded as the technical requirements and nationwide network architecture has been developed, and FirstNet is operational.** Recipients, however, must coordinate with FirstNet in advance of any strategic acquisition of broadband LTE equipment

[1] 47 U.S.C. § 1424(a).
[2] 47 U.S.C. § 1426(b).
[3] 47 U.S.C. §§ 1401(2), 1421(a).

to ensure that purchases adhere to all applicable standards for public safety entities. Recipients with questions on FirstNet should contact info@firstnet.gov. Refer to the FY 2018 SAFECOM Guidance for additional guidance.

EXHIBIT G

LOS ANGELES COUNTY/DEPARTMENT OF AUDITOR-CONTROLLER

SHARED SERVICES DIVISION

GRANT PAYMENT REQUEST

SECTION A: SUBMITTING YOUR REQUEST

Please submit Grant Payment Request Form along with **legible** supporting documents to:

Grants@auditor.lacounty.gov

In the event e-mail is not available, you can mail your Grant payment request to (please do **not** fax or send duplicates):

Department of Auditor-Controller
Shared Services Division / Attn: Grants Unit
3470 Wilshire Blvd., Suite 812
Los Angeles, CA 90010

1. Grant Name & Year:

SECTION B: SUB-RECIPIENT'S INFORMATION

1. Sub-recipient's Name: (reimbursement check will be made payable to a payee entered	3. Taxpayer ID #:	4. Contact's Name:
2. Mailing Address (please let us know where you want your check delivered, including attention line if necessary):		4. Contact's phone:
		4. Contact's e-mail:

SECTION C: DETAIL PAYMENT REQUEST INFORMATION

1. SOLUTION AREA (e.g. equipment, training, planning, exercise, organization)	2. PROJECT # (e.g. 011.22)	4. EHP required? (Environmental & Historic Preservation)		5. VENDOR'S INVOICE # (Maximum of 5 Invoices)	6. PURCHASE METHOD (including Training)			7.CLAIM AMOUNT (indicate the amount per each line)
		No	Yes (attach State Approval)		If Competitive, indicate the # of bids.	Non-Competitive Bid	Sole Source	
					8. TOTAL		$	-

SECTION D: SUB-RECIPIENT'S CERTIFICATION

I certify that (please use the checkbox):

☐ 1. I am the duly authorized officer of the claimant herein and this claim is in all respect true and correct. All expenditures were made in accordance with applicable laws, rules, regulations and grant conditions and assurances.

☐ 2. All instructions for this form were followed and all the supporting documentation (per instructions) is included with this claim.

3. _____ _____
AUTHORIZED SIGNATURE DATE

4. _____ _____
AUTHORIZED PRINTED NAME AUTHORIZED TITLE

5. AUTHORIZED CONTACT INFORMATION (**If different from Section B**):

PHONE # _____

E-MAIL: _____

SECTION E: FOR SSD USE ONLY

STAMP WITH RECEIVED DATE HERE:

ASSIGNED INVOICE NO.:

NOTE: This Form is intended for Internal SSD review purpose only.

Revised on December 2019

COUNTY OF LOS ANGELES

DEPARTMENT OF AUDITOR-CONTROLLER / SHARED SERVICES DIVISION

INSTRUCTIONS TO COMPLETE THE GRANT PAYMENT REQUEST

Purpose of these instructions:

To assist sub-recipients in completing the Grant Payment Request. We appreciate your participation in this program, for questions or suggestions please use our e-mail below to contact us. **Please do not send these instructions to us, they are to be used for your guidance only.**

SECTION A: GENERAL INSTRUCTIONS FOR SUBMISSION OF GRANT PAYMENT REQUEST

In numeral 1 of this section, please enter the name and year of the grant program that you are submitting for payment. In addition, please help us expedite the process of your Homeland Security claims by:

- Completing the Grant payment request correctly and according to these instructions.
- Submitting your Grant payment request using our e-mail --> **Grants@auditor.lacounty.gov** (please do **not** fax documents).
- Sending your Grant payment request only once (we do not require original documents and duplicates will slow down our process).
- Using the checkboxes to ensure all the required supporting documents and files accompany your Grant payment request. Supporting documents are flagged for your convenience with a checkbox within the corresponding areas.
- Ensuring that all documents attached to your Grant payment requests are legible.
- Submitting Grant payment request timely. We do **not** guarantee the process of Grant payment requests that are submitted late or too close to the final due date. Reimbursable expenditures need to be charged within the performance period of the grant and submitted to us as soon as they are incurred.

SECTION B: SUB-RECIPIENT'S INFORMATION

The following numerals provide the instructions to fill in the corresponding numeral in the form:

1. Please enter the name of the agency requesting for payment. The name of the agency should be typed according to its signed agreement and as you need it to appear in the payee line of the reimbursement check.
2. Please enter the complete address (street number and name, city, zip code) and attention line where you will need to receive the reimbursement check. Please note that this is not necessary for L.A. County departments.
3. Please enter the tax ID of the governmental entity requesting payment. Please leave blank for L.A. County departments.
4. Please enter the information of the person that can assist us with detail claim questions.

SECTION C: DETAIL PAYMENT REQUEST INFORMATION

In order to expedite your Grant payment request, in this area's grid, include a **maximum of five (5) invoices or reimbursements charges (one charge or one invoice per line)**. The invoices or charges need to share the same solution area, project #.

The following numerals provide the instructions to fill in the corresponding numeral in the form:

1. Enter the solution area corresponding to the claim. This information is found in the latest budget of the grant. Examples of solution areas are: equipment, training, planning or exercise.
2. Enter the project # corresponding to the claim. This information is found in the latest budget of the grant. An example of Item # is 17.020.
4. Check with an X under either yes or no according to the claim's Environmental & Historical Preservation (EHP) requirements from the State. EHP approval needs to be obtained from the State **prior** to the start of the project on certain equipment items (see AEL description) or training/exercise projects. Please attach the following:

   a) ☐ **State EHP Approval:** if required by the state for your claim.

SECTION C: (Continued)

5. If the expenditures that you are claiming were purchased thru a vendor or contractor, please enter the invoice # in the grid area. Please note that you are responsible for following acceptable purchasing policies and for documenting your procurement process. Additionally please include the following documentation with your claim:

   a) ☐ **Copy of the invoice**: Please attach an invoice that provides sufficient information to be used as a cross reference with the items described in your grant line item and AEL #. When the invoice includes items that are not being claimed or that belong to different claims or grants, please circle and designate on the invoice the items that you are requesting for reimbursement. Each item circled must have a project #, a funding source, and a total. Purchase orders and price quotes will not be accepted in the place of the invoice.

   b) ☐ **Copy of the purchase order**

   c) ☐ **Print out of the corresponding AEL # (Authorized Equipment List number).** The AEL listing can be found at: https://www.rkb.us/fema_grants.cfm

   d) ☐ **Proof of payment of the invoice:** The proof of payment for L.A. County Departments is the printout from e-CAPS showing that the check cleared the bank. The proof of payment for **other** than L.A. County Department is the corresponding copy of the bank's cleared check .

   e) ☐ **Calculations for use tax paid:** When use tax is paid, clearly show the calculations of the use tax in the invoice included in your claim.

   f) ☐ **Proof of payment of the use tax**: Please provide official documents which authenticate the remittance of the use tax to the state, the amount and the reference to the invoice being claimed.

   g) ☐ **Federal Debarment Listing:** Please provide a screen print out of the queried Federal Debarment Listing at http://www.sam.gov/portal/public/SAM. (you will need a username and a password; if you don't please create an account) . The listing needs to be queried **prior** to the selection of the vendor.

6. If you are claiming services, supplies, training related costs, or any other type of items purchased thru a vendor or contractor or government agency, please indicate with an X the method that you used to acquire the items (do **not** leave blank or mark more than one). Please note that competitive bid, non-competitive bid or sole source are the only valid purchasing methods.

   a) ☐ **Competitive Bid:** for projects that received more than one bid. Please indicate number of bids received (must be more than one).

   b) ☐ **Non-Competitive Bid:** for single bid purchases of $250,000 or more (effective June 21, 2018) to a single vendor or a single project, please attach the approval from the State. The approval needs to be requested from the State **prior** to the start of the project.

   c) ☐ **Sole Source:** for non-bid purchases of $250,000 or more effective (June 21, 2018) to a single vendor or a single project, please attach the approval from the State. The approval needs to be requested from the State **prior** to the start of the project.

7. Enter the amount of your claim after you verify that your budget is sufficient to cover your request. When the amount of the budget is not sufficient, please let your Program Coordinator know of the possible need for budget modification.
8. Enter the "Total Amount" by adding the subtotal claims included in each line.

SECTION D: SUB-RECIPIENT'S CERTIFICATION

The following numerals provide the instructions to fill in the corresponding numeral in the form:

1. Please read and check the box provided if you are an authorized signor.
2. Please read and check the box provided if you are an authorized signor.
3. Please sign the Grant payment request if you are an authorized signor of your agency.

4 & 5. When the authorized person is the same as the contact person in Section B you do not need to enter the authorized contact information. If the authorized person and the contact person in Section B are different, please enter all the fields in this area as requested.

ADDITIONAL ITEMS THAT YOU NEED TO ATTACH TO YOUR GRANT PAYMENT REQUEST:

For Equipment Claims:

a) ☐ **Equipment Inventory Listing (Print out & Excel File):** Please include both the printout of the listing and the corresponding excel file with your claim. The excel file is used to submit your claim with the state and the printout as backup document for audits. If there is no serial # for your equipment please assign a valid ID tag, or write "Consumable" (if it applies) or write N/A. please do NOT leave the corresponding space blank. *1 Please refer to the **Instructions to Equip Inty Tab for completion procedures of Equipment Inventory.**

Additionally, please enter the appropriate CBRNE Mission (Chemical, Biological, Radiological, Nuclear, or Explosive) in the column titled "Equipment Description & Quantity". This only applies to vehicles with AEL # 12VE-00-MISS (Vehicle Specialized Mission:CBRNE).

You need to inform us of any changes on the items above *1. This applies to each piece of equipment added in the Inventory Listing, including when the items are disposed and/or no longer useful. We will update the master inventory listing (per grant requirement) according to the information you give us. Please make sure that you include all the attachments that are necessary to provide us with the requested information.

For Training Claims:

a) ☐ **State Sole Source Approval:** If you are claiming training related costs thru a Non-Competitive Bid or Sole Source training provider, regardless the purchased amount, please attach the State's approval (effective December 03, 2018). The approval needs to be requested from the State prior to the start of the project.

b) ☐ **State-Sponsored Training Reporting Form (with the tracking request #):** Please add this form along with the Training Request Form Training Officer (POC), which you completed at the website, to the claim's backup documentation. All the backup documentation submitted for the training claim needs to agree with the training period and the detail description on the Training Reporting Form and the line item of the Grant. Training request #'s must be obtained from the State prior to the start of the project.

c) ☐ **Receipts and paid invoices:** please include the complete copy of the receipts and paid invoices with your claim for itemized costs such as air plane tickets, hotel stays, instructor's fees, workshop cost, facilities fees, consulting services, etc. Additionally, you will need to include the documents requested in numeral 5 under Section C.

If you are including **personnel cost** with your training claim, please add the following:

d) ☐ **Personnel List (Print out & Excel File):** Please include both the printout of the listing and the corresponding excel file with your claim. The excel file is used to submit your claim with the state and the printout as backup document for audits.

e) ☐ **Documents that certify completion of the training:** please attach supporting documents that show the class name, dates of training, # of hours of the training class, printed name and signature of individual taking the class and approval signature from supervisor or trainer (attach the information for backfilled positions also). Examples of documents that certify completion of training are:

- Attendance sheets (signed by employee and instructor)
- Sign in sheets (same as above)
- Signed training certificates

f) ☐ **Summary Listing of Charges:** Please use the **Training Summary Sheet** form provided in this claim packet that **clearly** shows the breakdown of the training charges per employee and that match the total claimed. This form includes the following: employee name, assignment, job title, date, salary, hours claimed, regular rate, overtime rate, employee benefits rate, claim amount per employee, clear calculations of amount claimed per employee and total (equal to the amount claimed).

Please ensure that the Training Summary Sheet is verified/approved by an authorized signatory, with printed name and title, and dated.

g) ☐ **Backup for the Benefits Rate:** If you are adding benefits to your claim, please make sure that you include the official calculation for the rate used.

h) ☐ **Timecards:** Include a printout of the corresponding timecards. Manual timecards need to indicate the # of hours charged per day to the grant, supervisor's signature, employee name and signature. Automatic system generated timecards need to be approved and include the name of the employee and hours charged per day to the grant.

i) ☐ **Explanation of timekeeping codes:** When the supporting documentation (timesheet, payroll register, etc.) includes timekeeping codes please provide a printout with the explanation of the usage as detailed as possible.

j) ☐ **Payroll register:** The payroll register needs to clearly support and explain the amount claimed per employee. It also needs to show the salary, hourly rate, employee benefits and overtime rate.

k) ☐ **Roster of backfilled positions:** When you are claiming overtime for a backfilled position, please attach the backfilled roster to your claim. The roster needs to include the name of the backfilling employees, a short description of duties performed, the corresponding employee whose duties were covered and the dates accordingly. Please make sure that the roster is signed and that you include documentation corresponding to the employee covered by the backfilling position.

For Planning Claims:

a) ☐ **Deliverable (or final product):** Please include with your claim the final product of the planning activity (deliverable) that was identified in the grant award.

b) ☐ **Signed Certificate of Completion:** The certificate of completion can be an e-mail confirming that the planning activity was completed.

c) ☐ **Invoices:** If your planning claim includes charges invoiced by vendors, please see requirements and documents you need to attach to your claim form under Section C (numeral 5 and numeral 6).

d) ☐ **Supporting Documentation for Personnel Cost:** When your planning claim includes personnel cost, please see d) to i) under Training Claim (supporting documents needed) and add to the documentation.

For Exercise Claims:

a) ☐ **Proof of State Approval of After Action Report (AAR):** In order for your AAR to be approved you have to submit it to the State using the ODP Portal (see link below), within 90 days after completion of the exercise. You need to notify the State when the AAR is uploaded so they can proceed with the approval process.

https://hseep.dhs.gov/DHS_SSO/

b) ☐ **Invoices:** If your exercise claim includes charges invoiced by vendors please see requirements and documents you need to attach to your claim form under Section C (numeral 5 and numeral 6).

c) ☐ **Supporting Documentation for Personnel Cost:** When your exercise claim includes personnel cost, please see d) to i) under Training Claim (supporting documents needed) and add to the documentation.

For Organization Claims: Please see above b) and c) under Exercise Claims

GRANT PROPERTY AND EQUIPMENT INVENTORY LISTING

GRANT NAME:
SUB-RECIPIENT: _____
DATE OF REPORT: _____

Grant Year	Project Number	AEL No.	Description of Property	Serial # or Other ID #	SAFECOM Consult (Yes/No/NA)	Source of Property (SHSP or EMPG Grant Program)	Department (Title Holder)	Vendor Name	Invoice Number	Acquisition		% of FED Participation	Location	Use & Condition (N=New, D=Deployed, O=Out of Service, L=Lost,	Disposition	
										Date	Cost				Date	Sale Price

Equipment Inventory Listing
Procedures for Completion

OBJECTIVE: To provide an equipment inventory listing that links the State Homeland Security Workbook, to the Equipment Ledger and to the Equipment Listing to simplify the tracking and accountability; and to eliminate duplication and confusion.

Field	Date Element	Procedure
(1)	Grant Name	SHSP or EMPG
(2)	Sub-Recipient	Name of your agency
(3)	Date of Report	Date report completed {1}
(4)	Grant Year	Grant Year of funds used to purchase equipment
(5)	Project #	Project Number (from Grant Workbook Project Sheets)
(7)	AEL No.	Authorized Equip Listing No (from Grant Workbook)
(8)	Description	Description of the equipment
(9)	Serial # or Other ID #	Serial # or Other identification # used
(10)	Safecom consult	Fill out either by Yes, No, or N/A
(11)	Source of Property	Funding source, i.e, SHSP, EMPG, etc.
(12)	Title Holder	Name of agency (City/Department)
(13)	Vendor Name	Name of the vendor
(14)	Invoice Number	Invoice number
(15)	Acquisition Date	Date equipment acquired
(16)	Acquisition Cost	Cost of the individual equipment item
(17)	% of Fed Part	Fed participation in the cost of equipment
(18)	Location	Location of equipment
(19)	Use & Condition	Use & condition {2}
(20)	Disposition data	Date of disposition
(21)	Sale Price	Sale price, If applicable, or N/A for not applicable

The Equipment Inventory Listing must be completed in its entirety to meet the objective of the form.

Note {1}: This date should be the date the physical inventory of equipment was taken and the results reconciled with the equipment records (at least once every two years).

{2} Indicate: N = New, D = Deployed, O = Out of Service, L = Lost & S = Stolen

Distribution
Copy maintained in sub-recipient file
Copy forwarded to Shared Services Division

Training Summary Sheet

Grant Name _____
Jurisdiction Name: _____
Training Provider: _____
OHS Approved Course Title: _____
Non-SLGCP Course Title & OHS Tracking No. _____
(requires pre-approval thru OEM)
Date of Course: _____
Class/ Exercise Duration/Hours: _____

	EMP NO.	EMPLOYEE NAME	ASSIGNMENT	TITLE	TRAINING REQUEST # (for Training only)	TRAINING START DATE	TRAINING END DATE	SALARY	OT HOURS	REG RATE	OT RATE	OT PAY	Are you claiming for Employee Benefits?	Employee Benefits Rate	CLAIM TOTAL
1											$ -	$ -			$ -
2															
3															
4															
5															
6															
7															
8															
9															
10															
	GRAND TOTAL														$ -

Approved by: _____
Authorized Signature

_____ _____
Print Name and Title Date

CALIFORNIA GOVERNOR'S OFFICE OF EMERGENCY SERVICES (Cal OES)

PLANNING ROSTER

Project	Planning Activity	Solution Area Sub-Category	Discipline	Funding Source	Total Cost	Total Claimed	Cash Request Number	Final Product
					-	-		
	GRAND TOTAL						**$**	

Approved by:

_____
Authorized Signature

_____ _____
Print Name and Title Date

CALIFORNIA GOVERNOR'S OFFICE OF EMERGENCY SERVICES (Cal OES)

EXERCISE ROSTER

Project	Exercise Title	Funding Source	Solution Area Sub-Category	Discipline	Cash Request Number	Total Cost	Total Claimed	Conducted By	Date of Exercise	Exercise Type	Exercise Role	Date AAR entered into HSEEP
						-	-					
	GRAND TOTAL						**$**					

Approved by:

Authorized Signature

Print Name and Title

Date

8. Notes on Personnel Cost:

In general, costs associated with:

- Work performed under contract for a specific deliverable DOES NOT count against the personnel cap, however,
- Work performed under contract for an undefined period, such as for personnel costs supporting operational activities, including general planning, training or exercise activities DO count against the personnel cap; and
- Work performed by all non-contractor personnel, including for full- or part-time staff and operational overtime DO count against the personnel cap.

The following examples would not count towards the personnel cap:

- Vendor installation of a radio tower;
- Vendor training on new equipment purchased;
- Contractor hired to create an Emergency Operations Plan;
- Contractor hired to provide deliveries of ICS 400; and
- Contractor hired to assist with planning, training, evaluating, and reporting the effectiveness of a specific exercise.

The following examples would count towards the personnel cap:

- Contractor hired to be the State's WMD training instructor with no specific deliverables under contract;
- Contractor hired to facilitate unidentified number of exercises throughout the performance period;
- Contractor hired to be the part-time auditor of Homeland Security Grants throughout the year; and
- Contractor hired to be an intelligence analyst.

CALIFORNIA GOVERNOR'S OFFICE OF EMERGENCY SERVICES (Cal OES)

Project	Employee Name	Project / Deliverable	Funding Source	Discipline	Solution Area	Solution Area Sub Category	Dates of Payroll Period	Total Salary & Benefits charged for this Reporting Period	Total Project Hours	REIMB Request #	Total Cost Charged to Grant
								-	-	N/A	-

PROJECT LEDGER

City of Gardena
2018 SHSP Projects
Cal OES ID: 037-000000
Grant #: 2018-0054

Ledger Type:	**Modification**	
Today's Date:	**3/22/2021**	
Request No.:	**4**	
Performance Period:	**Start Date:**	September 1, 2018
	End Date:	May 31, 2021

Project Number	Project Title	Funding Source	Discipline	Solution Area	Total Budgeted
039	Law Personal Protection Equipment	HSGP-SHSP	LE	Equipment	$ 70,185

Totals **$ 70,185**

EQUIPMENT

City of Gardena
2018 SHSP Projects
Cal OES ID: 037-000000
Grant #: 2018-0054

Ledger Type:	**Modification**	
Today's Date:	**3/22/2021**	
Request No.:	**4**	
Performance Period:	**Start Date:**	September 1, 2018
	End Date:	May 31, 2021

Project Number	Equipment Description & (Quantity)	AEL #	AEL Title	SAFECOM Consult	Funding Source	Discipline	Solution Area Sub-Category	Deployable / Shareable	Part of a Procurement over $150K	Sole Source Involved	Hold Trigger	Budgeted Cost
039.12	Purchase 140- AVON PC50 Gas Masks; 140 - AVON 70501-156 Outsert Lenses; 56 - AVON CTCF 50 Riot Filters; 31 - AVON 72601-29 Laser Outsert Lenses	01AR-05-COMB 01ZA-03-EYEP 01AR-06-FLTR 01ZA-03-LASR	Equipment, Respiratory Protection, Combination; Protection, Eye; Filter, Particulate; Protection, Laser Eye, Personal	No	HSGP-SHSP	LE	Personal Protective Equipment	Deployable	No	No	No Hold Indicated	$ 70,185

City of Gardena

Gardena City Council Meeting

AGENDA REPORT SUMMARY

Agenda Item No. 8.L
Section: CONSENT CALENDAR
Meeting Date: April 27, 2021

TO: THE HONORABLE MAYOR AND MEMBERS OF THE GARDENA CITY COUNCIL

AGENDA TITLE: PURCHASE OF HIGH YARD LIGHTING FOR GTRANS CAMPUS FROM MAJESTIC LIGHTING, INC. IN THE AMOUNT OF $43,306.20
CONTACT: TRANSPORTATION

COUNCIL ACTION REQUIRED:

RECOMMENDATION AND STAFF SUMMARY:
For the past few years, GTrans has been replacing its existing incandescent and fluorescent light bulbs in order to be more cost effective and reduce the energy draw from the electrical grid. The GTrans campus has lighting inside the building in various offices and common areas, and also extensive lighting located in the maintenance shop and fueling/cleaning areas, all over the yard and in the employee/public parking areas. GTrans has recently replaced internal building lighting with more energy efficient LED bulbs.

GTrans now wishes to replace its high yard lighting in the bus parking area (20 lights), lighting under the solar canopy, fuel island and inside the bus wash (57 lights). GTrans obtained quotes from local vendors for the purchase of these lights. Majestic Lighting, Inc., a local Gardena firm, provided the lowest responsible bid in accordance with the City's Local Small Business Credit Program Ordinance No. 1717, where Gardena-based businesses can qualify for a small business credit of 5% for City contracts up to $250,000, for purposes of determining the lowest responsible bidder on certain City contracts.

Therefore staff is recommending a purchase of high yard lighting from Majestic Lighting, Inc, for a total cost of $43,306.20, which includes 10.25% sales tax. Installation will be performed by GTrans Facilities Staff.

FINANCIAL IMPACT/COST:
GTrans has local sales tax funding for capital, available for this project. There is no impact to the General Fund.

ATTACHMENTS:
High Yard Lighting Quote from Majestic Lighting.pdf

APPROVED:



_____

Clint Osorio, City Manager

Majestic Lighting Inc.

1741 W ROSECRANS AVE
GARDENA CA 90249

Estimate

Date	Estimate #
1/5/2021	16766

Contractor:
CITY OF GARDENA 1700W. 162ND ST. GARDENA CA. 90247

Project:

Rep
BV

Description	Qty	Cost	Total
GARDENA TRANS			
VSS-S-T5-32L-1-50K-UNV-CM	57	380.00	21,660.00T
VSS-2-T5-96L-50K-RQMB	20	881.00	17,620.00T

Subtotal	$39,280.00
Sales Tax (10.25%)	$4,026.20
Total	$43,306.20

Phone #	Fax #
310.808.1008	310.808.1009

City of Gardena

Gardena City Council Meeting

AGENDA REPORT SUMMARY

Agenda Item No. 8.M
Section: CONSENT CALENDAR
Meeting Date: April 27, 2021

TO: THE HONORABLE MAYOR AND MEMBERS OF THE GARDENA CITY COUNCIL

AGENDA TITLE: RECEIVE AND FILE: GARDENA GENERAL PLAN ANNUAL PROGRESS REPORT

CONTACT: COMMUNITY DEVELOPMENT

COUNCIL ACTION REQUIRED:

RECOMMENDATION AND STAFF SUMMARY:

On April 8, 2021, the City of Gardena filed its General Plan Annual Progress Report (APR) with the Governor's Office of Planning and Research (OPR) and the Department of Housing and Community Development (HCD) as required under California Government Code Sections 65400 and 65700. The APR outlines the status of the General Plan and the City's progress in implementation over the previous 12-month reporting period.

FINANCIAL IMPACT/COST:

None.

ATTACHMENTS:

Gardena General Plan APR 2021.pdf

APPROVED:



_____

Clint Osorio, City Manager

DEPARTMENT of COMMUNITY DEVELOPMENT
1700 WEST 162nd STREET / GARDENA, CALIFORNIA 90247-3732 / WWW.CITYOFGARDENA.ORG / PHONE (310) 217-9530

April 8, 2021

Office of Planning and Research
P.O. Box 3044
Sacramento, CA 95812-3044

SUBJECT: GARDENA GENERAL PLAN ANNUAL PROGRESS REPORT

Dear Sir or Madam:

This serves as the City of Gardena's General Plan Annual Progress Report (GP APR) to the Governor's Office of Planning and Research (OPR).

The Gardena General Plan was last updated in 2006. Its purpose is to guide the physical development of the City for the next 15-20 years addressing all aspects of growth and development, including land use, housing, economic development, safety, parks and recreation, and public facilities. The Gardena General Plan includes the following elements and plans:

- Community Development
  - Land Use Plan
  - Economic Development Plan
  - Community Design Plan
  - Circulation Plan
- Community Resources
  - Open Space Plan
  - Conservation Plan
- Community Safety
  - Public Safety Plan
  - Noise Plan
- Implementation
  - Implementation Program
- Housing Element
  - Adoption Date: 8/9/11 (Resolution No. 6023)
  - Received by HCD: 8/17/11
  - Amended: 10/15/13
  - Cycle: 2014-2021

TASHA CERDA, Mayor / ART KASKANIAN, Mayor Pro Tem
MARK E. HENDERSON, Councilmember / DAN MEDINA, Councilmember / RODNEY G. TANAKA, Councilmember
MINA SEMENZA, City Clerk / J. INGRID TSUKIYAMA, City Treasurer / CLINT OSORIO, City Manager / CARMEN VASQUEZ, City Attorney

Compliance

The Gardena General Plan complies with OPR's General Plan Guidelines, including environmental justice considerations, collaborative planning with the military lands and facilities, and consultation with Native American tribes. The following is a summary of actions related to the General Plan over the past year:

Moratoriums

- The City adopted a moratorium on evicting tenants due to causes related to the COVID-19 pandemic. On March 26, 2020, the City Council adopted Urgency Ordinance No. 1819 to be consistent with federal, state, and local declarations of a State of Emergency. The ordinance is consistent with the General Plan in that it preserves the economic and social stability of the City and prevents the further occurrence of homelessness and unemployment. The residential eviction moratorium expired when the State moratorium assumed control but the commercial eviction moratorium remains and is extended as necessary.

- The City has no other moratoriums related to the General Plan.

General Plan Compliance

- On January 28, 2020, Urgency Ordinance No. 1814 was passed to comply with State requirements regarding accessory dwelling units (ADUs) primarily found in AB 68 an AB 881. The Urgency Ordinance is consistent with the Gardena General Plan.

- On February 11, 2020, the City adopted Ordinance No. 1815 which adopts by reference the 2019 California State Building Standards Code to be consistent with the State Department of Housing and Community Development. The ordinance is consistent with the goals and policies in the General Plan.

- On May 26, 2020, the City adopted Ordinance No. 1817 amending Chapter 18.43 of the Gardena Municipal Code relating to density bonus provisions. The ordinance is consistent with State legislative changes to the density bonus law and further supports the development of affordable housing units which is consistent with the Housing Element.

- On August 11, 2020, the City adopted Ordinance No. 1820 making additional changes to the Zoning Code relating to residential development and granting time extensions for entitlements impacted during the COVID-19 pandemic. Ordinance No. 1820 is consistent with the General Plan in that it updates residential development standards to accommodate housing development and extends entitlements that would have otherwise expired during the pandemic.

- On November 10, 2020, the City Council adopted Resolution No. 6480 approving a General Plan Amendment proposed by Melia Homes changing the land use designation

of a property located at 13615-13633 Vermont Avenue from General Commercial to High Density Residential. On December 15, 2020, City Council adopted Ordinance No. 1822 approving a zone change to make the Zoning Map consistent with the General Plan Land Use Map. The project would provide 84 condominium units, which is consistent with the Housing Element.

- On November 10, 2020, the City Council adopted Resolution No. 6482 approving a General Plan Amendment proposed by The Olson Company to change the land use designation of a property located at 1335, 1337, 1341, and 1343 W. 141t Street from Low and Medium Density to High Density Residential. On December 15, 2020, City Council adopted Ordinance No. 1823 approving a zone change to make the Zoning Map consistent with the General Plan Land Use Map. The project would provide 50 condominium units, which is consistent with the Housing Element.

- On December 15, 2020, the City Council voted, 5-0, to adopt Resolution Nos. 6486 and 6487 adopting a mitigated negative declaration (MND) and mitigation monitoring and reporting program (MMRP) and approving a general plan amendment to change the land use designation of a property located at 1108 W. 141st Street from Medium Density Residential and High Density Residential to General Commercial with a Mixed-Use Overlay. Ordinance No. 1824 approves a Zone Change from Medium Density Multiple-Family Residential (R-3) and High-Density Multiple-Family Residential (R-4) to General Commercial (C-3) with a Mixed-Use Overlay (MUO) for the property. Ordinance No. 1824 was adopted on January 12, 2021 and became effective February 11, 2021.

  Approval of Ordinance No. 1824 was possible because of a no net loss finding that allowed the City to rezone a property from residential to commercial while other properties were being rezoned from commercial to residential or being up-zoned. As discussed above, the City Council approved the Evergreen Residential Project proposed by Melia Homes, Inc. to change the land use designation from General Commercial to High Density Residential and the zoning from C-3 (General Commercial) to R-4 (High Density Multiple-Family Residential). The City Council also approved a project proposed by The Olson Company to change the land use designation from Low and Medium Density Residential to High Density Residential; the zoning similarly changed from R-1 (3 lots, 1.39 acres) and R-3 (0.63 acres) to R-4. The original land use and zoning designations resulted in development of 14 units. Instead, the up-zoning allowed up to 50 units, or 36 more units than allowed under the previous zoning.

  The property at 1108 W. 141st Street involved the potential future development of approximately 2.0 acres of the 4.59 acres. In contrast, Melia's Evergreen Residential Project would more than make up for the loss of residential development that could have been built on the developable portion of the 1108 W. 141st Street site. However, even if the entire 4.59-acre parcel were developed for residential uses, the Melia and The Olson Company projects would more than compensate for the housing that could have been developed at the 1108 W. 141st Street site.

- On December 15, 2020, Ordinance No. 1821 was introduced by City Council relating to low barrier navigation centers. A low barrier navigation center assists homeless individuals by removing barriers to finding temporary housing. Ordinance No. 1821 complies with AB 101 which adds Article 12 to Chapter 4.5 of the Government Code (sections 65660 et seq.) relating to low barrier navigation centers and provides that these uses are allowed by right in areas zoned for mixed use and nonresidential zones where multifamily uses are allowed. Ordinance No. 1821 was adopted on January 12, 2021 and became effective February 11, 2021.

RHNA Sixth Cycle/Housing Element

The City participated in several workshops and meetings hosted by the Southern California Association of Governments (SCAG) related to the regional housing needs assessment (RHNA) methodology for the sixth cycle period from 2021 to 2028. The City has been awarded grants through the SB 2 and LEAP programs to update its Housing Element. The City has retained the services of a housing consultant to prepare the Housing Element, and a planning and environmental consultant to prepare the related environmental and planning documents, including the Safety Element and Environmental Justice Element. The following is a summary of the City's past activities and future schedule on the Housing Element Update:

- On October 23, 2020, the City filed an appeal of its RHNA allocation with SCAG contesting that allocation of 5,721 units was excessive and unreasonable.

- On January 13, 2021, the City participated in the RHNA appeals hearing to present its case. Although the appeal was unsuccessful, staff gave its commitment to adopt a Housing Element that addresses its RHNA obligation and is acceptable to HCD.

- On February 4 and March 31, 2021, the City held joint housing workshops with the City Council, Planning Commission, and general public. Discussions included the inventory and selection of housing sites, strategies in providing new housing, and concerns the community may have on the Housing Element Update.

- Public hearings with the Planning Commission and City Council are expected in the summer to fall 2021.

- The Housing Element Update is expected to be adopted by October 2021.

Thank you for your consideration. If you have any questions regarding the contents of this letter, please contact the Community Development Department at 310-217-9530.

Sincerely,

Gregg McClain
Interim Community Development Director

cc: John F. Signo, AICP, Senior Planner

Attachment: Housing Element APR

2020 GARDENA Housing Element Annual Progress Report

General Information

First Name	Amanda	**Street Address**	1700 W. 162nd Street	**Phone**	3102179524
Last Name	Acuna	**City**	Gardena	**Email**	aacuna@cityofgardena.org
Title	Senior Planner	**Zip Code**	90247		

Comments: Include any additional information or explanation for the information provided in the following tables.

2020 GARDENA Housing Element Annual Progress Report

TABLE A - Housing Development Applications Submitted

Unit Information

Project Identifier		Proposed Units Affordability by Household Incomes									
Current APN	Street Address	Very Low-Income Deed Restricted	Very Low-Income Non Deed Restricted	Low-Income Deed Restricted	Low-Income Non Deed Restricted	Moderate-Income Deed Restricted	Moderate-Income Non Deed Restricted	Above Moderate-Income	Total Proposed Units by Project	Total Approved Units by Project	Total Disapproved Units by Project
4060004039	12850 Crenshaw Blvd	0	0	0	0	0	0	265	265	0	0
4062007025	1938 W 146th Street	0	0	0	0	0	0	6	6	0	0
6115019042, 6115019043, 6115019044, 6115019045	13615 S Vermont Ave	0	0	2	0	0	0	82	84	0	0
6113035015	1031 Magnolia Ave	0	0	0	0	0	0	6	6	0	0
4064003028, 4064003040	2500 Rosecrans Ave	0	0	0	0	0	0	52	52	0	0
Totals		**0**	**0**	**2**	**0**	**0**	**0**	**411**	**413**	**0**	**0**

Project Information

Project Identifier					Unit Types				
Prior APN	**Current APN**	**Street Address**	**Project Name**	**Local Jurisdiction Tracking ID**	**Unit Category**	**Tenure**	**Date Application Submitted**	**Was Application Submitted Pursuant to SB 35 Streamlining?**	**Notes**
	4060004039	12850 Crenshaw Blvd	GTOPSP	EA #1-20	5+	Renter	01/22/2020	No	
	4062007025	1938 W 146th Street		EA #2-20	SFA	Owner	01/31/2020	No	
	6115019042, 6115019043, 6115019044, 6115019045	13615 S Vermont Ave	Melia - Moneta	EA #5-20	SFA	Owner	03/09/2020	No	
	6113035015	1031 Magnolia Ave	Gardena Havens	EA #9-20	SFA	Owner	06/10/2020	No	
	4064003028, 4064003040	2500 Rosecrans Ave	Walnut Place	EA #10-20	SFA	Owner	08/19/2020	No	

2020 GARDENA Housing Element Annual Progress Report

TABLE A2 - Annual Building Activity Report Summary - New Construction

Entitlements

Project Identifier			Affordability by Household Income - Entitlements								
Current APN	Street Address	Local Jurisdiction Tracking ID	Very Low-Income Deed Restricted	Very Low-Income Non Deed Restricted	Low-Income Deed Restricted	Low-Income Non Deed Restricted	Moderate-Income Deed Restricted	Moderate-Income Non Deed Restricted	Above Moderate-Income	Entitlement Date Approved	# of Units Issued Entitlements
4062007025	1938 W 146th Street	EA #2-20	0	0	0	0	0	0	6	06/23/2020	6
4061028049, 4061028018	2129 Rosecrans Ave	EA #5-19	0	0	0	0	0	0	113	08/04/2020	113
6103031075	1621 W 147th Street	EA #14-19	0	0	0	0	0	0	6	08/18/2020	6
6115013007, 6115013008, 6115013009, 6115013010, 6115013011	1335 W 141st Street	EA #15-19	0	0	0	0	0	0	50	11/10/2020	50
6115019042, 6115019043, 6115019044, 6115019045	13615 S Vermont Ave	EA #5-20	0	0	2	0	0	0	82	11/10/2020	84
4064003028, 4064003040	2500 Rosecrans Ave	EA #5-20	0	0	0	0	0	0	52	01/12/2021	52
4062016044	1835 W 149TH ST	50018-0636	0	0	0	0	0	0	0		0
4062009020	14608 HAAS AVE UNIT B	50018-1145	0	0	0	0	0	0	0		0
6113016006	1328 W 164TH ST B	50018-1229	0	0	0	0	0	0	0		0
6106031050	17326 S DENKER AVE B	50019-0391	0	0	0	0	0	0	0		0

6113027010	1029 W 160TH ST UNIT B	50019-0847	0	0	0	0	0	0	0		0
6114014006	15012 VAN BUREN AVE B	50019-0910	0	0	0	0	0	0	0		0
4066023009	16510 GRAMERCY PL	50019-1000	0	0	0	0	0	0	0		0
6103006014	1505 W 153RD ST B	50019-1020	0	0	0	0	0	0	0		0
6106041030	16918 BRIGHTON AVE	50019-1082	0	0	0	0	0	0	0		0
4063003047	15211 S WILTON PL	50019-1234	0	0	0	0	0	0	0		0
6113005001	15820 S RAYMOND AVE	50019-1280	0	0	0	0	0	0	0		0
4064008020	14412 DUBLIN AVE B	50019-1311	0	0	0	0	0	0	0		0
6114017007	1227 W 146TH ST B	50019-1333	0	0	0	0	0	0	0		0
6106005010	16906 S HARVARD BLVD B	50019-1438	0	0	0	0	0	0	0		0
6106016027	17941 S HARVARD BLVD B	50019-1444	0	0	0	0	0	0	0		0
6114013028	14923 VAN BUREN AVE UNIT B	50019-1452	0	0	0	0	0	0	0		0
6115017036	14059 ZIRCONIA LANE UNITS 1 -5	50020-0088	0	0	0	0	0	0	0		0
6115017036	14037 RUBY LANE UNITS 1 -4	50020-0089	0	0	0	0	0	0	0		0

6115017036	14039 RUBY LANE UNITS 1 -4	50020-0090	0	0	0	0	0	0	0		0
6115017036	14057 RUBY LANE UNITS 1 -5	50020-0091	0	0	0	0	0	0	0		0
6115017036	14055 RUBY LANE UNITS 1 -5	50020-0092	0	0	0	0	0	0	0		0
6111018025	1024 W 168TH ST	50020-0112	0	0	0	0	0	0	0		0
6111018026	1030 W 168TH ST	50020-0119	0	0	0	0	0	0	0		0
4066015010	16232 GRAMERCY PL	50020-0129	0	0	0	0	0	0	0		0
6106027028	16819 S NORMANDIE AVE	50020-0325	0	0	0	0	0	0	0		0
6113014013	1329 W 164TH ST	50020-0353	0	0	0	0	0	0	0		0
6114014016	14904 VAN BUREN AVE UNIT B	50020-0364	0	0	0	0	0	0	0		0
4062017001	1860 W 149TH ST B	50020-0399	0	0	0	0	0	0	0		0
6113028011	1011 W 161ST ST B	50020-0401	0	0	0	0	0	0	0		0
6115017036	14041 ROYALTON LN 1-4	50020-0841	0	0	0	0	0	0	0		0
6115017036	14043 ROYALTON LN 1-4	50020-0842	0	0	0	0	0	0	0		0
6115017036	14051 DIAMOND LN 1-5	50020-0843	0	0	0	0	0	0	0		0

6115017036	14053 SPURLOCK LN 1-5	50020-0844	0	0	0	0	0	0	0		0
4064003036	14377 Van Ness Ave	50019-0332	0	0	0	0	0	0	0		0
4064003036	14381 Van Ness Ave	50019-0332	0	0	0	0	0	0	0		0
4064003036	14383 Van Ness Ave	50019-0332	0	0	0	0	0	0	0		0
4064003036	14385 Van Ness Ave	50019-0332	0	0	0	0	0	0	0		0
4064003036	14384 Van Ness Ave	50019-0332	0	0	0	0	0	0	0		0
Totals			**0**	**0**	**2**	**0**	**0**	**0**	**309**		**311**

Building Permits

Project Identifier			Affordability by Household Income - Building Permits								
Current APN	Street Address	Local Jurisdiction Tracking ID	Very Low-Income Deed Restricted	Very Low-Income Non Deed Restricted	Low-Income Deed Restricted	Low-Income Non Deed Restricted	Moderate-Income Deed Restricted	Moderate-Income Non Deed Restricted	Above Moderate-Income	Building Permits Date Issued	# of Units Issued Building Permits
4062007025	1938 W 146th Street	EA #2-20	0	0	0	0	0	0	0		0
4061028049, 4061028018	2129 Rosecrans Ave	EA #5-19	0	0	0	0	0	0	0		0
6103031075	1621 W 147th Street	EA #14-19	0	0	0	0	0	0	0		0
6115013007, 6115013008, 6115013009, 6115013010, 6115013011	1335 W 141st Street	EA #15-19	0	0	0	0	0	0	0		0
6115019042, 6115019043, 6115019044, 6115019045	13615 S Vermont Ave	EA #5-20	0	0	0	0	0	0	0		0
4064003028, 4064003040	2500 Rosecrans Ave	EA #5-20	0	0	0	0	0	0	0		0
4062016044	1835 W 149TH ST	50018-0636	0	0	0	0	0	0	1	01/31/2020	1
4062009020	14608 HAAS AVE UNIT B	50018-1145	0	0	0	0	0	0	1	03/11/2020	1
6113016006	1328 W 164TH ST B	50018-1229	0	0	0	0	0	0	1	12/21/2020	1
6106031050	17326 S DENKER AVE B	50019-0391	0	0	0	0	0	0	1	12/23/2020	1
6113027010	1029 W 160TH ST UNIT B	50019-0847	0	0	0	0	0	0	1	04/30/2020	1
6114014006	15012 VAN BUREN AVE B	50019-0910	0	0	0	0	0	0	1	03/02/2020	1

4066023009	16510 GRAMERCY PL	50019-1000	0	0	0	0	0	0	1	10/02/2020	1
6103006014	1505 W 153RD ST B	50019-1020	0	0	0	0	0	0	1	02/10/2020	1
6106041030	16918 BRIGHTON AVE	50019-1082	0	0	0	0	0	0	1	02/26/2020	1
4063003047	15211 S WILTON PL	50019-1234	0	0	0	0	0	0	1	03/02/2020	1
6113005001	15820 S RAYMOND AVE	50019-1280	0	0	0	0	0	0	1	02/11/2020	1
4064008020	14412 DUBLIN AVE B	50019-1311	0	0	0	0	0	0	1	06/08/2020	1
6114017007	1227 W 146TH ST B	50019-1333	0	0	0	0	0	0	1	03/03/2020	1
6106005010	16906 S HARVARD BLVD B	50019-1438	0	0	0	0	0	0	1	06/29/2020	1
6106016027	17941 S HARVARD BLVD B	50019-1444	0	0	0	0	0	0	1	10/29/2020	1
6114013028	14923 VAN BUREN AVE UNIT B	50019-1452	0	0	0	0	0	0	1	03/09/2020	1
6115017036	14059 ZIRCONIA LANE UNITS 1 -5	50020-0088	0	0	0	0	0	0	5	02/05/2020	5
6115017036	14037 RUBY LANE UNITS 1 -4	50020-0089	0	0	0	0	0	0	4	02/05/2020	4
6115017036	14039 RUBY LANE UNITS 1 -4	50020-0090	0	0	0	0	0	0	4	02/05/2020	4

6115017036	14057 RUBY LANE UNITS 1 -5	50020-0091	0	0	0	0	0	0	5	02/05/2020	5
6115017036	14055 RUBY LANE UNITS 1 -5	50020-0092	0	0	0	0	0	0	5	02/05/2020	5
6111018025	1024 W 168TH ST	50020-0112	0	0	0	0	0	0	1	08/10/2020	1
6111018026	1030 W 168TH ST	50020-0119	0	0	0	0	0	0	1	08/10/2020	1
4066015010	16232 GRAMERCY PL	50020-0129	0	0	0	0	0	0	1	02/10/2020	1
6106027028	16819 S NORMANDIE AVE	50020-0325	0	0	0	0	0	0	63	12/15/2020	63
6113014013	1329 W 164TH ST	50020-0353	0	0	0	0	0	0	1	09/23/2020	1
6114014016	14904 VAN BUREN AVE UNIT B	50020-0364	0	0	0	0	0	0	1	10/01/2020	1
4062017001	1860 W 149TH ST B	50020-0399	0	0	0	0	0	0	1	11/09/2020	1
6113028011	1011 W 161ST ST B	50020-0401	0	0	0	0	0	0	1	11/18/2020	1
6115017036	14041 ROYALTON LN 1-4	50020-0841	0	0	0	0	0	0	4	11/17/2020	4
6115017036	14043 ROYALTON LN 1-4	50020-0842	0	0	0	0	0	0	4	11/17/2020	4
6115017036	14051 DIAMOND LN 1-5	50020-0843	0	0	0	0	0	0	5	12/16/2020	5
6115017036	14053 SPURLOCK LN 1-5	50020-0844	0	0	0	0	0	0	5	12/16/2020	5

4064003036	14377 Van Ness Ave	50019-0332	0	0	0	0	0	0	0		0
4064003036	14381 Van Ness Ave	50019-0332	0	0	0	0	0	0	0		0
4064003036	14383 Van Ness Ave	50019-0332	0	0	0	0	0	0	0		0
4064003036	14385 Van Ness Ave	50019-0332	0	0	0	0	0	0	0		0
4064003036	14384 Van Ness Ave	50019-0332	0	0	0	0	0	0	0		0
Totals			**0**	**0**	**0**	**0**	**0**	**0**	**127**		**127**

Certificate of Occupancy

Project Identifier			Affordability by Household Income - Certificate of Occupancy								
Current APN	Street Address	Local Jurisdiction Tracking ID	Very Low-Income Deed Restricted	Very Low-Income Non Deed Restricted	Low-Income Deed Restricted	Low-Income Non Deed Restricted	Moderate-Income Deed Restricted	Moderate-Income Non Deed Restricted	Above Moderate-Income	Certificates of Occupancy or other forms of readiness Date Issued	# of Units Issued Certificates of Occupancy or other forms of readiness
4062007025	1938 W 146th Street	EA #2-20	0	0	0	0	0	0	0		0
4061028049, 4061028018	2129 Rosecrans Ave	EA #5-19	0	0	0	0	0	0	0		0
6103031075	1621 W 147th Street	EA #14-19	0	0	0	0	0	0	0		0
6115013007, 6115013008, 6115013009, 6115013010, 6115013011	1335 W 141st Street	EA #15-19	0	0	0	0	0	0	0		0
6115019042, 6115019043, 6115019044, 6115019045	13615 S Vermont Ave	EA #5-20	0	0	0	0	0	0	0		0
4064003028, 4064003040	2500 Rosecrans Ave	EA #5-20	0	0	0	0	0	0	0		0
4062016044	1835 W 149TH ST	50018-0636	0	0	0	0	0	0	0		0
4062009020	14608 HAAS AVE UNIT B	50018-1145	0	0	0	0	0	0	0		0
6113016006	1328 W 164TH ST B	50018-1229	0	0	0	0	0	0	0		0
6106031050	17326 S DENKER AVE B	50019-0391	0	0	0	0	0	0	0		0
6113027010	1029 W 160TH ST UNIT B	50019-0847	0	0	0	0	0	0	0		0

6114014006	15012 VAN BUREN AVE B	50019-0910	0	0	0	0	0	0	0		0
4066023009	16510 GRAMERCY PL	50019-1000	0	0	0	0	0	0	0		0
6103006014	1505 W 153RD ST B	50019-1020	0	0	0	0	0	0	0		0
6106041030	16918 BRIGHTON AVE	50019-1082	0	0	0	0	0	0	0		0
4063003047	15211 S WILTON PL	50019-1234	0	0	0	0	0	0	0		0
6113005001	15820 S RAYMOND AVE	50019-1280	0	0	0	0	0	0	0		0
4064008020	14412 DUBLIN AVE B	50019-1311	0	0	0	0	0	0	0		0
6114017007	1227 W 146TH ST B	50019-1333	0	0	0	0	0	0	0		0
6106005010	16906 S HARVARD BLVD B	50019-1438	0	0	0	0	0	0	0		0
6106016027	17941 S HARVARD BLVD B	50019-1444	0	0	0	0	0	0	0		0
6114013028	14923 VAN BUREN AVE UNIT B	50019-1452	0	0	0	0	0	0	0		0
6115017036	14059 ZIRCONIA LANE UNITS 1 -5	50020-0088	0	0	0	0	0	0	0		0
6115017036	14037 RUBY LANE UNITS 1 -4	50020-0089	0	0	0	0	0	0	0		0
6115017036	14039 RUBY LANE UNITS 1 -4	50020-0090	0	0	0	0	0	0	0		0

6115017036	14057 RUBY LANE UNITS 1 -5	50020-0091	0	0	0	0	0	0	0		0
6115017036	14055 RUBY LANE UNITS 1 -5	50020-0092	0	0	0	0	0	0	0		0
6111018025	1024 W 168TH ST	50020-0112	0	0	0	0	0	0	0		0
6111018026	1030 W 168TH ST	50020-0119	0	0	0	0	0	0	0		0
4066015010	16232 GRAMERCY PL	50020-0129	0	0	0	0	0	0	0		0
6106027028	16819 S NORMANDIE AVE	50020-0325	0	0	0	0	0	0	0		0
6113014013	1329 W 164TH ST	50020-0353	0	0	0	0	0	0	0		0
6114014016	14904 VAN BUREN AVE UNIT B	50020-0364	0	0	0	0	0	0	0		0
4062017001	1860 W 149TH ST B	50020-0399	0	0	0	0	0	0	0		0
6113028011	1011 W 161ST ST B	50020-0401	0	0	0	0	0	0	0		0
6115017036	14041 ROYALTON LN 1-4	50020-0841	0	0	0	0	0	0	0		0
6115017036	14043 ROYALTON LN 1-4	50020-0842	0	0	0	0	0	0	0		0
6115017036	14051 DIAMOND LN 1-5	50020-0843	0	0	0	0	0	0	0		0
6115017036	14053 SPURLOCK LN 1-5	50020-0844	0	0	0	0	0	0	0		0

4064003036	14377 Van Ness Ave	50019-0332	0	0	0	0	0	0	1	01/31/2020	1
4064003036	14381 Van Ness Ave	50019-0332	0	0	0	0	0	0	1	01/31/2020	1
4064003036	14383 Van Ness Ave	50019-0332	0	0	0	0	0	0	1	01/31/2020	1
4064003036	14385 Van Ness Ave	50019-0332	0	0	0	0	0	0	1	01/31/2020	1
4064003036	14384 Van Ness Ave	50019-0332	0	0	0	0	0	0	1	01/31/2020	1
Totals			**0**	**0**	**0**	**0**	**0**	**0**	**5**		**5**

Project Information

Project Identifier					Unit Types					Housing with Financial Assistance and/or Deed Restrictions				Demolished/Destroyed Units Units?			
Prior APN	Current APN	Street Address	Project Name	Local Jurisdiction Tracking ID	Unit Category	Tenure	Extremely Low Income Units	Was Project Approved using SB 35 Streamlining?	Infill Units?	Assistance Programs for each Development	Deed Restriction Type	Housing without Financial Assistance or Deed Restrictions	Term of Affordability or Deed Restriction	Number of Demolished/ Destroyed Units	Demolished or Destroyed Units?	Demolished/ or Destroyed Units Owner or Renter	Notes
	4062007025	1938 W 146th Street		EA #2-20	SFA	Owner	0	N						0			
	4061028049, 4061028018	2129 Rosecrans Ave		EA #5-19	SFA	Owner	0	N						0			
	6103031075	1621 W 147th Street		EA #14-19	SFA	Owner	0	N						0			
	6115013007, 6115013008, 6115013009, 6115013010, 6115013011	1335 W 141st Street		EA #15-19	SFA	Owner	0	N						0			

	6115019042, 6115019043, 6115019044, 6115019045	13615 S Vermont Ave		EA #5-20	SFA	Owner	0	N			DB			0			
	4064003028, 4064003040	2500 Rosecrans Ave		EA #5-20	SFA	Owner	0	N						0			
	4062016044	1835 W 149TH ST		50018-0636	ADU	Renter	0	N						0			
	4062009020	14608 HAAS AVE UNIT B		50018-1145	ADU	Renter	0	N						0			
	6113016006	1328 W 164TH ST B		50018-1229	ADU	Renter	0	N						0			
	6106031050	17326 S DENKER AVE B		50019-0391	ADU	Renter	0	N	N					0			
	6113027010	1029 W 160TH ST UNIT B		50019-0847	ADU	Renter	0	N						0			
	6114014006	15012 VAN BUREN AVE B		50019-0910	ADU	Renter	0	N						0			
	4066023009	16510 GRAMERCY PL		50019-1000	ADU	Renter	0	N						0			
	6103006014	1505 W 153RD ST B		50019-1020	ADU	Renter	0	N						0			

	6106041030	16918 BRIGHTON AVE		50019-1082	ADU	Renter	0	N						0			
	4063003047	15211 S WILTON PL		50019-1234	ADU	Renter	0	N						0			
	6113005001	15820 S RAYMOND AVE		50019-1280	ADU	Renter	0	N						0			
	4064008020	14412 DUBLIN AVE B		50019-1311	ADU	Renter	0	N						0			
	6114017007	1227 W 146TH ST B		50019-1333	ADU	Renter	0	N						0			
	6106005010	16906 S HARVARD BLVD B		50019-1438	ADU	Renter	0	N						0			
	6106016027	17941 S HARVARD BLVD B		50019-1444	ADU	Renter	0	N						0			
	6114013028	14923 VAN BUREN AVE UNIT B		50019-1452	ADU	Renter	0	N						0			
	6115017036	14059 ZIRCONIA LANE UNITS 1-5		50020-0088	SFA	Owner	0	N						0			
	6115017036	14037 RUBY LANE UNITS 1-4		50020-0089	SFA	Owner	0	N						0			

	6115017036	14039 RUBY LANE UNITS 1-4		50020-0090	SFA	Owner	0	N						0			
	6115017036	14057 RUBY LANE UNITS 1-5		50020-0091	SFA	Owner	0	N						0			
	6115017036	14055 RUBY LANE UNITS 1-5		50020-0092	SFA	Owner	0	N						0			
	6111018025	1024 W 168TH ST		50020-0112	ADU	Renter	0	N						0			
	6111018026	1030 W 168TH ST		50020-0119	ADU	Renter	0	N						0			
	4066015010	16232 GRAMERCY PL		50020-0129	ADU	Renter	0	N						0			
	6106027028	16819 S NORMANDIE AVE		50020-0325	5+	Renter	0	N						0			
	6113014013	1329 W 164TH ST		50020-0353	ADU	Renter	0	N						0			
	6114014016	14904 VAN BUREN AVE UNIT B		50020-0364	ADU	Renter	0	N						0			
	4062017001	1860 W 149TH ST B		50020-0399	ADU	Renter	0	N						0			

	6113028011	1011 W 161ST ST B		50020-0401	ADU	Renter	0	N						0			
	6115017036	14041 ROYALTON LN 1-4		50020-0841	SFA	Owner	0	N						0			
	6115017036	14043 ROYALTON LN 1-4		50020-0842	SFA	Owner	0	N						0			
	6115017036	14051 DIAMOND LN 1-5		50020-0843	SFA	Owner	0	N						0			
	6115017036	14053 SPURLOCK LN 1-5		50020-0844	SFA	Owner	0	N						0			
	4064003036	14377 Van Ness Ave		50019-0332	SFA	Owner	0	N						0			
	4064003036	14381 Van Ness Ave		50019-0332	SFA	Owner	0	N						0			
	4064003036	14383 Van Ness Ave		50019-0332	SFA	Owner	0	N						0			
	4064003036	14385 Van Ness Ave		50019-0332	SFA	Owner	0	N						0			
	4064003036	14384 Van Ness Ave		50019-0332	SFA	Owner	0	N						0			

2020 GARDENA Housing Element Annual Progress Report

TABLE B - Regional Housing Needs Allocation Progress

Permitted Units Issued by Affordability

Income Level	RHNA Allocation	Restrictions	Year 1 - 2013	Year 2 - 2014	Year 3 - 2015	Year 4 - 2016	Year 5 - 2017	Year 6 - 2018	Year 7 - 2019	Year 8 - 2020	Year 9 - 2021	Total Units to Date (all years)	Total Remaining RHNA by Income Level
Very Low*	98	Deed restricted	0	0	0	25	0	0	0	0	0	25	73
		Non-Restricted	0	0	0	0	0	0	0	0	0		
Low	60	Deed restricted	0	0	0	8	7	0	0	0	0	15	45
		Non-Restricted	0	0	0	0	0	0	0	0	0		
Moderate	66	Deed restricted	0	0	0	0	0	0	0	0	0	54	12
		Non-Restricted	0	6	14	28	6	0	0	0	0		
Above Moderate	173		0	21	42	74	44	124	40	127	0	472	0
Total Units			**0**	**27**	**56**	**135**	**57**	**124**	**40**	**127**	**0**	**566**	
Total RHNA	**397**										**Total Remaining Need for RHNA Period**		**130**

***Note: Units serving extremely low-income households are included in the very low-income permitted units totals**

2020 GARDENA Housing Element Annual Progress Report

TABLE C - Sites Identified or Rezoned to Accommodate Shortfall Housing Need

No Data Available

2020 GARDENA Housing Element Annual Progress Report

TABLE D - Program Implementation Status

Program Description	Housing Programs Progress Report - Government Code Section 65583		
Name of Housing Element Program	**Objective**	**Timeframe in H.E.**	**Status of Program Implementation**
1) Housing Rehabilitation Program a) Handyworker Fix-Up Program b) Residential Rebate c) Multi-Family Rehabilitation and Code Correction Program (MFRCCP) d) Owner -Occupied Rehabilitation Program (OORP) e) Mobile Home Rehabilitation Loan	1) Assist 100 households annually. a), b), c) Assist 179 households annually which is equivalent to approximately 550 households d) Provide 15 deferred loans e) Provide 15 deferred loans	1) 2014-2021 a), b), c) 2014-2021 d) Over two years e) Over two years	a) Handyworker Fix-Up Program- 13 households were assisted during 2020 reporting year. b) Residential Rebate- The City was unable to assist any households under this program in 2020. This program was placed on hold in March of 2020 due to the COVID-19 health crisis. c) MFRCCP - as of 2019, this program is no longer funded. d) OORP - No households were assisted through this program in 2020. e) Mobile Home Rehabilitation Loan - this program continues to assist mobile home households within the City.
2. Section 8 Rental Assistance	Continue to provide updated information on the Section 8 program through the City's website and making it available at the City's CDC counter.	2014-2021	Ongoing and to be completed.
3. Preservation of At-Risk Units	Continue to monitor and gauge at-risk units' activities.	2014-2021	Ongoing and to be completed.
4. Senior Housing Development	Support applications for federal and state funding for quality senior developments by providing the information on the City's website and making it available at the City's CDD counter.	2014-2021	Completed.
5. Homeownership Program	a) Continue to provide information on financing funds available through ICLFA. b) Mail information packages to local financial institutions and facilitate workshops on annual basis.	2014-2021	a) Ongoing to be completed b) Ongoing to be completed
6. Specific Plans	Determine the feasibility of specific plan sites along Rosecrans Avenue.	2014-2021	Ongoing to be completed.
7. Gardena Boulevard	Develop 20 new multi-family units along Gardena Blvd	2014-2021	Since 2013 nine new multi-family units have been developed on Gardena Boulevard

8. Development of Vacant and Underutilized Residential Sites	a) Use HOME funds to partner with for- profit and non-profit developers for construction of new affordable housing on vacant and underutilized properties within the City b) Work with CHDOs to facilitate the development of new affordable housing units c) Update the vacant land inventory using the City's GIS system	2014-2021	a) Ongoing b) Ongoing . The City will continue to seek opportunities to partner with non- profit affordable housing developers and non-profits c) Ongoing
9. Brownfields Program	a) Market Brownfields Opportunity Sites with information packets b) Continue community outreach through the Brownfields Community Relations Committee (BCRC)	2014-2021	The City of Gardena no longer has an actively funded Brownfields Program however the final objectives have been achieved and are ongoing: a) The City has an active and aggressive marketing program for its Brownfield sites; ongoing marketing of the sites occurs regularly b) The BCRC is no longer active
11. Single Room Occupancy	a) Maintain a list of existing hotels that are candidates for conversion; b) Review SRO conversion applications on an annual basis	2014-2021	a) Ongoing b) Ongoing
12. Transitional and Supportive Housing	Amend the MU zone (Municipal Code Section 18.19) to list transitional housing and supportive housing as permitted uses, in compliance with SB 2.	Within One Year of adoption of Housing Element	Completed in 2019
13. Adequate Sites Monitoring	a) Maintain an up-to-date inventory of adequate housing sites for each income category b) Develop and implement a formal ongoing procedure to evaluate and identify additional sites as necessary c)Perform an annual evaluation to determine whether sites are being utilized for residential development and monitor the effectiveness of programs and incentives	2008-2014	a) Ongoing b) Ongoing c) Ongoing
14. Opportunity Sites Listing and Outreach	a) Continue to maintain an updated listing of opportunity sites b) Initiate contact with South Bay Board of Realtors about development opportunities involving lot consolidation	Within One Year of adoption of Housing Element	a) Opportunity Sites have been identified and a process for maintaining their visibility is in process b) Implemented
15. Non-Profit Development Department Partnership	Hold at least one workshop annually to discuss the City's plans, development opportunities, resources/assistance and the RFQ Process	Ongoing	Ongoing

16. Rent Meditation Board	a) Continue to provide Rent Mediation Assistance b) Continue conducting the annual survey of rental housing units	Ongoing	The City continues to provide the Rent Mediation and Hearing Procedure assistance to renters and property owners and continues to conduct annual surveys of rental units. During 2020, the Rent Mediation Board considered 14 cases of which, 2 were settled; 7 was resolved; 2 were closed or cancelled; and 3 were denied. Rental rate reports are conducted monthly by the Rent Mediation Board-members.
17. Fair Housing Program	Continue contracting with the Fair Housing Foundation (FHF) to assure City residents have equal access to housing	Ongoing	The City continues to provide information of the Fair Housing Foundation on the City's website
18. Rental Assistance	Continue to promote diversity through affirmative marketing of the availability of Section 8 Rental Certificates and the availability of Section 202 units	Ongoing	All of the City's Section 8 rental assistance is administered by the LA County CDC (see Program 2: Section 8 Rental Assistance). Inquiries regarding availability of affordable and senior housing are referred to the CDC and to the management at one of our local senior complexes. The Human Services Bureau for the City of Gardena provides assistance with counselling and rental assistance referrals
19. Accessible Housing	Provide rehab loans/grants to income qualified households for access improvements	Within One Year of adoption of Housing Element	The City of Gardena continues to provide funding for access services through its CDBG Handyworker Fix Up Program. Out of the 28 households assisted in 2019, out of these grants 16 provided direct funding for access improvements (See Program 1 under Rehabilitation Assistance).
20. Continuum of Care	Continue to participate in the County's Continuum of Care Program and allocate CDBG monies to fund the City's Emergency Services Program	2014-2021	In addition to our current efforts, the City through its Community Development Department participated in the updated homeless count. The City is also working in partnership with the Los Angeles County CDC, the Los Angeles County Services Authority as well as local nonproits and volunteer organizations to ensure that resources and temporary housing is available to the Gardena homeless population. The Gardena City Health and Human Services also provides assistance to the homeless and assistance in finding Public Housing. Gardena Police Department assists with providing referrals for Mental Health assistance.

21. Outreach for Persons with Developmental Disabilities	Develop an outreach program providing information on housing options for persons with developmental disabilities through a variety of traditional and electronic media, as well as through face-to-face interaction.	2014-2021	Ongoing
10. Second Unit Ordinance	Continue to provide an information packet on second-unit developments, as well as other affordable housing information, at the CDD counter and on the City's website	2014-2021	Ongoing

2020 GARDENA Housing Element Annual Progress Report

TABLE E - Commercial Development Bonus Approved pursuant to GC Section 65915.7

No Data Available

2020 GARDENA Housing Element Annual Progress Report

TABLE F - Annual Building Activity Report Summary - Units Rehabilitated, Preserved and Acquired pursuant to GC Section 65583.1(c)(2)

	Affordability by Household Incomes (Units that DO NOT count towards RHNA)				
Activity Type	**Extremely Low-Income**	**Very Low-Income**	**Low-Income**	**Total Units**	**Description of Activity**
Rehabilitation Activity	0	0	0	0	
Preservation of Units At-Risk	0	0	0	0	
Acquisition of Units	0	0	0	0	
Mobilehome Park Preservation	0	0	0	0	
Total Units by Income	**0**	**0**	**0**	**0**	

	Affordability by Household Incomes (Units that DO count towards RHNA)				
Activity Type	**Extremely Low-Income**	**Very Low-Income**	**Low-Income**	**Total Units**	**Description of Activity**
Rehabilitation Activity	0	0	0	0	
Preservation of Units At-Risk	0	0	0	0	
Acquisition of Units	0	0	0	0	
Mobilehome Park Preservation	0	0	0	0	
Total Units by Income	**0**	**0**	**0**	**0**	

2020 GARDENA Housing Element Annual Progress Report

TABLE G - Locally Owned Lands Included in the Housing Element Sites Inventory that have been sold, leased, or otherwise disposed of (CCR Title 25 §6202)

No Data Available

2020 GARDENA Housing Element Annual Progress Report

TABLE H - Locally Owned Surplus Sites (CCR Title 25 §6202)

No Data Available

2020 GARDENA Housing Element Annual Progress Report

LEAP Reporting (CCR Title 25 §6202)

No Data Available

City of Gardena

Gardena City Council Meeting

AGENDA REPORT SUMMARY

Agenda Item No. 10.A
Section: PLANNING & ENVIRONMENTAL QUALITY COMMISSION ACTION SHEET
Meeting Date: April 27, 2021

TO: THE HONORABLE MAYOR AND MEMBERS OF THE GARDENA CITY COUNCIL

AGENDA TITLE: APRIL 20, 2021

COUNCIL ACTION REQUIRED:
Receive and File. No action needed.

RECOMMENDATION AND STAFF SUMMARY:

FINANCIAL IMPACT/COST:

ATTACHMENTS:
2021_04_20 PCAX.doc

CITY OF GARDENA
PLANNING & ENVIRONMENTAL QUALITY COMMISSION
CITY COUNCIL CHAMBER ■ 1700 WEST 162nd STREET
Telephone: (310) 217-9524 ■ E-mail address: CDDPlanningandZoning@cityofgardena.org

REPORT OF ACTIONS
April 20, 2021

6. PUBLIC HEARING ITEMS:

A. Environmental Assessment #9-20, Site Plan Review #4-20, Zone Change #4-20, General Plan Amendment #5-20, Tentative Tract Map #3-20, Variance #2-20.
This item was continued to the May 18, 2021, Planning Commission meeting.

Commission Action: No action taken.

City of Gardena

Gardena City Council Meeting

AGENDA REPORT SUMMARY

Agenda Item No. 12.A
Section: DEPARTMENTAL ITEMS - COMMUNITY DEVELOPMENT
Meeting Date: April 27, 2021

TO: THE HONORABLE MAYOR AND MEMBERS OF THE GARDENA CITY COUNCIL

AGENDA TITLE: PUBLIC HEARING: ENVIRONMENTAL ASSESSMENT #1-20; GENERAL PLAN AMENDMENT #1-20; SPECIFIC PLAN #1-20; ZONE CHANGE #1-20; ZONING CODE AMENDMENT #3-20; DEVELOPMENT AGREEMENT #1-20; LOT LINT ADJUSTMENT #1-20; SITE PLAN REVIEW #1-20 (GARDENA TRANSIT ORIENTED DEVELOPMENT SPECIFIC PLAN)
APPLICANT: DIN/CAL 4, INC.

COUNCIL ACTION REQUIRED:

Staff Recommendation:

- **Conduct a Public Hearing**
- **Receive testimony from the public**
- **Adopt Resolution Nos. 6507 & 6508**
- **Introduce Ordinance No. 1828**

RECOMMENDATION AND STAFF SUMMARY:

Staff respectfully recommends that the City Council conduct a public hearing and adopt Resolution No. 6507 and 6508 and introduce Ordinance No. 1828.

On January 22, 2020, the applicant, Din/Cal 4, Inc., filed an application to develop an eight-story, 265-unit apartment building with a 2,500-square-foot dynamic digital display on a 1.33-acre site located at 12850-12900 Crenshaw Boulevard.

A Draft Environmental Impact Report (DEIR) was circulated for review from January 15 until March 1, 2021. A Mitigation Monitoring and Reporting Program (MMRP) was also prepared.

On April 6, 2021, the Planning Commission held a public hearing and adopted Resolution No. PC 4-21 recommending that the City Council certify the EIR and adopt the MMRP, findings related to alternatives and mitigation measures, and statement of overriding considerations; and approve the General Plan Amendment, Specific Plan, Zone Change, Zoning Code Amendment, Development Agreement, and Site Plan Review.

A full analysis of the project is contained in the attached staff report.

FINANCIAL IMPACT/COST:

One-time residential impact fee to City of $265,000
Construction related fees for business license and permits of approximately $1,250,000
Yearly property tax of approximately $110,000—current taxes are estimated at less than $4,000
Yearly business license fee of approximately $2,660—current yearly license fee is $125
Increased yearly Utility User's Tax of approximately $15,000
Minimum revenue of $75,000 per year for the digital display for 30 years
Indirect impacts include:
An agreement to buy locally for construction-related items which will increase sales tax revenues
An agreement to implement a Local Hiring Policy, h iring approximately 400 full- and part-time workers will create an indirect economic benefit from workers spending money in the City
Undetermined economic benefit from spending of new residents in the City

ATTACHMENTS:

CC_staff_report_-_GTODSP_042721
CC Resolution No. 6507 - GTODSP EIR.pdf
CC Resolution No. 6508 GTODSP GPA.pdf
CC Ordinance No. 1828 - GTODSP.pdf
RESOLUTION NO. PC 4-21 without attachments.pdf
GTODSP PC staff report without Attachment A 040621.pdf

APPROVED:



_____
Clint Osorio, City Manager

City of Gardena
City Council Meeting

Agenda Item No.: 12.A.
Department: Community Development
Meeting Date: 04/27/2021
Ordinance No.: 1828
Resolution Nos. 6507 and 6508

AGENDA STAFF REPORT

AGENDA TITLE: PUBLIC HEARING: Environmental Assessment #1-20; General Plan Amendment #1-20; Specific Plan #1-20; Zone Change #1-20; Zoning Code Amendment #3-20; Development Agreement #1-20; Lot Lint Adjustment #1-20; Site Plan Review #1-20 (Gardena Transit Oriented Development Specific Plan) (APNs: 4060-004-039)

a) RESOLUTION NO. 6507, Certifying an Environmental Impact Report, adopting a Mitigation Monitoring and Reporting Program, adopting a Statement of Overriding Considerations and making CEQA findings relating to the Gardena Transit Oriented Development Specific Plan and related entitlements for the 1.33 acre property located at 12850-12900 Crenshaw Boulevard

b) RESOLUTION NO. 6508, Amending the Land Use Plan of the City of Gardena General Plan by changing the Land Use Designation of the 1.33 acre property located at 12850-12900 Crenshaw Boulevard to Specific Plan and making minor text changes primarily related to specific plans

c) ORDINANCE NO. 1828, Amending Section 18.08.010 of the Gardena Municipal Code relating to established zones, amending Chapter 18.58 of the Gardena Municipal Code relating to digital billboards, amending the Zoning Map of the City of Gardena, Approving a Specific Plan, including a Site Plan, and approving a Development Agreement with Din/Cal 4, Inc. relating to the development of up to 265 dwelling units

RECOMMENDATION:

Staff respectfully recommends that Council:

1. Conduct a Public Hearing;

2. Receive testimony from the public

3. Adopt Resolution Nos. 6507 and 6508; and

4. Introduce Ordinance No. 1828

BACKGROUND:

On April 6, 2021, the Planning and Environmental Quality Commission considered the proposed project and voted 5-0 to recommend approval to the City Council. The Commission made one change to Condition BS12 to require each until to be separately sub-metered at the request of the applicant. Three speakers from the public spoke in support of the project: Wanda Love, Graham Jenkins, and Steven Ludwig.

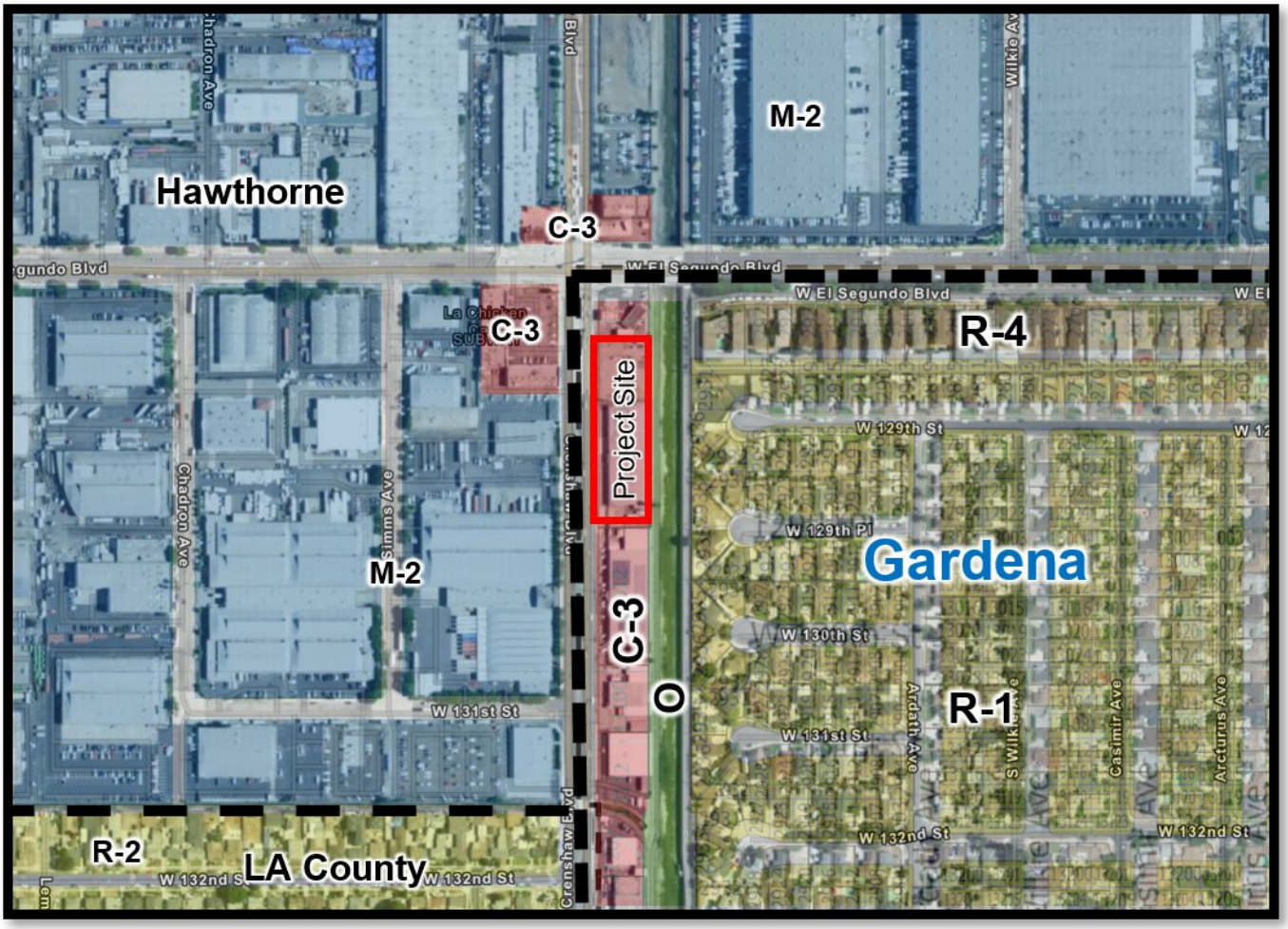
PROJECT DESCRIPTION:

Location Map



Source: Google Maps

Zoning and setting



The project site is part of a larger regional industrial, engineering, commercial, and employment area that generally extends north to south from I-105 to Rosecrans Avenue and east to west from Van Ness Avenue to Prairie Avenue. The site is fully developed with one late 1950s, one-story, 24,990-square-foot warehouse building used to store vintage cars and auto parts. The site is a blighted property that is under significant deterioration and disrepair. Additionally, the structure does not conform to current zoning in that it is an industrial building in a commercial zone.

The Los Angeles County Metro Rail Crenshaw Station is located approximately 0.6 miles north of the project site on Crenshaw Boulevard in the city of Hawthorne. In addition, three

major freeways are conveniently accessible to the project: I-105 to the north, I-110 to the east, and I-405 to the southwest.

Proposed Development Project

The project is located on a 58,144 square foot parcel that includes up to 247,112 square feet of floor area with a floor area ratio (FAR) of 4.25:1.

Residential Component

The development project includes the demolition of an existing single-story building which will be replaced with an eight-story residential building with up to 265 dwelling units, although only 262 dwelling units are proposed. The maximum density will be just under 200 units per acre. The building will be eight stories with a maximum height of 100 feet, as measured from the finished floor to the highest point on the roof. The building will include five and one-half residential floors over two and one-half parking floors, with the third level being half-residential and half-parking. The developer will provide unbundled on-site parking at one space per unit and secured bicycle parking for the residents.

The proposed building design will incorporate a modern architectural style and scale that is compatible with the intended use. The building will have various horizontal and vertical articulations to create visual interest, and a mix of building colors and materials will be used for variation. Street trees and onsite landscaping will add interest at the pedestrian level.

The overhead power lines in front of the project site on the east side of Crenshaw Boulevard will be undergrounded. Additional features of the Project are discussed in the Site Plan Review section below.





CRENSHAW (WEST) ELEVATION

The project is a transit-oriented development that will place urban residential uses near public transit. The site is located within walking distance of the Crenshaw Station, numerous local and regional bus lines, and neighborhood-serving commercial uses, providing residents with a reduced dependence on the personal automobile. In order to reduce such dependency, one secure bicycle parking space will be provided for each unit, a designated loading area will be available for ride-sharing pick-up and drop-off, and parking spaces are to be unbundled from the units—meaning that residents must separately rent parking spaces. The unbundling of automobile and bicycle parking were specific recommendations from CalTrans in order to shift individuals from private vehicles to public and active transportation. There is also co-working space on-site which will allow residents to work on-site rather than commute to an office.

The project is expected to draw residents from nearby businesses such as Space X, and the Transportation Demand Management Plan requires an exclusive pre-leasing period targeted for employees who work within one half-mile of the site. The project will also help to address the regional jobs-housing imbalance, support the local economy by creating new, high-quality, multi-family housing options in northwest Gardena near significant employment centers in the technology and creative industries.

Residents will have access to various elevated courtyards and grade-level open space amenities. A minimum of 8,500 square feet of onsite common open space will be provided. This includes:

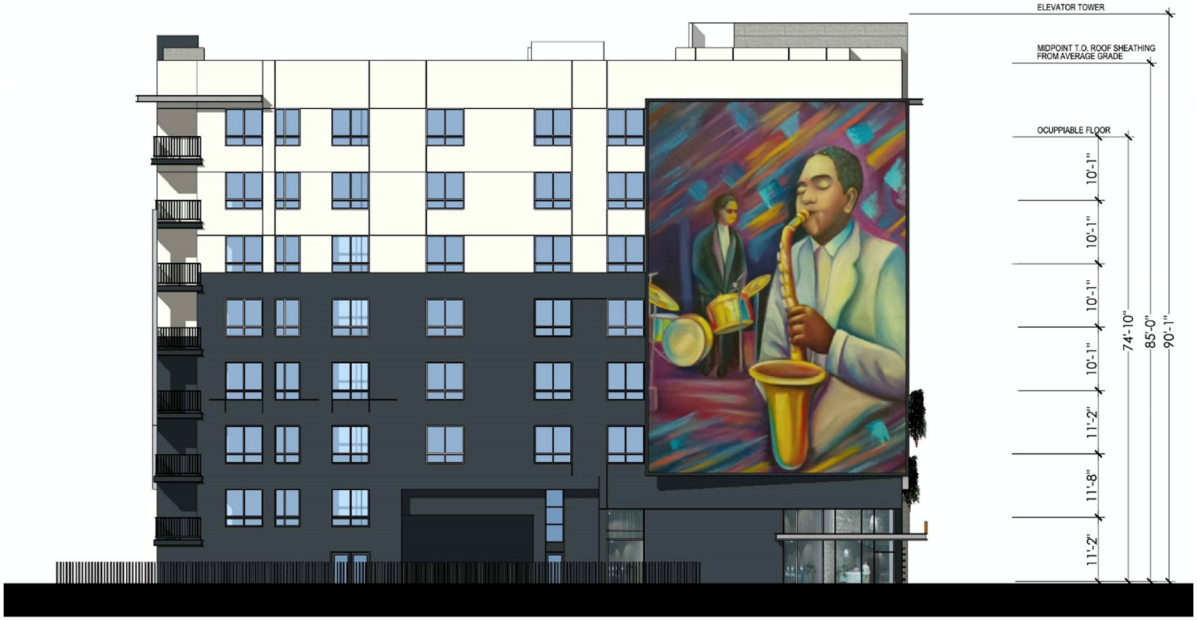
- Dog park
- Swimming pool and upper-level courtyards
- Fitness room
- Club house
- Co-working space



Digital Display

The development also includes a single digital billboard on the north side of the building which will have a dynamic display. The display will be approximately 42 feet by 60 feet and will not exceed 2,500 square feet in total. It will be illuminated between the hours of 6:00 a.m. to 2:00 a.m. The display was analyzed in the EIR under the aesthetics section

which concluded that there would not be any significant aesthetic impacts from the digital display as designed.



NORTH ELEVATION

As safety was not an issue under the EIR, an analysis was prepared by Fehr & Peers on behalf of the developer relating to the potential effects on distracted driving when reading the display. The Fehr & Peers memorandum indicates that: based on the evidence, it is not possible to conclude that there is a direct relationship between driving behavior changes attributed to roadside advertising and subsequent road crashes; the results remain inconclusive; roadside advertising, may increase crash risk; the empirical studies that have been done feature strong methodological limitations; and there is a need for further research to ensure recent technological advancements are addressed. The Fehr & Peers memo specifically noted that the impact of installing a dynamic sign in an urban location such as the proposed Project is much different than a sign in a rural context or highway. In conclusion the Fehr & Peers memo sates that the design and operational characteristics of the sign were identified to minimize driver distraction and the potential for traffic safety hazards and will be operated to reduce potential for traffic safety hazards. (Attachment B.) All recommendations in the Fehr & Peers report are incorporated into the Specific Plan development regulations.

GENERAL PLAN CONSISTENCY

The project is consistent with General Plan goals and policies from: Community Development Element—Land Use Plan, Economic Development Plan, Community Design Plan, and Circulation Plan; Community Resources Element—Conservation Plan; Community Safety Element—Public Safety Plan and Noise Plan; and the Housing Element. The consistency analysis is set forth in great detail in Section 4.9 of the EIR.

Since the applications were filed, SCAG finalized the Regional Housing Needs Assessment (RHNA) for the 6th Cycle Housing Element. The City of Gardena's final housing allocation is 5,735 units distributed among the various income categories as follows: Very Low—1,485; Low—761; Moderate—894; and Above Moderate—2,595. This project will satisfy approximately 10 percent of the City's Above Moderate housing need in one location.

PROJECT ENTITLEMENTS

The project site is in the C-3 (General Commercial) zoning district. The C-3 zoning district does not permit residential uses, permits a maximum FAR of 0.5:1, and permits a maximum building height of two and one-half stories. By comparison, the GTODSP zoning permits residential density of 200 dwelling units per acre, a maximum FAR of 4.25:1, and building heights of up to eight stories and 100 feet.

This section provides a review of the various entitlements, the following section provides an overview of the various entitlement and CEQA documents required. The Planning Commission will be making a recommendation to the City Council on all approvals with the exception of the Lot Line Adjustment, which is an administrative action subject to the Community Development Director's approval.

Environmental Impact Report

An EIR is generally prepared for projects where there is a fair argument that there may be a significant impact on the environment, and the impacts may not be mitigated below a level of significance. EIRs are generally used for larger and more complex projects.

The EIR process starts with the preparation of an Initial Study and then a Notice of Preparation during which there is a 30-day review period for people and public agencies to comment on what should be studied in the document. There is also a public scoping meeting during this time. The Notice of Preparation public review period for this project ran from August 20 through September 18, 2020. There was a virtual scoping meeting on September 2, 2020, with only two people from the public in attendance.

A Draft EIR (DEIR) covers the same topics as a Mitigated Negative Declaration (MND), but with additional required sections such as a discussion of alternatives and growth inducing impacts. As with an MND, mitigation measures are included in a DEIR to reduce or eliminate significant impacts. Once the DEIR is completed, a Notice of Availability is prepared and the DEIR is circulated for a 30 or 45-day public review period. The public review period for the GTODSP DEIR was from January 15 until March 1, 2021. The DEIR is included in Exhibit A to Exhibit 1.

The DEIR identified several topic areas where there was a possibility of a significant impact from the project and identified mitigation measures to reduce those impacts as well. The topic areas are: cultural and tribal resources; geology, soils, and paleontological resources; hazardous materials and waste; and transportation. The mitigation measures that will alleviate these impacts are listed in the Mitigation Monitoring and Reporting Program (MMRP) which is attached as Exhibit C to Exhibit 1. The DEIR also identified one impact which could not be mitigated below a level of significance, construction noise. While construction noise is exempt from the City's noise standards, it was identified as a significant impact out of an abundance of caution.

A DEIR is required to include an examination of reasonable alternatives, include the "No Project" alternative, i.e., what happens if the Project is not approved. The alternatives are supposed to meet the project objectives. The DEIR analyzed the following alternatives: No Project/No Construction—which leaves the property as is; No Project/Existing Land Use Designation—which allows construction under the General Commercial land use and zoning; No Digital Sign—which would develop the project exactly as proposed with the exception of the digital display; and Reduced Density—to construct 97 fewer dwelling units. Of these alternatives, the DEIR is required to identify the environmentally superior project. In this case, the No Project/No Construction alternative is the environmentally superior project. However, this alternative, like the other No Project alternative, would not achieve any of the goals of the Project. In accordance with the requirements of CEQA, the DEIR identified the Reduced Density alternative as the environmentally superior alternative among the two remaining alternatives. However, neither of the other alternatives would eliminate the only significant and unmitigable impact, which is construction noise. The only alternative which would eliminate the construction noise impact was considered infeasible because it would render the site nearly undevelopable in order to provide sufficient distance from residences to mitigate the construction noise.

Once the public review period has closed, a Final EIR (FEIR) is prepared. The FEIR is required to include, among other things, all written comments received on the DEIR, responses to comments, and revisions necessitated due to the comments. No comments from the public were received on the DEIR and there were only three comment letters

from public agencies, none of which commented on the substantive provisions of the DEIR. The Final EIR is attached as Exhibit B to Exhibit 1.

When an EIR identifies significant impacts, there are findings that the public agency must make in order to approve the Project, and these findings must be supported by substantial evidence. These findings are: changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant effects; the changes or alterations are within the responsibility and jurisdiction of another public agency; or specific economic, legal, social, technological, or other considerations make mitigation measures or project alternatives feasible. In addition to the mitigation measures discussed throughout the EIR and included in the MMRP, the project also included design features which reduced all significant impacts with the exception of construction noise. As explained above, there is no way to eliminate the noise impact without making the project of such a small size that it becomes economically infeasible to build.

When a project has a significant impact which cannot be mitigated, the decision-making body is required to balance the economic, legal, social, technological, or other benefits of a project against the unavoidable impacts in determining whether to approve the project. This is accomplished by the adoption of a Statement of Overriding Considerations. In the present case, the project has a number of benefits, including: increased property and utility user taxes; a one-time residential impact fee of $265,000 to the City; satisfaction of approximately 10 percent of the City's above-moderate housing allocation for the 2021-2029 Housing Cycle; a development agreement that includes revenue sharing related to the digital sign display time to advertise community events and spotlight businesses; and a commitment to hire and buy locally for construction. It is also hoped that this Project will serve as a catalyst to stimulate other development in the area.

<u>Legislative Approvals – General Plan Amendment, Specific Plan, Zone Change, Zoning Code Amendment</u>

Legislative approvals are at the discretion of the City Council, with recommendation from the Planning Commission. Such changes should be approved when it is in the public interest and represents good planning practices. In order to develop the project, the following legislative approvals are required:

- General Plan Amendment to the Land Use Plan—to change the land use designation from Commercial to Specific Plan and to amend the text of the Land Use Plan primarily relating to specific plans.
- Specific Plan—to adopt the Gardena Transit Oriented Development Specific Plan which will act as the zoning for the property.

- Zone Change—to change the zoning of the property from General Commercial (C-3) to Gardena Transit Oriented Development Specific Plan (GTODSP).
- Zoning Code Amendment—to amend the Gardena Municipal Code to add the GTODSP and a previously approved specific plan to the zoning designations and amend the Code to allow digital displays when approved by a Development Agreement and allowed in the zone.

Legislative Approval—Development Agreement

In the normal course of project approvals, a City may not place conditions on projects or demand exactions unless there is a reasonable nexus between the condition and the impact created by the project. Additionally, until a developer obtains vested rights, a City may always change the zoning and other requirements related to entitlements. For example, an applicant could obtain a CUP for a car wash in the commercial zone and before he starts building, the City could change the zoning to residential. However, once a developer starts spending money to construct the project, he obtains a vested right. Once the rights are vested, the City cannot impose new conditions or fees.

A Development Agreement is a contract between the City and a Developer. Under a Development Agreement, a developer gets an “early” vested right that protects his ability to develop. In exchange, the City usually gets benefits it would not otherwise be able to obtain.

In the GTODSP, the City is getting several benefits that it would not otherwise get—in return for providing a (proposed) 5-year time frame, with the possibility of two 2-year extensions, in which the developer may implement the project, the City is getting the following benefits which would not otherwise occur:

- A share of the revenue received from the digital display for a 30-year period; the Development Agreement provides for a minimum of $75,000 per year or 25% of all Net Profits, whichever is greater.
- Community programming time for City business, arts, and community related non-commercial programming.
- A local hiring and local buying program—see Exhibit D to the Development Agreement (Exhibit D to Exhibit 3).

Site Plan Review

Normally the Planning Commission approves the site plan, subject only to a call for review or an appeal to the City Council. However, in this case the Specific Plan and its regulations have been tailored around the specific site plan that is being proposed and

the site plan is embedded within the Specific Plan. Therefore, the City Council will approve the site plan along with the Specific Plan. The Los Angeles County Fire Department approved 26-foot fire lanes shown on the north and south side of the development. The table below summarizes the development standards proposed in the Specific Plan. Development standards not covered by the Specific Plan will be regulated by the Gardena Municipal Code.

STANDARD	**REQUIREMENT**
Minimum Lot Area	1.33 acres
Density/Capacity	200 units/acre, up to 265 units
Building Height	8 stories and 100 feet
Floor Area Ratio	4.25:1
Dwelling Unit Size	Studio: 400 SF 1 Bedroom: 550 SF 2+ Bedrooms: 850 SF + 150 SF for each additional bedroom
Setbacks	Front: None Side: 10 feet Rear: None
Encroachments	Canopy or awning: 5 feet Planter boxes: 5 feet Outdoor seating: 5 feet
Minimum Open Space	8,500 SF common 250 SF ground-level planter
Parking	267 spaces; up to 50% compact
Parking Dimensions	Compact: 9’ x 16’ Standard: 9’ x 18’
Drive Aisle	24 feet
Bicycle Parking	1 per unit

The following factors shall be considered in determining whether the site plan shall be approved.

1. *The dimensions, shape and orientation of the parcel;*

   The property is 1.33 acres and 125 feet deep by 464.3 feet wide. It is fairly flat and suitable for development with adoption of the Specific Plan.

2. *The placement of buildings and structures on the parcel;*

   The proposed building covers approximate 71 percent of the property with an eight-story building. Access into the parking garage is via a driveway from Crenshaw Boulevard near the center of the property. A fire lane is provided via driveways on the north and south portions of the property which continues behind the building along the Dominguez Channel to the east. The building includes five and one-half levels of residential floors over two and one-half levels of parking.

3. *The height, setbacks, bulk and building materials;*

   The building includes a maximum of eight stories with a maximum height of up to 100 feet, as measured from the finished floor to the highest point on the roof. Adequate setbacks are provided in the sides and rear due to the fire lane proposed around the building. Although there is no required front yard setback, approximately 250 square feet of planters will be provided along the street. The building design incorporates an architectural style and scale that is compatible with the intended use. Architectural details will include features that contribute to the aesthetic ambience of the immediate area.

4. *The distance between buildings or structures;*

   The proposed building is the only structure being proposed on the subject property. The closest adjacent structures are a car wash building to the north and an industrial building to the south. Due to the fire lane along the sides and rear perimeters, no building will be closer than 26 feet to the building. The residential properties to the east are 100 feet away across the Dominguez Channel.

5. *The location, number, and layout of off-street parking and loading spaces;*

   The project includes 262 dwelling units and a total of 267 parking spaces. Two of the spaces will be designated for leasing, mail, and shared ride services. The building will include two and one-half levels of parking. The project also includes secured bicycle parking spaces for residents at a ratio of one space per unit. Due to the site's proximity to the Green Line Crenshaw Station 0.6 miles to the north, the project is considered a transit-oriented development; retail and transit uses are

in close proximity. The number of disabled and electric vehicle charging spaces are set by the Building Code.

The site plan shows 50% of the parking spaces for compact vehicles with dimensions of 9 feet wide by 16 feet deep. The width is six inches wider than Gardena's minimum compact space and one foot shorter. However, as previously noted, when the City Council discussed a revision to parking standards last year, no other jurisdiction in the surrounding area requires a 17-foot long compact space. Almost every other City requires only 15 feet for compact spaces.

LLG Engineers provided a parking study for the Project. (Attachment C.) The Study discusses the Transportation Demand Management (TDM) Program that was developed to reduce single-occupant vehicle travel and take advantage of the project site's proximity to employment, transit, and bicycle and pedestrian facilities. The Study also examines parking ratios at other transit-oriented development projects, discusses the need to reduce the parking aisle width, and reduce the size of the parking spaces. In addition to the study by LLG, the applicant provided an additional parking analysis prepared by Richard Willson, professor in urban and regional planning at Cal Poly Pomona, who specializes in transportation planning and parking. (Professor Willson's Bio is found at Attachment D.) This analysis also supports that the development contains sufficient parking. (Attachment E.)

Both CalTrans and Los Angeles County Metropolitan Transportation Authority submitted letters supporting the reduction or removal of minimum parking requirements.

6. *The internal vehicular patterns and pedestrian safety features;*

Internal vehicular patterns and pedestrian safety features are designed to be safe and secure. Access to the parking garage is via a driveway on Crenshaw Boulevard in the middle of the project site. A public sidewalk abutting the site along Crenshaw Boulevard will allow pedestrians to walk safely. Street lighting and curb and gutters will be provided along the sidewalk.

The internal drive aisles in the parking structure are proposed to be 24 feet. As the Fire Department will have access from fire lanes on the north and south side of the developments, as well as from Crenshaw Boulevard, wider aisles are not needed for fire access. As mentioned above, the LLG Parking Study also justifies the use of a narrower aisle.

7. *The location, amount, and nature of landscaping;*

   The project includes 8,500 square feet of common open space and 250 square feet of planter areas along Crenshaw Boulevard. Common open space includes a dog park, swimming pool, upper-level courtyards, fitness room, club house, and co-working space.

8. *The placement, height and, direction of illumination of light standards;*

   Lighting for vehicles and pedestrians will be located in appropriate areas where they do not create a significant light and glare impact. Perimeter light poles will be 12 feet high to illuminate drive aisles and the dog park. Pendant lights and festival lighting will be provided in the courtyard areas for the safety of residents. A 2,500-square-foot dynamic, digital display is proposed on the north side of the building which will automatically adjust to lighting conditions based on the time of day and ambient lighting. Additional development standards for the digital display are incorporated into the Specific Plan.

9. *The location, number, size and height of signs;*

   The top of the proposed digital display is approximately 80 feet high. As this is a residential apartment building, signage will be minimal and limited to identification, directional, and safety signs. All signage will be reviewed by the City prior to issuance of a permit.

10. *The location, height and materials of walls, fences or hedges;*

    All walls and fences in a front yard setback will comply with the requirements of Gardena Municipal Code Section 18.42.070 A.2. All walls or fences in the side and rear yard setbacks will not exceed ten feet in height and will be constructed of solid decorative concrete masonry or open wrought iron. A ten-foot-high solid decorative concrete masonry wall is required along the southern property line to buffer from existing industrial uses, and may also be provided along the northern property line.

11. *The location and method of screening refuse and storage areas, roof equipment, pipes, vents, utility equipment and all equipment not contained in the main buildings of the development;*

    Refuse and storage areas will all be interior to the building and properly screened. Roof equipment will be screened by a parapet along the perimeter of the building. Two staircases will be provided on the roof which are not expected to be visible from street level. These staircases will be painted to match the building. All pipes, vents, and other equipment are required to be incorporated into the building design or painted to match the building.

12. *[Repealed]*

13. *Such other information which the community development director or commission may require to make the necessary findings that the provisions of this code are being complied with.*

    The Specific Plan essentially becomes the zoning and development standards for the project site. Since the Specific Plan was written to incorporate the project's design features, the project will be consistent with the zoning and development standards once the Specific Plan is approved.

Lot Line Adjustment

The project site is currently made of four legal lots which need to be combined into one. Under the Gardena Municipal Code, lot line adjustments are acted upon by the Director of Community Development. The project will be conditioned to obtain a lot line adjustment.

ECONOMIC IMPACT

The Project is projected to have an overall positive economic impact for the City, including the following:

- One-time residential impact fee of $265,000
- Construction related fees for business license, fees, and permits of approximately $1,250,000
- Yearly property tax of approximately $110,000—current property taxes are estimated at less than $4,000 per year
- Yearly business license fee of approximately $2,660—current yearly business license fee is $125
- Increased yearly Utility User's Tax of approximately $15,000
- An agreement to buy locally for construction related items which will increase the City's sales tax revenues
- An agreement to implement a Local Hiring Policy
- Hiring of approximately 400 full- and part-time workers which will create an indirect economic benefit from workers spending money in the City
- Undetermined economic benefit from spending of new residents in the City
- Minimum revenue of $75,000 per year for the digital display for 30 years

Additionally, this project will serve as a catalyst for other economic development in the area, including other transit-oriented development and high-density residential projects.

Although not an economic impact, under the Development Agreement the City will be granted community programming time of 8 percent of the total display time and 50 percent of uncommitted display time on a monthly basis. This time will be used for City business, arts, and community related non-commercial programming.

ISSUES OF SUPPORT

Housing Needs

California is experiencing a housing shortage that is impacting everyone in one way or another. The project will supply about 10% of the City's share of above moderate income RHNA units, which is certainly significant and helpful. Pushing high-density housing projects into areas of low-performing commercial and industrial properties helps avoid disruption to the existing residential community.

Economic argument in favor of this project

The historic pattern of development in Gardena resulted in a little over half of the land built with single-family houses and duplexes. Higher density residential is restricted to less than 10% of the buildable land. While not unusual, it hurts Gardena's economic development efforts. National brands looking to site new retail, service, or hospitality facilities are looking for the right combination of desirable factors to suit their demographic targets. Among the things they often look for are the number of households within certain distances of a site as a gauge of the potential customer base. All other factors being equal, a location with more households nearby will be favored over a location dominated by single-family houses and duplexes. Additional developments like this application over the next eight to ten years will help address the low household count that is contributing to making economic development more difficult than it should be in Gardena. Additionally, having more households in Gardena adds economic stimulus to the local economy when new residents spend and pay taxes.

Environmental argument in favor of this project

When employees work in Gardena and surrounding jobs-rich cities but live to the north or east where housing is relatively affordable, they contribute to pollution and congestion by commuting to work. That degrades the quality of life for residents of Gardena. Having 262 new households in this project represents potentially over 200 significantly shorter commutes to, or passing through, Gardena twice per day. Many of these commutes will be practically eliminated.

Social argument in favor of this project

Many young adults growing up here cannot find affordable housing in Gardena to set down roots to establish their independence or to start their own families. Although this is

part of a nationwide trend, the high cost of land in this area makes it even worse here. The most obvious manifestation of this is grown children living with their parents well into adulthood. This development is offering 262 units, of which 85% are one-bedroom and studio units. Although these will be offered at market rate, many of the renters will likely be current residents of Gardena, so the addition of these units into the real estate market should have a positive cascading effect in the rental marketplace. As renters move from older or less conveniently located buildings to the new building, they free up their current units. This causes a cascading effect that ends with units that are affordable to low income residents entering the rental market, which is a good outcome.

Special considerations in favor of this project

This project is in the far northwest corner of the City and is ideally located to have the minimum negative impact on the low-density residential neighbors nearest its location. This project is buffered from the nearest low-density residential neighborhoods by the Dominguez Channel. The nearest point of entry to the neighborhood is Purche Avenue at El Segundo Boulevard, more than half a mile away. There is also no benefit to drivers using neighborhood streets as a shortcut, so traffic impacts to the neighborhood should be none. Noise is another potential issue. The open space areas where noise is most likely to be generated are located on the west side of the building, away from Gardena homes. As far as visual or aesthetic impacts, this project will be among the highest quality residential projects to be constructed in Gardena. Attention to the back and south side of the building facing Gardena neighborhoods was not overlooked.

Not every residential development will be as well sited as this one to have the least negative impacts on the rest of the City while contributing in positive ways as explained above. Not every residential development will make such as large dent in the City's RHNA allocation as this one does. Typically, the plusses and minuses are more evenly balanced.

IN CONCLUSION, Staff respectfully recommends that Council take the following actions:

1) Adopt Resolution No. 6507 (Attachment 1) certifying an Environmental Impact Report, adopting a Mitigation Monitoring and Reporting Program, adopting a Statement of Overriding Considerations and making CEQA findings relating to the Gardena Transit Oriented Development Specific Plan and related entitlements for the 1.33 acre property located at 12850-12900 Crenshaw Boulevard;

2) Adopt Resolution No. 6508 amending the Land Use Plan of the City of Gardena General Plan by changing the Land Use Designation of the 1.33 acre property located at 12850-12900 Crenshaw Boulevard to Specific Plan and making minor text changes primarily related to specific plans; and

3) Introduce Ordinance No. 1828, amending Section 18.08.010 of the Gardena Municipal Code relating to established zones, amending Chapter 18.58 of the Gardena Municipal Code relating to digital billboards, amending the Zoning Map of the City of Gardena, approving a Specific Plan, including a Site Plan, and approving a Development Agreement with Din/Cal 4, Inc. relating to the development of up to 265 dwelling units.

Submitted by: John F. Signo, AICP Date: April 23, 2021

Attachments

1) Resolution No. 6507 – City Council CEQA Resolution
    a. Exhibit A – Draft EIR
    b. Exhibit B – Final EIR
    c. Exhibit C – Mitigation Monitoring and Reporting Program
2) Resolution No. 6508 – City Council General Plan Amendment Resolution
    a. Exhibit A – Land Use Plan Map Change
    b. Exhibit B – Updated Land Use Plan
3) Ordinance No. 1828 – City Council Ordinance Adopting the Specific Plan, Changing the Zoning, Approving the Zoning Code Amendment, and Approving the Development Agreement
    a. Exhibit A – Specific Plan
    b. Exhibit B – Conditions of Approval
    c. Exhibit C – Zone Change Map
    d. Exhibit D – Development Agreement
4) Planning Commission Resolution No. PC 4-21 without attachments
5) Planning Commission staff report dated April 6, 2021 (without Attachment A)

RESOLUTION NO. 6507

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF GARDENA, CALIFORNIA CERTIFYING AN ENVIRONMENTAL IMPACT REPORT, ADOPTING A MITIGATION MONITORING AND REPORTING PROGRAM, ADOPTING A STATEMENT OF OVERRIDING CONSIDERATIONS AND MAKING CEQA FINDINGS RELATING TO THE GARDENA TRANSIT ORIENTED DEVELOPMENT SPECIFIC PLAN AND RELATED ENTITLEMENTS FOR THE 1.33 ACRE PROPERTY LOCATED AT 12850 – 12900 CRENSHAW BOULEVARD

(APN # 4060-004-039)

WHEREAS, on January 21, 2020, Din/Cal 4, Inc., filed an application for a General Plan Amendment to the Land Use Plan (the "General Plan Amendment"), Specific Plan, Zone Change, Zoning Code Amendment, Site Plan Review and lot merger to develop an apartment building with approximately 265 units on 1.33 acres located at 12850 – 12900 Crenshaw Boulevard (the "Property"); and

WHEREAS, it was subsequently determined that the development would also require a Development Agreement and that the lot merger should be a lot line adjustment; and

WHEREAS, the General Plan Amendment, Specific Plan, Zone Change, Zoning Code Amendment, Development Agreement, Site Plan Review, and Lot Line Adjustment are collectively referred to as the Project; and

WHEREAS, on April 6, 2021, the Planning Commission of the City of Gardena held a duly, noticed public hearing on the Project at which time it considered all evidence presented, both written and oral, after which it adopted PC Resolution No. 4-21, recommending that the City Council certify the Environmental Impact Report, adopt a Mitigation Monitoring and Reporting Program, make CEQA findings regarding mitigation measures and alternatives, adopt a statement of overriding considerations, and approve all the requested entitlements for the Project, with the exception of the Lot Line Adjustment which will be administratively approved at a later date; and

WHEREAS, on April 27, 2021, the City Council of the City of Gardena held a duly noticed hearing on the Project;

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF GARDENA DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. CEQA Procedures. The City Council of the City of Gardena does hereby find as follows:

A. In April 2020, the City entered into a consultant agreement with Kimley-Horn and Associates to prepare an EIR for the Project.

B. A Notice of Preparation ("NOP") for the Draft EIR and the Initial Study ("IS") was timely distributed and the public comment period on the NOP and of August 20, 2020, to September 18, 2020.

C. On September 2, 2020, the City held a virtual scoping meeting in accordance with Public Resources Code § 21083.9 and CEQA Guidelines § 15082(c). There were two people in attendance at the meeting, but neither provided any comments.

D. The Draft EIR was made available for a 45-day public review period from January 15, 2021, through March 1, 2021. The Notice of Availability ("NOA") was sent to a list of interested persons, agencies and organizations, adjacent property owners, and to anyone who had requested notice. The Notice of Completion was sent to the State Clearinghouse in Sacramento for distribution to public agencies. The DEIR and all the appendices were made available on the City's website with directions to contact staff if help was needed in accessing the document. Physical copies could not be made available due to the coronavirus pandemic which has closed Gardena City Hall and other public posting places.

E. Prior to the release of the DEIR and in accordance with SB 18 and AB 52, the City sent notices to the list of Native American Tribes provided by the Native American Heritage Council. Only one tribe requested consultation: the Gabrieleno Band of Mission Indians – Kizh Nation. The City engaged in consultation and mitigation measures have been included in the EIR as a result of the consultation.

F. The City received and reviewed comments on the Draft EIR and prepared responses to those comments which are incorporated into the Final EIR through its consultant. The Final EIR consists of the Draft EIR and all Appendices thereto and that separate document dated March 2021, incorporating the written comments and responses thereto. No edits to the Draft EIR were required based on the comments received.

G. Responses were sent to the public agencies that commented on the DEIR and the Final EIR was made available for public review on March 16, 2021.

H. The City has complied with all procedural requirements relating to CEQA and other requirements of law. The Final EIR is adequate and complete and complies with all CEQA requirements.

I. In certifying the Final EIR, adopting the Findings and a Statement of Overriding Considerations, and adopting the Mitigation Monitoring and Reporting Program, the City Council has exercised its independent judgement and analysis. The City Council has reviewed and considered the Final EIR, agenda reports, written reports, public testimony, and other information in the record.

SECTION 2. CEQA Findings Regarding Impacts.

A. An Initial Study was prepared for the Project which determined that a number of topics were not required to be discussed in the EIR. The City Council finds that the topics listed therein and included in Section 7.0 of the EIR of Effects Found Not to Be Significant did not require any further analysis.

B. The impacts that are analyzed in the EIR are discussed in detail in Sections 4.1 through 4.15 and summarized in Section ES.4 of the Draft EIR and identified therein as less than significant, less than significant after mitigation, and significant even after mitigation. The following is a summary of the mitigation measures and impacts which are all fully described in the EIR.

C. The EIR identifies the below topic areas as significant, but to be mitigated below a level of significance.

1. Under Cultural Resources and Tribal Cultural Resources, it was determined that the Project could cause a substantial adverse change in the significance of an archaeological resource and cause a substantial adverse change in the significance of a Tribal Cultural Resource. Mitigation Measures TCR-1 through TCR-8, the mitigation measures requested by the Gabrieleno Band of Mission Indians – Kizh Nation, will mitigate these impacts to a less than significant level. Additionally, under Cultural Resources it was determined that the Project could disturb human remains, but Mitigation Measure TCR-4 would reduce this impact to less than significant as well.

2. Under Geology, Soils, and Paleontological Resources it was determined that the Project could destroy a unique paleontological resource, site, or unique geologic feature. Mitigation Measures GEO-1 through GEO-3 requiring a Paleontological Resources Monitoring and Mitigation Plan, monitoring by a Paleontological Monitor, and assessment by the Paleontologist if fossils are discovered will reduce this impact to a less than significant level.

3. Under Hazardous Materials and Wastes, it was determined that the Project could create a significant hazard through a reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Mitigation Measures HAZ 1 and HAZ 2 requiring the installation of an impermeable vapor membrane under the slab areas and a construction management plan to be submitted to the City addressing procedures and requirements for responding to disturbances of undocumented contaminated soil will mitigate those impacts below a level of significance.

4. Under Transportation, it was determined that the Project could result in inadequate emergency access. Mitigation Measures TRANS-1 and TRANS-2 which require a construction transportation plan to be submitted to the City and a requirement to maintain emergency vehicle access will reduce this impact to a less than significant level.

D. Construction noise, which takes place during the hours of 7:00 a.m. to 6:00 p.m. on weekdays and between the hours of 9:00 a.m. to 6:00 p.m. on Saturdays, is exempt from the City's noise standards. Nevertheless, out of an abundance of caution, the EIR identified construction noise as a significant impact. The only impact which cannot be mitigated below a level of significance is the construction noise associated with the Project. Mitigation Measure NOI-1 requires a temporary and impermeable sound barrier that reduces noise by at least 10dB(A) but will not completely reduce the Noise impacts.

E. In addition to Mitigation Measures, several Project Design Features (PDFs) were incorporated into the Project which, when implemented, reduce impacts to a less than significant level for those impacts relating to Air Quality, Greenhouse Gas Emissions, and Aesthetics. A list of these PDFs is included in Section 2.3.2 of the EIR as well as discussed within the various topic sections.

1. Under Aesthetics, there are nine PDFs for the digital display that were incorporated into the Project that will prevent the display from having an aesthetic impact. These PDFs are also a requirement of the Specific Plan. Although the safety of the digital display was not a topic that was analyzed under CEQA, the Project also incorporates in recommended safety measures as additional requirements.

2. Under Air Quality, construction air impacts will be reduced due to watering of construction areas which will minimize dust emissions.

3. Under Air Quality and Greenhouse Gas Emissions electric vehicle charging stations, the implementation of transportation demand management strategies, and use of a solar swimming pool heating system will all reduce impacts in these areas.

SECTION 4. Alternatives.

A. In accordance with CEQA, the EIR examined four alternatives to the Project. The Alternatives are discussed in detail in Chapter 6 of the EIR and summarized in Section ES.6. The purpose of looking at alternatives is to try and avoid or substantially lessen any of the significant effects of the Project while still attaining most of the basic objectives. As discussed in Section 3 above, the only impact of the Project that could not be reduced to a less than significant level is construction noise.

1. The No Project/No Construction Alternative would retain the Project site in its current condition with a decades-old building on site which does not conform to current development standards. This alternative does not implement any of the Project's improvements and would not meet any of the Project's objectives.

2. The No Project/Existing Land Use Designation Alternative provides for the site to be redeveloped in accordance with its current General Plan and zoning designation, which is for general commercial purposes. Redevelopment of the site in this manner would cause development to be in conformance with the City's development standards, but the alternative still would not meet any of the Project's objectives.

3. The No Digital Sign Alternative would develop the Project exactly as proposed with the exception of the approximately 2,500 square foot digital sign, which is proposed for the north face of the building. This alternative meets all of the Project objectives except for allowing digital signs that allows for community programming and sharing of revenue.

4. The Reduced Density Alternative would develop a high-density apartment project but it would be: reduced by two floors, resulting in a reduction in height of approximately 22 feet, from 100 to 78 feet; result in a reduction in units from 265 to 168; and result in an approximately 50 percent reduction in the digital sign area. This alternative would meet all of the Project objectives, but to a lesser degree.

B. An EIR is supposed to identify alternatives that were considered for analysis, but rejected. The only impact that was significant and could not be mitigated was construction noise. In order to reduce construction noise below a level of significance, the footprint of what could be built would have to be reduced to a level which would render the site nearly undevelopable, would not be practical, and would not accomplish the Project's objectives. Alternative sites were rejected given that the Applicant does not have any interest in any alternative site within the City.

C. CEQA requires an identification of the environmentally superior alternative and if that alternative is one of the No Project alternatives, then an identification of the environmentally superior alternative among the remaining alternatives. In this case the No Project/No Construction alternative is the environmentally superior alternative, although it is noted that it will leave the Property in a blighted condition. Between the No Digital Sign Alternative and the Reduced Density Alternative, the Reduced Density Alternative would be environmentally superior. However, while construction noise impacts would be reduced, the impact would still be significant.

SECTION 5. CEQA Section 15091 Findings.

CEQA Section 15091 provides that the City shall not approve a project when there are significant environmental effects unless certain findings are made. In accordance with Section 15091, the City Council makes the following findings:

A. The applicant has incorporated Project Design Features into the Project which will avoid aesthetic impacts from the digital sign, as well as air and greenhouse gas emissions.

B. Mitigation Measures will be imposed on the Project which will reduce the impacts to Cultural Resources, Geology, Soils, and Paleontological Resources, Hazardous Materials and Wastes, Transportation, and Tribal Cultural Resources to less than significant levels.

C. A Mitigation Measure will be imposed to reduce Construction Noise impacts, but the impact will still remain significant. There is no alternative that would both eliminate the significant construction noise impact and achieve the objectives of the Project.

D. The No Digital Sign alternative would have the same impacts as the Project, except it would not require a change to the City's Zoning Ordinance to allow for digital displays. However, as aesthetics is not a significant impact, there is no reason to choose this alternative as it would not eliminate or reduce any of the significant impacts identified in the EIR and would eliminate benefits of the Project.

E. The Reduced Density alternative would achieve most of the objectives, but would still have significant construction noise. Social justifications lead the City Council to reject this alternative.

1. The City has received a final Regional Housing Needs Allocation from SCAG for a total of 5,735 housing units for the period of 2021 – 2029; the City's previous allocation was 397 units. The allocation for above-moderate units is 2,595 and

this Project will satisfy just over ten percent of this requirement. The Reduced Density alternative will cause a loss of 97 potential units which will have to be accounted for elsewhere in the City.

2. The Pandemic has taken a financial toll on the City causing a loss of general fund revenue and resulted in the laying off of employees. The Project will provide a projected minimum of $75,000 a year to the City over a 30-year period from the digital display. A smaller digital display would result in the City received approximately half of the anticipated revenue, which would result in a loss of over one million dollars in the same time period.

SECTION 6. CEQA Section 15093 Findings. Statement of Overriding Considerations.

CEQA requires decisionmakers to balance the benefits of a proposed project against its unavoidable environmental impacts. If the benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse effects may be considered "acceptable" by adopting a Statement of Overriding Considerations. This statement sets forth the project benefits or reasons why the City Council is in favor of approving the Project, and weighs these benefits against the Project's environmental impacts that cannot be mitigated to a level less than significant as identified in the Final EIR. In adopting this Statement of Overriding Considerations, the City Council finds that while all of these benefits are important, each benefit on its own supports a sufficient reason why the benefits outweigh the significant impacts, of which only one cannot be mitigated below a level of significance.

A. As identified above, the City's final RHNA allocation for the 6th Cycle of the Housing Element is 5,735 units, with 2,595 units being allocated to the above-moderate income level. This Project will satisfy just over ten percent of the City's above-moderate allocation.

B. The Project will help revitalize a site that is blighted and does not meet current development standards, acting as a catalyst for other new development in the area.

C. The digital display portion of the Project will provide general fund revenue to the City in the approximate amount of $2,250,000 over 30 years and provide space for community programming.

D. The Project will provide a financial benefit to the City in the amount of approximately an additional $110,000 per year in property taxes.

E. The Project will provide a financial benefit to the City in the amount of approximately $15,000 per year in utility user's taxes;

F. The Project will provide one-time construction related fees in the amount of approximately $1,150,000 for business license taxes, permit, plan-check and inspection fees.

G. The Project will provide a one-time residential impact fee of approximately $265,000.

H. The Project will provide approximately 400 full-time and part-time construction jobs. The applicant has agreed to a provision to use its best efforts to hire from the local community.

I. The applicant has agreed to use its best efforts to buy products from suppliers located in the City to the extent possible and to the extent such prices are not higher than other suppliers.

J. The Project will provide approximately 7-8 full-time, on-site jobs; additional jobs will be created for the various vendors and services that will be required.

K. Adding new residents to the City will create more residential spending in the City from people eating at local restaurants, shopping in Gardena, and using services in Gardena. This will not only assist local businesses, but will also provide additional income to the City in terms of increased business license fees that are paid to the City.

SECTION 7. Approvals. Based on the above, the City Council hereby certifies the Final Environmental Impact Report for the Gardena Transit-Oriented Development Specific Plan Project attached hereto has Exhibits A (Draft EIR) and B (Final EIR) and adopts the Mitigation Monitoring and Reporting Program attached hereto as Exhibit C.

SECTION 8. Custodian of Record. Each and every one of the findings and determinations in this Resolution are based on the competent and substantial evidence, both oral and written, contained in the entire record relating to the Project. All summaries of information in the findings which precede this section are based on the entire record. The absence of any particular fact from any such summary is not an indication that a particular finding is not based in part on that fact. The documents and materials that constitute the record of proceedings on which these findings and approval are based are located in the Community Development Department at City Hall, 1700 W. 162nd Street, Gardena, California 90247. The Custodian of Records is Gregg McClain, Interim Community Development Director who can be reached at 310/217-9546 or gmcclain@cityofgardena.org.

SECTION 9. Severability. If any section, subsection, subdivision, paragraph, sentence, clause or phrase of this ordinance, or any part thereof is for any reason held to be unconstitutional, such decision shall not affect the validity of the remaining portion of this ordinance or any part thereof. The City Council hereby declares that it would have passed

each section, subsection, subdivision, paragraph, sentence, clause or phrase thereof, irrespective of the fact that any one or more section, subsection, subdivision, paragraph, sentence, clause or phrase be declared unconstitutional.

SECTION 10. Certification. The City Clerk shall certify the passage of this resolution.

SECTION 11. Effective Date. This Resolution shall be effective immediately.

Passed, approved, and adopted this 27th day of April, 2021.

_____
TASHA CERDA, Mayor

ATTEST:

_____
MINA SEMENZA, City Clerk

APPROVED AS TO FORM:

_____
LISA KRANITZ, Assistant City Attorney

Exhibit A – Draft EIR, dated January 2021
Exhibit B – Final EIR, dated March 2021
Exhibit C – Mitigation Monitoring and Reporting Program

EXHIBIT A

Gardena Transit-Oriented Development Specific Plan Project

Public Review Draft Environmental Impact Report

January 2021



Prepared by

Kimley»Horn

Expect More. Experience Better.

PUBLIC REVIEW DRAFT
ENVIRONMENTAL IMPACT REPORT
SCH # 2020080305

GARDENA TRANSIT-ORIENTED DEVELOPMENT SPECIFIC PLAN PROJECT

LEAD AGENCY

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JOHN F. SIGNO, AICP – SENIOR PLANNER
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APPLICANT

The Dinerstein Companies

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JANUARY 2021

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ES EXECUTIVE SUMMARY

ES Executive Summary

ES.1 PROJECT OVERVIEW

The Gardena Transit-Oriented Development Specific Plan ("GTODSP") Project ("Project") would be developed in the City of Gardena ("City"). The Project proposes to establish a maximum allowable development within the 1.33-acre GTODSP area of up to 265 dwelling units (DU). Because the City does not have any zone that would accommodate the proposed development, the Applicant is proposing a specific plan, the GTODSP, which would establish the Project area's zoning regulations and development standards.

The GTODSP includes the statutorily required elements, including a land use plan, a circulation plan, a description of existing and proposed utilities and infrastructure, design guidelines, development standards, and administrative provisions. For analysis purposes, it is assumed all existing on-site improvements are currently 100 percent occupied and would be removed and replaced with the proposed residential development. **Section 2.3: Project Characteristics**, describes the Project in detail.

ES.2 PROJECT OBJECTIVES

Pursuant to State CEQA Guidelines §15124(b), the EIR project description must include "[a] statement of objectives sought by the proposed project…. The statement of objectives should include the underlying purpose of the Project."

The Project objectives, as referenced in the Draft GTODSP, are:

1. Diversify Gardena's existing multi-family housing options to serve the City's growing and evolving technology and creative sectors and aid in recruiting talent for these companies.
2. Balance job growth in the expanding technology and creative sector with new high-quality housing opportunities, enabling local employees to live close to where they work.
3. Cluster urban development near the Crenshaw Station, technology firms, and other large employment centers, providing City residents with the opportunity to live, work, and shop with less reliance on automobiles.
4. Establish multi-family development that meets high design standards and pursues environmental sustainability.
5. Allow for digital signage for off-site advertising, community programming and City/Applicant revenue sharing opportunities as a public benefit.
6. Redevelop a blighted, non-conforming site, increase tax revenues to the City, and create a catalyst for future development in the northern portion of Gardena.

ES.3 PROJECT LOCATION

The Project site is located in the City of Gardena (City), approximately 8.8 miles southwest of downtown Los Angeles. The Project site consists of one 1.33-acre parcel (APN # 4060-004-039) on Crenshaw

Boulevard south of West El Segundo Boulevard, at 12850 – 12900 Crenshaw Boulevard. The City encompasses approximately 6.0 square miles in the County's South Bay region.

Gardena is a fully urbanized city with of a mix of residential densities, although low density residential uses predominate. The City also contains a mix of retail, commercial, office, and industrial uses. The Project site is in the City's northwestern corner in a predominantly industrial area, with some residential uses to the east of the Project Site, separated from the Project site by the Dominguez Flood Control Channel (Dominguez Channel) and Laguna Dominguez Trail (Dominguez Trail). The Project site is bound by a gas station to the north, commercial and light industrial uses to the south, residential uses to the east across the Dominguez Channel, and commercial and industrial uses to the west in the City of Hawthorne. Vermont Avenue forms a western City boundary with the City of Los Angeles approximately 2.0 miles to the east of the site, and Crenshaw Boulevard forms the western City boundary with Hawthorne immediately adjacent to and west of the site.

ES.4 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table ES-1: Summary of Project Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
4.1 Aesthetics			
Impact 4.1-1: 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	No mitigation measures are required	Less than significant
Impact 4.1-2: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than significant	No mitigation measures are required	Less than significant
4.2 Air Quality			
Impact 4.2-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?	Less than significant	No mitigation measures are required	Less than significant
Impact 4.2-2: 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	No mitigation measures are required	Less than significant
Impact 4.2-3: Would the project expose sensitive receptors to substantial pollutant concentrations?	Less than significant	No mitigation measures are required	Less than significant

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Impact 4.2-4: Would the project result in other emissions (such as those leading to odors)?	Less than significant	No mitigation measures are required	Less than significant
4.3 Cultural Resources			
Impact 4.3-1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	No impact	No mitigation measures are required	No impact
Impact 4.3-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Significant	**MM CUL-1: Inadvertent discovery of an archaeological resource.** Before ground disturbing activities are initiated on the Project site, the construction personnel conducting the activities shall be notified of the potential for archaeological resources, and the protocols to be implemented in the event of a discovery. Ground disturbing work includes but is not limited to activities such as excavation, grading, digging, trenching, plowing, drilling, tunneling, stripping, and clearing where the ground disturbance exceeds 3.0 feet. In the event that an archaeological resource is observed during construction, all ground disturbing work in the immediate vicinity of the find should temporarily cease until a Qualified Archaeologist can evaluate the find as a historical resources pursuant to Public Resources Code (PRC) §5024.1 and California Code of Regulations Title 14, CEQA Guidelines §15064.5 of the CEQA Guidelines. A Qualified Archaeologist is one who meets the Secretary of the Interior Professional Qualification Standards in archeology. The Qualified Archaeologist or an archaeologist working under their direction would have the authority to stop or divert construction	Less than significant

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		excavation elsewhere on the site while the find is being assessed. Upon discovery, the project proponent will notify the City of Gardena (the City). At the direction of the project proponent and in consultation with the City, the Qualified Archaeologist shall prepare plans for feasible mitigation of impacts to the find, pursuant to Section 15064.5 of the State CEQA Guidelines §15064.5. **MM TCR-1: Retain a Native American Monitor/Consultant:** Prior to ground-disturbing construction activities, the Project Applicant shall retain and compensate for the services of a Tribal Monitor/Consultant who is ancestrally affiliated with the Project area, approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government, and listed under the Native American Heritage Commission's (NAHC) Tribal Contact list for the Project area. Applicant shall obtain this list from the NAHC. A Native American Monitor shall be retained by the Lead Agency or Project owner to be on-site to monitor all project-related, ground-disturbing construction activities (i.e., boring, grading, excavation, potholing, trenching, etc.). A monitor associated with one of the NAHC recognized Tribal governments, which have commented on the Project shall provide the Native American Monitor. The Monitor/Consultant shall only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the	

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The Tribal Monitor/Consultant shall complete daily monitoring logs that provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the Project site grading and excavation activities are completed, or when the Tribal Representatives and Monitor/Consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources. **MM TCR-2: Unanticipated Discovery of Tribal Cultural and Archaeological Resources:** Upon discovery of any tribal cultural or archaeological resource, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All tribal cultural and archaeological resources unearthed by Project construction activities shall be evaluated by a qualified archaeologist and Tribal Monitor/Consultant; see MM TCR-8: Professional Standards below. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe requests preservation in	

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		place or recovery for educational purposes. Work may continue on other parts of the Project while evaluation and, if necessary, additional protective mitigation takes place (State CEQA Guidelines §15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with State CEQA Guidelines §15064.5(f) for historical resources. **MM TCR-3: Public Resources Code §21083.2(b)** for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. All tribal cultural resources shall be returned to the Tribe. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to the Tribe or a local school or historical society in the area for educational purposes.	

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		MM TCR-4: Unanticipated Discovery of Human Remains and Associated Funerary Objects: Native American human remains are defined in PRC §5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC §5097.98, are also to be treated according to this statute. Pursuant to Health and Safety Code §7050.5, any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the remains' nature. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC and PRC §5097.98 shall be followed. **MM TCR-5: Resource Assessment & Continuation of Work Protocol:** Upon discovery of human remains, the Tribal and/or Archaeological Monitor/Consultant shall immediately divert work at a minimum of 150 feet from the discovery and place an exclusion zone around the discovery location. The Monitor/Consultant(s) shall then notify the Tribe, the qualified Archaeologist, and the construction manager who shall call the coroner. Work shall continue to be diverted, while the coroner determines whether the remains are human and subsequently Native American. The discovery shall be kept confidential and secure to	

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		prevent any further disturbance. If the finds are determined to be Native American, the coroner shall notify the NAHC as mandated by state law who shall then appoint a Most Likely Descendent (MLD). **MM TCR-6: Kizh-Gabrieleno Procedures for burials and funerary remains:** If the Gabrieleno Band of Mission Indians – Kizh Nation is designated MLD, the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. **MM TCR-7: Treatment Measures:** If human remains/ceremonial objects are discovered, prior to continuation of ground disturbing activities, the landowner shall arrange a designated site location within the Project site	

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		footprint for the respectful reburial of the human remains/ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard shall be posted outside of working hours. The Tribe shall make every effort to recommend diverting the Project and keeping the remains in situ and protected. If the Project cannot be diverted, it may be determined that burials shall be removed. The Tribe shall work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations shall either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive	

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		and/or destructive diagnostics on human remains. Each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects, and objects of cultural patrimony shall be removed to a secure on-site container, if possible. These items shall be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the Project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered. **MM TCR-8: Professional Standards:** Archaeological and Native American monitoring and excavation during construction shall be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.	

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Impact 4.3-3: Would the project disturb any human remains, including those interred outsides of dedicated cemeteries?	Significant	**MM TCR-4: Unanticipated Discovery of Human Remains and Associated Funerary Objects:** Native American human remains are defined in PRC §5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC §5097.98, are also to be treated according to this statute. Pursuant to Health and Safety Code § 7050.5, any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the remains' nature. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC and PRC §5097.98 shall be followed.	Less than significant
4.4 Energy			
Impact 4.4-1: 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	No mitigation measures are required	Less than significant
Impact 4.4-2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less than significant	No mitigation measures are required	Less than significant
4.5 Geology, Soils, and Paleontological Resources			
Impact 4.5-1: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Significant	**MM GEO-1: Retain a Project Paleontologist and prepare a monitoring plan:** A Project Paleontologist shall prepare a Paleontological	Less than significant

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		Resources Monitoring and Mitigation Plan (PRMMP). A Project Paleontologist is defined as one who meets the Society of Vertebrate Paleontology (SVP) standards for a Qualified Professional Paleontologist. The PRMMP shall conform to SVP standards and address the specifics of monitoring and procedures to follow in the event of a fossil discovery. The PRMMP shall include a repository agreement with an accredited paleontological repository, such as the Natural History Museum of Los Angeles County. The PRRMP shall also include a Worker's Environmental Awareness Program that shall describe the legal requirements for preserving fossil resources, procedures to follow in the event of a fossil discovery, and other relevant sections of the PRMMP. This training program shall be given to the crew before ground-disturbing work commences and shall include handouts to be given to new workers. **MM GEO-2: Monitor for paleontological resources:** Monitoring shall be conducted by a Paleontological Monitor, defined as one who meets the SVP standards for a Paleontological Resource Monitor. The Paleontological Monitor shall be under the supervision of the Project Paleontologist. As defined in the PRMMP, Paleontological monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments that occur in previously undisturbed sediment, which has been estimated as any	

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		portion of the Project site where excavation exceeds 0.9 m (3 .0 feet) in depth. The frequency of monitoring shall be based on consultation with or periodic inspection by the Project Paleontologist, and shall depend on the rate of excavation and grading activities and the materials being excavated. **MM GEO-3: Evaluate and treat fossil discoveries:** In the event of a fossil discovery work shall cease in a 15-m (50-foot) radius of the find while the Project Paleontologist assesses the significance of the fossil and documents its discovery. Work outside this radius may continue. Should the fossil be determined significant, it shall be salvaged following the procedures and guidelines of the SVP and recommendations of the Project Paleontologist. Recovered fossils shall be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and reposited with the paleontological curation facility identified in the PRMMP. The Project Paleontologist shall prepare a report of the monitoring work and any findings after construction is completed.	
4.6 Greenhouse Gas Emissions			
Impact 4.6-1: Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than significant	No mitigation measures are required	Less than significant

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Impact 4.6-2: Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?	Less than significant	No mitigation measures are required	Less than significant
4.7 Hazardous Materials & Wastes			
Impact 4.7-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than significant	No mitigation measures are required	Less than significant
Impact 4.7-2: 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? Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Significant	**MM HAZ-1:** Prior to issuance of a Building Permit, the building plans shall include an impermeable vapor membrane (or equivalent). The building plans shall be submitted to the City for review and approval prior to commencement of construction activities. The impermeable vapor membrane shall not underlay non-slab areas, such as landscaping and the dog run area, because these spaces are not enclosed. The local Building Department would have oversight/sign-off responsibility for the vapor barrier. **MM HAZ-2:** Prior to issuance of a demolition permit of the on-site structure, preparation of a construction management plan addressing procedures and requirements for responding to disturbance of undocumented contaminated soil shall be required. The construction management plan shall be submitted to the City for review and approval prior to commencement of construction activities.	Less than significant

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Impact 4.7-3: 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	No mitigation measures are required	No impact
Impact 4.7-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No impact	No mitigation measures are required	No impact
Impact 4.7-5: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than significant	No mitigation measures are required	Less than significant
4.8 Hydrology and Water Quality			
Impact 4.8-1: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than significant	No mitigation measures are required	Less than significant
Impact 4.8-2: 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	No mitigation measures are required	Less than significant
Impact 4.8-3: 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:	Less than significant	No mitigation measures are required	Less than significant

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
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?			
4.9 Land Use and Planning			
Impact 4.9-1: Would the project cause a significant environmental impact due to a conflict with any Gardena General Plan 2006 including land use plan, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect?	Less than significant	No mitigation measures are required	Less than significant
Impact 4.9-2: Would the project cause a significant environmental impact due to a conflict with any Gardena Municipal Code land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less than significant	No mitigation measures are required	Less than significant
Impact 4.9-3: Would the project cause a significant environmental impact due to a conflict with any Connect SoCal 2020-2045 RTPS/SCS land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less than significant	No mitigation measures are required	Less than significant

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
4.10 Noise			
Impact 4.10-1: 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?	Significant	**MM NOI-1:** A temporary and impermeable sound barrier shall be constructed along the Project eastern property line prior to construction and shall remain during construction. The temporary sound barrier shall be a minimum of 8.0-feet high and shall have a minimum Sound Transmission Class rating of STC-25. The sound barrier must be designed to meet a minimum 10dB(A) attenuation.	Significant
Impact 4.10-2: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?	Less than significant	No mitigation measures are required	Less than significant
4.11 Population and Housing			
Impact 4.11-1: 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	No mitigation measures are required	Less than significant
4.12 Public Services and Recreation			
Impact 4.12-1: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, 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?	Less than significant	No mitigation measures are required	Less than significant

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Impact 4.12-2: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, 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?	Less than significant	No mitigation measures are required	Less than significant
Impact 4.12-3: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, 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 schools?	Less than significant	No mitigation measures are required	Less than significant
Impact 4.12-4: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, 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 parks? Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial	Less than significant	No mitigation measures are required	Less than significant

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
physical deterioration of the facility would occur or be accelerated? Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			
Impact 4.12-5: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, 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 facilities?	Less than significant	No mitigation measures are required	Less than significant
4.13 Transportation			
Impact 4.13-1: Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than significant	No mitigation measures are required	Less than significant
Impact 4.13-2: Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	Less than significant	No mitigation measures are required	Less than significant
Impact 4.13-3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than significant	No mitigation measures are required	Less than significant

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Impact 4.13-4: Would the project result in inadequate emergency access?	Significant	**MM TRAN-1: Construction Transportation Plan:** The contractor shall prepare a detailed Construction Transportation Plan (CTP) for the purpose of minimizing the impact of construction and construction traffic on adjoining and nearby roadways in close consultation with the City. The City shall review and approve the CTP before the contractor commences any construction activities. This plan shall address, in detail, the activities to be carried out in each construction phase, with the requirement of maintaining traffic flow during peak travel periods. Such activities include, but are not limited to, the routing and scheduling of materials deliveries, materials staging and storage areas, construction employee arrival and departure schedules, employee parking locations, and temporary road closures, if any. The CTP shall provide traffic controls pursuant to the California Manual on Uniform Traffic Control Devices sections on temporary traffic controls (Caltrans 2012) and shall include a traffic control plan that includes, at a minimum, the following elements: ▪ Temporary signage to alert drivers and pedestrians to the construction zone. ▪ Flag persons or other methods of traffic control. ▪ Traffic speed limitations in the construction zone. ▪ Temporary road closures and provisions for alternative access during the closure.	Less than significant

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		▪ Detour provisions for temporary road closures—alternating one-way traffic would be considered as an alternative to temporary closures where practicable and where it would result in better traffic flow than would a detour. ▪ Identified routes for construction traffic. ▪ Provisions for safe pedestrian and bicycle passage or convenient detour. ▪ Provisions to minimize access disruption to residents, businesses, customers, delivery vehicles, and buses to the extent practicable—where road closures are required during construction, limit to the hours that are least disruptive to access for the adjacent land uses. ▪ Provisions for 24-hour access by emergency vehicles. ▪ Safe vehicular and pedestrian access to local businesses and residences during construction. The plan shall provide for scheduled transit access where construction would otherwise impede such access. Where an existing bus stop is within the work zone, the design-builder shall provide a temporary bus stop at a safe and convenient location away from where construction is occurring in close coordination with the transit operator. Adequate measures shall be taken to separate students and parents walking to	

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		and from the temporary bus stop from the construction zone. ▪ Advance notification to the local school district of construction activities and rigorously maintained traffic control at all school bus loading zones, to provide for the safety of schoolchildren. Review existing or planned Safe Routes to Schools with school districts and emergency responders to incorporate roadway modifications that maintain existing traffic patterns and fulfill response route and access needs during Project construction operations. ▪ Identification and assessment of the potential safety risks of Project construction to children, especially in areas where the Project is located near homes, schools, daycare centers, and parks. ▪ Promotion of child safety within and near the Project area. For example, crossing guards could be provided in areas where construction activities are located near schools, daycare centers, and parks. ▪ CTPs would consider and account for the potential for overlapping construction projects. **MM TRAN-2: Emergency Vehicle Access:** Emergency vehicle access shall be maintained at all times to the construction worksite and adjacent businesses. Emergency vehicle access	

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		will be maintained at all times to and from fire stations, hospitals, and medical facilities near the construction site and along the haul routes. Construction activities, road closures, and lane closures will be coordinated with local law enforcement and fire department officials prior to implementation. The implementation of these measures would provide emergency vehicle access to the construction worksite and adjacent businesses and require that construction activities be coordinated with City law enforcement and fire department officials prior to implementation.	
4.14 Tribal Cultural Resources			
Impact 4.14-1: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or 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 the criteria set	Significant	**MM TCR-1: Retain a Native American Monitor/Consultant:** Prior to ground-disturbing construction activities, the Project Applicant shall retain and compensate for the services of a Tribal Monitor/Consultant who is ancestrally affiliated with the Project area, approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government, and listed under the Native American Heritage Commission's (NAHC) Tribal Contact list for the Project area. Applicant shall obtain this list from the NAHC. A Native American Monitor shall be retained by the Lead Agency or Project owner to be on-site to monitor all project-related, ground-disturbing construction activities (i.e., boring, grading, excavation, potholing, trenching, etc.). A monitor associated with one of the NAHC recognized Tribal governments, which have commented on the	Less than significant

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?		Project shall provide the Native American Monitor. The Monitor/Consultant shall only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The Tribal Monitor/Consultant shall complete daily monitoring logs that provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the Project site grading and excavation activities are completed, or when the Tribal Representatives and Monitor/Consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources. **MM TCR-2: Unanticipated Discovery of Tribal Cultural and Archaeological Resources:** Upon discovery of any tribal cultural or archaeological resource, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All tribal cultural and archaeological resources unearthed by Project construction activities shall be evaluated by a qualified archaeologist and Tribal Monitor/Consultant; see MM TCR-8: Professional Standards below. If the resources	

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe requests preservation in place or recovery for educational purposes. Work may continue on other parts of the Project while evaluation and, if necessary, additional protective mitigation takes place (State CEQA Guidelines § 15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with State CEQA Guidelines § 15064.5(f) for historical resources. **MM TCR-3: Public Resources Code §21083.2(b)** for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. All tribal cultural resources shall be returned to the Tribe. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, if such an	

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to the Tribe or a local school or historical society in the area for educational purposes. **MM TCR-4: Unanticipated Discovery of Human Remains and Associated Funerary Objects:** Native American human remains are defined in PRC §5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC §5097.98, are also to be treated according to this statute. Pursuant to Health and Safety Code § 7050.5, any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the remains' nature. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC and PRC §5097.98 shall be followed. **MM TCR-5: Resource Assessment & Continuation of Work Protocol:** Upon discovery of human remains, the Tribal and/or Archaeological Monitor/Consultant shall immediately divert work at a minimum of 150 feet from the discovery and place an exclusion zone around the discovery location. The Monitor/Consultant(s) shall then notify the	

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		Tribe, the qualified Archaeologist, and the construction manager who shall call the coroner. Work shall continue to be diverted, while the coroner determines whether the remains are human and subsequently Native American. The discovery shall be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner shall notify the NAHC as mandated by state law who shall then appoint a Most Likely Descendent (MLD). **MM TCR-6: Kizh-Gabrieleno Procedures for burials and funerary remains:** If the Gabrieleno Band of Mission Indians – Kizh Nation is designated MLD, the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.	

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		MM TCR-7: Treatment Measures: If human remains/ceremonial objects are discovered, prior to continuation of ground disturbing activities, the landowner shall arrange a designated site location within the Project site footprint for the respectful reburial of the human remains/ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard shall be posted outside of working hours. The Tribe shall make every effort to recommend diverting the Project and keeping the remains in situ and protected. If the Project cannot be diverted, it may be determined that burials shall be removed. The Tribe shall work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations shall either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be	

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains. Each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects, and objects of cultural patrimony shall be removed to a secure on-site container, if possible. These items shall be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the Project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered. **MM TCR-8: Professional Standards:** Archaeological and Native American monitoring and excavation during construction shall be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in	

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.	
4.15 Utilities and Public Service Systems			
Impact 4.15-1: Would the project require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects? Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? dry years?	Less than significant	No mitigation measures are required	Less than significant
Impact 4.15-2: Would the project require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects? 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	No mitigation measures are required	Less than significant
Impact 4.15-3: Would the project require or result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects?	Less than significant	No mitigation measures are required	Less than significant

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Impact 4.15-4: Would the project require or result in the relocation or construction of new or expanded electric power, natural gas, and telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less than significant	No mitigation measures are required	Less than significant
Impact 4.15-5: 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? Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less than significant	No mitigation measures are required	Less than significant

ES.5 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

The Project's environmental effects are addressed in **Sections 4.1** through **4.15** of this EIR. Project implementation would result in potentially significant impacts for the following topical issues: cultural resources, paleontological resources, tribal cultural resources, transportation, hazards and hazardous materials and noise. Implementation of project design features (PDFs), standard conditions and requirements (SCs), and mitigation measures (MMs) provided in **Sections 4.1** through **4.15** would reduce these impacts to levels considered less than significant, except concerning construction-related noise impacts, as discussed below.

Noise

Construction activities would result in a substantial temporary increase in ambient noise levels to various nearby noise-sensitive receptors (i.e., R-1 through R-3). Mitigation Measure (MM) NOI-1, which involves the placement of a temporary and impermeable sound barrier, is proposed to reduce noise levels. However, given that construction activities would occur over an extended period (i.e., approximately 27 months), the temporary construction-related noise would remain significant despite mitigation. There would be periodic, temporary, unavoidable significant noise impacts that would cease upon completion of construction activities.

ES.6 SUMMARY OF ALTERNATIVES EVALUATED

CEQA states that an EIR must address "a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." [14 Cal. Code of Reg. 15126.6(a)]. As described in **Section 6.0: Alternatives to the Proposed Project** of this DEIR, four project alternatives were identified and analyzed for relative impacts as compared to the Project:

- "No Project/No Construction" Alternative;
- "No Project/Existing Land Use Designation" Alternative;
- "No Digital Sign" Alternative; and
- "Reduced Density" Alternative.

"NO PROJECT/NO CONSTRUCTION" ALTERNATIVE

The No Project/No Construction Alternative would retain the Project site in its current condition. With this Alternative, the site's existing improvements would remain. None of the proposed Project improvements would be implemented.

"NO PROJECT/EXISTING LAND USE DESIGNATION" ALTERNATIVE

In this instance, the "no project" alternative is the circumstance under which the Project would not proceed, but the existing environmental conditions would not be preserved. The Project site is wholly

within the City. The Project site is zoned C-3 (General Commercial). The maximum allowable Floor-Area-Ratio for the C-3 zone is 0.5. The Project site is 1.33 acres (57,935 SF), thus, the maximum allowable development on the Project site is 28,967 SF of commercial uses. This Alternative would demolish the existing 24,990 SF of industrial uses and in its place construct up to 28,967 SF of commercial uses.

The Project site is occupied by a building and could be redeveloped consistent with the underlying zoning. Thus, the "No Project/Existing Land Use Designation" Alternative assumes development of the Project site consistent with the GGP allowed density and intensity. This Alternative assumes that the existing use would be demolished and replaced with a new commercial use up the maximum allowable development capacity.

"NO DIGITAL SIGN" ALTERNATIVE

The No Digital Sign Alternative would be identical to the Project, except that it would exclude the approximately 2,500 SF digital sign on the building's north face. All other components of the Project would remain unchanged.

"REDUCED DENSITY" ALTERNATIVE

The "Reduced Density" Alternative assumes development of the Project site similar to the proposed Project, however, it proposes a reduced density compared to the Project on the same Project site. The DUs would be reduced to 168 DUs and the building height would be reduced to six stories. This would eliminate one level of parking and approximately 22 feet from the height for a total height of approximately 78 feet. This Alternative would include partially-underground parking and an approximately 50 percent reduction in digital sign area.

ES.7 MITIGATION MONITORING AND REPORTING

CEQA requires public agencies to adopt monitoring and reporting programs to ensure compliance with mitigation measures adopted or made conditions of Project approval in order to mitigate or avoid the significant environmental effects identified in EIRs. A Mitigation Monitoring and Reporting Program (MMRP) incorporating the mitigation measures set forth in this EIR will be prepared and approved by the Lead Agency and other responsible agencies concurrently with adoption of the findings of this EIR and prior to approval of the Project.

ES.8 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

CEQA Guidelines §15123 (b)(2) and (3) require that the EIR summary identify areas of controversy known to the Lead Agency, issues raised by agencies and the public, and issues to be resolved, including the choice among alternatives and whether, or how to, mitigate the significant effects.

Based on the Lead Agency's review of available information and comments received from the general public and other public agencies in response to the Notice of Preparation and public scoping meeting (**Appendix 9.1: Notice of Preparation and Comment Letters**), the following issues may be either controversial or require further resolution.

AREAS OF CONTROVERSY

There are no areas of controversy that were raised through the scoping process conducted in association with circulation of the NOP.

ISSUES TO BE RESOLVED

The above issues have been considered in this EIR, where applicable, under resource-specific **Sections 4.1** through **4.15**. However, despite the incorporation of strategic Project Design Features (see **Section 2.0: Project Description** for a complete list) and careful development and implementation of mitigation measures, significant and unavoidable noise impacts remain.

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1.0 INTRODUCTION

1.0 INTRODUCTION

The California Environmental Quality Act (CEQA), Public Resources Code §§21000 et seq. specifies that before a public agency decides to approve a project that could have one or more adverse effects on the physical environment, the agency must inform itself about the Project's potential environmental impacts, give the public an opportunity to comment on the environmental issues, and take feasible measures to avoid or reduce potential harm to the physical environment.

This document is an Environmental Impact Report (EIR) prepared for the City of Gardena (herein referred to as the "City") in compliance with CEQA. This EIR evaluates the potential environmental impacts associated with planning, constructing, and operating the proposed Gardena Transit-Oriented Development Specific Plan Project (hereafter, the "Project" or "proposed Project"). The Project would develop up to 265 dwelling units (DUs) and adopt the Gardena Transit-Oriented Development Specific Plan (herein referred to as "Specific Plan"). The State CEQA Guidelines are located within the California Code of Regulations (CCR), Title 14, Division 6, Chapter 3, §§15000-15387, while the CEQA Statute is codified as Public Resources Code §§21000-21189.57.

This EIR evaluates the potentially significant, adverse, and beneficial environmental impacts resulting from Project implementation. **Section 2.0: Project Description** details the Project's location, environmental setting, background and history, characteristics, discretionary actions, goals/objectives, construction schedule/phasing, agreements, and required permits and approvals. **Section 4.0: Environmental Impact Analysis**, discusses the Project's affected environment, regulatory framework, environmental impacts, and mitigation measures. Following public review of the Draft EIR, a Final EIR will be prepared, in which the City will respond to public comments on the Draft EIR.

1.1 PURPOSE OF THE EIR

According to State CEQA Guidelines §15121, an EIR is an informational document which will inform public agency decision-makers and the public of the significant environmental effects of a proposed project. This EIR's purpose is to inform decision-makers and the public of the proposed Project's environmental effects, provide environmental information sufficient to evaluate the proposed Project and its potential to cause significant environmental effects, examine methods of reducing adverse environmental impacts, and consider alternatives to the proposed Project, which would eliminate or reduce the significant effects. The potential impacts include both temporary construction-related effects and long-term operational effects. This EIR addresses the Project's potential environmental impacts using available plans, technical studies, and related information available. This EIR will be used by the City as the lead agency, other responsible and trustee agencies, interested parties, and the general public to evaluate the Project's potential environmental impacts; see **Section 2.6: Agreements, Permits, and Approvals**, for a list of anticipated agreements and required responsible agency permits and approvals.

1.2 COMPLIANCE WITH CEQA

According to the State CEQA Guidelines §15064(f)(1), preparation of an EIR is required whenever a project may result in one or more significant effects on the environment. Public agencies are required to consider the information presented in the EIR when determining whether to approve a project. CEQA requires that

state and local government agencies consider the environmental effects of projects over which they have discretionary authority before taking action on those projects.

This EIR analyzes the Project's environmental effects to the degree of specificity appropriate to the current proposed actions, as required by State CEQA Guidelines §15146. The analysis considers the Project activities to determine the short-term and long-term effects associated with their implementation. This EIR discusses both direct and indirect Project impacts, as well as cumulative impacts associated with other past, present, and reasonably foreseeable future projects.

Based on significance criteria, the Project's effects have been categorized as either "no impact," "less than significant impact," "less than significant with mitigation incorporated," or "significant unavoidable impact"; see **Section 4.0: Environmental Impact Analysis**. Mitigation measures are recommended to avoid or lessen potentially significant impacts. If the Project would result in significant unavoidable impacts, despite implementation of feasible mitigation, the decision-makers may approve the Project based on a "Statement of Overriding Considerations." This determination would require the decision-makers to balance the Project's benefits to determine if they outweigh the identified significant unavoidable impacts. State CEQA Guidelines §15093 provides in part the following:

- That the decision-makers balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve the project. If the benefits of the project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."
- Where the decision of the public agency allows the occurrence of significant effects that are identified in the Final EIR but are not avoided or substantially lessened, the agency must state in writing the reason to support its action based on the Final EIR and/or other information on the record. This statement may be necessary if the agency also makes the finding under State CEQA Guidelines §15091 (a)(3).
- If an agency makes a Statement of Overriding Considerations, the statement should be included in the record of the project approval and should be mentioned in the Notice of Determination.

1.3 SCOPE OF THE ENVIRONMENTAL IMPACT REPORT

1.3.1 NOTICE OF PREPARATION

In compliance with the State CEQA Guidelines, the City has provided opportunities for responsible agencies, interested parties, and the general public to participate in the environmental review process. During Draft EIR preparation, efforts were made to contact various federal, state, regional, and local government agencies and other interested parties to solicit comments on the scope of review in this document. This included the distribution of the Notice of Preparation (NOP) to various responsible and trustee agencies and interested parties. Pursuant to State CEQA Guidelines §15082, the City distributed the NOP directly to public agencies, special districts, and the public who had requested such notice. The NOP was filed with the County of Los Angeles Clerk of the Board of Supervisors. The NOP was distributed on August 20, 2020, with a 30-day public review period ending on September 18, 2020. **Table 1-1: Summary of Written Comments on Notice of Preparation** summarizes the comments received from agencies/persons during the NOP process and provides a reference, as applicable, to the section(s) of this

EIR where the issues are addressed. The NOP and NOP comment letters are provided in **Appendix 9.1: Notice of Preparation and Comment Letters**.

Table 1-1: Summary of Written Comments on Notice of Preparation

Commenter	Summary of Comment and Where Addressed
California Department of Transportation (Caltrans), District 7 Letter dated September 10, 2020	**Recommendations** – Create a direct and safe connection from the project site to the Laguna Dominguez Trail (Dominguez Trail) for pedestrians and bicyclists. – Building a safe and viable way for persons using the Dominguez Trail to cross El Segundo Boulevard. – Consider similar improvements to Crenshaw Boulevard. – Supports unbundling of parking. Recommends further reductions in number of parking spaces. – If a parking structure is built, design for adaptive reuse. – Provide one secure, long-term bicycle parking space per residential unit. See **Section 2: Project Description**, and **Section 4.13: Transportation**.
Los Angeles County Sanitation Districts (Districts) Letter dated September 10, 2020	Sewer Service – Wastewater will be discharged to a local sewer line, which is not maintained by the Districts, for conveyance to the District's trunk sewer in Crenshaw Boulevard at 135th Street. – Wastewater will be treated at the Joint Water Pollution Control Plant in the City of Carson. – Connection fees will be charged. – Wastewater treatment facilities' capacity is based on regional growth forecasts adopted by the Southern California Association of Governments (SCAG). See **Section 4.15: Utilities and Service Systems.**
Native American Heritage Commission Letter dated August 20, 2020	Tribal Cultural Resources – The Project needs to comply with Assembly Bill (AB) 52 and Senate Bill (SB) 18 related to consultation with California Native American tribes. See **Section 4.14: Tribal Cultural Resources**.
South Coast Air Quality Management District (SCAQMD) Letter Dated September 8, 2020	Air Quality and Greenhouse Gas (GHG) – Recommends using the SCAQMD's CEQA Air Quality Handbook and website for guidance in preparing air quality and GHG analyses. – Identify air quality impacts by phase, as well as construction and operations. – Recommends a mobile source health risk assessment if the Project generates diesel emissions from long-term construction or attract diesel-fueled trips, especially heavy-duty trucks. – Provide mitigation measures, as needed. Identify impacts of the mitigation measures. See **Section 4.2: Air Quality** and **Section 4.6: Greenhouse Gas Emissions**.

Table 1-1: Summary of Written Comments on Notice of Preparation

Commenter	Summary of Comment and Where Addressed
Los Angeles County Metropolitan Transportation Authority (Metro) Letter dated September 18, 2020	Recommendations – Consult with transit operators. – Analyze potential effects to Metro Bus service. – Consider features that encourage transit use, particularly due to proximity to the Crenshaw Boulevard Station (examples/ suggestions provided). – Consider reduction or removal of minimum parking requirements and shared parking. See EIR **Section 2: Project Description**, and **Section 4.13: Transportation**.
County of Los Angeles Fire Department Letter dated September 10, 2020	Comments provided related to compliance with code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants. The Planning Division did not have any comments.

1.3.2 SCOPING MEETING

Pursuant to §21083.9 of the CEQA Statute, the lead agency is required to conduct at least one scoping meeting for all projects of statewide, regional, or area-wide significance. A scoping meeting is for jurisdictional agencies and interested persons or groups to provide comments regarding, but not limited to, the range of actions, alternatives, and environmental effects to be analyzed. The City held an online public scoping meeting on September 2, 2020 at 7:00 PM. No public comments were provided during the scoping meeting.

This Draft EIR addresses the potential environmental effects of the Project and was prepared following input from the public and the responsible and affected agencies, through the EIR scoping process, as discussed previously. The contents of this Draft EIR were established based on the findings in the NOP and public and agency input. Based on the findings of the NOP, a determination was made that an EIR was required to address potentially significant environmental effects on the following resources:

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

The NOP also noted that cumulative and growth-inducing impacts would be analyzed and that alternatives would be considered.

Where the Initial Study determined that Project would have a “less than significant impact” or “no impact” on environmental topics or specific threshold questions, these topics and thresholds are not addressed in the EIR. Based on the analysis prepared for the Initial Study through the EIR scoping process, the following

environmental topical issues are not addressed in the EIR. Substantiation for the "less than significant impact" or "no impact" finding is provided in **Section 7.0: Effects Found Not to be Significant**.

- Agriculture and Forestry Resources
- Biological Resources
- Mineral Resources
- Wildfire

Additionally, certain issues associated with aesthetics, geology and soils, hazards and hazardous materials, hydrology and water quality, land use planning, noise, and population and housing are also included in **Section 7.0** based on the Initial Study.

1.4 PUBLIC REVIEW – COMPLIANCE WITH CEQA

1.4.1 PUBLIC REVIEW OF DRAFT EIR

Notice of the availability of the Draft EIR has been provided to agencies, organizations, and interested groups and persons for comment during a 45-day review period in accordance with State CEQA Guidelines §15087 and §15105. The Notice of Completion for the Draft EIR has also been distributed as required by CEQA. The Draft EIR is available to the public for review at the City of Gardena website:

- https://www.cityofgardena.org/community-development/planning-projects/

If you cannot retrieve a copy from the website, please contact John F. Signo at the contact information below to obtain the document in an alternate way.

The public is invited to comment in writing on the information contained in this document. Responsible agencies, interested parties, and the public are invited to provide written comments on the Draft EIR. All comments should be submitted in writing to:

John F. Signo, AICP
Senior Planner
City of Gardena, Community Development Department
1700 West 162nd Street
Gardena, CA 90247-3732
Email: jsigno@cityofgardena.org
Phone: (310) 217-9530

1.4.2 FINAL EIR

Pursuant to State CEQA Guidelines §15088 and upon completion of the 45-day Draft EIR public review period, the City will evaluate all written comments and prepare written responses to comments received during the public review period concerning significant environmental issues. As set forth in State CEQA Guidelines §15132, the Final EIR will be prepared and will include:

- The Draft EIR or a revision of the draft;
- Comments and recommendations received on the Draft EIR either verbatim or in summary;
- A list of persons, organizations, and public agencies commenting on the Draft EIR; and
- The Lead Agency's responses to significant environmental points raised in the review and consultation process.

Additionally, pursuant to State CEQA Guidelines §15088, after the Final EIR is completed, the City will provide a written proposed response to each public agency on comments made by that public agency at least ten days prior to certifying the EIR.

1.4.3 CERTIFICATION OF THE FINAL EIR

The Final EIR will be considered by the City of Gardena Planning Commission and City Council (the decision-making bodies for the Project) for certification, consistent with State CEQA Guidelines §15090, which states:

Prior to approving a project, the lead agency shall certify that:

- The Final EIR has been completed in compliance with CEQA;
- The Final EIR was presented to the decision-making body of the lead agency, and that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the project; and
- The Final EIR reflects the lead agency's independent judgment and analysis.

Regarding the EIR's adequacy, according to State CEQA Guidelines §15151, "An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure."

1.4.4 PROJECT CONSIDERATION

After Final EIR certification, the City may consider approval of the proposed Project. A decision to approve the Project would be accompanied by specific, written findings, in accordance with State CEQA Guidelines §15091 and, if necessary, a specific, written Statement of Overriding Considerations, in accordance with State CEQA Guidelines §15093.

1.5 FORMAT OF THE EIR

This EIR's purpose is to enable the City and other responsible and trustee agencies and interested parties to evaluate the environmental impacts of the Project.

This EIR is organized into the following sections:

Section ES.0: **Executive Summary**, provides a Project summary and summary of environmental impacts, and the proposed mitigation measures and alternatives.

Section 1.0: **Introduction**, provides CEQA compliance information.

Section 2.0: **Project Description**, details the Project's location, environmental setting, background and history, characteristics, discretionary actions, goals/objectives, construction schedule/ phasing, agreements, and required permits and approvals.

Section 3.0: **Basis of Cumulative Analysis,** describes the cumulative analysis' proposed approach and methodology.

Section 4.0: **Environmental Analysis**, discusses the existing conditions for each environmental issue area. This analysis also describes methodologies for significance determinations, identifies the Project's short-term and long-term environmental impacts, recommends mitigation measures to avoid or reduce the significance of environmental impacts, and identifies any areas of potentially significant unavoidable impacts. This section also discusses cumulative impacts that could arise as a result of Project implementation of the proposed Project.

Section 5.0: **Other CEQA Considerations**, summarizes unavoidable significant impacts, and discusses significant irreversible environmental changes, and growth-inducing impacts.

Section 6.0: **Alternatives to the Proposed Project**, describes potential Project alternatives, including alternatives considered but rejected from further consideration, the No Project Alternative, various Project Alternatives, and identifies the Environmentally Superior Alternative.

Section 7.0: **Effects Found Not to Be Significant**, describes potential impacts that have been determined through the CEQA process not to be significant.

Section 8.0: **List of Preparers** identifies the Lead Agency and EIR preparation team, as well as summarizes the EIR consultation process.

Section 9.0: **Appendices**, contains the NOP, notification documents, and technical studies (available on thumb drive).

1.6 RESPONSIBLE AND TRUSTEE AGENCIES

1.6.1 LEAD AGENCY

The City of Gardena is the lead agency under CEQA. This EIR has been prepared in accordance with Public Resources Code §21000 *et seq.,* the State CEQA Guidelines, and the City's Policies and Procedures for Implementing CEQA. CEQA requires lead agencies to consider potential environmental effects that may occur with implementation of a project and to avoid or substantially lessen significant effects to the environment when feasible. When a project may have a significant effect on the environment, the agency with primary responsibility for carrying out or approving the project (the lead agency) is required to prepare an EIR.

1.6.2 RESPONSIBLE AND COOPERATING AGENCIES

Other federal, state, and local agencies are involved in the Project's review and approval, including trustee and responsible agencies under CEQA. Under CEQA, a trustee agency is a state agency that has jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California. A responsible agency is an agency other than the lead agency that has responsibility for carrying out or approving a project. Responsible and trustee agencies are consulted by the CEQA lead agency to ensure the opportunity for input and also review and comment on the Draft EIR. Responsible agencies also use the CEQA document in their decision-making. Several agencies other than the City may require

permits, approvals, and/or consultation in order to implement various Project elements; see **Section 2.6: Agreements, Permits and Approvals**.

1.7 INCORPORATION BY REFERENCE

Pertinent documents relating to this EIR have been cited in accordance with State CEQA Guidelines §15148 or have been incorporated by reference in accordance with State CEQA Guidelines §15150, which encourages incorporation by reference as a means of reducing redundancy and the length of environmental reports. The following documents are hereby incorporated by reference into this EIR and are available for review on the City's website and at the City. Information contained within these documents has been used for various sections of this EIR.

Gardena General Plan 2006. The City adopted the comprehensive Gardena General Plan 2006 (GGP) in 2006 and the Community Development Element's Land Use Plan was updated in June 2012 and March 2013, although various amendments have occurred to the Land Use Map since 2013. Additionally, the City's 2014-2021 Housing Element was adopted in November 2013 and found to be in compliance by the Department of Housing and Community Development in December 2013. The GGP constitutes the City's overall plans, goals, and objectives for land use within the City's jurisdiction. The GGP is based upon the following core visions for the City: City of Opportunity; Safe and attractive place to live, work and play; Community that values ethnic and cultural diversity; Strong and diverse economic base. It evaluates the existing conditions and provides long-term goals and policies necessary to guide growth and development in the direction that the community desires. Through its Goals, Objectives, Policies, and Programs, the GGP serves as a decision-making tool to guide future growth and development decisions.

The GGP consists of the following elements and was used throughout this EIR as a source of baseline data:

- **Community Development Element:** Land Use Plan, Economic Development Plan, Community Design Plan, Circulation Plan
- **Community Resources Element:** Open Space Plan, Conservation Plan
- **Community Safety Element:** Public Safety Plan, Noise Plan
- **Implementation: Implementation Program**
- **Housing Element**

City of Gardena General Plan 2006 Final Environmental Impact Report (April 2006) (SCH #2005021125). The GGP Final Environmental Impact Report (GGP FEIR) analyzed the potential environmental impacts that would result from GGP implementation. At the time of the preparation of the GGP FEIR, the City was 98.5 percent developed and there was approximately 45 acres of vacant land. GGP FEIR Tables 2 and 3 present the forecasted capacity at the City's buildout as 22,329 DU, a population of 63,799 persons, and approximately 18.9 million square feet (SF) of nonresidential land uses. Buildout was estimated to occur over 20 years. The GGP FEIR concluded significant and unavoidable impacts concerning Transportation and Traffic (GGP FEIR, page 138).

Since adoption of the GGP FEIR, the Southern California Association of Governments (SCAG) Regional Housing Needs Assessment Allocation Plan 5th Cycle, which was adopted in 2012, identified that between years 2014 and 2021, the City will need to accommodate development of 397 DU. The City's 2014-2021 Housing Element determined that adequate development capacity remained for the City to meet the

Regional Housing Needs Assessment (RHNA) allocation for the 2014-2021 planning period. On November 12, 2013, the City Council adopted Resolution No. 6106 approving the 2014-2021 Housing Element and the supporting Initial Study/Negative Declaration.

As of this writing, SCAG is in the process of finalizing the numbers for the 6th Cycle Housing Element (October 2021 through October 2029), which in draft form allocates over 5,700 DUs to Gardena. The City has contracted a consultant to update the Housing Element for the 6th Cycle and anticipates its completion prior to the start of the 7th Cycle.

Gardena Municipal Code. The Gardena Municipal Code (GMC) regulates municipal affairs within the City's jurisdiction including, without limitation, zoning regulations (codified in GMC Title 18). GMC Title 18 is the primary tool for implementing the GGP's Goals, Objectives, and Policies. The GMC is referenced throughout this EIR to establish the Project's baseline requirements according to the City's regulatory framework.

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2.0 PROJECT DESCRIPTION

2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The Gardena Transit-Oriented Development Specific Plan (GTODSP) Project (Project) would be developed in the City of Gardena (City), approximately 8.8 miles southwest of downtown Los Angeles; see **Exhibit 2-1: Regional Vicinity Map.** The Project site is comprised of four lots on one 1.33-acre parcel (APN #4060-004-039) on Crenshaw Boulevard south of West El Segundo Boulevard, at 12850 - 12900 Crenshaw Boulevard.

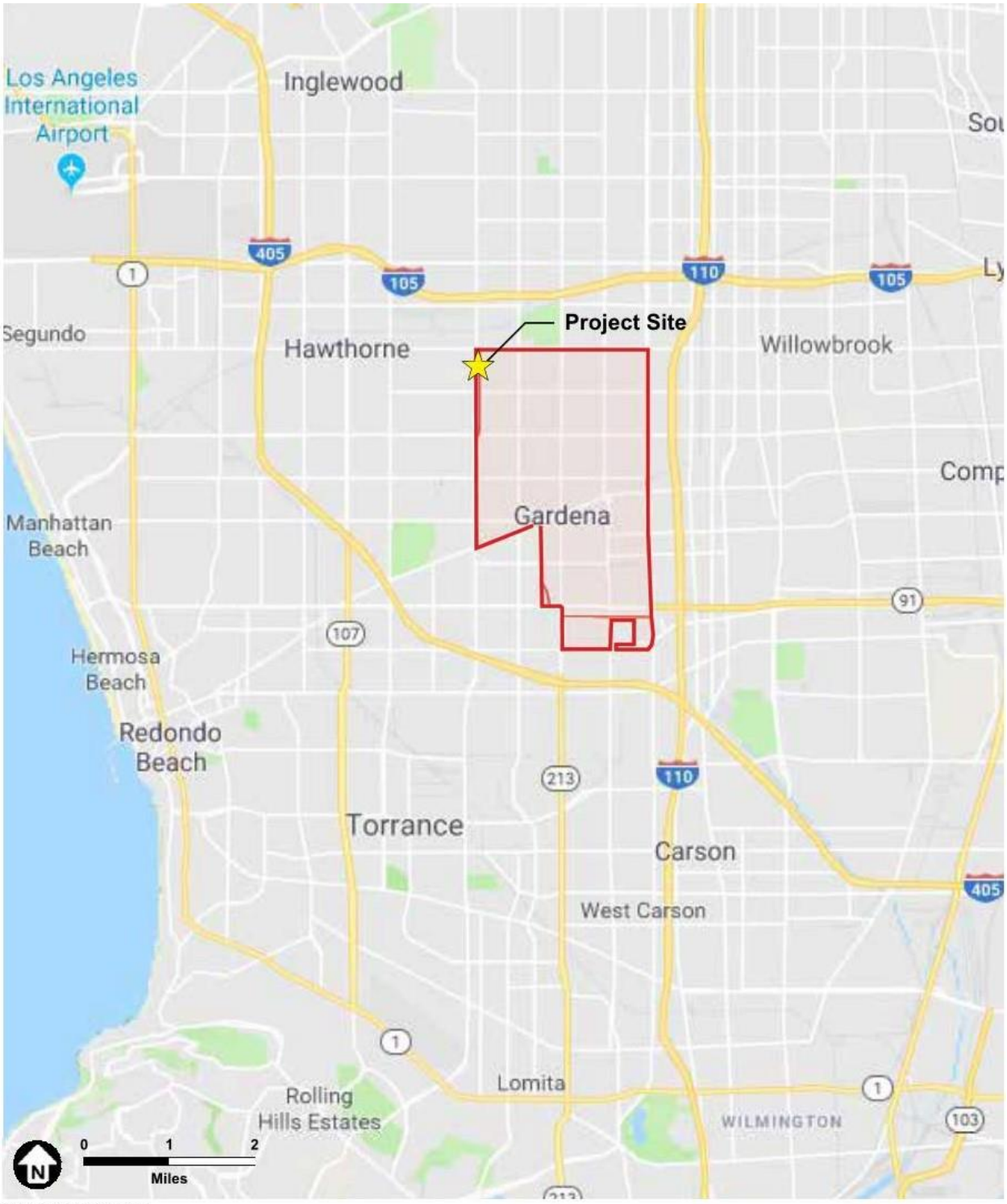
2.2 ENVIRONMENTAL SETTING

The City encompasses approximately 6.0 square miles in the County's South Bay region. Gardena is an urbanized city with a mix of residential densities, although low-density residential uses predominate. The City also contains a mix of retail, commercial, office, and industrial uses. The City of Hawthorne is west of the Project site across Crenshaw Boulevard and north of the Project site across West El Segundo Boulevard; see **Exhibit 2-2: Site Vicinity Map**.

Three major freeways provide regional access to the Project site: Interstate 105 (I-105) to the north, I-110 to the east, and I-405 to the south and west. From I-105, access to the Project site is provided via Crenshaw Boulevard, which runs along the GTODSP area's western boundary. Local access to the GTODSP area is provided via El Segundo Boulevard, which is a six-lane arterial oriented east-west just north of the GTODSP. Local access is also provided via Crenshaw Boulevard, which is a six-lane arterial oriented north-south on the Project Site's western edge.

Transit, bicycle, and pedestrian facilities exist near the GTODSP area. The Crenshaw Station, which is a Los Angeles County Metro Rail freeway median station on the Metro C (Green) Line, is located at Crenshaw Boulevard in the City of Hawthorne, in the I-105 median, approximately 0.6 miles north of the Project site. Additionally, the GTrans bus route Line 5 runs on El Segundo Boulevard with a stop 125 feet north of the Project site. There is an existing bicycle route along the Laguna Dominguez Trail (Dominguez Trail) approximately 60 feet east of the Project site, separated from the Project site by the Dominguez Flood Control Channel (Dominguez Channel). The Dominguez Trail spans nearly 3.0 miles between the cities of Lawndale and Hawthorne. Additionally, sidewalks are provided along Crenshaw Boulevard (fronting the Project site) and within a continuous and complete pedestrian network in the surrounding area. Marked crosswalks are provided on all legs of the nearest intersection (i.e., Crenshaw Boulevard at El Segundo Boulevard).

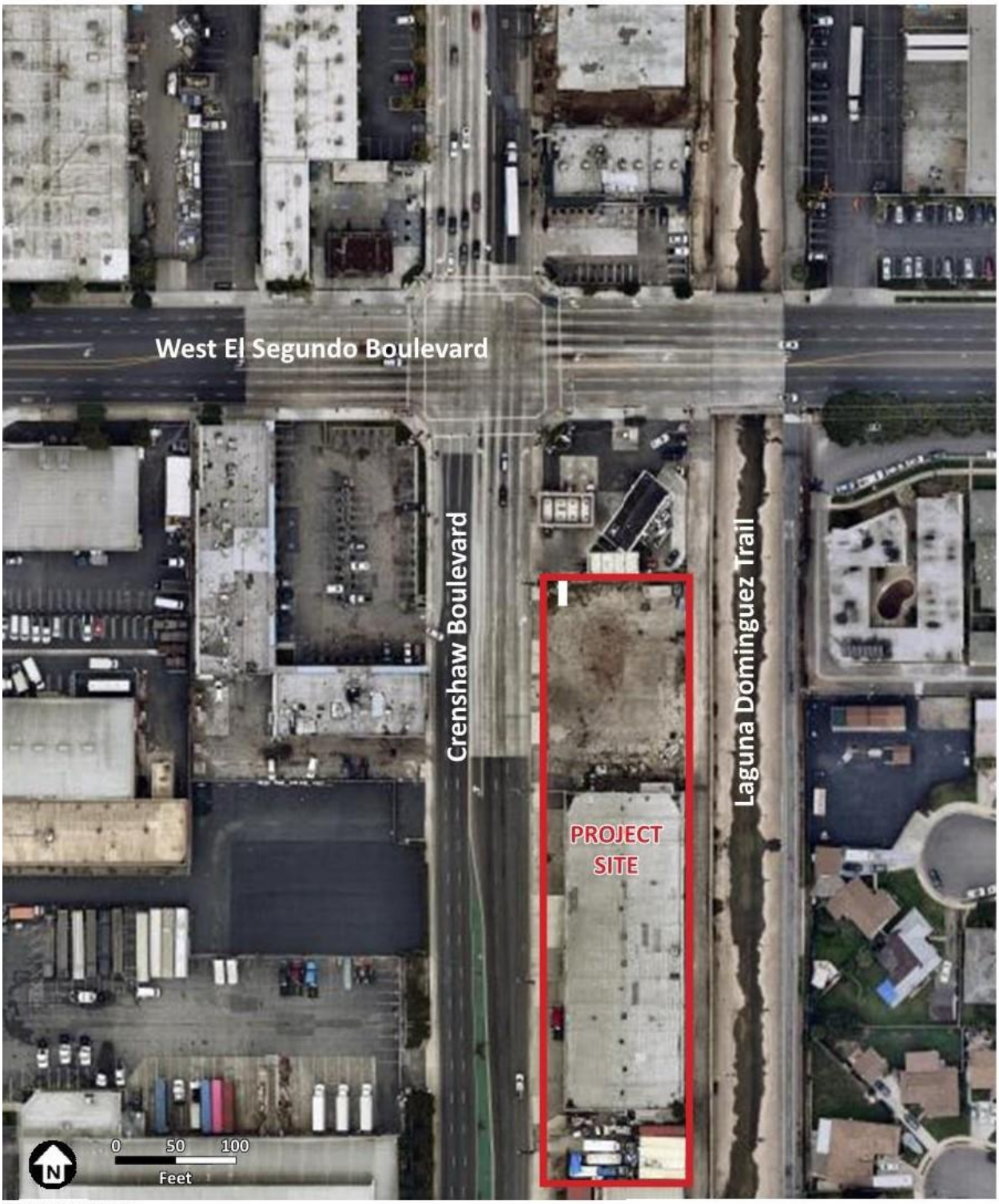
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Source: Google Maps

Transit-Oriented Development Specific Plan Project
Environmental Impact Report
Exhibit 2-1
Regional Vicinity Map

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Source: Near Maps

Kimley»Horn

Transit-Oriented Development Specific Plan Project
Environmental Impact Report
Exhibit 2-2
Site Vicinity Map

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2.2.1 ONSITE LAND USES

The Project site is part of a larger regional industrial, engineering, commercial, and employment area that generally extends north to south from I-105 to Rosecrans Avenue and east to west from Van Ness Avenue to Prairie Avenue. The Project site is generally bordered by general commercial, logistical, and research and development land uses. The Project site has existed in its current configuration since at least 1958. Uses before 1958 are presently unknown. The Project site is fully developed with one circa 1958, one-story, approximately 24,990-square foot (SF) warehouse used to store both vintage cars and auto parts. The Project site is a blighted property that is under significant deterioration and disrepair. Additionally, the property does not conform to current development standards.

2.2.2 EXISTING GENERAL PLAN AND ZONING

The Gardena General Plan 2006 (GGP) designates the Project site as General Commercial, which provides for a wide range of larger-scale commercial uses to serve both the needs of the City and the region.[1] The Zoning Map classifies the Project site as General Commercial Zone (C-3), which is consistent with the GGP. The C-3 Zone is intended for general commercial uses; see Gardena Municipal Code (GMC) Chapter 18.32, General Commercial Zone (C-3). GMC §18.32.00 identifies the C-3 Zone's permitted uses.

2.2.3 SURROUNDING LAND USES

The Project site is in the City's northwestern corner in a predominantly industrial area, although there are some residential uses to the east of the Project site, which are separated from the Project site by the Dominguez Channel and Dominguez Trail. Land uses, and corresponding zoning designations, bordering the Project site are depicted on **Exhibit 2-2** and summarized in **Table 2-1: Onsite and Surrounding Land Uses and Zoning**.

2.3 PROJECT CHARACTERISTICS

2.3.1 PROJECT OVERVIEW

The Applicant seeks approval of the GTODSP (SP #1-20) Project. The Project proposes to establish a maximum allowable development within the 1.33-acre GTODSP area of up to 265 dwelling units (DU). The Project components are described below. Because the City does not have any zone that would accommodate the proposed development, the Applicant is proposing a Specific Plan, the GTODSP, which would establish the Project area's zoning regulations and development standards. The GTODSP is available for review on the City's website and at the City's Community Development Department. In addition to requiring a Specific Plan, the Project requires various other approvals; see **Section 2.6: Agreements, Permits, and Approvals** below. The approvals are collectively referred to as the "Project."

The GTODSP includes the statutorily required elements, including a land use plan, a circulation plan, a description of existing and proposed utilities and infrastructure, design guidelines, development standards, and administrative provisions. For analysis purposes, it is assumed all existing onsite

[1] City of Gardena. (2006, Updated February 2013). *Gardena General Plan 2006*. Figure LU-2: 2013 General Plan Land Use Policy Map. Gardena, CA: City of Gardena.

improvements are currently 100 percent occupied and would be removed and replaced with the proposed residential development.

Table 2-1: Onsite and Surrounding Land Uses and Zoning

Description	Existing On-the-Ground Land Uses	Zoning[1]
Project Site	Approximately 24,990-SF, circa 1958, warehouse used for the storage of both vintage cars and auto parts.	Gardena: General Commercial Zone (C-3)
North	A gas station is immediately north, adjacent to the Project site. Properties north of West El Segundo Boulevard are in the City of Hawthorne and are predominantly light and heavy industrial uses. Additionally, a mixed-use development (238 DU and approximately 3,100 SF of restaurant space) is under construction at 12540 Crenshaw Boulevard.	Gardena: General Commercial Zone (C-3) Hawthorne: • North: General Industrial (M-2) (north of El Segundo Boulevard) • North/northeast: Trucking Intensive Overlay Zone (150 feet north of Project site) and Green Line Mixed Use Specific Plan (250 feet north of Project site) (for uses in support of the Green Line bus route) • Northwest: Century Business Center Specific Plan (1,200 feet north of Project site) and the Airport Master Plan (1,800 feet north of Project site)
South	Land uses to the south are in Gardena and are primarily commercial and light industrial. Approximately 700 feet to the southwest is a residential area of unincorporated Los Angeles County known as Hawthorne Island.	Gardena: General Commercial Zone (C-3) Hawthorne Island (Los Angeles County) (southwest): Two-Family Residence Zone (R-2), Neighborhood Business (C-2), and Limited Density Multiple Residence (R-3-P). Hawthorne: Southwest: Limited Industrial (M-1) and High Density Residential (R-3)
East	Land uses east of the Dominguez Channel and Dominguez Trail are residential.	Gardena: • Dominguez Channel and Dominguez Trail: Official Zone (O) • East of Dominguez Channel and Dominguez Trail: Low Density Residential Zone (R-1) and High Density Multiple-Family Residential Zone (R-4)
West	Land uses to the west are commercial and industrial. Properties west of Crenshaw Boulevard are in the City of Hawthorne.	Hawthorne: General Industrial Zone (M-2) and General Commercial Zone (C-3)

Sources:
1. City of Gardena. (January 2018). *Zoning Map*. Gardena, CA: City of Gardena Planning Division; City of Hawthorne. (April 2019). *Hawthorne, CA Zoning, CA Zoning*; Los Angeles County. (2009). *Z-Net: Find Your Zoning.*
2. ParcelQuest. (March 2020). *Assessor Data*. Retrieved from: https://pqweb.parcelquest.com/#home

2.3.2 LAND USE PLAN

The GTODSP establishes the maximum allowable development within the GTODSP area. Development in the Specific Plan area would be subject to compliance with the GTODSP's provisions and reviewed by the City to ensure compliance.

The allowable development is described in detail in GTODSP Chapter 4 Section II, and summarized below. The Project would replace the existing warehouse (approximately 24,990 SF) with an eight-story residential building with up to 265 DUs at a density of 200 DU/acre. The proposed building would have a maximum height of 100 feet, as measured from the finished floor (i.e., the level of the finished floor on the ground level) to the highest point on the roof, including non-habitable projections (including, without limitation, architectural features, elevator shafts mechanical equipment, stairwells, canopies, or shade structures). The building would include 5.5 levels of residential development over 2.5 levels of parking; see **Exhibit 2-3: Conceptual Site Plan**.

The Project would also include an approximately 2,500-SF (42' x 60') digital, animating and moving sign on the building's north façade; see **Exhibit 2-4: Conceptual Billboard Design**. The digital sign would be used for off-site commercial advertising, as well as community events. The City would share in a portion of the off-site advertising revenue generated as a community benefit of the Project.

GTODSP Chapter 5, *Development Regulations and Requirements*, specifies the standards which development in the GTODSP area would be subject to. These standards (which are intended to replace the existing zoning regulations) address various aspects of development on the Project site, including the following:

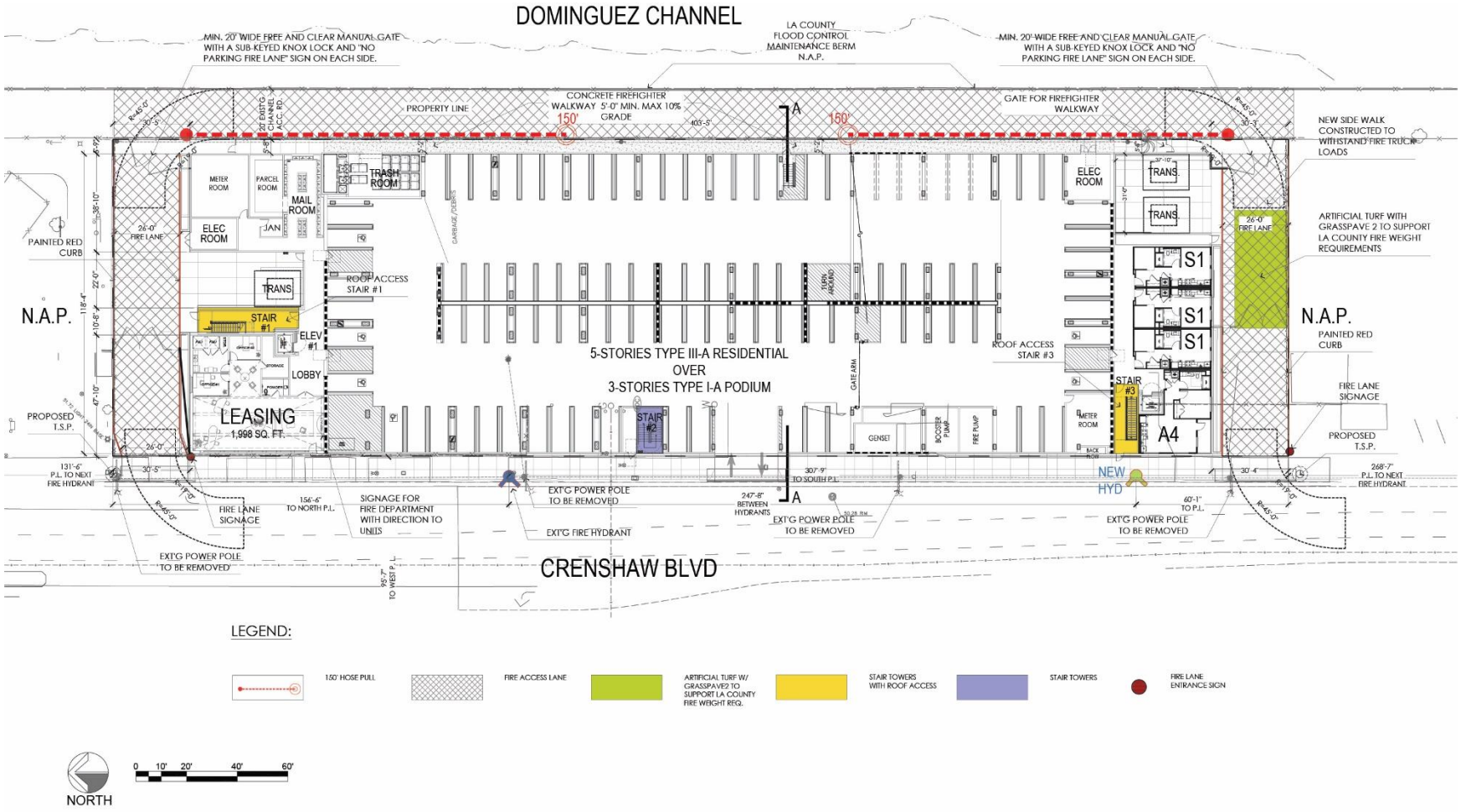
- Permitted uses
- Development standards (e.g., lot area, height, setbacks, lot frontage, floor area/floor area ratio, walls/fences, and accessory structures)
- Circulation
- Parking/loading
- Landscaping
- Public safety (Lighting)
- Signage
- Sustainability

Specific Plan Permitted Land Uses

A project in the GTODSP area would only be occupied by land uses identified in the GTODSP and would be subject to the applicable City approval process identified in GTODSP Chapter 8. The following uses would be permitted in the GTODSP area. Any use not listed as a permitted use, and not found to be sufficiently similar to a permitted use by the City, would be prohibited.

- Multi-family housing.
- Short-term corporate housing (leases of 30 days or less) within up to 10 percent of the dwelling units at any given time. The intent of this provision is to allow an entity such as a corporate housing provider or large local employer to master lease up to 10 percent of the units and then sublease those to corporate tenants for periods less than 30 days.
- Residential amenities and ancillary uses and any use customarily incidental to a permitted use, including home occupations.

- Digital, animated, and moving signage for off-site advertising purposes not to exceed 2,500 SF in size.
- Any other use not specifically listed here determined by the City to be similar to a permitted use.



Source: *AO ARCHITECTS: Building Plans*



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Exhibit 2-3
Conceptual Site Plan

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Source: *AO ARCHITECTS: Conceptual Perspective Bird's Eye View*



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Exhibit 2-4
Conceptual Billboard Design

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Specific Plan Land Use Development Standards

The site development standards are summarized below.

- Minimum Lot Area: The minimum lot area required for development permitted by the GTODSP would be 1.33 acres. Individual lots may be consolidated to meet the minimum lot area.
- Development Capacity: The GTODSP area's maximum development capacity is 265 DUs (just under 200 DUs per acre), with related amenities and ancillary uses.
- Maximum Building Height: The maximum building height shall not exceed eight stories or 100 feet in height as measured from finished floor to the highest point on the roof, including non-habitable projections such as elevator shafts, architectural features, stairwells, canopies or shade structures. A portion of the internal ramp and parking would be located below grade; the parking garage's below-grade portions would not count towards the permitted building height.
- Floor Area Ratio: Floor area ratio (FAR) would not exceed a maximum of 4.25 as calculated over the GTODSP gross area, excluding parking areas.
- Dwelling Unit Size: The minimum DU sizes are: 400 SF for studio units, 550 SF for one-bedroom units, and 850 SF for two-bedroom units, plus 150 SF for each additional bedroom over two bedrooms.
- Setbacks
    - Front and Rear: None required.
    - Side: 10.0 feet (as measured from the property line)
- Permitted Encroachments: Non-habitable architectural features (e.g., canopy or awning), planter boxes, outdoor seating for pedestrians and similar features may encroach within required setback areas by up to 5.0 feet. Fire lanes and other drive aisles may be located in the required side yard setbacks.

Project Design Features (PDFs)

Project Design Features (PDFs) are design and/or operational characteristics proposed by the Project Applicant that are incorporated into the Project to avoid or reduce its potential environmental effects. Because they are incorporated into the Project, they do not constitute mitigation measures. Following are the Project's proposed PDFs:

PDF AQ-1: The Project would include watering of active construction areas at least three times daily to minimize fugitive dust emissions.[2]

PDF AQ-2/PDF GHG 1: The Project would install seven Level 2 electric vehicle (EV) charging stations in the parking structure for the building tenants. The installation of EV charging stations corresponds to a reduction in GHG emissions as quantified in **Appendix 9.7**.

[2] Note that the control efficiency of watering is dependent on numerous variables such as soil/ground conditions, temperature, and vehicle travel specifics. For unpaved roads, increased frequency and/or water amounts are expected to improve the control efficiency. The control effectiveness in this analysis is based on the CalEEMod default for this watering assumption.

PDF AQ-3/PDF GHG 2: The Project would implement transportation demand management strategies in the Gardena Transit Oriented Development Specific Plan area to advance the vision for multi-modal transportation. These strategies include:

- **Unbundled Parking**: There shall be a charge for parking spaces. The property owner shall unbundle automobile parking charges from the rents or other fees charged for leasing residential units in the Specific Plan area.
- **Pre-Leasing for Area Employees**: Residential units within the Specific Plan area shall be marketed exclusively for a thirty-day period to employees working within a 0.5-mile radius of the development, before the units are offered for rent to the general public. The developer shall submit a pre-leasing marketing plan to the Community Development Director for review and approval prior to issuance of a temporary certificate of occupancy. The developer must then demonstrate compliance with the approved thirty-day exclusive marketing plan prior to issuance of a final certificate of occupancy.
- **Transit Information**: To ensure that residential tenants are aware of transit options and transportation demand management programs available to them, an information board or kiosk shall be posted in a central location in the building.
- **Onsite Residential Bicycle Parking**: One bicycle parking space shall be provided for every residential unit (located in secured facilities accessible only by residents). There would also be unsecured bicycle parking spaces for guests, provided at-grade on a first-come, first-serve basis. All bicycle parking shall be located in a safe, convenient location, encouraging the use of bicycle transportation by residents and guests.
- **Ride-Sharing Pick-Up/Drop-Off**: A designated loading area within the Gardena Transit-Oriented Development Specific Plan area shall be signed and distinguished (e.g., with paving and/or paint) so that it may be used as a pick-up and drop-off zone for ride-sharing services.

PDF AQ-4/PDF GHG 3: The Project would install a solar swimming pool heating system. The emissions savings from the solar swimming pool heating system were not quantified for this analysis.

PDF NOI-1: The amplified sound system at the Level 3 pool deck/courtyard shall be designed such that it does not exceed a maximum noise level of 85 dBA (L_{eq}) at a distance of 25 feet from the amplified sound system.

PDF AES-1: Location: The Digital Display shall be located or screened to minimize to the greatest reasonable extent possible direct light sources onto any exterior wall of a residential unit in the City of Gardena.

PDF AES-2: Materials: The Digital Display shall not use highly reflective materials such as mirrored glass.

PDF AES-3: Title 24: All light sources, including illuminated signage, shall comply with CALGreen (Part II of Title 24, California Code of Regulations).

PDF AES-4: Dimming: The Digital Display shall be fully dimmable and shall be controlled by a programmable timer so that luminance levels may be adjusted according to the time of day and ambient light conditions.

PDF AES-5: Brightness: The Digital Display shall have a nighttime brightness no greater than 400 candelas per square meter and a daytime brightness no greater than 7,000 candelas per square meter. The displays shall transition smoothly at a consistent rate from the permitted daytime brightness to the permitted nighttime brightness levels, beginning 45 minutes prior to sunset and concluding 20 minutes after sunset, and at all times when the ambient light is less than 100 footcandles.

PDF AES-6: Ground Spillage: When measured at ground level from any residential property other than the property on which the Digital Display is located, the Digital Display shall not under any circumstance increase the total amount of measurable light more than 8 LUX above the ambient-light level that exists when the Digital Display is extinguished.

PDF AES-7: Interior Spillage: When measured from any location within the building, the Digital Display shall not increase the total amount of measurable light more than 5 LUX above the ambient-light level that exists when the Digital Display is extinguished.

PDF AES-8: Refresh Rate: The Digital Display would operate under unrestricted refresh rates and shall permit images, videos, animation, parts and/or illumination that flash, change, move, stream, scroll, blink or otherwise incorporate motion to change at an unrestricted rate.

PDF AES-9: Hours of Operation: The Digital Display may be illuminated between the hours of 6:00 a.m. to 2:00 a.m.

2.3.3 CIRCULATION PLAN

The GTODSP includes an infrastructure and access plan for various travel modes including automobiles, transit, bicycles, and pedestrians.

Improvements

The GTODSP includes vehicular and nonvehicular circulation improvements to the GTODSP area to connect to existing off-site transportation facilities. Specifically, the Project proposes to:

- Replace the six curb cuts on Crenshaw Boulevard along the frontage for the use and surface parking lots with a single right-in/right-out vehicle access point to the proposed residential building (plus additional fire access lanes along the north and south property lines). This improvement would reduce potential conflict points between vehicles and pedestrians using the sidewalk. Project construction would require an approximately two-year partial closure of Crenshaw Boulevard's western lanes.
- Provide pedestrian access to the Project site on the ground floor with primary pedestrian access located at the building lobby on the Project site's northern portion. Additional restricted pedestrian access would also be provided at the Project site's southern portion and via the parking garage.
- Onsite pedestrian circulation would consist of a network of pathway connections between residential units, common areas, and the parking garage. A sidewalk along the east side of Crenshaw Boulevard would provide access between the Project site and the adjacent pedestrian network, which connects to the Crenshaw Station (0.6 mile north of the Project site) and other transit stops and surrounding land uses.

- Provide secured bicycle storage in the enclosed garage: one bicycle parking space per DU. Adjacent bicycle access between the Project site and the Dominguez Trail would be provided via West El Segundo Boulevard, just north of the Project site.

Implement transportation demand management (TDM) strategies to advance the GTODSP's vision for multi-modal transportation. The Project would integrate TDM measures to reduce single-occupant automobile travel and take advantage of the GTODSP's proximity to large employment centers, transit services, and bicycle and pedestrian facilities, as described above. The proposed TDM strategies are: Unbundled Parking (see also ***Vehicle Parking*** discussion below); Pre-Leasing for Area Employees; Transit Information; Onsite Residential Bicycle Parking; and Ride-Sharing Pick-Up/Drop-Off. These TDM measures are described in greater detail in GTODSP Chapter 4, Section III.

Vehicle Parking

Onsite parking would be provided in an unenclosed[3] garage in the lower 2.5 floors. The Project would provide 267 parking spaces (one space per DU) within the parking garage. Parking spaces would be leased separately from the residential units (unbundled) from rental of the residential units. The additional cost associated with an onsite parking space is intended to incentivize alternate transportation modes.

2.3.4 UTILITIES AND INFRASTRUCTURE

The distribution, location, extent of major components of public and private utilities and infrastructure, and other essential facilities within the GTODSP area that are needed to support the proposed residential development are described in **Section 4.15: Utilities and Service Systems**, and summarized below. The utilities and infrastructure proposed in the GTODSP area are potable and reclaimed water, sewer, stormwater drainage and treatment, electricity, natural gas, and telecommunications.

Water. The Golden State Water Company Water provides water service to the Project site by an existing 8.0-inch cast iron line, and domestic and fire water lateral. The Project proposes to connect a domestic water line, a fire line, and irrigation line to the existing main.

Sewer. The Project site is within the jurisdictional boundaries of Sanitation Districts of Los Angeles County Sanitation District No. 5 (LACSD). The Project's wastewater would discharge to the local sewer line for conveyance to a LACSD's trunk sewer.

Stormwater Drainage and Treatment. Stormwater from the GTODSP area is generally conveyed to the Dominguez Channel through curb and gutter along Crenshaw Boulevard. The Project proposes to collect stormwater onsite and route the water by means of various BMP solutions and into the street flow line of Crenshaw Boulevard.

Electricity. The Project site is currently served by overhead power lines on the east side of Crenshaw Boulevard owned and maintained by SoCal Edison. The Project proposes to relocate these lines underground within the Project site to provide permanent electrical power.

Natural Gas. The Project site is currently served by natural gas lines within Crenshaw Boulevard. The Project proposes to connect to the existing natural gas line to provide natural gas to the Project site.

[3] Garage referred to as "unenclosed" because it would be naturally ventilated, which is the primary distinguishing factor between enclosed and unenclosed structures.

Telecommunications. SCE and local telecommunications companies operate and maintain transmission and distribution infrastructure in the Project area, inclusive of the Project site. The Project proposes to connect to the existing lines to provide telecommunications service to the Project.

2.3.5 DESIGN GUIDELINES

Land uses within the GTODSP area must conform to GTODSP Chapter 6 guidelines, which address design principles for the architecture, landscape and streetscape, lighting standards, sign program, and performance standards to ensure the quality development envisioned for the GTODSP area. Any modifications to these guidelines must undergo a consistency review to determine whether the modifications are in conformity with these regulations and requirements.

- Architecture: The Project should provide high-quality development, development that is human scale, and a cohesive environment. A unique style of design achieved through the creative use of massing, materials, roof forms, and facades should be provided.
- Landscape and Streetscape: Landscaping for any development within the GTODSP area must be substantially consistent with the landscape plan concepts set forth in Chapter 4, Section VIII of the Specific Plan. The property owner shall maintain all landscaped areas. See **Exhibit 2-5: Composite Conceptual Landscape Plan** and **Exhibit 2-6: Conceptual Ground Level Landscape Plan**.
- Lighting Standards. Lighting should be used to illuminate open spaces and contribute to the safety and beauty of the Project.
- Sign Program. A master sign program shall be submitted to the Community Development Director for administrative approval.
- Performance Standards. Development within the GTODSP shall conform to the most recent CALGreen sustainability standards in effect at the time of building plan submission.

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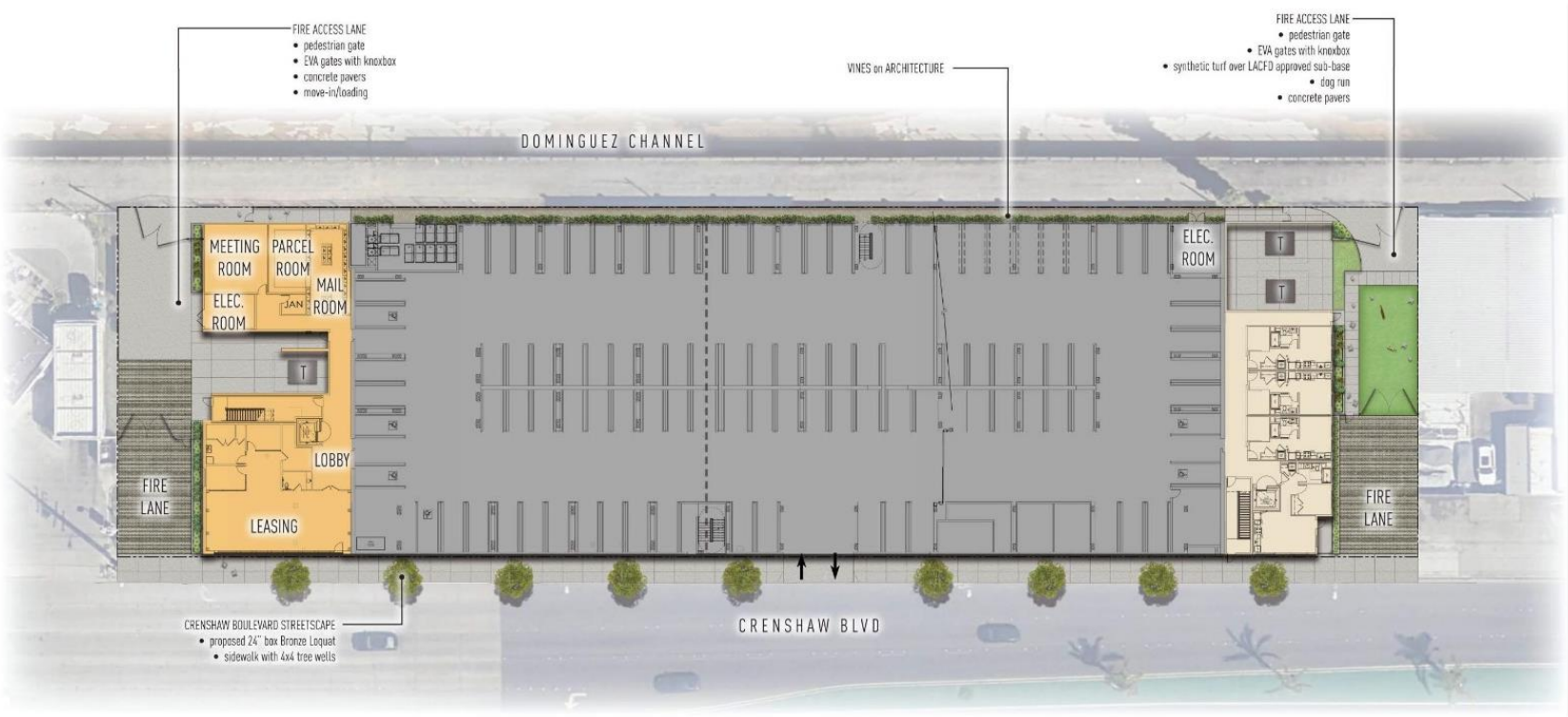
Source: *MJS Landscape Architecture: Composite Conceptual Landscape Plan, 07-08-2020*



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Exhibit 2-5
Composite Conceptual Landscape Plan

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Source: *MJS Landscape Architecture: Conceptual Ground Level Landscape Plan, 07-08-2020*



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Exhibit 2-6
Conceptual Ground Level Landscape Plan

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2.3.6 ADMINISTRATION

The program of implementation necessary to carry out the land use plan, utilities/infrastructure, and development standards described above is addressed in GTODSP Chapter 8, Section VI. This chapter addresses the phasing plan, plan review process, CEQA review, infrastructure improvement/coordination, financing measures, and administration of plan.

Phasing Plan. The Project is envisioned to be built in one phase. Phased occupancy of the Project is permitted.

Plan Review Process. Development in the GTODSP would be implemented through City review of the site plan, plot plan, building permits, and other permits that may be required by the City of Gardena. The Site Plan, including new construction or modifications to the existing building, shall be reviewed by the Gardena Planning Commission for conformance with the General Plan, this Specific Plan, the Zoning Ordinance (if not superseded by this Specific Plan), and all other applicable documents. The Community Development Director may approve minor modifications to the approved Site Plan. The Site Plan is being processed concurrently with this Draft EIR.

CEQA Review. For any subsequent discretionary approvals requiring further CEQA review, the City as lead agency would rely on the certified Final EIR, together with any necessary errata, addenda or subsequent or supplemental EIR to the fullest extent permitted by CEQA.

Infrastructure Improvement/Coordination/Financing Measures. The developer and/or property owner shall be responsible for making transportation and infrastructure utility improvements identified as part of the GTODSP and/or the EIR. All improvements shall be to the specifications of the City of Gardena Community Development Department, Public Works, or another applicable department.

Administration of Plan. Approval of the GTODSP indicates acceptance by the Gardena City Council of a specific framework for the development of the Plan Area. The plan shall be administered by the Community Development Department and Planning Commission of the City of Gardena in accordance with the provisions of the Gardena Municipal Code.

2.4 PROJECT CONSTRUCTION ACTIVITIES AND PHASING

Project construction is anticipated to occur as a single phase. Phased occupancy of the Project is permitted. A Temporary Certificate of Occupancy may be issued pending clearance of certain final Project conditions of approval, subject to City approval. For purposes of this environmental analysis, opening year is assumed to be 2023.

The duration of the Project's construction activities is estimated to be approximately two years, beginning in the third quarter of 2021 with completion in the third quarter of 2023. Project construction would occur in the following sequence:

- Demolition;
- Site preparation;
- Grading for the proposed improvements would require cut and fill. The Project site would be graded to mimic the existing grading and drainage patterns. The overall site grading and drainage

pattern would be westerly towards Crenshaw Boulevard. Project grading is estimated to result in approximately 8,000 cubic yards of export;

- Building Construction:
  - Foundations;
  - Vertical concrete;
  - Wood framing and exterior façade; and
- Architectural Coating/Finishes to completion.

2.5 GOALS AND OBJECTIVES

Pursuant to State CEQA Guidelines §15124(b), the EIR project description must include "[a] statement of objectives sought by the proposed project…. The statement of objectives should include the underlying purpose of the Project."

The Project objectives, as referenced in the Draft GTODSP, are:

1. Diversify Gardena's existing multi-family housing options to serve the City's growing and evolving technology and creative sectors and aid in recruiting talent for these companies.
2. Balance job growth in the expanding technology and creative sector with new high-quality housing opportunities, enabling local employees to live close to where they work.
3. Cluster urban development near the Crenshaw Station, technology firms, and other large employment centers, providing City residents with the opportunity to live, work, and shop with less reliance on automobiles.
4. Establish multi-family development that meets high design standards and pursues environmental sustainability.
5. Allow for digital signage for off-site advertising, community programming and City/Applicant revenue sharing opportunities as a public benefit.
6. Redevelop a blighted, non-conforming site, increase tax revenues to the City, and create a catalyst for future development in the northern portion of Gardena.

2.6 AGREEMENTS, PERMITS, AND APPROVALS

The City, as Lead Agency for the Project, has discretionary authority over the Project. In order to implement the Project, the Applicant would need to obtain, at a minimum, the following discretionary permits/approvals/entitlements listed below:

General Plan/General Plan Map Amendment (GPA #1-20). A General Plan Amendment to: (i) change the land use designation on the General Plan Land Use Map from "General Commercial" to "Gardena TOD Specific Plan" and (ii) amend the Land Use Element text relating to specific plans and Land Use Element Table LU-1 to account for the GTODSP.

Zone Change (ZC #1-20) and Zoning Code Amendment (ZCA #3-20). A zoning map amendment to: (i) replace the existing General Commercial (C3) zoning with the Gardena Transit-Oriented Development Specific Plan zone and; (ii) amend the GMC text to add this new zone and to allow for digital signage in the GTODSP area.

Gardena Transit-Oriented Development Specific Plan (GTODSP) (SP #1-20). Approval of the GTODSP, as described above, which would serve as the zoning regulations for the property.

Lot Line Adjustment (LLA#1-20). A lot line adjustment to combine the Project site's four legal lots into a single development site, in accordance with GMC §17.08.120.

Site Plan Review (SPR #1-20). Review of the proposed development's physical design.

Development Agreement (DA #1-20). The Applicant and the City would be required to enter into a Development Agreement (DA) pursuant to the amendment to GMC §18.58.018G proposed as a part of this Project. The DA would further memorialize the Applicant's commitments to provide public benefits to the City and the community in return for assuring that the Project can be developed pursuant to the GTODSP. The digital display would be developed in accordance with the provisions that would be incorporated into the Specific Plan.

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3.0 BASIS OF CUMULATIVE ANALYSIS

3.0 BASIS OF CUMULATIVE ANALYSIS

3.1 INTRODUCTION

A project's cumulative impact is "an impact to which that project contributes and to which other projects contribute as well. The Project must make some contribution to the impact; otherwise, it cannot be characterized as a cumulative impact of that project."[1] Under CEQA's cumulative impact analysis requirements, the pertinent question is not whether there is a significant cumulative impact but whether the effects of an individual project are cumulatively considerable. Thus, the analysis must assess whether the additional amount of impact resulting from the proposed Project should be considered significant in the context of the existing cumulative effect. Importantly, this does not mean that any contribution to a cumulative impact should be considered cumulatively considerable.

State CEQA Guidelines §15355 provides the following definition of cumulative impacts:

"Cumulative impacts" refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

(a) The individual effects may be changes resulting from a single project or a number of separate projects.

(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

State CEQA Guidelines §15130(a) further addresses the discussion of cumulative impacts, as follows:

(1) As defined in §15355, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR.

(2) When the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency shall identify facts and analysis supporting the lead agency's conclusion that the cumulative impact is less than significant.

(3) An EIR may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. A project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The lead agency shall identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable.

[1] *Sierra Club v. West Side Irrigation Dist.* (2005) 128 Cal.App.4th 690, 700.

Pursuant to State CEQA Guidelines §15130(b), the discussion of cumulative impacts shall be guided by the standards of practicality and reasonableness, and should include the following elements:

(c) Either:

(A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the Agency, or

(B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projects may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

(1) When utilizing a list, as suggested in paragraph (1) of subdivision (b), factors to consider when determining whether to include a related project should include the nature of each environmental resource being examined, the location of the project and its type. Location may be important, for example, when water quality impacts are at issue since projects outside the watershed would probably not contribute to a cumulative effect. Project type may be important, for example, when the impact is specialized, such as a particular air pollutant or mode of traffic.

(2) Lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.

(3) A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available.

(4) A reasonable analysis of the cumulative impacts of the relevant projects, including examination of reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects."

3.2 CUMULATIVE PROJECTS LIST

The cumulative study area varies from one environmental topic to another depending upon the nature of impacts related to the topic. For example, cumulative aesthetic considerations encompass only the surrounding areas with direct views of the Project site, while air quality is a regional issue that is analyzed on a broader scale. To determine the Project's potential cumulative impacts, this EIR includes the use of a list of past, present, and future projects obtained from the cities of Hawthorne and Gardena; **Table 3-1: List of Cumulative Projects**.

The cumulative impacts analyses are provided in **Sections 4.1** through **4.15**. These analyses describe the potential environmental changes to the existing physical conditions that may occur as a result of the Project together with the cumulative projects listed in the table. Not all related projects would contribute to significant cumulative impacts for each topical area. For example, not all related projects would have visual impacts. The cumulative impact analyses in each topical area provides an evaluation of the

cumulative projects and how these would contribute to cumulative impacts. Some of the impacts are very site-specific and would not compound the impacts associated with the Project. In other cases, short-term impacts would not contribute to cumulative impacts because the construction of the cumulative Project and the development of the Project would not occur in the same time period or be near to each other.

Table 3-1: List of Cumulative Projects

Type	Location (Project Name)	Description
City of Gardena		
Residential	1333 West 168th Street	3 DU, Condominiums
Mixed-Use	1112 Gardena Boulevard	12 DU, Apartments and 3,986 SF Commercial
Residential	1932 West 145th Street	4 DU, Apartments, with 2 DU existing
Residential	1348 West 168th Street (Normandie Courtyard Project)	9 DU, Small Lot Subdivision, 3-story
Residential	1017 West 141st Street and 14031 South Vermont Avenue (KB Home Stonefield Project)	63 DU, Townhomes, 3-story
Residential	13919 Normandie Avenue	20 DU, Single-Room Occupancy
Mixed-Use	1341 West Gardena Boulevard	14 DU, Townhomes and 3,385 SF Retail/Office
Residential	16819 Normandie Avenue	63 DU, Single-Room Occupancy
Mixed-Use	14321 Van Ness Avenue	35 DU, Townhomes and 5 DU Live/Work with 1,835 SF Commercial
Industrial	1528 West 134th Street	62,960 SF Industrial
Commercial	2169 West Redondo Beach Boulevard	3,486 SF Commercial (drive-thru restaurant)
Residential	1938 West 146th Street	6 DU, Townhomes
Residential	1621 West 147th Street	6 DU, Townhomes, Three-story
Residential	1335 West 141st Street	50 DU, Townhomes, Three-story
Residential	1515 West 178th Street (Melia 178th Street Townhomes Project)	114 DU, Townhomes
Residential	13615, 13619, 13633 Vermont Avenue	84 DU, Townhomes (2 DU affordable)
Mixed-Use	2129 West Rosecrans Avenue (Rosecrans Place Project)	113 DU Townhomes, 3-Story, including 15 Live/Work with 3,969 SF Commercial
Commercial*	1108 West 141st Street	Flynt parking lot rezone to commercial
Residential*	1031 Magnolia Avenue	6-unit residential project
Residential*	2500-2508 Rosecrans Avenue	53 units on 2.35 acres
City of Hawthorne		
Mixed-Use	3670 Imperial Highway	96 DU and approximately 6,200 SF Commercial (retail and office)
Mixed-Use	12540 Crenshaw Boulevard (Greenline Mixed Use)	238 DU and approximately 3,100 SF of restaurant space
Mixed-Use	14128 Kornblum	100 DU and approximately 15,000 SF of Commercial (retail and office space)
Industrial	12515 Cerise	62,000 SF Warehouse

Sources: Fehr & Peers. (2020). *Gardena TOD Specific Plan (12850 Crenshaw Boulevard) Local Transportation Assessment*. Appendix 9.11; * - City of Gardena (October 2020).
DU – dwelling unit; SF – square foot

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4.0 ENVIRONMENTAL ANALYSIS

4.0 ENVIRONMENTAL ANALYSIS

The following EIR subsections contain a detailed environmental analysis of the existing conditions, potential Project impacts (including direct and indirect, short-term, long-term, and cumulative impacts), recommended mitigation measures, and unavoidable significant impacts. **Sections 4.1** through **4.15** analyze those environmental resource areas where potentially significant impacts could occur, as stated in **Appendix 9.1: Notice of Preparation and Comment Letters**

This EIR examines environmental factors outlined in State CEQA Guidelines Appendix G Environmental Checklist Form, as follows:

4.1 Aesthetics
4.2 Air Quality
4.3 Cultural Resources
4.4 Energy
4.5 Geology and Soils
4.6 Greenhouse Gas Emissions
4.7 Hazards and Hazardous Materials
4.8 Hydrology and Water Quality
4.9 Land Use and Planning
4.10 Noise
4.11 Population and Housing
4.12 Public Services and Recreation
4.13 Transportation
4.14 Tribal Cultural Resources
4.15 Utilities and Service Systems

The environmental issues related to agriculture and forestry resources, biological resources, mineral resources, and wildfire were found to result in no impacts or less than significant impacts; see **Section 7.0: Effects Found Not to be Significant**. Additionally, certain issues associated with aesthetics, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, and population and housing are also included in **Section 7.0** based on the Initial Study.

Each potentially significant environmental issue area is addressed in a separate EIR section and is organized into the following subsections, as follows:

- "Introduction" briefly introduces the section's purpose, environmental issues that would be addressed, and key source documentation used to prepare the analysis.
- "Affected Environment" describes the physical conditions in the Project's vicinity that exist at the time the Notice of Preparation was published (August 20, 2020) and that may influence or affect the issue under investigation.
- "Regulatory Framework" discusses the laws, ordinances, regulations, and standards applicable to the Project.
- "Significance Criteria and Thresholds" provides the thresholds that are the basis of conclusions of significance, which are primarily the criteria in State CEQA Guidelines Appendix G (14 California Code of Regulations §§15000-15387).

  Primary sources used in identifying the criteria include the State CEQA Guidelines; local, State, Federal, or other standards applicable to an impact category; and officially established significance thresholds. ". . . An ironclad definition of significant effect is not possible because the significance of any activity may vary with the setting" (State CEQA Guidelines §15064(b)).

Principally, ". . . a substantial, or potentially substantial, adverse change in any of the physical conditions within an area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance" constitutes a significant impact (State CEQA Guidelines §15382).

- "Impacts and Mitigation Measures" describes potential environmental changes to the existing physical conditions that may occur if the Project is implemented. Evidence, based on factual and scientific data, is presented to show the cause and effect relationship between the Project and the potential environmental changes. The exact magnitude, duration, extent, frequency, range, or other parameters of a potential impact are ascertained, to the extent possible, to determine whether impacts may be significant; all of the potential direct and reasonably foreseeable indirect effects are considered.

  Mitigation Measures are measures that would be required of the Project to avoid a significant adverse impact; to minimize a significant adverse impact; to rectify a significant adverse impact by restoration; to reduce or eliminate a significant adverse impact over time by preservation and maintenance operations; or to compensate for the impact by replacing or providing substitute resources or environment.

- "Cumulative Impacts" describes potential environmental changes to the existing physical conditions that may occur as a result of the Project together with all other reasonably foreseeable, planned, and approved future projects producing related or cumulative impacts.

- "Significant Unavoidable Impacts" describes impacts that would be significant and cannot be feasibly mitigated to less than significant, and thus would be unavoidable. To approve a project with unavoidable significant impacts, the lead agency must adopt a Statement of Overriding Considerations. In adopting such a statement, the lead agency is required to balance the benefits of a project against its unavoidable environmental impacts in determining whether to approve the project. If a project's benefits are found to outweigh the unavoidable adverse environmental effects, the adverse effects may be considered "acceptable" (State CEQA Guidelines §15093(a)).

- "References" identifies the sources used in and throughout the subsection.



4.1 AESTHETICS

4.1 AESTHETICS

The purpose of this section is to examine the aesthetic and other visual resources present on the Project site and its surroundings and evaluate whether the Project would adversely impact such resources. Aesthetic and other visual resources include both natural and built-up environments. The *Sign Lighting Technical Study* (Francis Krahe & Associates, 2021) is summarized in this section and is included as **Appendix 9.2**.

4.1.1 VISUAL RESOURCES TERMINOLOGY AND CONCEPTS

When viewing the same landscape, people may have different responses to that landscape and any proposed visual changes, based upon their values, familiarity, concern, or expectations for that landscape and its scenic quality. Because each person's attachment to and value for a landscape is unique, visual changes to that landscape inherently affect viewers differently. However, generalizations can be made about viewer sensitivity to scenic quality and visual changes. Recreational users (e.g., hikers, equestrians, tourists, and people driving for pleasure) are expected to have high concern for scenery and landscape character. People commuting daily through the same landscape generally have a moderate concern for scenery, while people working at industrial sites generally have a lower concern for scenic quality or changes to existing landscape character. The visual sensitivity of a landscape is affected by the viewing distances at which it is seen, such as close-up or far away. The visual sensitivity of a landscape is also affected by the travel speed at which a person is viewing the landscape (high speeds on a highway, low speeds on a hiking trail, or stationary at a residence).

The same project feature can be perceived differently by people depending on the distance between the observer and the viewed object. When a viewer is closer to a viewed object in the landscape, greater detail is visible, and there is greater potential influence of the object on visual quality because of its form or scale (relative size of the object in relation to the viewer). When the same object is viewed at background distances, details may be imperceptible but overall forms of terrain and vegetation are evident, and the horizon and skyline are dominant. In the middle ground, some detail is evident (e.g., the foreground), and landscape elements are seen in context with landforms and vegetation patterns (e.g., the background).

The following terms and concepts are used in the discussion below to describe and assess the aesthetic setting and Project impacts.

Scenic Vista. An area that is designated, signed, and accessible to the public for the express purposes of viewing and sightseeing. This includes any such areas designated by a federal, state, or local agency. Scenic vistas usually provide expansive, elevated views.

Scenic Highway. Any stretch of public roadway that is designated as a scenic corridor by a federal, state, or local agency.

Sensitive Receptors. Viewer responses to visual settings are inferred from a variety of factors, including distance and viewing angle, types of viewers, number of viewers, duration of view, and viewer activities. The viewer type and associated viewer sensitivity are distinguished among project viewers in recreational, residential, commercial, military, and industrial areas. Viewer activities can range from a circumstance that encourages a viewer to observe the surroundings more closely (such as recreational activities) to one

that discourages close observation (such as commuting in heavy traffic). Viewers in recreational areas are considered to have high sensitivity to visual resources. Residential viewers generally have moderate sensitivity but extended viewing periods. Viewers in commercial, military, and industrial areas are considered to have low sensitivity.

Viewshed. A project's viewshed is defined as the surrounding geographic area from which the Project is likely to be seen, based on topography, atmospheric conditions, land use patterns, and roadway orientations. "Project viewshed" is used to describe the area surrounding a project site where a person standing on the ground or driving a vehicle can view the Project site.

Visual character typically consists of the landforms, vegetation, water features, and cultural modifications that impart an overall visual impression of an area's landscape. Scenic areas typically include open space, landscaped corridors, and viewsheds. Visual character is influenced by many different landscape attributes including color contrasts, landform prominence, repetition of geometric forms, and uniqueness of textures among other characteristics.

4.1.2 AFFECTED ENVIRONMENT

REGIONAL SETTING

Natural Setting

The City of Gardena is landlocked and located in a relatively flat area of the greater southwest Los Angeles area, with the Santa Monica Mountains located approximately 15 miles to the north, the San Gabriel Mountains located approximately 25 miles to the northeast, the Palos Verdes Peninsula located approximately 7 miles to the southwest[1], and the Pacific Ocean about five miles to the west. Because of this dense urban environment there are no identifiable scenic vistas within the City, except those that may be afforded by parkland/open space within the City including Rowley Park, the largest of City parks, and the natural Willows Wetland, which is a protected natural habitat that occupies eight acres of land in the far southeast portion of the City.[2] The City is bordered by existing development in the cities of Hawthorne, Torrance, Los Angeles, and unincorporated Los Angeles County.

SCENIC VISTAS

Appendix A: NOP and Initial Study, of the Gardena General Plan's (GGP) Final EIR states that the City is not located within an area known to be a "scenic vista."[3]

SCENIC HIGHWAY

Appendix A: NOP and Initial Study, of the GGP's FEIR states that the City is not located along a City, County, or State designated scenic highway or corridor. It also adds that "As stated in the existing Circulation and Scenic Highway Element, due to the physical features of the local streets, highways, and surrounding

[1] City of Gardena. (2005). *Final Environmental Impact Report City of Gardena General Plan 2006*. Appendix A: NOP and Initial Study. Retrieved from https://www.cityofgardena.org/wp-content/uploads/2020/04/General-Plan-Update-2006-Final-EIR.pdf.

[2] City of Gardena. (2006). *Gardena General Plan 2006: Community Resources Element, Open Space Plan*. Page OS-2. Retrieved from https://www.cityofgardena.org/wp-content/uploads/2016/04/generalplan6.pdf.

[3] City of Gardena. (2005). *Final Environmental Impact Report City of Gardena General Plan 2006*. Appendix A: NOP and Initial Study. Retrieved from https://www.cityofgardena.org/wp-content/uploads/2020/04/General-Plan-Update-2006-Final-EIR.pdf.

cityscapes and landscapes, no potential exists within the foreseeable future for satisfying the criteria necessary for scenic highways."[4]

VISUAL CHARACTER

The Project site is comprised of four lots on one 1.33-acre parcel (APN # 4060-004-039) on Crenshaw Boulevard south of West El Segundo Boulevard, at 12850 - 12900 Crenshaw Boulevard. The Project site is fully developed with one circa 1958, one-story, approximately 24,990-square foot (SF) light-industrial building currently used to store both vintage cars and auto parts. The Project site is a blighted property that is under significant deterioration and disrepair. The existing building is dilapidated, and the property is inadequately maintained and devoid of all landscaping. Therefore, the property is an eyesore in the neighborhood. Additionally, the property does not conform to current development standards.

The greater Project area is fully developed, and surrounding land uses include commercial, industrial, and residential uses. The parking areas north and south of the existing building are enclosed in chain-link fencing. The concrete-lined Dominguez Flood Control Channel (Dominguez Channel) and the Laguna Dominguez Trail (Dominguez Trail) border the Project site to the east, with residential development beyond the trail. Vegetation is ornamental and consists of palm trees within the Crenshaw Boulevard center median, and landscape trees/hedges on the west side of Crenshaw Boulevard. There are no landforms, cultural modifications, open space, landscaped corridors, or viewsheds within the Project area.

LIGHT AND GLARE

Light and glare in the Project area are mostly typical of that found in urban environments and active businesses. Dominant sources of light and glare in the area include streetlight poles, parking lot lights, and night glow from the surrounding city.

All California urban areas are designated Lighting Zone 3, as default under the California Energy Code (CEC); see the *Regulatory Framework* section below.

The distance to adjacent sensitive use properties from the Project site varies considerably. The distance from the Project site's north property line to the nearest adjacent sensitive use property is 320 feet. The distance from the Project site's east property line to the nearest sensitive use property line is 96 feet.

Existing Conditions Monitoring Sites. Monitoring Sites are utilized to describe and evaluate the existing lighting conditions at and surrounding the Project site to determine the maximum potential impacts that may result from light or glare onto sensitive sites surrounding the Project site. All Monitoring Site locations are near the Project site and would have views of the Project. Monitoring Sites may also be considered existing residential use properties, or may be located adjacent to existing residential properties. The following criteria were used to select potential Monitoring Site locations:

- Project Light Visibility – Monitoring Sites are analyzed that provide direct view of the areas of greatest light intensity from the Project.
- Proximity – Monitoring Sites at the least distance to the Project are analyzed. These locations are selected because light intensity decreases exponentially with distance. Locations at a greater distance would experience less light intensity than nearby locations.

[4] Ibid.

Exhibit 4.1-1: Monitoring Sites, depicts the Project site's location, the Monitoring Site locations, and the properties surrounding the Project site. Monitoring Site locations were selected for observation and field lighting measurements to evaluate the views to the Project from adjacent residential properties to determine the extent and intensity of existing light sources within and surrounding the Project. The Monitoring Sites are within the public right of way, adjacent to residential use properties, or at the Project property line. These locations are representative of the view to the Project from residential use properties surrounding the Project site to the north, south, east, and west.

- Monitoring Site MN1: Monitoring Site MN1 is located from the southeast roof the Green Line Apartments located at 12540 Crenshaw Boulevard, north of the West El Segundo Boulevard intersection, at the east side of the Crenshaw Boulevard right of way. This location is used to evaluate sensitive use properties north of the Project. The distance to the Project site's north property line is approximately 367 feet. The dominant light sources for this area are streetlights and parking lot lights from the Project site along with night glow from the surrounding city.
- Monitoring Site MN2: Monitoring Site MN2 is located east of the Dominguez Channel at 2936 West El Segundo Boulevard. This location is used to evaluate the sensitive use properties northeast of the Project site. The distance to the Project site northeast property line is approximately 132 feet. The dominant light source in this area is city night glow and street light poles.

4.1.3 REGULATORY FRAMEWORK

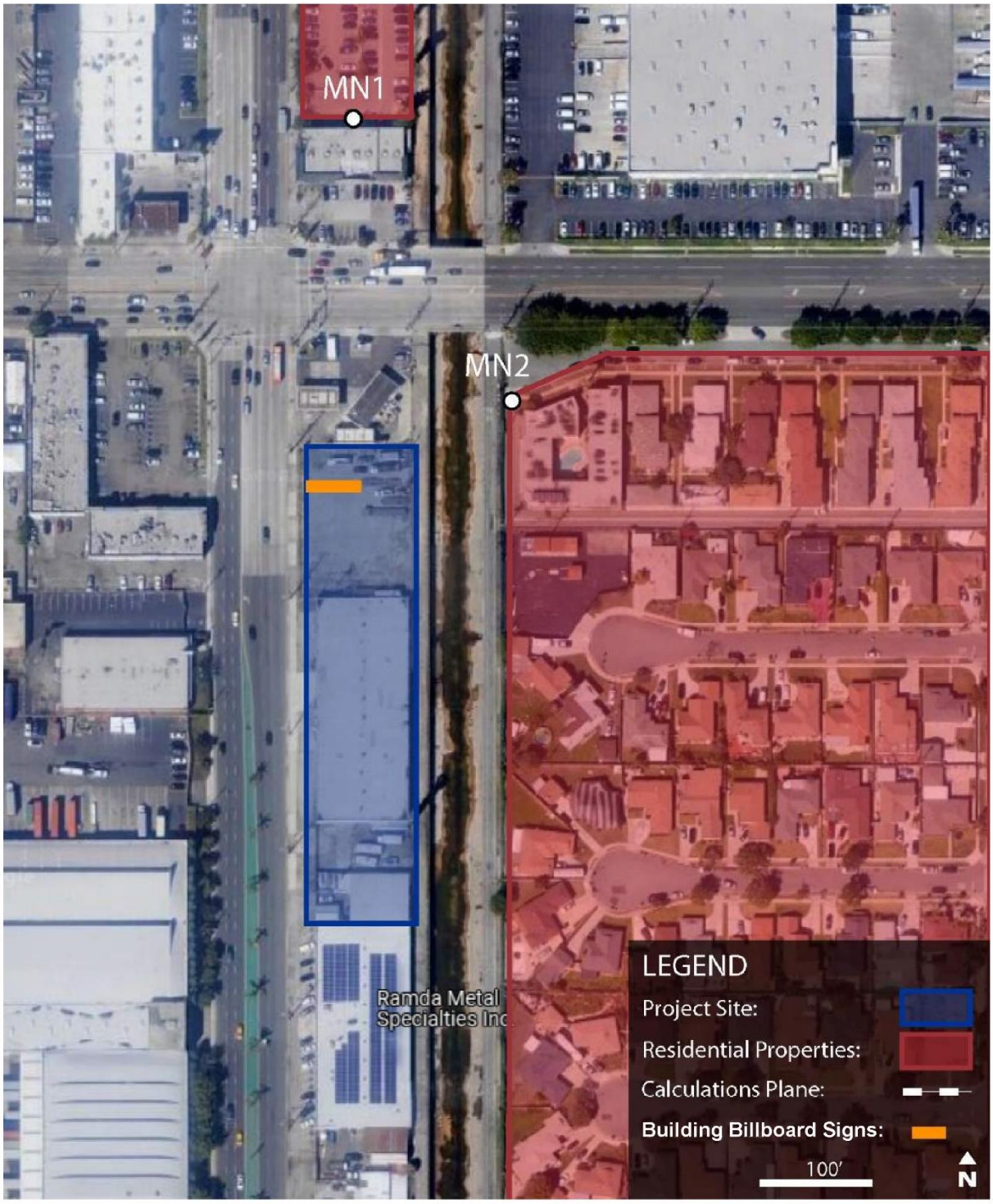
FEDERAL

Illuminating Engineering Society of North America (IESNA) Recommended Practices

The IESNA recommends illumination standards for a wide range of building and development types. These recommendations are widely recognized and accepted as best practices and are therefore a consistent predictor of the type and direction of illumination for any given building type. For all areas not stipulated by the regulatory building code, municipal code or specifically defined requirements, the IESNA standards are used as the basis for establishing the amount and direction of light for the Project.

The IESNA 10th Edition Lighting Handbook defines Outdoor Lighting Zones relative to a range of human activity versus natural habitat. Table 26.4, Nighttime Outdoor Lighting Zone Definitions establishes the Zone designation for a range of existing lighting conditions, from low or no existing lighting to high light levels in urban areas. Table 26.4 is referenced by the California Energy Code (CEC) as noted below in relation to allowable energy use for outdoor lighting. In addition, the IESNA 10th Edition Lighting Handbook defines Recommended Light Trespass Limits in Table 26.5 relative to the Outdoor Lighting Zones. The Recommended Light Trespass Illuminance Limits describe the maximum Light Trespass values in Lux at the location where trespass is under review.

The existing conditions surrounding the Project site are best described as Lighting Zone (LZ) 3. IESNA Table 26.5, lists a Pre-curfew 8 Lux (0.74 footcandles [fc]) maximum at the location where trespass is under review for LZ 3.



Source: Francis Krahe & Associates, *Sign Lighting Technical Study*

Transit-Oriented Development Specific Plan Project
Environmental Impact Report

Exhibit 4.1-1
Monitoring Sites

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STATE

California Department of Transportation

The California Department of Transportation (Caltrans) manages the California Scenic Highway Program, which is intended to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. State laws governing the Scenic Highway Program are found in Streets and Highways Code §§260 to 263. A highway may be designated as scenic based on certain criteria, including how much of the natural landscape can be seen by travelers, the landscape's scenic quality, and the extent to which development intrudes on the traveler's scenic view enjoyment. The Program's *Scenic Highway System List* identifies scenic highways that are either eligible for designation or have already been designated as such. As previously stated, there are no State designated scenic highways within the vicinity of the Project site.

California Code of Regulations, Title 24

California Code of Regulations (CCR) Title 24, also known as the California Building Standards Code, consists of regulations to control building standards throughout the State. The following Title 24 components include standards related to sign lighting:

The California Green Building Standards Code, which is Part 11 of Title 24, is commonly referred to as the CALGreen Code. Paragraph A4.106.10, Light Pollution Reduction, recommends that residential outdoor lighting comply with the following:

- The minimum requirements in the California Energy Code for Lighting Zones 1–4, as defined in California Administrative Code Chapter 10, as noted above;
- Backlight, Uplight and Glare (BUG) ratings defined in IES TM-15-11;
- Allowable BUG ratings not exceeding those shown in Table A4.106.10; and
- A local ordinance lawfully enacted pursuant to Section 101.7, whichever is more stringent.

Lighting Zone Designation LZ3

The Project site and surrounding properties are urban, mixed use, commercial, and residential zones with nighttime uses. Current best practices for lighting standards recognize the unique issues related to nighttime use adjacent to residences. The CEC includes designations for LZ 1 through 4 which correspond to the IESNA 10th Edition Handbook, Table 26.4 Light Trespass recommendations.

All California urban areas are designated LZ 3, as default under the CEC, which limits the Light Trespass to 8 lux (0.74 footcandles). Per the CEC, California Building Energy Efficiency Standards, Section 10-114, pages 40, 41, the designations for outdoor lighting zones in urban areas are as follows:

> "The default for urban areas, as defined by the U.S. Census Bureau, is Lighting Zone 3. Local AHJs (Authorities Having Jurisdiction) may designate areas to Lighting Zone 4 for high intensity nighttime use, such as entertainment or commercial districts or areas with special security considerations requiring very high light levels."

The existing conditions within and surrounding the Project site and along Crenshaw Boulevard and El Segundo Boulevard are consistent with the definition of LZ 3 noted above. In addition, the IESNA defines LZ 3 as:

> "areas of human activity where the vision of human residents and users is adapted to high light levels. Lighting is generally considered necessary for safety, security and/or convenience and it is mostly uniform or continuous."

IESNA Table 26.5, lists a Pre-curfew 8 Lux (0.74 footcandles) maximum at the location where trespass is under review for LZ 3. The CEC standard is well defined and supported by the IESNA and ASHRAE, and other independent lighting organizations such as the International Dark Sky Organization and U.S. Green Building Council.

California Vehicle Code, Division 11. Rules of the Road

California Vehicle Code Chapter 2, Article 3 stipulates limits to the location of light sources that may cause glare and impair driver's vision.

ARTICLE 3. Offenses Relating to Traffic Devices [21450 - 21468] (Article 3 enacted by Stats. 1959, Ch. 3.), §21466.5. No person shall place or maintain or display, upon or in view of any highway, any light of any color of such brilliance as to impair the vision of drivers upon the highway. A light source shall be considered vision impairing when its brilliance exceeds the values listed below.

The brightness reading of an objectionable light source shall be measured with a 1.5 degree photoelectric brightness meter placed at the driver's point of view. The maximum measured brightness of the light source within 10 degrees from the driver's normal field of view shall not be more than 1,000 times the minimum measured brightness in the driver's field of view, except that when the minimum measured brightness in the field of view is 10 footlamberts or less, the measured brightness of the light source in footlambert shall not exceed 500 plus 100 times the angle, in degrees, between the driver's field of view and the light source.

California Outdoor Advertising Act

The California Outdoor Advertising Act (Business & Professions Code §5200 et seq.) stipulates limits to the location of outdoor advertising displays administered by CALTRANS, which provides the following regulations to limit outdoor illuminated signs within 1,000 feet of a freeway that may cause glare and impair the vision of drivers.

ARTICLE 7. Regulations [5400-5419], §5408(d).

a) Advertising displays may not be placed that exceed 1,200 square feet in area with a maximum height of 25 feet and a maximum length of 60 feet, including border and trim, and excluding base or apron supports and other structural members. This subdivision shall apply to each facing of an advertising display. The area shall be measured by the smallest square, rectangle, triangle, circle, or combination thereof, which will encompass the entire advertisement. Two advertising displays not exceeding 350 square feet each may be erected in a facing.

d) No advertising display shall be placed within 500 feet from another advertising display on the same side of any portion of an interstate highway or a primary highway that is a freeway. No advertising display shall be placed within 500 feet of an interchange, or an intersection at grade,

> or a safety roadside rest area on any portion of an interstate highway or a primary highway that is a freeway and if the interstate or primary highway is located outside the limits of an incorporated city and outside the limits of an urban area. … No advertising display shall be placed within 100 feet from another advertising display on the same side of any portion of a primary highway that is not a freeway if that portion of the primary highway is located inside the limits of an incorporated city or inside the limits of an urban area.

The Project sign is located more than 1,000 feet from the nearest freeway. Therefore, the California Outdoor Advertising Act requirements do not apply to this Project.

LOCAL

City of Gardena General Plan

The City of Gardena's General Plan's Community Development Element provides a Community Design Plan that focuses on focuses on the aesthetic qualities of existing and future developments in the City and its relationship to the surrounding environment. The following goals and policies are relevant to aesthetic resources:

- **DS Goal 1:** Enhance the visual environment and create a positive image of the City.
  - **Policy DS 1.3**: Promote a stronger design review process to ensure that public and private projects comply with best design practices and standards.
  - **DS Policy 1.4**: Provide a sense of arrival to Gardena through entry monument signs, landscaping features, architectural and motifs at key gateway locations.
- **DS Goal 2**: Enhance the aesthetic quality of the residential neighborhoods in the City.
  - **DS Policy 2.1**: Provide stronger design guidelines for residential development, including both new construction and additions to existing single-family units or multi-family dwellings.
  - **DS Policy 2.2**: Ensure that new and remodeled dwelling units are designed with architectural styles, which are varied and are compatible in scale and character with existing buildings and the natural surroundings.
  - **Policy DS 2.3**: Encourage a variety of architectural styles, massing, floor plans, color schemes, building materials, façade treatments, elevation and wall articulations.
  - **DS Policy 2.7**: Require appropriate setbacks, massing, articulation and height limits to provide privacy and compatibility where multiple-family housing is developed adjacent to single-family housing.
  - **Policy DS 2.9**: Integrate new residential developments with the surrounding built environment. In addition, encourage a strong relationship between the dwelling and the street.
  - **DS Policy 2.10**: Provide landscape treatments (trees, shrubs, groundcover, and grass areas) within multi-family development projects in order to create a "greener" environment for residents and those viewing from public areas.
  - **DS Policy 2.11**: Incorporate quality residential amenities such as private and communal open spaces into multi-unit development projects in order to improve the quality of the Project and to create more attractive and livable spaces for residents to enjoy.

- **DS Policy 2.12**: Provide well-designed and safe parking areas that maximize security, surveillance, and efficient access to building entrances.
- **DS Policy 2.14**: Require design standards be established to provide for attractive building design features, safe egress and ingress, sufficient parking, adequate pedestrian amenities, landscaping, and proper signage.
- **Policy DS 2.15**: Promote innovative development and design techniques, new material and construction methods to stimulate residential development that protects the environment.

City of Gardena Municipal Code

The Project is subject to compliance with GMC Chapter 18.39: Specific Plans. Per Subsection B of §18.39.010: Intent and Authority, the regulations established in a specific plan zone would allow residential, commercial or industrial land uses and development standards created specifically for the Project area, while ensuring compliance with the spirit, intent and provisions of Titles 17 and 18 of this code, the general plan of the City, and other applicable laws. Guidelines, regulations and development standards incorporated in any specific plan zone are intended to achieve the following:

1. Respond sensitively to the natural and built environment and increase amenities to serve the inhabitants and surrounding community and neighborhood area;
2. Minimize the alteration of existing land forms and preserve significant natural features and vegetation unique to the city;
3. Conserve the historic, cultural and scenic assets of the city;
4. Provide an enriched environment with aesthetic cohesiveness and harmonious massing of structures within a framework of natural and landscaped open space through the utilization of superior land planning and architectural design;
5. Minimize the intrusion of new development into environmentally sensitive areas;
6. Protect new development from adverse visual impacts and excessive noise from nearby off-site structures and transportation corridors.

The GMC regulates lighting with respect to light trespass (i.e., the spillover of light onto adjacent light-sensitive properties). The City also enforces the building code requirements of the California Building Code, the California Green Building Standards Code (CALGreen), and the California Electrical Code, as adopted by the City of Gardena.

The regulations applicable to the Project include the GMC, CALGreen, and the California Vehicle Code.

The GMC includes the following sections pertaining to illumination:

GMC Section 18.58.060 - Design Standards

D. Lighting. All lighting and illumination of signs, when allowed, shall comply with all applicable safety codes. All external lighting shall be hooded and directed to the sign face and away from adjacent properties. On uses where the sign is visible from a residential zone, the illumination shall be shielded to minimize the flow of light into the residential zone.

GMC Section 18.58.070 - Permit Requirements and Procedures

A. Any person seeking a permit for a sign, for which a permit is required under this Chapter, shall submit to the Director a written application for such sign permit. A sign permit application is complete only when it is accompanied by the appropriate application fee, in an amount set by resolution of the City Council, and provides the following information:

12. A statement or graphical description as to whether the proposed sign, or any part of it, is proposed to utilize any of the following physical methods of message presentation: sound or odor; smoke or fumes or steam; rotating or moving elements; activation by wind or forced air; neon or other fluorescing gases; flashing or strobing lighting; liquid crystal displays or other video-like methods; use of animals or persons as part of the display

In this analysis, the above standards apply to Sign Lighting where the Project sign is adjacent to sensitive use properties.

4.1.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions pertaining to aesthetics. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, the Project may create a significant environmental impact if it would:

- Have a substantial adverse effect on a scenic vista (see **Section 7.0: Effects Found Not to be Significant**);
- Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway (see **Section 7.0**);
- 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, impacts may be significant if the Project conflicts with applicable zoning and other regulations governing scenic quality (see Impact 4.1-1); and/or
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area (see Impact 4.1-2).

In the context of impact threshold statement above (Impact 4.1-2), the determination of significance takes into account the following factors:

- The change in ambient nighttime levels as a result of Project sources; and
- The extent to which Project lighting would trespass/spill off the Project site and affect nearby residential zoned properties.

Specifically, the Project Sign Lighting would create a significant impact concerning light or glare if:

- The Project Sign Lighting Trespass Illuminance would exceed 0.74 footcandles at the property line of a residential zoned property and therefore adversely change the ambient light level at residential properties.

- The Project Sign Lighting creates glare with new high contrast conditions, with luminance greater than 400 cd/m^2 or contrast ratio greater than 30:1, visible from a field of view from a residentially zoned property.

In addition, based on the California Vehicle Code requirements identified above, the Project Sign Lighting would create a significant impact with regard to artificial light or glare effects on drivers of motor vehicles if:

- The maximum measured brightness of the light source within 10 degrees from the driver's normal field of view is greater than 1,000 times the minimum measured brightness in the driver's field of view, except that when the minimum measured brightness in the field of view is 10 footlamberts or less, the measured brightness of the light source in footlambert is greater than 500 plus 100 times the angle, in degrees, between the driver's field of view and the light source.[5]

METHODOLOGY AND ASSUMPTIONS

The Project and proposed Specific Plan Design Guidelines are evaluated against the aforementioned significance criteria/thresholds, as the basis for determining the impact's level of significance concerning aesthetics. In addition to the design characteristics of future development, this analysis considers the existing regulatory framework (i.e., laws, ordinances, regulations, and standards) that avoid or reduce the potentially significant environmental impact. Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measures are recommended, to avoid or reduce the Project's potentially significant environmental impacts.

This analysis of impacts on aesthetic resources examines the Project's temporary (i.e., construction) and permanent (i.e., operational) effects-based significance criteria/threshold's application, outlined above. For each criterion, the analyses address both temporary (construction) and operational impacts, as applicable. Each criterion is discussed in the context of Project components that share similar characteristics/geography. The impact conclusions consider the potential for changes in environmental conditions, as well as compliance with the regulatory framework enacted to protect the environment.

The baseline conditions and impact analyses are based on field observations conducted by Francis Krahe & Associates, Inc. in November 2020; review of Project maps and drawings; design guidelines and development standards of the Specific Plan, analysis of aerial and ground-level photographs; and review of various data available in public records, including local planning documents. The determination that a Project component would or would not result in "substantial" adverse effects on scenic resources or visual character considers the site's aesthetic resource value and the Project's individual component visual impact (e.g., the nature and duration of the impact). For example, a Project component resulting in a severe impact on a site with a low aesthetic resource value would result in a less than significant impact concerning scenic or visual character. In other words, new conspicuous structures or visual changes in areas with a low aesthetic resource value may not necessarily result in substantial adverse effects on visual resources.

Visual sensitivity can be described as viewer awareness of visual changes in the environment and is based on the viewers' perspective while engaging in activities from public areas near a project site. The Project site is visible to various users, primarily from local roadways and businesses. The sensitivity of those users

[5] The driver's field of view from the center of the roadway plus 10 degrees.

to changes within a project site varies with the type of use, length of time that the viewer would be within a project site's zone of visual influence (ZVI), and the viewer's distance from a project site. Viewers of a project site typically include nearby residents, and recreational users, travelers, and commuters within a project's ZVI.

4.1.5 PROJECT DESIGN FEATURES

The following project design features (PDF) were incorporated into the analysis:

- **PDF AES-1:** Location: The Digital Display shall be located or screened to minimize to the greatest reasonable extent possible direct light sources onto any exterior wall of a residential unit in the City of Gardena.
- **PDF AES-2:** Materials: The Digital Display shall not use highly reflective materials such as mirrored glass.
- **PDF AES-3:** Title 24: All light sources, including illuminated signage, shall comply with CALGreen (Part II of Title 24, California Code of Regulations).
- **PDF AES-4:** Dimming: The Digital Display shall be fully dimmable and shall be controlled by a programmable timer so that luminance levels may be adjusted according to the time of day and ambient light conditions.
- **PDF AES-5:** Brightness: The Digital Display shall have a nighttime brightness no greater than 400 candelas per square meter and a daytime brightness no greater than 7,000 candelas per square meter. The displays shall transition smoothly at a consistent rate from the permitted daytime brightness to the permitted nighttime brightness levels, beginning 45 minutes prior to sunset and concluding 20 minutes after sunset, and at all times when the ambient light is less than 100 footcandles.
- **PDF AES-6:** Ground Spillage: When measured at ground level from any residential property other than the property on which the Digital Display is located, the Digital Display shall not under any circumstance increase the total amount of measurable light more than 8 LUX above the ambient-light level that exists when the Digital Display is extinguished.
- **PDF AES-7:** Interior Spillage: When measured from any location within the building, the Digital Display shall not increase the total amount of measurable light more than 5 LUX above the ambient-light level that exists when the Digital Display is extinguished.
- **PDF AES-8:** Refresh Rate: The Digital Display would operate under unrestricted refresh rates and shall permit images, videos, animation, parts and/or illumination that flash, change, move, stream, scroll, blink or otherwise incorporate motion to change at an unrestricted rate.
- **PDF AES-9:** Hours of Operation: The Digital Display may be illuminated between the hours of 6:00 a.m. to 2:00 a.m.

4.1.6 IMPACTS AND MITIGATION MEASURES

Public Resources Code §21099 relates to projects in a Transit Priority Area which is defined as an area within 0.5 mile of a major transit stop. Section 21099(d) provides that aesthetic and parking impacts of a residential project on an infill site within a Transit Priority Area shall not be considered significant impacts on the environment. The GTODSP area lies within a Transit Priority Area. Based on this, the only part of

the Project that is evaluated under the aesthetics section is the digital display being proposed on the north side of the building, as that is not a necessary component of a residential project.

Impact 4.1-1:	**If in a non-urbanized area, would the project 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 in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**
Level of Significance: Less Than Significant Impact	

The Project site is in urbanized area. The Project site is in the City's northwestern portion, in a predominantly commercial and industrial area, although residential uses exist to the east. The Project site is fully developed with a circa 1958 warehouse. The Project site is a blighted property that is inadequately maintained and does not conform to current development standards. The Project proposes to remove all existing on-site improvements, and construct a single building of up to 265 DU. The maximum proposed building height would be eight stories or 100 feet as measured from the finished floor (i.e., the level of the finished floor on the ground level) to the highest point on the roof, including non-habitable projections (including, without limitation, architectural features, elevator shafts mechanical equipment, stairwells, canopies, or shade structures).

The on-site and abutting/surrounding zoning and the GMC and Hawthorne Municipal Code (HMC) regulations pertaining to each zone are detailed in **Table 2-1: Onsite and Surrounding Land Uses and Zoning**. The regulations specified in **Table 2-1** do not include standards governing scenic quality. Additionally, the GMC does not include other regulations governing scenic quality.

The Project proposes on the north building elevation an approximately 42' x 60' digital, animated and moving sign not to exceed 2,500 square feet for off-site advertising, community programming and City revenue sharing purposes. According to GMC §18.58.050: Prohibited Signs, billboards and flashing or animated signs are prohibited (unless expressly authorized by other provisions of the Chapter). Therefore, the Project as proposed conflicts with existing GMC regulations as they relate to signage and associated scenic quality, resulting in a potentially significant impact.

However, the Project is requesting a Zone Change (ZC #1-20) and Zoning Code Amendment (ZCA #3-20). Approval of a Zoning Map Amendment is requested to replace the existing General Commercial (C3) zoning with the GTODSP zone and the Zoning Code Amendment is required to amend the GMC text to add this new zone and to allow for digital signage to be developed in the City when they are an allowed use in the zone and subject to a development agreement with the City which provides a public benefit. Upon City approval of the Zone Change and Zoning Code Amendment, the Project would adhere to the GMC design standards, which would add the GTODSP zone and allow for digital signage in the zone; therefore, resulting in a less than significant impact.

MITIGATION MEASURES

No mitigation is required.

Impact 4.1-2: Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Level of Significance: Less than Significant Impact

A Sign Lighting Study (Study) was conducted by Francis Krahe & Associate Inc. and is summarized below. For full Study details, methodology, and analysis, see the Study in **Appendix 9.2**. The new lighting associated with the Project improvements was analyzed, including new lighting for an outdoor sign (hereinafter referred to as Sign Lighting) located at the north elevation of the Project site, oriented to the north. Surrounding sensitive use properties include existing residential use properties to the north and east of the Project site. Residential properties are identified as the most sensitive use sites due to their close proximity to the Project site and possible direct view of the Project Sign. The nearest sensitive use properties are the residential uses north of West El Segundo Boulevard, north of the Project site (Monitoring Site MN 1), and east of the Dominguez Channel, east of the Project site (Monitoring Site MN2), as described above.

Light trespass and glare were analyzed at surrounding sensitive use properties surrounding the Project site that could result from Sign Lighting on the Project site.

Light exposure is evaluated based on the following key subjects: Light Trespass and Glare. These two technical terms are defined by the Illuminating Engineering Society of North America (IESNA) as follows:

- Light trespass is the light that falls on a property but originates on an adjacent property. Light trespass is measured in terms of illuminance (footcandles or metric units lux), and can be measured at any point and in any direction. Where Light Trespass is evaluated the illuminance is measured perpendicular to the source of light, toward the source of light, at the property line, or the location where light is causing an issue, such as a residential window or balcony.
- Glare occurs when either the luminance is too high or the range of brightness in a visual field is too large. A bright light source, such as a flood light or streetlight, viewed against a dark sky may be uncomfortable to look at, and may create a temporary sensation of blindness, which is referred to as disability glare. Glare is evaluated by measuring the luminance (footlamberts or metric units candelas per square meter [cd/m2]) at the source of light, such as a digital display, in comparison to the surrounding adjacent luminance. The term which describes the extent of glare at an observer position for a view is referred to as contrast and is determined by the variation of luminance within the field of view. The contrast ratio is the ratio of peak luminance to the average luminance within a field of view. “High,” “Medium,” and “Low” contrast are terms used to describe contrast ratios: contrast ratios greater than 30:1, between 10:1 and 30:1, and below 10:1, respectively. Contrast ratios above 30:1 are generally uncomfortable for the human eye to perceive. Any source luminance that is more than 50 times the adjacent background would be viewed as prominent and may be viewed as distracting.

Light trespass is evaluated at night. Glare may occur during day or night.

The Project's potential environmental impacts relating to light trespass and glare were analyzed based on the Project sign lighting scope components, as described in Appendix A of the Study in **Appendix 9.2**. The following illumination criteria for Sign Lighting were established:

- Light trespass illuminance would not exceed 0.74 fc at the nearest residential use property.
- Project sign would include design features which limit sign luminance to 400 cd/m^2 (all white) at night (from 20 minutes before sunset until 20 minutes after sunrise), and to 7000 cd/m^2 (all white) during the day (from 20 minutes after sunrise to 20 minutes before sunset).

The Project sign would transition smoothly from the maximum day luminance to maximum night luminance over a period no less than 20 minutes. It was demonstrated that the Light Trespass from the sign lighting at the adjacent sensitive use properties described above would not exceed the 0.74 fc threshold as defined by the California Green Building Code; see **Appendix 9.2** for analysis. There is no light trespass threshold for commercial use properties, which are not considered light or glare-sensitive receptors. Therefore, at commercial properties where the illuminance is calculated to exceed the 0.74 fc threshold, there is no significant Light Trespass impact from the Sign Lighting.

Further, the sign lighting was evaluated with respect to glare visible at adjacent residential properties or roadways. To present a conservative analysis, the Sign Lighting was evaluated with a maximum luminance of 7000 cd/m^2 during the day and 400 cd/m^2 for the north-facing sign at night, operating at all white.

The glare from the sign lighting at sensitive use properties was analyzed at night by calculating the contrast ratio, which compares the maximum Project sign luminance to the existing average luminance measured at the residential properties. The calculated contrast ratios were less than 30:1, which indicates the sign lighting would not create a new glare condition at adjacent sensitive use properties; see **Appendix 9.2** for analysis. The glare at roadways was evaluated concerning California Vehicle Code standards, which define maximum sign luminance within drivers field of view for both day and night. Analysis determined that the sign lighting would not exceed the maximum luminance defined by the California Vehicle Code during the day, at night, and during periods of low sun intensity.

Conclusion. The Project proposes to install a new illuminated sign while minimizing light trespass and glare to neighboring sensitive use properties through design features that comply with the following design standards:

- Sign light trespass illuminance at night would not exceed 0.74 fc at all adjacent residential use properties as stipulated by CALGreen Code, Paragraph 5.1106.8, Light Pollution Reduction.
- At night and during sunset, sunrise, glare at sensitive residential or roadway sites would be less than high contrast conditions with a maximum sign luminance of 400 cd/m^2.
- During the day, glare at sensitive residential or roadway sites would be less than high contrast conditions with a maximum sign luminance of 7000 cd/m^2.
- Project Lighting would be controlled by a photocell on and timeclock off to transition smoothly from the daytime conditions to the maximum nighttime luminance.
- The Study accurately evaluated the potential for the Project sign to create a new source of light trespass and or glare at adjacent sensitive use properties. The Project sign location, type, dimensions, and maximum luminance are as described by the Concept Plan in Appendix A of the

Study (**EIR Appendix 9.2**), and are evaluated at night with the Project Sign operating at maximum luminance, all white, of 400 cd/m^2.

- The Study confirms the Sign Lighting would not exceed the maximum luminance defined by the California Vehicle Code during the day, at night, and during periods of low sun intensity.

Therefore, the Project sign would not create a new source of light trespass or glare that would exceed established standards. As such, this analysis represents a conservative evaluation of the proposed Project sign lighting potential for off-site light trespass and glare.

Based on the Project sign of design features, and with adherence to state and local regulatory standards and policies, the Project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area. Therefore, the impact would be less than significant.

MITIGATION MEASURES

No mitigation is required.

4.1.7 CUMULATIVE IMPACTS

When evaluating cumulative aesthetic impacts, several factors must be considered. The cumulative study area for aesthetic impacts is the viewshed that includes the Project area and its surrounding areas. The context in which a project is being viewed would also influence the significance of the aesthetic impact. The contrast a project has with its surrounding environment may be reduced by the presence of other cumulative projects. If most of an area is or is becoming more urbanized, the contrast of a project with the natural surrounding may be less since it would not stand out in contrast as much. In order for a cumulative aesthetic impact to occur, the proposed elements of the cumulative projects would need to be seen together or in proximity to each other. If the projects were not near each other, the viewer would not perceive them in the same scene.

Ongoing development within the Project area would alter the area's existing character and quality. Future development projects would have the potential to increase the amount of light and glare. Each development in the Project area would be required to comply with policies and regulations set out by the City's GP and MC. No other display/billboard is proposed at this time. Additionally, no other display/billboard would be approved without a zoning text amendment and CEQA compliance. Compliance with these policies, plans, and regulations would ensure that proposed future development in the surrounding areas would be compatible with the City's urban development.

Concerning nighttime illumination, nighttime lighting effects may be considered in a regional context because of the potential for night glow that would extend beyond a site's boundaries. Therefore, concerning night lighting, the Project is considered in context to the forecasted growth for the area that may contribute to the increased nighttime lighting. Future development in the Project area and the surrounding areas would be subject to GMC Chapter 18.42 General Provisions lighting restrictions. Because the GTODSP area is predominately developed and is bordered by existing development, has existing nighttime lighting, and would comply with City ordinances, the GTODSP's contribution to nighttime lighting would be less than cumulatively considerable.

Compliance with policies and regulations set out by the proposed GTODSP, the City's General Plan and ordinances, the Project would not cumulatively contribute to cumulative impacts related to aesthetics and visual resources. Impacts would be less than significant.

4.1.8 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts to aesthetics have been identified.

4.1.9 REFERENCES

California Department of Transportation. (2017). California Scenic Highways. Retrieved from https://www.arcgis.com/home/item.html?id=f0259b1ad0fe4093a5604c9b838a486a.

City of Gardena. (2005). *Final Environmental Impact Report City of Gardena General Plan 2006*. Appendix A: NOP and Initial Study. Retrieved from https://www.cityofgardena.org/wp-content/uploads/2020/04/General-Plan-Update-2006-Final-EIR.pdf.

City of Gardena. (2006). *Gardena General Plan 2006: Community Resources Element, Open Space Plan*. Page OS-2. Retrieved from https://www.cityofgardena.org/wp-content/uploads/2016/04/generalplan6.pdf.

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4.2 AIR QUALITY

4.2 AIR QUALITY

This section describes the existing regulatory and environmental conditions related to air quality, identifies potential impacts that could result from Project implementation, and as necessary, recommend mitigation to avoid or reduce the significance of impacts. The *Air Quality Technical Report* (Ramboll US Corporation, 2020) and *Health Risk Assessment* (Air Quality Dynamics, 2020) are summarized in this section and are included as **Appendix 9.3: Air Quality Data**.

Kimley-Horn conducted a third-party review of the Project's air quality analyses on behalf of the City; see **Appendix 9.3**. The third-party review concluded the analyses meet the applicable provisions of CEQA and the State CEQA Guidelines.

4.2.1 AFFECTED ENVIRONMENT

CLIMATE AND METEOROLOGY

The California Air Resources Board (CARB) divides the state into 15 air basins that share similar meteorological and topographical features. The Project site is located within the South Coast Air Basin (Air Basin). The Air Basin is an approximately 6,745-square-mile area bordered by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east.[1] The Air Basin consists of Orange County and the non-desert portions of Los Angeles, San Bernardino, and Riverside counties. Air quality in this area is determined by such natural factors as topography, meteorology, and climate, in addition to the presence of existing air pollution sources and ambient conditions.

The Air Basin lies in the semi-permanent high-pressure zone of the eastern Pacific Ocean. The usually mild climatological pattern is interrupted by periods of hot weather, winter storms, or Santa Ana winds. The extent and severity of criteria pollutant concentrations in the Air Basin is a function of the area's natural physical characteristics (weather and topography) and man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of pollutants throughout the Air Basin, making it an area of high pollution potential. The Air Basin's meteorological conditions, in combination with regional topography, are particularly conducive to the formation and retention of ozone (O_3), which is a secondary pollutant that forms through photochemical reactions in the atmosphere. Therefore, the greatest air pollution impacts throughout the Air Basin typically occur from June through September. This condition is generally attributed to the emissions occurring in the Air Basin, light winds, and shallow vertical atmospheric mixing. These factors reduce the potential for pollutant dispersion causing elevated air pollutant levels. Pollutant concentrations in the Air Basin vary with location, season, and time of day. Concentrations of O3, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Air Basin and adjacent desert.

AIR POLLUTANTS OF CONCERN

The air pollutants emitted into the ambient air by stationary and mobile sources are regulated by state and federal laws. These regulated air pollutants are known as "criteria air pollutants" and are categorized into primary and secondary pollutants.

[1] South Coast Air Quality Management District. (2016). *Air Quality Management Plan*. page 1-4.

Primary air pollutants are emitted directly from sources. Carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxide (NO_X), sulfur dioxide (SO_2), coarse particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), and lead are primary air pollutants. Of these, CO, NO_X, SO_2, PM_{10}, and $PM_{2.5}$ are criteria pollutants. ROG and NO_X are criteria pollutant precursors and form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere. For example, the criteria pollutant O_3 is formed by a chemical reaction between ROG and NO_X in the presence of sunlight. O_3 and nitrogen dioxide (NO_2) are the principal secondary pollutants. Sources and health effects commonly associated with criteria pollutants are summarized in **Table 4.2-1: Air Contaminants and Associated Public Health Concerns**.

Table 4.2-1: Air Contaminants and Associated Public Health Concerns

Pollutant	Major Man-Made Sources	Human Health Effects
Particulate Matter (PM_{10} and $PM_{2.5}$)	Power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles and others.	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; asthma; chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility.
Ozone (O_3)	Formed by a chemical reaction between reactive organic gases/volatile organic compounds (ROG or VOC)[1] and nitrogen oxides (NO_X) in the presence of sunlight. Motor vehicle exhaust industrial emissions, gasoline storage and transport, solvents, paints and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield.
Sulfur Dioxide (SO_2)	A colorless gas formed when fuel containing sulfur is burned and when gasoline is extracted from oil. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid which can damage marble, iron and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO_2)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to O_3. Contributes to global warming and nutrient overloading which deteriorates water quality. Causes brown discoloration of the atmosphere.
Lead (Pb)	Lead is a metal found naturally in the environment as well as in manufactured products. The major sources of lead emissions have historically been motor vehicles (such as cars and trucks) and industrial sources. Due to the phase out of leaded gasoline, metals processing is the major source of lead emissions to the air today. The highest levels of lead in air are generally found near lead smelters. Other stationary sources are waste incinerators, utilities, and lead-acid battery	Exposure to lead occurs mainly through inhalation of air and ingestion of lead in food, water, soil, or dust. It accumulates in the blood, bones, and soft tissues and can adversely affect the kidneys, liver, nervous system, and other organs. Excessive exposure to lead may cause neurological impairments such as seizures, mental retardation, and behavioral disorders. Even at low doses, lead exposure is associated

Pollutant	Major Man-Made Sources	Human Health Effects
	manufacturers.	with damage to the nervous systems of fetuses and young children, resulting in learning deficits and lowered IQ.

[1] Volatile Organic Compounds (VOCs or Reactive Organic Gases [ROG]) are hydrocarbons/organic gases that are formed solely of hydrogen and carbon. There are several subsets of organic gases including ROGs and VOCs. Both ROGs and VOCs are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. The major sources of hydrocarbons are combustion engine exhaust, oil refineries, and oil-fueled power plants; other common sources are petroleum fuels, solvents, dry cleaning solutions, and paint (via evaporation).

Source: California Air Pollution Control Officers Association (CAPCOA), Health Effects, Accessed March 18, 2020.

TOXIC AIR CONTAMINANTS

Toxic air contaminants (TACs) are airborne substances that can cause short-term (acute) or long-term (i.e., chronic, carcinogenic or cancer-causing) adverse human health effects (i.e., injury or illness). TACs include both organic and inorganic chemical substances. They may be emitted from a variety of common sources including gasoline stations, automobiles, dry cleaners, industrial operations, and painting operations. The current California list of TACs includes more than 200 compounds, including particulate emissions from diesel-fueled engines.

CARB identified diesel particulate matter (DPM) as a toxic air contaminant. DPM differs from other TACs in that it is not a single substance but rather a complex mixture of hundreds of substances. Diesel exhaust is a complex mixture of particles and gases produced when an engine burns diesel fuel. DPM is a concern because it causes lung cancer; many compounds found in diesel exhaust are carcinogenic. DPM includes the particle-phase constituents in diesel exhaust. The chemical composition and particle sizes of DPM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerate, decelerate), fuel formulations (high/low sulfur fuel), and the year of the engine. Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation, and diesel exhaust can cause coughs, headaches, light-headedness, and nausea. DPM poses the greatest health risk among the TACs. Almost all diesel exhaust particle mass is 10 microns or less in diameter. Due to their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

AMBIENT AIR QUALITY

CARB monitors ambient air quality at approximately 250 air monitoring stations across the state. Within this Air Basin, the South Coast Air Quality Management District (SCAQMD) maintains the air quality stations to measure ambient pollutant concentrations. The monitoring station most representative of the Project site is the Southwest Coastal Los Angeles County monitoring station. Criteria pollutants monitored at this station include $PM_{2.5}$, O3, PM_{10}, and CO. The next most representative station is the South Central Los Angeles County monitoring station. Criteria pollutants monitored at this station include CO, O3, NO_2, $PM_{2.5}$, and lead.

Existing Site Emissions

There is a one-story, approximately 24,990 SF warehouse used to store both vintage cars and auto parts on the Project site. The warehouse building would be demolished as a part of the Project. The estimated criteria pollutant emissions from the existing land use were estimated using the California Emission

Estimator Model (CalEEMod) and are identified in **Table 4.2-2: Maximum Daily Net Criteria Air Pollutant Emission Estimates For Existing Conditions.**

Table 4.2-2: Maximum Daily Net Criteria Air Pollutant Emission Estimates For Existing Conditions

Emission Source	Maximum Daily Criteria Air Pollutant Emissions [1,2] (lb/day)					
	VOC_2	NO_X	CO	SO_X	PM_{10}[3]	$PM_{2.5}$[3]
Existing Conditions[4]						
Area	0.5	0.0	0.0	0.0	0.0	0.0
Energy	0.0	0.0	0.0	0.0	0.0	0.0
Mobile	3.5	10.8	51.9	0.14	12	3.4
Total	**4**	**11**	**52**	**0**	**12**	**3**

[1] Numbers are rounded for reporting purposes. The sum of the emissions may not add up due to rounding.
[2] For purposes of this analysis VOC emissions are assumed to be equal to ROG.
[3] PM emissions for mobile sources are estimated as a sum of exhaust emissions, tire wear, brake wear, and entrained road dust.
[4] Emissions for existing conditions were estimated using CalEEMod. See **Appendix 9.3** for CalEEMod outputs.
[5] SCAQMD Air Quality Significance Thresholds.
CalEEMod = California Emissions Estimator Model; CAP = criteria air pollutant; CO = carbon monoxide; EMFAC = Emission Factors model; lb = pounds; NO_x = nitrogen oxides; $PM_{2.5}$ = particulate matter less than 2.5 microns in diameter; PM_{10} = particulate matter less than 10 microns in diameter; ROG = reactive organic gases; SCAQMD = South Coast Air Quality Management District; SOx = oxides of sulfur; VOC = volatile organic compounds

Source: Ramboll US Corporation, 2020.

Sensitive Receptors and Locations

Sensitive populations are more susceptible to the effects of air pollution than is the general population. Sensitive receptors that are in proximity to localized sources of toxics are of particular concern. Land uses considered sensitive receptors include residences, schools, playgrounds, childcare centers, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The nearest sensitive receptor is a residential location to the east of Dominguez Flood Control Channel (Dominguez Channel).

4.2.2 REGULATORY FRAMEWORK

FEDERAL

Federal Clean Air Act

The Federal Clean Air Act of 1963 was the first federal legislation regarding air pollution control and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990. At the federal level, the U.S. Environmental Protection Agency (U.S. EPA) is responsible for implementation of certain portions of the Clean Air Act including mobile source requirements. Other portions of the Clean Air Act, such as stationary source requirements, are implemented by state and local agencies.

The Clean Air Act establishes federal air quality standards, known as National Ambient Air Quality Standards (NAAQS) and specifies future dates for achieving compliance. The Clean Air Act also mandates that the state submit and implement a State Implementation Plan (SIP) for areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met. The 1990 amendments to the Clean Air Act identify specific emission reduction goals for areas

not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones.

In addition to criteria pollutants, Title I also includes air toxics provisions which require the U.S. EPA to develop and enforce regulations to protect the public from exposure to airborne contaminants that are known to be hazardous to human health. In accordance with Section 112, the U.S. EPA establishes National Emission Standards for Hazardous Air Pollutants. The list of hazardous air pollutants (HAPs), or air toxics, includes specific compounds that are known or suspected to cause cancer or other serious health effects.

Title II requirements pertain to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline, automobile pollution control devices, and vapor recovery nozzles on gas pumps are a few of the mechanisms the U.S. EPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles which have strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have been lowered substantially, and the specification requirements for cleaner-burning gasoline are more stringent.

STATE

California Clean Air Act

CARB administers air quality policies for the state of California. The California Clean Air Act (CCAA), signed into law in 1988, requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with the California Ambient Air Quality Standards (CAAQS) by the earliest practical date. The AQMPs also serve as the basis for the preparation of the SIP for meeting federal clean air standards for the state. Like the U.S. EPA, CARB also designates areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. The CAAQS apply to the same criteria pollutants as the Federal Clean Air Act but also include state-identified criteria pollutants. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events such as wildfires, volcanoes, etc., are not considered violations of a state standard, and are not used as a basis for designating areas as nonattainment. The state standards are generally more stringent and apply to more pollutants than the NAAQS. In addition to the criteria pollutants, CAAQS have been established for visibility reducing particulates, hydrogen sulfide, and sulfates. **Table 4.2-3: State and Federal Ambient Air Quality Standards** identifies the CAAQS and NAAQS standards. The Air Basin is currently designated as a nonattainment area with respect to the state O_3, PM_{10}, and $PM_{2.5}$ standards, as well as the national 8-hour O_3 and $PM_{2.5}$ standards. The Air Basin is designated as in attainment or unclassified for the remaining state and federal standards.

Table 4.2-3: State and Federal Ambient Air Quality Standards

Pollutant	Averaging Time	State Standards[1]	Federal Standards[2]
Ozone (O_3) [2, 5, 7]	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm
	1 Hour	0.09 ppm (180 µg/m^3)	NA
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)
	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)

Pollutant	Averaging Time	State Standards[1]	Federal Standards[2]
Nitrogen Dioxide (NO_2)	1 Hour	0.18 ppm (339 µg/m^3)	0.10 ppm[11]
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)
Sulfur Dioxide (SO_2) [8]	24 Hour	0.04 ppm (105 µg/m^3)	0.14 ppm (365 µg/m^3)
	1 Hour	0.25 ppm (655 µg/m^3)	0.075 ppm (196 µg/m^3)
	Annual Arithmetic Mean	NA	0.03 ppm (80 µg/m^3)
Particulate Matter (PM_{10}) [1, 3, 6]	24-Hour	50 µg/m^3	150 µg/m^3
	Annual Arithmetic Mean	20 µg/m^3	NA
Fine Particulate Matter ($PM_{2.5}$) [3, 4, 6, 9]	24-Hour	NA	35 µg/m^3
	Annual Arithmetic Mean	12 µg/m^3	12 µg/m^3
Sulfates (SO_{4-2})	24 Hour	25 µg/m^3	NA
Lead (Pb) [10, 11]	30-Day Average	1.5 µg/m^3	NA
	Calendar Quarter	NA	1.5 µg/m^3
	Rolling 3-Month Average	NA	0.15 µg/m^3
Hydrogen Sulfide (H_2S)	1 Hour	0.03 ppm (0.15 µg/m^3)	NA
Vinyl Chloride (C_2H_3Cl) [10]	24 Hour	0.01 ppm (26 µg/m^3)	NA

ppm = parts per million; µg/m^3 = micrograms per cubic meter; mg/m^3 = milligrams per cubic meter; – = no information available.

1 California standards for O_3, carbon monoxide (except Lake Tahoe), sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, suspended particulate matter - PM_{10}, and visibility reducing particles are values that are not to be exceeded. The standards for sulfates, Lake Tahoe carbon monoxide, lead, hydrogen sulfide, and vinyl chloride are not to be equaled or exceeded. If the standard is for a 1-hour, 8-hour or 24-hour average (i.e., all standards except for lead and the PM_{10} annual standard), then some measurements may be excluded. Measurements are excluded that CARB determines would occur less than once per year on the average. The Lake Tahoe carbon monoxide standard is 6.0 ppm, a level one-half the national standard and two-thirds the State standard.

2 National standards shown are the "primary standards" designed to protect public health. National standards other than for O_3, particulates and those based on annual averages are not to be exceeded more than once a year. The 1-hour O_3 standard is attained if, during the most recent three-year period, the average number of days per year with maximum hourly concentrations above the standard is equal to or less than one. The 8-hour O_3 standard is attained when the 3-year average of the 4th highest daily concentrations is 0.070 ppm or less. The 24-hour PM_{10} standard is attained when the 3-year average of the 99th percentile of monitored concentrations is less than 150 µg/m_3. The 24-hour $PM_{2.5}$ standard is attained when the 3-year average of 98th percentiles is less than 35 µg/m^3.

3 Except for the national particulate standards, annual standards are met if the annual average falls below the standard at every site. The national annual particulate standard for PM_{10} is met if the 3-year average falls below the standard at every site. The annual $PM_{2.5}$ standard is met if the 3-year average of annual averages spatially-averaged across officially designed clusters of sites falls below the standard.
NAAQS are set by the U.S. EPA at levels determined to be protective of public health with an adequate margin of safety.

4 On October 1, 2015, the national 8-hour O_3 primary and secondary standards were lowered from 0.075 to 0.070 ppm. An area will meet the standard if the fourth-highest maximum daily 8-hour O_3 concentration per year, averaged over three years, is equal to or less than 0.070 ppm. U.S. EPA will make recommendations on attainment designations by October 1, 2016, and issue final designations October 1, 2017. Nonattainment areas will have until 2020 to late 2037 to meet the health standard, with attainment dates varying based on the O_3 level in the area.

5 The national 1-hour O_3 standard was revoked by the U.S. EPA on June 15, 2005.

6 In June 2002, CARB established new annual standards for $PM_{2.5}$ and PM_{10}.

7 The 8-hour California O_3 standard was approved by the CARB on April 28, 2005 and became effective on May 17, 2006.

8 On June 2, 2010, the U.S. EPA established a new 1-hour SO_2 standard, effective August 23, 2010, which is based on the 3-year average of the annual 99th percentile of 1-hour daily maximum concentrations. The existing 0.030 ppm annual and 0.14 ppm 24-hour SO_2 NAAQS however must continue to be used until one year following U.S. EPA initial designations of the new 1-hour SO_2 NAAQS.

9 In December 2012, U.S. EPA strengthened the annual $PM_{2.5}$ NAAQS from 15.0 to 12.0 µg/m^3. In December 2014, the U.S. EPA issued final area designations for the 2012 primary annual $PM_{2.5}$ NAAQS. Areas designated "unclassifiable/attainment" must continue to take steps to prevent their air quality from deteriorating to unhealthy levels. The effective date of this standard is April 15, 2015.

Pollutant	Averaging Time	State Standards[1]	Federal Standards[2]
[10] CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure below which there are no adverse health effects determined. [11] National lead standard, rolling 3-month average: final rule signed October 15, 2008. Final designations effective December 31, 2011.			
Source: South Coast Air Quality Management District, *Air Quality Management Plan*, 2016; California Air Resources Board, *Ambient Air Quality Standards*, May 6, 2016.			

REGIONAL

South Coast Air Quality Management District

The SCAQMD is responsible for air quality planning in the Air Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles. All projects are subject to SCAQMD rules and regulations in effect at the time of construction.

The SCAQMD is also the lead agency in charge of developing the AQMP, with input from the Southern California Association of Governments (SCAG) and CARB. The AQMP is a comprehensive plan that includes control strategies for stationary and area sources, as well as for on-road and off-road mobile sources. SCAG has the primary responsibility for providing future growth projections and the development and implementation of transportation control measures. CARB, in coordination with federal agencies, provides the control element for mobile sources.

The 2016 AQMP was adopted by the SCAQMD Governing Board on March 3, 2017. The purpose of the AQMP is to set forth a comprehensive and integrated program that would lead the SCAG into compliance with the federal 24-hour Fine Particulate Matter ($PM_{2.5}$) air quality standard, and to provide an update to the SCAQMD's commitments towards meeting the federal 8-hour Ozone (O_3) standards. The AQMP incorporates the latest scientific and technological information and planning assumptions, including the *Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS) and updated emission inventory methodologies for various source categories.

The SCAQMD has published the CEQA Air Quality Handbook (approved by the SCAQMD Governing Board in 1993 and augmented with guidance for Local Significance Thresholds [LST] in 2008). The SCAQMD guidance helps local government agencies and consultants to develop environmental documents required by CEQA and provides identification of suggested thresholds of significance for criteria pollutants for both construction and operation. With the help of the CEQA Air Quality Handbook and associated guidance, local land use planners and consultants are able to analyze and document how proposed and existing projects affect air quality in order to meet the requirements of the CEQA review process. The SCAQMD periodically provides supplemental guidance and updates to the handbook on their website.

4.2.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

The State CEQA Guidelines Initial Study Checklist have been used as significance criteria in this section. A project would result in a significant impact related to air quality if it would:

- Conflict with or obstruct implementation of the applicable air quality plan (see Impact 4.2-1)

- 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 (see Impact 4.2-2)
- Expose sensitive receptors to substantial pollutant concentrations (see Impact 4.2-3)
- Result in other emissions such as those leading to odors adversely affecting a substantial number of people (see Impact 4.2-4)

SCAQMD Thresholds. The significance criteria established by SCAQMD may be relied upon to make the above determinations. According to the SCAQMD, an air quality impact is considered significant if the Project would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established thresholds of significance for air quality during construction and operational activities of land use development projects, as shown in **Table 4.2-4: South Coast Air Quality Management District Emissions Thresholds.**

Table 4.2-4: South Coast Air Quality Management District Emissions Thresholds

Criteria Air Pollutants and Precursors	Construction-Related	Operational-Related
Reactive Organic Gases (ROG)	75	55
Carbon Monoxide (CO)	550	550
Nitrogen Oxides (NO_X)	100	55
Sulfur Oxides (SO_X)	150	150
Coarse Particulates (PM_{10})	150	150
Fine Particulates ($PM_{2.5}$)	55	55
Source: South Coast Air Quality Management District, *South Coast AQMD Air Quality Significance Thresholds,* April 2019.		

Localized Carbon Monoxide. In addition to the daily thresholds listed above, development associated with the Project would also be subject to the ambient air quality standards. These are addressed through an analysis of localized CO impacts. The significance of localized impacts depends on whether ambient CO levels near the project site are above the state and federal CO standards (the more stringent California standards are 20 ppm for 1-hour and 9 ppm for 8-hour). The SCAB has been designated as in attainment under the 1-hour and 8-hour standards.

4.2.4 PROJECT DESIGN FEATURES

The following project design features (PDF) were incorporated into the analysis:

- **PDF AQ-1:** The Project would include watering of active construction areas at least three times daily to minimize fugitive dust emissions.[2]

[2] Note that the control efficiency of watering is dependent on numerous variables such as soil/ground conditions, temperature, and vehicle travel specifics. For unpaved roads, increased frequency and/or water amounts are expected to improve the control efficiency. The control effectiveness in this analysis is based on the CalEEMod default for this watering assumption.

- **PDF AQ-2/PDF GHG 1:** The Project would install seven Level 2 electric vehicle (EV) charging stations in the parking structure for the building tenants. The installation of EV charging stations corresponds to a reduction in GHG emissions as quantified in **Appendix 9.7**.
- **PDF AQ-3/PDF GHG 2:** The Project would implement transportation demand management strategies in the Gardena Transit-Oriented Development Specific Plan area to advance the vision for multi-modal transportation. These strategies include:
  - **Unbundled Parking**: There shall be a charge for parking spaces. The property owner shall unbundle automobile parking charges from the rents or other fees charged for leasing residential units in the specific plan area.
  - **Pre-Leasing for Area Employees**: Residential units within the specific plan area shall be marketed exclusively for a thirty-day period to employees working within a 0.5-mile radius of the development, before the units are offered for rent to the general public. The developer shall submit a pre-leasing marketing plan to the Community Development Director for review and approval prior to issuance of a temporary certificate of occupancy. The developer must then demonstrate compliance with the approved thirty-day exclusive marketing plan prior to issuance of a final certificate of occupancy.
  - **Transit Information**: To ensure that residential tenants are aware of transit options and transportation demand management programs available to them, an information board or kiosk shall be posted in a central location in the building.
  - **On-site Residential Bicycle Parking**: One bicycle parking space shall be provided for every residential unit (located in secured facilities accessible only by residents). There would also be unsecured bicycle parking spaces for guests, provided at-grade on a first-come, first-serve basis. All bicycle parking shall be located in a safe, convenient location, encouraging the use of bicycle transportation by residents and guests.
  - **Ride-Sharing Pick-Up/Drop-Off**: A designated loading area within the Gardena Transit-Oriented Development Specific Plan area shall be signed and distinguished (e.g., with paving and/or paint) so that it may be used as a pick-up and drop-off zone for ride-sharing services.
- **PDF AQ-4/PDF GHG 3:** The Project would install a solar swimming pool heating system. The emissions savings from the solar swimming pool heating system were not quantified for this analysis.

4.2.5 IMPACTS AND MITIGATION MEASURES

Impact 4.2-1:	**Would the project conflict with or obstruct implementation of the applicable air quality plan?**
Level of Significance: Less Than Significant Impact	

As previously discussed, as part of its enforcement responsibilities, the U.S. EPA requires each state with nonattainment areas to prepare and submit a SIP that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under state law, the CCAA requires an air quality

attainment plan to be prepared for areas designated as nonattainment regarding the state and federal ambient air quality standards. SCAQMD's 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state and national air quality standards. The SCAQMD's CEQA Handbook identifies two key indicators of consistency with the AQMP:

Consistency Criterion No. 1. Whether a project will result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Consistency Criterion No. 2. Whether a project will exceed the assumptions noted in the AQMP or increments based on the years of the project buildout phase.

According to the SCAQMD's CEQA Air Quality Handbook, the purpose of the consistency finding (Criterion No. 1 and Criterion No. 2) is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus if it would interfere with the region's ability to comply with CAAQS and NAAQS.

The violations to which Consistency Criterion No. 1 refers are CAAQS and NAAQS. As identified in **Table 4.2-5: Construction Air Pollutant Emissions**, and **Table 4.2-6: Operational Air Pollutant Emissions**, the Project would not exceed construction or operational emission standards, respectively. The Project would comply with CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment. The Project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403. Compliance with these requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Therefore, the Project is consistent with the first criterion.

Concerning Consistency Criterion No. 2, the AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. The 2012 and 2016 AQMPs were prepared to accommodate growth, reduce the levels of pollutants within the areas under the jurisdiction of SCAQMD, return clean air to the region, and minimize the impact on the economy. Projects that are considered consistent with the AQMP would not interfere with attainment because this growth is included in the projections used in the formulation of the AQMP.

As discussed in **Section 4.9: Land Use and Planning,** the Project would require a General Plan Amendment to change the land use designation on the General Plan Land Use Map from "General Commercial" to "Gardena TOD Specific Plan" to allow for residential uses. As discussed in **Section 4.11: Population and Housing**, the Project's forecast population growth of approximately 750 persons associated with the new homes would increase the City's existing population of approximately 60,937 persons by approximately 1.2 percent. Although the Project would include a General Plan Amendment and a Zone Change, the increase in population resulting from the change in use would be nominal and within forecasted growth assumptions. Further, the Project would not exceed SCAQMD's significance thresholds. Therefore, the Project is consistent with the second criterion. Because the Project is consistent with the SCAQMD consistency finding criteria, the Project is considered consistent with the AQMP and no mitigation is required.

MITIGATION MEASURES

No mitigation is required.

Impact 4.2-2: 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?

Level of Significance: Less Than Significant Impact

CONSTRUCTION EMISSIONS

Construction associated with the Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern in the project area are O_3-precursor pollutants (i.e., ROG and NO_X) and PM_{10} and $PM_{2.5}$. Construction-generated emissions are short term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

Construction results in the temporary generation of emissions resulting from demolition, site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities as well as weather conditions and the appropriate application of water.

The duration of the Project's construction activities is estimated to be approximately two years, commencing in the third quarter of 2021 with completion in the third quarter of 2023. Construction-generated emissions associated with the Project were calculated using the CARB-approved CalEEMod computer program, which is designed to model emissions for land use development projects (see **Appendix 9.3** of this EIR for more information regarding the construction assumptions used in this analysis). The maximum daily emissions due to construction of the Project are identified in **Table 4.2-5: Construction Air Pollutant Emissions.** The estimated emissions are less than the SCAQMD significance thresholds for all pollutants. The Project would comply with SCAQMD Rules and Regulations that require the use of low VOC containing coatings to minimize the potential VOC emissions. Therefore, construction air quality emissions would be less than significant.

Table 4.2-5: Construction Air Pollutant Emissions

Source Location	Source Type	Maximum Daily Criteria Air Pollutant Emissions [1,2] (lb/day)					
		VOC[3]	NO_x	CO	SO_x	PM_{10}[4]	$PM_{2.5}$[4]
Onsite		58	20	18	0.0	4.9	2.5
Offsite	Worker	0.2	0.0	10.3	0.0	0.0	0.0
	Vendor	0.0	0.0	0.9	0.0	0.0	0.0
	Hauling	0.0	20	0.0	0.1	0.6	0.4
Total[5]		**59**	**40**	**29**	**0.1**	**5.6**	**2.9**
SCAQMD Significance Threshold[6]		**75**	**100**	**550**	**150**	**150**	**55**
Above Threshold		NO	NO	NO	NO	NO	NO

1. Emissions shown here are based on Project-specific construction schedule and hauling material. CalEEMod defaults were used for on-site construction equipment mix and on-road vehicle trips. Emissions were estimated using CalEEMod. See **Appendix 9.3** for detailed CalEEMod outputs. Analysis assumes on-site fugitive dust control [watering three times daily during construction].

Source Location	Source Type	Maximum Daily Criteria Air Pollutant Emissions [1,2] (lb/day)					
		VOC[3]	NO_x	CO	SO_x	PM_{10}[4]	$PM_{2.5}$[4]

2. Numbers are rounded for reporting purposes.
3. For purposes of this analysis the VOC emissions are assumed to be equal to ROG.
4. PM emissions are estimated as a sum of exhaust, tire wear, brake wear, and fugitive dust emissions.
5. The maximum emissions reported for each pollutant may occur on different days. The sum of the emissions may not add up due to rounding.
6. SCAQMD Air Quality Significance Thresholds. Available at http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2.
7. It is noted, construction and operational emissions modeling was completed based on 24,000 SF, and not 24,990 SF, the existing building's actual size, the 990 SF difference (approximately four percent) is considered negligible and would not change the conclusions of the GHG Technical Report (or AQ Technical Report). These findings are substantiated in the Supplemental Guidance on Air Quality and Greenhouse Gas Analyses for the Gardena Transit-Oriented Development Specific Plan (Ramboll, January 14, 2021); see **Appendix 9.3**.

CalEEMod = California Emissions Estimator Model; CO = carbon monoxide; lb = pounds; NO_x = nitrogen oxides; PM = particulate matter; PM_{10} = particulate matter less than 10 microns in diameter; $PM_{2.5}$ = particulate matter less than 2.5 microns in diameter; ROG = reactive organic gases; SCAQMD = South Coast Air Quality Management District; SO_X = oxides of sulfur; VOC = volatile organic compounds

Source: Ramboll US Corporation, 2020.

OPERATIONAL EMISSIONS

The regional daily emissions estimated due to Project operations are summarized in **Table 4.2-6: Operational Air Pollutant Emissions**. The estimated emissions include on-site emissions from stationary sources and offsite emissions from on-road sources. The primary source of the operational emissions is the traffic mobile sources. In order to reduce the emissions associated with mobile sources, the proposed Project Design Features, the Project has committed to installing seven electric vehicle (EV) charging stations and Transportation Demand Management (TDM) measures (e.g., unbundled parking, pre-leasing for area employees, transit information, on-site residential bicycle parking, and ride-sharing pickup and drop-off). This analysis is conservative as it does not account for reductions in CAP emissions associated with the use of the EV chargers.

Table 4.2-6: Operational Air Pollutant Emissions

Emission Source	Maximum Daily Criteria Air Pollutant Emissions [1,2] (lb/day)					
	VOC_2	NO_X	CO	SO_X	PM_{10}[3]	$PM_{2.5}$[3]
Project[4]						
Area	6.4	0.3	21.9	0.0	0.1	0.1
Energy	0.1	0.8	0.3	0.0	0.1	0.1
Mobile	2.5	6.0	35.0	0.1	10	2.7
Stationary	3.8	10.7	9.8	0.0	0.6	0.6
Total	**13**	**18**	**67**	**0**	**11**	**3**
Existing Conditions[4]						
Area	0.5	0.0	0.0	0.0	0.0	0.0
Energy	0.0	0.0	0.0	0.0	0.0	0.0
Mobile	3.5	10.8	51.9	0.14	12	3.4
Total	**4**	**11**	**52**	**0**	**12**	**3**
Project Minus Existing Conditions (Net Change)						
Total Net Emissions	9	7	15	0	-1	0
SCAQMD Significance Thresholds[5]	55	55	550	150	150	55
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

1. Numbers are rounded for reporting purposes. The sum of the emissions may not add up due to rounding.
2. For purposes of this analysis VOC emissions are assumed to be equal to ROG.
3. PM emissions for mobile sources are estimated as a sum of exhaust emissions, tire wear, brake wear, and entrained road dust.
4. Emissions for Project and existing conditions were estimated using CalEEMod. See **Appendix 9.3** for CalEEMod outputs.
5. SCAQMD Air Quality Significance Thresholds.

CalEEMod = California Emissions Estimator Model; CAP = criteria air pollutant; CO = carbon monoxide; EMFAC = Emission Factors model; lb = pounds; NO_x = nitrogen oxides; $PM_{2.5}$ = particulate matter less than 2.5 microns in diameter; PM_{10} = particulate matter less than 10 microns in diameter; ROG = reactive organic gases; SCAQMD = South Coast Air Quality Management District; SOx = oxides of sulfur; VOC = volatile organic compounds

Source: Ramboll US Corporation, 2020.

For criteria air pollutants, the emissions for existing uses are subtracted from the Project mass emissions, to get the net mass emissions, which are then compared to the SCAQMD mass daily significance thresholds. As shown in the table, the maximum daily net emissions for the Project's operational activities are less than the SCAQMD mass daily significance thresholds for all CAPs, i.e., VOC, NO_X, CO, SO_2, PM_{10}, and $PM_{2.5}$. Air quality impacts of the maximum daily criteria emissions from Project operations would be less than significant.

MITIGATION MEASURES

No mitigation is required.

Impact 4.2-3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Level of Significance: Less than Significant Impact

Sensitive land uses 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 daycare centers. The nearest sensitive receptor is a residential use located to the east, across the Dominguez Channel.

CONSTRUCTION: LOCALIZED SIGNIFICANCE THRESHOLDS

Localized Significance Thresholds (LSTs) are used to evaluate the construction emissions relative to the SCAQMD ambient air quality standard significance thresholds. The on-site construction emissions for NO_x, CO, PM_{10}, and $PM_{2.5}$ are compared to their respective thresholds provided in Appendix C of SCAQMD's LST Methodology. The Source Receptor Area (SRA) applicable to the Project site is SRA Number 3, Southwest Coastal Los Angeles County. As a conservative approach, the thresholds chosen are for a project site area of one acre since there is no published threshold specifically for the Project site area of 1.33 acres. A receptor distance of 25 meters was chosen based on the lowest, and thus conservative, threshold for each pollutant for the "1-acre" LST. While the exact construction schedule and equipment mix may vary from the current analysis, the maximum daily emissions are not expected to be higher than that estimated given the conservative assumptions included in this analysis.

As shown in **Table 4.2-7: Localized Significance of Construction Emissions,** the maximum daily on-site emissions for Project construction are less than the SCAQMD mass-rate Localized Significance Thresholds for NO_x, CO, PM_{10}, and $PM_{2.5}$. The construction emissions are based on conservative assumptions to represent the maximum level of construction activity that may occur on the Project site on a given day. Since the screening analysis shows that the construction emissions are below the mass-rate LSTs, the Project's contribution to the localized air concentrations of these pollutants would be less than significant.

Table 4.2-7: Localized Significance Of Construction Emissions (Maximum Pounds Per Day)

Emission Type	Maximum Daily On-Site Construction Emissions (lb/day)			
	NOx	CO	PM_{10}	$PM_{2.5}$
Onsite Construction Emissions[1]	20	18	4.9	2.5
SCAQMD Localized Significance Thresholds[2]	104 58[3]	764	6.0	3.7
Exceeds Threshold?	NO	NO	NO	NO

CalEEMod® - California Emissions Estimator Model; CO - carbon monoxide; lb – pounds; LST - Localized Significance Threshold; NO_2 - nitrogen dioxide; NOx - nitrogen oxides; PM_{10} - coarse particulate matter; $PM_{2.5}$ - fine particulate matter; SCAQMD - South Coast Air Quality Management District

Notes:

1. Emissions estimated using CalEEMod®. Only on-site emissions are compared with the LSTs.
2. LSTs based on Southwest Coastal Los Angeles County construction LSTs for a site at an interpolated 1.33-acre size between the given 1-acre and 2-acre thresholds for a 25-m receptor distance. Obtained from http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed: April 2020.
3. An approximated LST was estimated to evaluate the federal 1-hour NO2 standard, as the SCAQMD LST has not been updated to reflect this standard. This value was estimated by scaling the SCAQMD LST that represents the state 1-hour NO_2 standard with the ratio of the federal to state 1-hour NO_2 standard (0.10 ppm/0.18 ppm).

Source: Ramboll US Corporation, 2020.

OPERATIONS

Localized Carbon Monoxide Impacts

A CO hot spot is an area of localized carbon monoxide pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. The purpose of the analysis is to verify that a project would not cause or contribute to a violation of the CO standard at intersections for which a significant impact would occur. It should be noted that the air basin is designated as an attainment area for State and federal CO standards; and that there has been a decline in CO emissions even though vehicle miles traveled on urban and rural roads have increased. The SCAQMD studied the four most congested intersections within the Air Basin in 2003 in order to support their CO "attainment" demonstration to the U.S. EPA. The modeled intersections experienced more than 100,000 average daily trips, and SCAQMD found that even these highly-congested intersections would not cause a CO hot spot to result. Therefore, it can be reasonably inferred that CO hot spots would not be experienced at any vicinity intersections as a result of 1,370 additional vehicle trips attributable to the Project. Therefore, impacts would be less than significant.

Health Risk Assessment

Agencies are not required to analyze the CEQA impact of existing environmental conditions on a project's future users or residents, unless a proposed project risks exacerbating environmental hazards or conditions that already exist. Nonetheless, for land use decision-making purposes, a Health Risk Assessment (HRA) was prepared to analyze the potential health effects to the Project's future residents associated with existing air pollutant sources at the Project site.

The adjoining community is typified by commercial/manufacturing, warehousing, and residential land uses. The Project site is bounded by commercial/manufacturing businesses to the north and south, the Dominguez Channel to the east, and Crenshaw Boulevard to the west.

In urban communities, vehicle emissions contribute significantly to localized concentrations of air contaminants. Typically, emissions generated from these sources are characterized by vehicle mix, the rate pollutants are generated during the course of travel and the number of vehicles traversing the roadway network. Currently, emission factors are generated from a series of computer-based programs to produce a composite emission rate for vehicles traveling at various speeds within a defined geographical area or along a discrete roadway segment. To account for the emission standards imposed on the California fleet, CARB has developed the EMFAC2017 emission factor model. EMFAC2017 was utilized to identify exhaust emission rates for particulates (PM_{10}) which serve as a surrogate for diesel emissions.

To produce a representative vehicle fleet distribution, the assessment utilized CARB's Los Angeles County (South Coast) population estimates for the 2023 calendar year. The reported population estimates were subsequently adjusted to coincide with the vehicle counts for the surrounding uses. A transient lot speed of 5 miles per hour was considered for all vehicles entering and exiting the subject properties. In consideration of lot speed and associated travel distance, a conservative lot ingress/egress time of 5 minutes was assumed. For all trucks, an idle time of 5 minutes was considered and added to the running emission rate to produce composite emission profiles. This is based upon the assumption that emissions are generated when trucks are 1) entering the facility and traversing to the dock area; 2) idling within the dock area; and 3) when leaving the dock area and departing from the facility. For idle exhaust emissions

not listed in EMFAC2017, the 5 mile per hour rate was utilized and adjusted to produce a gram per hour value. All entering/exiting vehicles were assumed to have a homogeneous daily distribution.

For gasoline dispensing, the SCAQMD currently utilizes total organic gas (TOG) emission factors for the processes of loading, breathing, refueling and spillage. Specifically, loading emissions occur when a fuel truck unloads gasoline to the storage tanks and the storage tank vapors are displaced during loading and emitted through its vent pipe. Breathing emissions occur through the storage tank vent pipe as a result of temperature and pressure changes in the tank vapor space. Refueling emissions are associated with motor vehicle refueling when gasoline vapors escape through the vehicle/nozzle interface. Evaporating gasoline that spills during vehicle refueling are associated with spillage emissions.

To assess the impact of emitted compounds on individuals who would reside within and/or access common areas, air quality modeling utilizing the AMS/EPA Regulatory Model AERMOD was performed to assess the downwind extent of stationary source emissions located within proximity of the Project site. AERMOD is a steady-state Gaussian plume model applicable to directly emitted air pollutants that employs best state-of-practice parameterizations for characterizing meteorological influences and atmospheric dispersion.

AERMOD is the U.S. EPA's guideline model for the assessment of near-field pollutant dispersion. The volume source algorithm was utilized to model the emissions generated from all stationary source activity. For warehouse/distribution sources, vertical (sigma z) dispersion parameters and source release heights were based upon the Risk Characterization Scenarios published by CARB for the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles*. For gasoline dispensing, the California Air Pollution Officers Association (CAPCOA) *Industrywide Risk Assessment Guidelines* were utilized to produce sigma z and emission release heights. To ensure a conservative assessment, characterizations associated with refueling and spillage were used for all process emissions. The horizontal (sigma y) parameters were generated by dividing the source separation distance by a standard deviation of 2.15. The model scalar option was additionally invoked to account for continuous emissions occurring over a 24-hour period (ending hours 1 through 24). The modeling analysis also considered the spatial distribution of stationary source activity in relation to the Project site. To accommodate a Cartesian grid format, direction dependent calculations were obtained by identifying the Universal Transverse Mercator (UTM) coordinates for each volume source location. On-site receptors were uniformly placed to provide coverage across the identified Project boundary commensurate with residential uses and areas of common access. For short-duration exposures (i.e., 1 and 8-hours) receptor locations were set at flagpole heights commensurate with common/recreational area elevations. For chronic exposures, receptor locations were set at flagpole heights representing residential floor levels and the presumed height above local terrain for proposed heating, ventilation and air conditioning (HVAC) equipment.

Air dispersion models require additional input parameters including pollutant emission data and local meteorology. Due to their sensitivity to individual meteorological parameters such as wind speed and direction, the U.S. EPA recommends that meteorological data used as input into dispersion models be selected on the basis of relative spatial and temporal conditions that exist in the area of concern. In response to this recommendation, meteorological data from the SCAQMD Hawthorne Airport (KHHR) monitoring station was used to represent local weather conditions and prevailing winds. For daily and short-duration exposures, five years of available AERMOD meteorological data were reviewed to identify the calendar years which produced the highest pollutant concentrations. For chronic exposures, maximum concentrations were produced by incorporating all five years of available data. See Appendix D

and Appendix E of the Project Health Risk Assessment in **Appendix 9.3** for dispersion model input tables and a listing of model output summary files. Carcinogenic compounds are not considered to have threshold levels (i.e., dose levels below which there are no risks). Any exposure, therefore, would have some associated risk. As a result, the state of California has established a threshold of one in one hundred thousand (1.0E-05) as a level posing no significant risk for exposures to carcinogens regulated under the Safe Drinking Water and Toxic Enforcement Act (Proposition 65). For a chemical that is known to the state of California to cause cancer, the level posing no significant risk is defined as the level of exposure that would result in not more than one excess case of cancer in 100,000 individuals exposed to the chemical over a 70-year lifetime.

Health risks associated with exposure to carcinogenic compounds can be defined in terms of the probability of developing cancer as a result of exposure to a chemical at a given concentration. Under a deterministic approach (i.e., point estimate methodology), the cancer risk probability is determined by multiplying the chemical's annual concentration by its unit risk factor (URF). The URF is a measure of the carcinogenic potential of a chemical when a dose is received through the inhalation pathway. It represents an upper bound estimate of the probability of contracting cancer as a result of continuous exposure to an ambient concentration of one microgram per cubic meter ($\mu g/m^3$) over a 70-year lifetime. The URFs used in the assessment and corresponding cancer potency factors were obtained from the *Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values*.

Several discrete exposure variates are used to quantify dose. To account for upper bound exposures associated with residential occupancies, lifetime risk values were adjusted to account for an exposure frequency of 350 days per year for a period of 30 years (i.e., 0.25 years for the third trimester, 2 years for ages 0 to 2 years, 14 years for ages 2 to 16 years and 14 years for ages 16 to 30 years). An exposure duration (i.e., residency time) of 30 years was utilized as it provides adequate public health protection addressing individual risk and is a reasonable estimate of the 95th percentile associated with residency duration within a population. Point estimates for daily breathing rates representing the 95th percentile for the identified age groups were utilized and incorporated into the carcinogenic risk calculations.

Table 4.2-8: Maximum Residential Receptor And Carcinogenic Risk presents the carcinogenic risk estimate for the maximum exposed residential receptor. The carcinogenic risk estimates for the maximum exposed residential receptor did not exceed the significance threshold of one in one hundred thousand (1.0E-05) for the 30-year exposure scenario. Therefore, impacts are less than significant, and mitigation is not required. See **Appendix 9.3** for the Health Risk Assessment.

Table 4.2-8: Maximum Residential Receptor And Carcinogenic Risk

Age Group	Exposure Scenario
Third Trimester	4.7E-08
0 to 2 years	1.1E-06
2 to 16 years	5.4E-06
16 to 30 years	2.4E-06
Total	9.0E-06

Source: Air Quality Dynamics, *12850 and 12900 Crenshaw Boulevard Health Risk Assessment*, 2020; see **Appendix 9.3**.

Noncarcinogenic Hazards

An evaluation of the potential noncancer effects of contaminant exposures was also conducted. Under the point estimate approach, adverse health effects are evaluated by comparing the concentration of each compound with the appropriate Reference Exposure Level (REL). Available REL's presented in the *Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values* were considered in the assessment.

To quantify noncarcinogenic impacts, the hazard index approach was used. The hazard index assumes that subthreshold exposures adversely affect a specific organ or organ system (i.e., toxicological endpoint). For each discrete pollutant exposure, target organs presented in regulatory guidance were utilized.

To calculate the hazard index, the pollutant concentration or dose is divided by the appropriate toxicity value. For compounds affecting the same toxicological endpoint, this ratio is summed. Where the total equals or exceeds one (i.e., unity), a health hazard is presumed to exist. No exposure frequency or duration adjustments are considered for noncarcinogenic exposures.

For chronic noncarcinogenic effects, the hazard index identified for each toxicological endpoint totaled less than one for the 30-year exposure scenario. For short-duration exposures, the hazard indices for each respective averaging time did not exceed unity; see the Project Health Risk Assessment in **Appendix 9.3**. Therefore, noncarcinogenic hazards were predicted to be within acceptable limits, resulting in a less than significant impact in this regard.

MITIGATION MEASURES

No mitigation is required.

Impact 4.2-4:	**Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people**
Level of Significance: Less Than Significant Impact	

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. SCAQMD Rule 1113 limits the allowable amount of VOCs from architectural coatings and solvents. Since compliance with SCAQMD Rules governing these compounds is mandatory, no construction activities or materials are proposed that would create objectionable odors adversely affecting a substantial number of people. Therefore, no significant impact would occur, and no mitigation is required.

The *SCAQMD CEQA Air Quality Handbook* identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Waste collection areas and disposal for the Project would be covered and situated away from the property line and sensitive offsite uses. Therefore, potential odor impacts would be less than significant, and no mitigation is required.

MITIGATION MEASURES

No mitigation is required.

4.2.6 CUMULATIVE IMPACTS

CUMULATIVE CONSTRUCTION EMISSIONS

As previously concluded above, the Project would be consistent with applicable air quality plans (Threshold 4.2.1). The Air Basin is designated nonattainment for O_3, PM_{10}, and $PM_{2.5}$ for state standards and nonattainment for O_3 and $PM_{2.5}$ for federal standards. Appendix D of the *SCAQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (2003) notes that projects that result in emissions that do not exceed the project-specific SCAQMD regional thresholds of significance should result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary. The mass-based regional significance thresholds published by the SCAQMD are designed to ensure compliance with both NAAQS and CAAQS and are based on an inventory of projected emissions in the Air Basin. Therefore, if a project is estimated to result in emissions that do not exceed the thresholds, the project's contribution to the cumulative impact on air quality in the SCAB would not be cumulatively considerable. Because project construction- and operations-related emissions would not exceed the SCAQMD significance thresholds for criteria pollutants, Project construction and operations would result in a less-than-significant impact. Therefore, Project construction and operations would not result in a significant cumulative impact.

As concluded above, 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, nor would it expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the federal Clean Air Act mandates. The analysis assumed fugitive dust controls would be used during construction, including frequent water applications. Compliance with SCAQMD rules and regulations would further reduce the Project construction-related impacts. Cumulative projects would also be required to comply with SCAQMD rules and regulations. Therefore, project-related construction emissions, combined with those from other projects in the area, would not substantially deteriorate local air quality significant given compliance with the established regulatory framework would be required.

As concluded above, the Project would not generate odors. Therefore, no cumulative impact concerning odors would occur.

4.2.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts to air quality have been identified.

4.2.8 REFERENCES

Air Quality Dynamics. (2020). *Health Risk Assessment for 12850 and 12900 Crenshaw Boulevard*.

Metropolitan Transportation Authority. (2004). *Congestion Management Program for Los Angeles County*. Exhibit 2-6 and Appendix A.

Ramboll US Corporation. (2020). *Air Quality Technical Report for the Gardena Transit Oriented Development (TOD) Specific Plan*.

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4.3 CULTURAL RESOURCES

4.3 CULTURAL RESOURCES

The purpose of this section is to describe the existing regulatory and environmental conditions related to cultural resources, identify potential impacts that could result from Project implementation, and as necessary, recommend mitigation to avoid or reduce the significance of impacts.

Information in this section is based primarily on the following sources:

- *Archaeological Resources Assessment for the 12850 and 12900 Crenshaw Boulevard Project, Gardena, California* (Archeological Assessment, see **Appendix 9.4**);
- *Historical Resource Assessment for 12850 and 12900 Crenshaw Boulevard, City of Gardena, County of Los Angeles, California* (Historical Assessment see **Appendix 9.4**);
- *Tribal Cultural Resources Assessment for the 12850 and 12900 Crenshaw Boulevard Project, Gardena, California* (Tribal Cultural Assessment, see **Appendix 9.12**).

Additional resource information was obtained from available public resources, including among others, the City of Gardena General Plan 2006 (GGP). Additionally, the Native American Heritage Commission (NAHC) letter in response to the Project's Notice of Preparation is provided in **Appendix 9.1** and provides guidance on Assembly Bill (AB) 52 and Senate Bill (SB) 18 compliance.

Kimley-Horn conducted a third-party review of the Project's cultural resources analyses on behalf of the City; see **Appendix 9.4**. The third-party review concluded the analyses meet the applicable provisions of CEQA and the State CEQA Guidelines.

4.3.1 CULTURAL RESOURCES TERMINOLOGY AND CONCEPTS

Key terms and concepts used in this section to describe and assess the potential cultural resource impacts are defined below:

Archeological Site. A site is defined by the National Register of Historic Places (NRHP) as the place or places where the remnants of a past culture survive in a physical context that allows for the interpretation of these remains. Archeological remains usually take the form of artifacts (e.g., fragments of tools, vestiges of utilitarian or non-utilitarian objects), features (e.g., remnants of walls, cooking hearths, or midden deposits), and ecological evidence (e.g., pollen remaining from plants that were in the area when the activates occurred). Prehistoric archaeological sites generally represent the material remains of Native American groups and their activities dating to the period before European contact. In some cases, prehistoric sites may contain evidence of trade contact with Europeans. Ethnohistoric archaeological sites are defined as Native American settlements occupied after the arrival of European settlers in California. Historic archaeological sites reflect the activities of non-native populations during the Historic period.

Artifact. An object that has been made, modified, or used by a human being.

Cultural Resource. A cultural resource is a location of human activity, occupation, or use identifiable through field inventory, historical documentation, or oral evidence. Cultural resources include archaeological resources and built environment resources (sometimes known as historic architectural resources), and may include sites, structures, buildings, objects, artifacts, works of art, architecture, and natural features that were important in past human events. They may consist of physical remains or areas

where significant human events occurred, even though evidence of the events no longer remains. Cultural resources also include places that are of traditional, cultural, or religious importance to social or cultural groups.

Cultural Resources Study Area (or study area). All areas of potential permanent and temporary impacts for a reasonable worst-case development within a project site and off-site impact areas, including a fifteen-foot buffer around construction areas.

Ecofact. An object found at an archaeological site that has an archaeological significance but has not been technologically altered, such as seeds, pollens, or shells.

Ethnographic. Relating to the study of human cultures. "Ethnographic resources" represent the heritage resource of an ethnic or cultural group, such as Native Americans or African, European, Latino, or Asian immigrants. They include traditional resource-collecting areas, ceremonial sites, value-imbued landscape features, cemeteries, shrines, or ethnic neighborhoods.

Historic Period. The period that begins with the arrival of the first non-native population and thus varies by area.

Historical Resource. This term is used for the purposes of California Environmental Quality Act (CEQA) and is defined in the State CEQA Guidelines (14 California Code of Regulations [CCR] §15064.5) as: (1) a resource listed in, or determined to be eligible for listing in the California Register of Historical Resources (CRHR); (2) a resource included in a local register of historical resources, as defined in Public Resources Code (PRC) §5020.1(k) or identified as significant in a historical resource survey meeting the requirements which a lead agency determines to by historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Historical resources may also include tribal cultural resources including sites, features, places, cultural landscapes, sacred places, objects, and/or archeological resources with value to a California Native American Tribe per PRC §21074.

Isolate. An isolated artifact or small group of artifacts that appear to reflect a single event, loci, or activity. Isolates typically lack identifiable context and thus have little interpretative or research value. Isolates are not considered to be significant under CEQA and do not require avoidance mitigation (PRC §21083.2 and State CEQA Guidelines §15064.5). All isolates located during the field effort, however, are recorded and the data are transmitted to the appropriate California Historical Resources Information System (CHRIS) Information Center.

Lithic. Of or pertaining to stone. Specifically, in archaeology, lithic artifacts are chipped or flaked stone tools, and the stone debris resulting from their manufacture.

Native American Sacred Site. An area that has been, or continues to be, of religious significance to Native American peoples, such as an area where religious ceremonies are practiced or an area that is central to their origins as a people.

Prehistoric Period. The era prior to 1772. The later part of the prehistoric period (post-1542) is also referring to as the protohistoric period in some areas, which marks a transitional period during which

native populations began to be influenced by European presence resulting in gradual changes to their lifeways.

Stratigraphy. The natural and cultural layers of soil that make up an archaeological deposit, and the order in which they were deposited relative to other layers.

Tribal Cultural Resource. This term refers to a site, feature, place, cultural landscape, sacred place, object, or archaeological resource with cultural value to a California Native American tribe that is listed or eligible for listing in national, California, or local registers. A lead agency also has the discretion to determine that a resource is a tribal cultural resource if the determination is supported by substantial evidence. Tribal cultural resources are addressed in **Section 4.14, Tribal Cultural Resources**.

Unique Archeological Resource. This term is used for the purposes of CEQA and is defined in PRC §21083.2(g) as an archaeological artifact, object, or site, about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it either contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information; has a special and particular quality such as being the oldest of its type or the best available examples of its type; or, is directly associated with a scientifically recognized important prehistoric or historic event or person.

4.3.2 AFFECTED ENVIRONMENT

ETHNOGRAPHIC, ARCHAEOLOGICAL, AND HISTORIC CONTENTS

See **Section 4.14: Tribal Cultural Resources** for the Ethnographic Setting.

Prehistory

In the last several decades, researchers have devised numerous prehistoric chronological sequences to aid in understanding cultural changes in southern California. Building on early studies and focusing on data synthesis, Wallace (1955, 1978) developed a prehistoric chronology for the southern California coastal region that is still widely used today and is applicable to near-coastal and many inland areas. Four horizons are presented in Wallace's prehistoric sequence: Early Man, Milling Stone, Intermediate, and Late Prehistoric. Although Wallace's 1955 synthesis initially lacked chronological precision due to a paucity of absolute dates (SWCA 2020a), this situation has been alleviated by the availability of thousands of radiocarbon dates obtained by southern California researchers in the last three decades (SWCA 2020a). As such, several revisions were subsequently made to Wallace's 1955 synthesis using radiocarbon dates and projectile point assemblages (SWCA 2020a). The summary of prehistoric chronological sequences for southern California coastal and near-coastal areas presented below is a composite of information in Wallace (1955) and Warren (1968), as well as more recent studies, including Koerper and Drover (1983).

Horizon I: Early Man (CA. 10,000–6000 B.C.)

The earliest dates for archaeological sites on the southern California coast are from two of the northern Channel Islands, located off the coast of Santa Barbara. On San Miguel Island, Daisy Cave clearly establishes the presence of people in this area approximately 10,000 years ago (SWCA 2020a). On Santa Rosa Island, human remains have been dated to approximately 13,000 years ago at the Arlington Springs site (SWCA 2020a). Present-day Orange and San Diego counties contain several sites dating from 9,000 to 10,000 years ago (SWCA 2020a). Although the dating of these finds remains controversial, several sets of

human remains from the Los Angeles Basin (e.g., "Los Angeles Man," "La Brea Woman," and the Haverty skeletons) apparently date to the Middle Holocene, if not earlier (SWCA 2020a). Recent data from Horizon I sites indicate that the economy was a diverse mixture of hunting and gathering, with a major emphasis on aquatic resources in many coastal areas (SWCA 2020a), and a greater emphasis on large-game hunting inland.

Horizon II: Milling Stone (6000–3000 B.C.)

Set during a drier climatic regime than the previous horizon, the Milling Stone horizon is characterized by subsistence strategies centered on collecting plant foods and small animals. The importance of the seed processing is apparent in the dominance of stone grinding implements in contemporary archaeological assemblages, namely milling stones (metates) and handstones (manos). Recent research indicates that Milling Stone horizon food procurement strategies varied in both time and space, reflecting divergent responses to variable coastal and inland environmental conditions (SWCA 2020a).

Horizon III: Intermediate (3000 B.C.–A.D. 500)

The Intermediate horizon is characterized by a shift toward a hunting and maritime subsistence strategy, along with a wider use of plant foods. An increasing variety and abundance of fish, land mammal, and sea mammal remains are found in sites from this horizon along the California coast. Related chipped stone tools suitable for hunting are more abundant and diversified, and shell fishhooks became part of the toolkit during this period. Mortars and pestles became more common during this period, gradually replacing manos and metates as the dominant milling equipment and signaling a shift away from the processing and consuming of hard seed resources to the increasing importance of the acorn (SWCA 2020a).

Horizon IV: Late Prehistoric (A.D. 500–Historic Contact)

In the Late Prehistoric horizon, there was an increase in the use of plant food resources in addition to an increase in land and sea mammal hunting. There was a concomitant increase in the diversity and complexity of material culture during the Late Prehistoric horizon, demonstrated by more classes of artifacts. The recovery of a greater number of small, finely chipped projectile points suggests increased use of the bow and arrow rather than the atlatl (spear thrower) and dart for hunting. Steatite cooking vessels and containers are also present in sites from this time, and there is an increased presence of smaller bone and shell circular fishhooks; perforated stones; arrow shaft straighteners made of steatite; a variety of bone tools; and personal ornaments such as beads made from shell, bone, and stone. There was also an increased use of asphalt for waterproofing and as an adhesive.

By A.D. 1000, fired clay smoking pipes and ceramic vessels were being used at some sites (Drover 1971, 1975; Meighan 1954; Warren and True 1961 as cited in SWCA 2020a). The scarcity of pottery in coastal and near-coastal sites implies that ceramic technology was not well developed in that area, or that occupants were trading with neighboring groups to the south and east for ceramics. The lack of widespread pottery manufacture is usually attributed to the high quality of tightly woven and watertight basketry that functioned in the same capacity as ceramic vessels.

During this period, there was an increase in population size accompanied by the advent of larger, more permanent villages (Wallace 1955:223 as cited in SWCA 2020a). Large populations and, in places, high population densities are characteristic, with some coastal and near-coastal settlements containing as

many as 1,500 people. Many of the larger settlements were permanent villages in which people resided year-round. The populations of these villages may have also increased seasonally.

In Warren's (1968) cultural ecological scheme, the period between A.D. 500 and European contact, which occurred as early as 1542, is divided into three regional patterns: Chumash (Santa Barbara and Ventura counties), Takic/Numic (Los Angeles, Orange, and western Riverside Counties), and Yuman (San Diego County). The seemingly abrupt introduction of cremation, pottery, and small triangular arrow points in parts of modern-day Los Angeles, Orange, and western Riverside Counties at the beginning of the Late Prehistoric period is thought to be the result of a Takic migration to the coast from inland desert regions. Modern Gabrielino, Juaneño, and Luiseño people in this region are considered the descendants of the Uto-Aztecan, Takic-speaking populations that settled along the California coast in this period.

History

Post-contact history for the state of California is generally divided into three periods: the Spanish period (1769–1822), Mexican period (1822–1848), and American period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican-American War, signals the beginning of the American period, when California became a territory of the United States.

Spanish Period (1769–1822)

Spanish explorers made sailing expeditions along the coast of southern California between the mid-1500s and mid-1700s. In search of the legendary Northwest Passage, Juan Rodríquez Cabríllo stopped, in 1542, at present-day San Diego Bay. With his crew, Cabríllo explored the shorelines of present Catalina Island, as well as San Pedro and Santa Monica Bays. Much of the present California and Oregon coastline was mapped and recorded in the next half-century by Spanish naval officer Sebastián Vizcaíno. Vizcaíno's crew also landed on Santa Catalina Island and at San Pedro and Santa Monica Bays, giving each location its long-standing name. The Spanish crown laid claim to California, based on the surveys conducted by Cabríllo and Vizcaíno (Bancroft 1886:96–99; Gumprecht 2001:35 as cited in SWCA 2020a).

More than 200 years passed before Spain began the colonization and inland exploration of Alta California. The 1769 overland expedition by Captain Gaspar de Portolá marks the beginning of California's Historic period, occurring just after the King of Spain installed the Franciscan Order to direct religious and colonization matters in assigned territories of the Americas. With a band of 64 soldiers, missionaries, Baja (lower) California Native Americans, and Mexican civilians, Portolá established the Presidio of San Diego, a fortified military outpost, as the first Spanish settlement in Alta California. In July 1769, while Portolá was exploring Southern California, Franciscan Fr. Junípero Serra founded Mission San Diego de Alcalá at Presidio Hill, the first of the 21 missions that would be established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823.

The Portolá expedition first reached the present-day boundaries of Los Angeles in August 1769, thereby becoming the first Europeans to visit the area. Father Juan Crespí, a member of the expedition, named the campsite by the river Nuestra Señora la Reina de los Angeles de la Porciúncula ("Our Lady the Queen

of the Angeles of the Porciúncula"). Two years later, Father Junípero Serra returned to the valley to establish a Catholic mission, the Mission San Gabriel Arcángel, on September 8, 1771 (Engelhardt 1927 as cited in SWCA 2020a). In 1781, a group of 11 Mexican families traveled from Mission San Gabriel Arcángel to establish a new pueblo called El Pueblo de la Reyna de Los Angeles ("the Pueblo of the Queen of the Angels"). This settlement consisted of a small group of adobe-brick houses and streets and would eventually be known as the Ciudad de Los Angeles ("City of Angels").

A major emphasis during the Spanish period in California was the construction of missions and associated presidios to integrate the Native American population into Christianity and communal enterprise. Incentives were also provided to bring settlers to pueblos or towns, but just three pueblos were established during the Spanish period, only two of which were successful and remain as California cities (San José and Los Angeles). Several factors kept growth within Alta California to a minimum, including the threat of foreign invasion, political dissatisfaction, and unrest among the indigenous population.

Mexican Period (1822–1848)

After more than a decade of intermittent rebellion and warfare, New Spain (Mexico and the California territory) won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade and decreed California ports open to foreign merchants.

Extensive land grants were established in the interior during the Mexican period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts. The secularization of the missions following Mexico's independence from Spain resulted in the subdivision of former mission lands and establishment of many additional ranchos.

During the supremacy of the ranchos (1834–1848), landowners largely focused on the cattle industry and devoted large tracts to grazing. Cattle hides became a primary Southern California export, providing a commodity to trade for goods from the east and other areas in the United States and Mexico. The number of nonnative inhabitants increased during this period because of the influx of explorers, trappers, and ranchers associated with the land grants. The rising California population contributed to the introduction and rise of diseases foreign to the Native American population, who had no associated immunities.

American Period (1848–Present)

War in 1846 between Mexico and the United States began at the Battle of Chino, a clash between resident Californios and Americans in the San Bernardino area. This battle was a defeat for the Americans and bolstered the Californios' resolve against American rule, emboldening them to continue the offensive in later battles at Dominguez Field and in San Gabriel (Beattie 1942 as cited in SWCA 2020a). However, this early skirmish was not a sign of things to come, and the Americans were ultimately the victors of this two-year war. The Mexican-American War officially ended with the Treaty of Guadalupe Hidalgo in 1848, which resulted in the annexation of California and much of the present-day southwest, ushering California into its American period.

California officially became a state with the Compromise of 1850, which also designated Utah and New Mexico (with present-day Arizona) as U.S. territories. Horticulture and livestock, based primarily on cattle as the currency and staple of the rancho system, continued to dominate the southern California economy through 1850s. The Gold Rush began in 1848; with the influx of people seeking gold, cattle were no longer

desired mainly for their hides but also as a source of meat and other goods. During the 1850s cattle boom, rancho vaqueros drove large herds from southern to northern California to feed that region's burgeoning mining and commercial boom. Cattle were at first driven along major trails or roads such as the Gila Trail or Southern Overland Trail, then were transported by trains when available. The cattle boom ended for southern California as neighbor states and territories drove herds to northern California at reduced prices. Operation of the huge ranchos became increasingly difficult, and droughts severely reduced their productivity (Cleland 1941 as cited in SWCA 2020a).

On April 4, 1850, only two years after the Mexican-American War and five months prior to California's achieving statehood, Los Angeles was officially incorporated as an American city. Settlement of the Los Angeles region continued steadily throughout the Early American period. Los Angeles County was established on February 18, 1850, one of 27 counties established in the months prior to California's acquiring official statehood in the United States. Many of the ranchos in the area now known as Los Angeles County remained intact after the United States took possession of California; however, a severe drought in the 1860s resulted in many of the ranchos being sold or otherwise acquired by Americans. Most of these ranchos were subdivided into agricultural parcels or towns (Dumke 1944 as cited in SWCA 2020a).

Ranching retained its importance through the mid-19th century, and, by the late 1860s, cities in the Los Angeles area were among the top dairy production centers in the country (Rolle 2003 as cited in SWCA 2020a). By 1876, Los Angeles County had a population of 30,000 (Dumke 1944:7 as cited in SWCA 2020a). The City of Los Angeles maintained its role as a regional business center, and the development of citriculture in the late 1800s and early 1900s further strengthened this status (Caughey and Caughey 1977 as cited in SWCA 2020a). These factors, combined with the expansion of port facilities and railroads throughout the region, contributed to the impact of the real estate boom of the 1880s (Caughey and Caughey 1977; Dumke 1944 as cited in SWCA 2020a). By the late 1800s, government leaders recognized the need for water to sustain the growing population in the Los Angeles area. Irish immigrant William Mulholland famously managed the efforts for a stable water supply. By 1913, the City of Los Angeles had purchased large tracts of land in the Owens Valley, and Mulholland planned and oversaw the construction of the 240-mile aqueduct that brought the valley's water to Los Angeles (Dumke 1944; Nadeau 1997 as cited in SWCA 2020a).

Gardena

The early settlement and development of Gardena began on what was either part of the Rancho San Pedro Spanish land grant or was open space abutting the loosely defined rancho boundary. The 43,119-acre rancho was granted to Juan Jose Dominguez for his military service between 1784 and 1800, after which he raised sheep and cattle on the land. In 1869, following the end of the Civil War, Union Army Major General William Starke Rosecrans bought 16,000 acres in Rancho San Pedro, dubbed the "Rosecrans Rancho." General Rosecrans sold the property in the early 1870s and after which point it was subdivided into various parcels. One of those parcels became the 800-acre McDonald Ranch, whose ranch buildings stood at what is today the intersection of 161st and Figueroa Streets. The development of Gardena proper began in 1887 when real estate developers Pomeroy & Harrison subdivided the McDonald Ranch and planned the community with the ranch buildings at its two-acre center, which the expectation of future transportation development projects (Los Angeles County Library 2020 as cited in SWCA 2020a). Pomeroy & Harrison were proved wrong, as the railway, which opened in April 1890, was built through

Gardena, but along Vermont Avenue instead of Figueroa Street. As a result, in 1889, the community moved the town's core from its original location to the intersection of Vermont and 166th Streets, where the City's center remains today.

The railroad was a major factor in the City's growth near the end of the 19th century. A rail line built by the California Pacific Railway Company (later bought by the Los Angeles Inter-Urban Railway Company) connecting Los Angeles and San Pedro via Gardena started operating in 1903 (Electric Railway Historical Association of Southern California [ERHA] 1957 as cited in SWCA 2020a). In 1907, the Los Angeles and Redondo Railway constructed a line along Moneta Avenue (Western Avenue) line between East Athens and Strawberry Park. Pacific Electric completed a third line in 1912, connecting Watts and Redondo Beach via Gardena. In 1940, Pacific Electric's service through Gardena ended and buses replaced all passenger trains (ERHA 1957 as cited in SWCA 2020a). Today, only diesel freight cars pass through Gardena.

The daughter of early settler Spencer Thorpe gave Gardena its name, in honor of being a "garden spot." The City of Gardena was incorporated on September 11, 1930, and combined the then-communities of Gardena, Moneta, and Strawberry Park into one municipality of about 20,000 people focused mainly on farming (City of Gardena 2020, as cited in SWCA 2020a). Gardena's early success as a farming community was in large part due to the ground water available within the Dominguez Slough. The Dominguez Slough was an inland freshwater drainage basin that captured rainwater runoff, and for several years in Gardena's early history it provided an excellent recreational destination for hunters, fishermen, and vacationers who swam and boated there. In the 1920s, the slough was drained and filled in to extend Vermont Avenue in Gardena. The City was also dubbed "Berryland" for its acres of strawberries, raspberries, and blackberries, which, a century ago, were grown year-round. Gardena was especially well-known for its annual Strawberry Day Festival and parade held each May, when each visitor received a free box of strawberries. The berry industry took a downturn during World War I, as other crops were cultivated for the war effort. After the war, the community's development grew and much of the former farmland diminished. Gardena, once the "berry-growing capital of southern California," is today known as the "Freeway City" because it is bound by I-105 to the north, SR-91 to the south, I-110 to the east, and I-405 to the south and west.

Hollypark Industrial Center. The Project area was constructed as part of the Hollypark Industrial Center, which was developed by the Hayden Lee Development Co., who also developed the Airport Industrial Tract and the Culver City Industrial Area (Los Angeles Times 1957, as cited in SWCA 2020a). The Hollypark Industrial Center was constructed as part of a 300-million-dollar residential, commercial, and industrial development, known as the Hollypark "City Within a City," located on the southwest side of Los Angeles. Apart from the Industrial Center, the development would include the Hollypark Business District (bordered by 135th Street to the north, Rosecrans Avenue to the south, Van Ness Avenue to the east, and Crenshaw Boulevard to the west). The Hollypark Business District included department stores, a civic auditorium, a bank and post office, a bowling alley, restaurants, and movie theaters, as well as 4,000 single-family units, and 5,000 apartment units.

In April 1955, Hollypark Crenshaw Co. subdivided Tract No. 18493. The tract consisted of 17 varying sized lots on the east side of Crenshaw Boulevard, between El Segundo Boulevard to the north and 135th Street to the south. In August 1955, George Keiter, spokesman for Hayden Lee Development Co., announced that the National Cash Register Co. was breaking ground on a 50,000-SF at Crenshaw Boulevard and El Segundo Boulevard. By this time, Hayden Lee Development Co. had also announced that they had reached

the halfway mark in the development of the industrial center and had already converted approximately 2,500,000 SF of land to modern industrial structures. Further construction in the area at this time included a drive-in theater on the east side of Crenshaw Boulevard, between Imperial Highway and El Segundo Boulevard and two auto service stations, one was built for the Shell Oil Co. at El Segundo and Crenshaw Boulevards and one for Tidewater Associated Oil Co. at Van Ness Boulevard at El Segundo Boulevard.

Thirty-five factories were planned as part of the Hollypark Industrial Center. By June 1956, the Los Angeles Times reported that 10 "single-story plants of modern concrete construction" had been completed in the first section of the Hollypark Industrial Center, and another four factories were under construction in the center's second section (Los Angeles Times 1956, as cited in SWCA 2020a). By June 1958, further development began at the Hollypark Industrial Center when Max Factor & Co. broke ground on their new industrial warehouse, located on a 13-acre site they purchased on the northwest corner of Van Ness Avenue at El Segundo Boulevard, adjoining the Western Avenue Golf Course. Albert C. Martin & Associates were the architects and engineers of the project, which featured a one-story building of modern design with a 200-foot glass wall along its western wall. In August 1958, the current building on the Project site was constructed near the corner of Crenshaw Boulevard at El Segundo Boulevard. The Project site is developed with a one-story, approximately 24,990 SF warehouse used to store both vintage cars and auto parts.

EXISTING CULTURAL RESOURCES

Current Historic Status

The onsite warehouse is not listed individually in the NRHP or the CRHR. The City of Gardena does not have a historic designation program or historic preservation ordinance. The CHRIS records search (see following discussion) revealed no previous studies that recorded and/or evaluated the property. The CHRIS records search identified 13 cultural resources studies for off-site properties.

Previously Conducted Studies

For the Project Historical Resource Assessment (SWCA 2020b), a CHRIS records search (within a 500-foot radius of the Project site) was conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton, on February 18, 2020. In addition to official maps and records, the following sources of information were consulted as part of the records search:

- National Register of Historic Places (NRHP)
- California Register of Historical Resources (CRHR)
- California State Historical Landmarks
- California Points of Historical Interest
- California Historic Resources Inventory (HRI)

Previously Recorded Cultural Resources

The CHRIS records search did not identify any archaeological resources within a 0.5-mile radius of the Project site. The closest recorded archaeological resources are more than 3.0 miles from the Project site away. These archaeological resources include two sites: a former prehistoric settlement to the southeast, near the former boundary of the Dominguez Slough (P-19-000088), and a mid-20th century refuse deposit

with domestic debris and construction material, located to the northwest of the Project site, south of Imperial Highway and the Atchison Topeka Santa Fe Railroad (P-19-004644). **Table 4.3-1: Previously Conducted Cultural Resources Studies (Within 0.5 Mile of the Project Site)** summarizes the findings of these studies.

Table 4.3-1 Previously Conducted Cultural Resources Studies (Within 0.5 Mile of the Project Site)

SCCIC Report No.	Title	Author	Author Affiliation	Year	Relationship to Project Site
LA-00078	*Evaluation of the Archaeological Resources and Potential Impact of the Proposed Construction of Route 105 Freeway From El Segundo to Norwalk*	Rosen, Martin D.	University of California, Los Angeles Archaeological Survey	1975	Outside
LA-00851	*Housing Replenishment/Route 105 Project*	Padon, Beth	Caltrans	1981	Outside
LA-02904	*Draft Report a Phase I Cultural Resources Literature Search for the West Basin Water Reclamation Project*	Stickel, Gary E.	Environmental Research Archaeologists: A Scientific Consortium	1993	Outside
LA-02950	*Consolidated Report: Cultural Resource Studies for the Proposed Pacific Pipeline Project*	Anonymous	Peak & Associates, Inc.	1992	Outside
LA-04836	*Phase I Archaeological Survey Along Onshore Portions of the Global West Fiber Optic Cable Project*	Anonymous	Science Applications International Corporation	2000	Outside
LA-07409	*Cultural Resource Assessment for Cingular Wireless Facility Sm214-01 City of Hawthorne Los Angeles County California*	Kyle, Carolyn E.	Kyle Consulting	2002	Outside
LA-07686	*Cultural Resources Records Search Results and Site Visit for Cingular Wireless Candidate El-0017-02 (Colo/Weber Way) 1300 Weber Way, Hawthorne, Los Angeles County, California*	Bonner, Wayne H.	Michael Brandman Associates	2005	Outside
LA-07687	*Cultural Resources Records Search Results and Site Visit for T-Mobile Candidate LA03361a (Pipe Tech) 12600 Chadron Avenue, Hawthorne, Los Angeles County, California*	Bonner, Wayne H.	Michael Brandman Associates	2005	Outside
LA-08255	*Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project State of California: Volumes I and Ii*	Arrington, Cindy and Nancy Sikes	SWCA Environmental Consultants, Inc.	2006	Outside

Table 4.3-1 Previously Conducted Cultural Resources Studies (Within 0.5 Mile of the Project Site)

SCCIC Report No.	Title	Author	Author Affiliation	Year	Relationship to Project Site
LA-10240	*Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidate LA33704A (New Image Auto), 13115 Yukon Ave., Hawthorne, Los Angeles County, California*	Bonner, Wayne H.	Michael Brandman Associates	2009	Outside
LA-11150	*West Basin Municipal Water District Harbor/ South Bay Water Recycling Project*	Maxwell, Pamela	U.S. Army Corps of Engineers	2003	Outside
LA-11973	*Crenshaw/LAX Transit Corridor Project Final Environmental Impact Report/Final Environmental Impact Statement*	Unknown	Metro	2011	Outside
LA-12819	*The City of Los Angeles, West Athens-Westmont TOD Specific Plan Project Area, Los Angeles County, California*	McKenna, Jeanette A.	–	2016	Outside
Source: Archeological Assessment; see **Appendix 9.4**: **Cultural Resources Data**					

Sacred Lands File Search

The Sacred Lands File (SLF) search completed in March 2020 through the NAHC was negative (no noted resources); see **Appendix 9.4: Cultural Resources Data**.

Archival Research

It is unclear whether the general Project area was part of the San Pedro and Sausal Redondo Rancho during the Spanish or Mexican periods; however, there is no indication in historical records that the Project site was of any significance during those periods. The earliest maps drawn for the adjacent ranchos, published in 1860, depict the general Project area as open space and public land. Topographic and other maps drawn in the late 19th century depict roads in the approximate location of El Segundo Boulevard and Crenshaw Boulevard. The earliest land uses for the general Project area were identified in aerial photos. The earliest photo was taken in 1923 and shows the general Project area surrounded by agricultural fields; El Segundo Boulevard and Crenshaw Boulevard are unpaved roads located in their current alignments. The Dominguez Flood Control Channel (Dominguez Channel) had not been constructed, and the Project site is visible within a cleared area that appears to have been flooded from discharge of a small stream. The next aerial photograph was taken in 1928 and shows the small flooded area, including the Project site, divided into plowed fields. Few changes are evident by 1938. It is not until 1947 that the Project site and vicinity transitioned from mainly agricultural uses within large plots, to subdivided parcels with mixed uses, in approximately their current configuration. The Dominguez Channel was also constructed around this time. The Project site remained an open plot of land, which may have remained in use as an agricultural field but may have been a vacant lot a portion of the time through the 1950s.

As recorded by the Los Angeles County Assessor, the Hollypark Crenshaw Co. acquired the Project site on August 3, 1954, and constructed the extant building in 1958 as a bowling alley. A Los Angeles Times article from August 17, 1958, announced the construction of Del Mar Lanes—a 24-lane bowling alley that included a restaurant, cocktail lounge with dancing, and a billiard room (Los Angeles Times 1958, as cited in SWCA 2020a). The bowling alley operated under different ownership through the 1960s and changed its name to Pro 300 Lanes in 1969. The property continued to change ownership through the 1970s and 1980s. Building permits issues in 1986 document a series of alterations to the interior, construction of a new fence, and signage, at which point the use of the building as a bowling alley appears to have ceased. The 1995 City directory listed I & D Auto Parts, U-Haul Co., and Rebuilt Masters at the property. More recent City directories list I & D Auto Parts warehouse, Kims Import & Domestic Auto Parts, and Rebuilt Masters at the property. Amid the changes in ownership and uses, few alterations to the Project Site have occurred since the original construction of the parking lot and building in 1958.

See the Historical Resource Assessment for a detailed discussion of the site history, and Appendix A of the Archeological Resources Assessment for historical topographic maps and aerial photographs. Both assessments are located in **Appendix 9.4**.

4.3.3 REGULATORY FRAMEWORK

FEDERAL

National Historic Preservation Act of 1966

Enacted in 1966 and amended in 2000, the National Historic Preservation Act (NHPA) declared a national policy of historic preservation and instituted a multifaceted program, administered by the Secretary of the Interior, to encourage the achievement of preservation goals at the Federal, State, and local levels. The NHPA authorized the expansion and maintenance of the NRHP, established the position of State Historic Preservation Officer and provided for the designation of State Review Boards, set up a mechanism to certify local governments to carry out the purposes of the NHPA, assisted Native American tribes to preserve their cultural heritage and created the Advisory Council on Historic Preservation.

STATE

California Environmental Quality Act

California public agencies must consider the effects of their actions on both “historical resources” and “unique archaeological resources.” Pursuant to PRC §21084.1, a “project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” PRC §21083.2 additionally requires agencies to determine whether proposed projects would have effects on “unique archaeological resources.”

“Historical resource” is a term with a defined statutory meaning. Under State CEQA Guidelines §15064.5 (a), “historical resource” includes the following:

- A resource listed in or determined to be eligible by the State Historical Resources Commission (SHRC), for listing in the CRHR (PRC §5024.1, Title 14 CCR, §4850 et seq.).
- A resource included in a local register of historical resources, as defined in §5020.1(k) of the PRC or identified as significant in an historical resource survey meeting the requirements §5024.1(g)

of the PRC, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR (PRC, §5024.1, Title 14 CCR, §4852) including the following:
    - Criterion 1 - Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
    - Criterion 2 - Is associated with the lives of persons important in our past;
    - Criterion 3 - Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
    - Criterion 4 - Has yielded, or may be likely to yield, information important in prehistory or history.

CEQA addresses significant impacts to historical resources. "A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (CEQA Guidelines §15064.5(b)(1)). CEQA also requires agencies to consider whether projects will affect "unique archaeological resources." PRC §21083.2(g), states that "'unique archaeological resources' means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized, important prehistoric or historic event or person."

Traditional Tribe Cultural Places Act (Senate Bill 18)

See **Section 4.14: Tribal Cultural Resources**.

Assembly Bill 52

See **Section 4.14: Tribal Cultural Resources.**

California Register of Historical Resources

Created in 1992 and implemented in 1998, the CRHR is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC §5024.1). Certain properties, including those listed in or formally determined eligible for listing in the NRHP and California Historical Landmarks (CHL) numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest program, identified as significant in historical resources surveys or designated by local landmarks programs, may be nominated for inclusion in the CRHR. A resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the SHRC determines that it meets one or more of the following criteria, which are modeled on NRHP criteria:

- Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- Criterion 2: It is associated with the lives of persons important in our past.
- Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.
- Criterion 4: It has yielded, or may be likely to yield, information important in history or prehistory.

Under PRC §5024.1 and 14 CCR §4852(c), a cultural resource must retain integrity to be considered eligible for the CRHR. Specifically, it must retain sufficient character or appearance to be recognizable as a historical resource and convey reasons of significance. Integrity is evaluated with regard to retention of such factors as location, design, setting, materials, workmanship, feeling, and association.

Typically, a prehistoric archaeological site in California is recommended eligible for listing in the CRHR based on its potential to yield information important in prehistory or history (Criterion 4). Important information includes chronological markers such as projectile point styles or obsidian artifacts that can be subjected to dating methods or undisturbed deposits that retain their stratigraphic integrity. Sites such as these have the ability to address research questions.

California Historical Landmarks

CHLs are buildings, structures, sites, or places that have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value and that have been determined to have statewide historical significance by meeting at least one of the criteria listed below. The resource also must have written consent of the property owner; be recommended by the SHRC; and be officially designated by the Director of California State Parks. The specific standards now in use were first applied in the designation of CHL #770. CHLs #770 and above are automatically listed in the CRHR.

To be eligible for designation as a CHL, a resource must meet at least one of the following criteria:

- It is the first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California);

- It is associated with an individual or group having a profound influence on the history of California; or
- It is a prototype of, or an outstanding example of, a period, style, architectural movement, or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer, or master builder.

California Points of Historical Interest

California Points of Historical Interest are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest designated after December 1997 and recommended by the SHRC are also listed in the CRHR. No historic resource may be designated as both a landmark and a point. If a point is later granted status as a landmark, the point designation is retired. In practice, the point designation program is most often used in localities that do not have a locally enacted cultural heritage or preservation ordinance. To be eligible for designation as a Point of Historical Interest, a resource must meet at least one of the same criteria for California Historical Landmarks (identified above).

California Historical Resource Status Codes

A resource must meet at least one of the above-listed criteria and retain enough integrity to support its period of significant and association within a historical context. A resource is assigned a California Historical Resource status code following evaluation, which identifies its significance level. The status codes and descriptions are listed below:

1. Properties listed in the NRHP or the CRHR.
2. Properties determined eligible for listing in the NRHP or CRHR.
3. Appears eligible for the NRHP or CRHR through survey evaluation.
4. Appears eligible for the NRHP or CRHR through other evaluation.
5. Properties recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated for the NRHP or CRHR or needs re-evaluation

California Historic Building Code

The California Historic Building Code (CHBC) provides guidelines for the preservation, restoration, rehabilitation, relocation, and reconstruction of buildings or structures designated as qualified historical buildings or properties by a local, State, or Federal jurisdiction, as defined by CHBC §8-218. The CHBC provides guidelines for long-term preservation efforts of qualified historical buildings or properties in order to allow owners to make improvements for access for persons with disabilities; to provide a cost-effective approach to preservation; and, to ensure overall safety of affected occupants or users.

As defined by the CHBC, a “qualified historical building” is “any building, site, structure, object, district, or collection of structures, and their associated sites, deemed of importance to the history, architecture, or culture of an area by an appropriate local, State, or Federal governmental jurisdiction. This includes

designated buildings or properties on, or determined eligible for, official national, State, or local historical registers or official inventories, such as the NRHP, CRHR, State Historical Landmark, State Points of Historical Interest, and officially adopted city or county registers, inventories, or surveys of historical or architecturally significant sites, places, or landmarks."

LOCAL

City of Gardena General Plan

The GGP Community Resource Element provides a Conservation Plan with the following goals and policies for the treatment of historic and cultural resources:

- **CN Goal 5:** Protect the City's cultural resources.
  - **Policy CN 5.3**: Protect and preserve cultural resources of the Gabrielino Native American Tribe found or uncovered during construction.

4.3.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning cultural resources. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, the Project may create a significant environmental impact if it would:

- Cause a substantial adverse change in the significance of a historical resource pursuant to [State CEQA Guidelines] §15064.5 (see Impact 4.3-1);
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to [State CEQA Guidelines] §15064.5 (see Impact 4.3-2);
- Disturb any human remains, including those interred outside of formal cemeteries (see Impact 4.3-3).

4.3.5 IMPACTS AND MITIGATION MEASURES

Impact 4.3-1:	**Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?**
Level of Significance: No Impact	

A California Historical Resources Information System (CHRIS) records search (within a 500-foot radius of the Project site) was conducted at the South Central Coastal Information Center (SCCIC). An intensive-level survey of the Project site was also conducted on March 5, 2020 and completed archival research in March 2020. The CHRIS records search identified no previously recorded and evaluated resources nor no previous cultural resource studies.

The Project site is an approximately 1.3-acre rectangular-shaped parcel. Situated on the property is an approximately 25,990-SF, one-story International Style-inspired commercial building that was constructed in 1958 as a bowling alley. The rectangular building is constructed of concrete. All façades are divided into

bays by square piers that project from the façade approximately four inches and project above the parapet by approximately eight inches. Fenestration consists of metal-framed fixed windows. The west (primary), south, and north façades all appear to have multiple layers of paint. The building has a flat roof.

National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR)

Criteria A/1: The Project site does not have a strong enough association with events or patterns that have made a significant contribution to the broad patterns of national, state, or local history. Although the onsite structure was constructed during a period of development and growth in the City, it is one of many similar commercial properties constructed during this period and is not individually able to convey this period or pattern. The building and its associated businesses do not appear to have had significant roles in Gardena's commercial development. Research did not reveal any historically significant discrete events that have taken place at the property. Therefore, the structure is not individually eligible under Criteria A/1 for listing in the NRHP or the CRHR.

Criteria B/2: Research to date did not reveal the structure to have an association with the lives of significant persons in our past. The building housed a bowling alley and auto part merchants, and numerous people would have occupied the building as employees and patrons. No individuals associated with the property have been found to be historically significant in local, state, or national history. Therefore, the structure is not individually eligible under Criteria B/2 for listing in the NRHP or the CRHR.

Criteria C/3: The structure is an unexceptional example of the International Style and property type. It was constructed in 1958 and reflects the popularity of International Style architecture at the time. Although the structure retains a few character-defining features of this style and type, such as the emphasis on horizontality, its simple unadorned, geometric volume, concrete exterior, and a flat roof, it is an unexceptional example of the style. Additionally, a key design feature of the horizontal emphasis intended by the band of windows and Roman brick, interspersed with tile panels, has been significantly diminished due to numerous coats of paint, the loss of entire tile panels, and the alteration of the band's continuation on the north and south façades. The structure does not exhibit distinguishing characteristics above other intact International Style buildings in Gardena and the surrounding area. Therefore, the structure is not individually eligible under Criteria C/3 for listing in the NRHP or the CRHR.

Criteria D/4: The Project site and structure have not yielded, nor appear to possess the potential to yield, information important in history. Therefore, the structure is not individually eligible under Criteria D/4 for listing in the NRHP or the CRHR.

Additionally, the structure does not appear to be a contributor to a potential historic district. The City has not been surveyed; therefore, the Project site and surrounding properties have not been recorded and there are no identified potential historic districts, which could include the Project site or area. The City does not currently have a historic designation program; there are also no locally identified or designated districts in the area. Assessor records indicate that construction dates for properties on Tract 18493 (the Project site's tract) range from 1954 to 1995, and properties range in style and type. Therefore, the subject Project site is not a contributor to an identified historic district.

Conclusion

In summary, there are no previously recorded and evaluated resources, nor previous cultural resource studies within a 500-foot radius of the Project site. Based on above NRHP and CRHR eligibility discussion and investigation and analysis, the onsite structure is not eligible individually or as a contributor to a historic district for listing in the NRHP and the CRHR. Research revealed the Project site and structure did not have a direct association with a significant event/pattern of history (Criterion A/1). Neither the building nor its associated businesses appear to have had significant roles in Gardena's commercial development. Research did not identify an association with an important person (Criterion B/2) or that the building represents a distinctive or rare building type or style (Criterion C/3). Lastly, the property does not appear to offer potential for additional historical insight (Criterion D/4). Therefore, the Project would not cause an adverse change in the significance of a historical resource. No impact would occur.

Impact 4.3-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Level of Significance: Less Than Significant With Mitigation Incorporated

An archaeological resources sensitivity assessment was conducted for the Project's Archaeological Assessment; see **Appendix 9.4**. The assessment found that the Project area's physical environment has undergone substantial alterations in the last 100 or more years, including natural processes of flooding and erosion, and human-caused changes from plow agriculture and its conversion to a paved commercial property. As a result, most of the sediments below the Project site's paved surfaces have been subject to ground disturbance, which, in most cases, diminishes the likelihood that any archaeological resources once present are still preserved. The following discussion considers the prehistoric environmental and cultural context, historical land uses, and physical setting to assess the likelihood that different types of archaeological resources could exist below the surface within the Project site.

Prehistoric- and Historic-Period Native American Archaeological Resources

No archaeological resources with Native American components were identified within a 0.5-mile radius through the CHRIS records search. Additionally, the SLF records search did not identify any sacred lands or sites in the area. The closest known archaeological site with Native American–affiliated materials on-file at the CHRIS are mapped approximately 3.0 miles southwest of the Project site, along a former slough and inland lake. Ethnographic reports describe a former Gabrielino village site known as Amupubit in the same approximate location as that archaeological site. The next closest Gabrielino placenames that included significant settlements are located between 7.0 and 8.0 miles north, south, and east of the Project site. The Project site is not located near any major stream courses or known sources of freshwater.[1] There are no landmarks or other landscape features apparent that might have given the Project site a significance to prehistoric foragers.

The area is underlain with alluvial sediments, the uppermost stratum of which accumulated as fan deposits formed during the late Pleistocene and early Holocene, between approximately 12,000 to 6,000

[1] Although the Dominguez Channel is located east of the Project site, this northerly segment of the channel was not constructed along a former water course. This segment of the Dominguez Channel was constructed between 1938 and 1947 as a concrete lined channel, oriented north-south to follow the street grid and property boundaries.

B.C., just before the first evidence for human presence in the Los Angeles Basin. The Project site was in agriculture production for at least 50 years before being developed as a commercial property with a paved lot. Onsite geotechnical borings identified two to three feet of artificial fill overlying alluvial sediments with varying strata of mixed composition. Together, this information suggests any former archaeological resources affiliated with Native Americans that were once present on the surface or near-surface would have likely been destroyed or otherwise compromised. This significantly reduces the Project site's sensitivity for prehistoric- or Historic-period Native American archaeological resources. The potential exists for archaeological deposits to be preserved as more deeply buried sites, preserved beneath surface disturbances, or even intermixed with artificial fill and Historic-period debris. However, the age of the deeply buried sediments allows for preservation of material from only the earliest Prehistoric period, which are extremely rare within the Los Angeles Basin. Further, the Project design is only likely to encounter this depth within the area for the internal ramp and parking, and three elevator shafts. Therefore, to the extent that the proposed ground disturbance extends into undisturbed alluvial soils buried beneath previously disturbed sediments, there may be some potential for preservation, but it is considered very unlikely for any resource to be present.

Given the overall lack of any indication of the Project area as a location of likely habitation or resource procurement, and the poor preservation conditions, there is a low potential for encountering prehistoric- or historic-period Native American archaeological resources within the Project area.

Historic-Period Non-Native American Archaeological Resources

No historic archaeological resources were identified in a CHRIS records search. The nearest archaeological site was identified 3.0 miles to the northwest. Archival research documents the land use history of the Project area. The Project area began as open land next to two roads between Spanish- and Mexican-period ranchos, several miles from the nearest settlements. Agricultural uses likely began in the late 19th century and by 1923, the Project area was subject to intensive plow agriculture, which defined the historical land uses within the Project area until the 1950s, when the property was paved and developed with a bowling alley. In the 1940s, the Dominguez Channel was constructed, and the Project area and adjacent lots to the south appear to have been cleared and left vacant. The potential exists for individual items such as food or beverage containers, hand tools, hardware, or other farming implements to have once been present within the Project area. However, given the alterations apparent in the 1940s aerial photo and the subsequent paving, it is very unlikely that any such materials have been preserved. Geotechnical bores did not identify any debris commonly associated with Historic-period refuse deposits. For these reasons, the Project area has a low sensitivity for containing historic-period non-Native American archaeological resources.

Conclusion

This evaluation included a review of historical archival sources and archaeological records. A CHRIS records search did not identify any known archaeological sites in the Project area or vicinity. The SLF results returned by the NAHC were negative. The Project area was further assessed for the potential to contain deeply buried, previously unidentified archaeological resources and was found to be low.

CONSTRUCTION AND OPERATIONS

A significant impact would occur if grading and construction activities would result in a substantial adverse change in the significance of an archaeological resource determined to be "historic" or "unique." According to CEQA, if an archaeological resource is neither historic nor unique, the effects of a project on that resource would not be considered significant effects on the environment (State CEQA Guidelines §15064(C)(4)).

Conservatively, it is assumed that any as-yet unidentified archaeological resources at the Project site would be impacted through grading and construction activities. However, the significance of the impact would be based upon the criteria presented in the thresholds of significance (i.e., is the archaeological resource determined to be "historic" or "unique").

As previously addressed, the Project site has been subject to disturbance by natural processes of flooding and erosion, plow agriculture, and commercial development. It was found that the Project area has a low potential/sensitivity for containing Historic-period Native American and non-Native American archaeological resources. AB 52 consultation with the Gabrieleno Band of Mission Indians - Kizh Nation (Kizh Nation) provided tribal archive information to the City to identify the Project site's high cultural sensitivity and support their concerns for subsurface ground disturbance activities to potentially impact tribal cultural resources. The Kizh Nation provided documents from historic books, screenshots of historic maps and some explanatory text to explain the area's cultural significance; see **Appendix 9.4**. Per the Kizh Nation (B. Salas, personal communication, June 25, 2020), the Project site is within the Village of Suangna. All of their mainland villages (sans their island villages) overlapped each other to help facilitate the movement of tribal cultural resources throughout the landscape and also to their sister tribes outside of their traditional ancestral territory. Village use areas were usually shared between village areas and were commonly used by two or more adjoining villages depending on the type, quantity, quality, and availability of natural resources in the area. Therefore, human activity can be pronounced within the shared use areas due to the combined use by multiple villages. Tribal cultural resources may be present. Therefore, according to the Kizh Nation, the potential exists for as-yet unidentified archaeological resources to be present at the Project site. Mitigation Measures (MM) CUL-1 and MMs TCR-1 through TCR-8 (see **Section 4.14**) are recommended to avoid or mitigate potential impacts to as yet undiscovered archaeological resources. Following compliance with MM CUL-1 and MMs TCR-1 through TCR-8, the Project would not cause a substantial adverse change in the significance of an archaeological resource. Impacts would be less than significant with mitigation incorporated. For further evaluation of tribal cultural resources, see **Section 4.14**.

MITIGATION MEASURES

MM CUL-1 **Inadvertent discovery of an archaeological resource.** Before ground disturbing activities are initiated on the Project site, the construction personnel conducting the activities shall be notified of the potential for archaeological resources, and the protocols to be implemented in the event of a discovery. Ground disturbing work includes but is not limited to activities such as excavation, grading, digging, trenching, plowing, drilling, tunneling, stripping, and clearing where the ground disturbance exceeds 3.0 feet. In the event that an archaeological resource is observed during construction, all ground disturbing work in the immediate vicinity of the find should temporarily cease until a

Qualified Archaeologist can evaluate the find as a historical resources pursuant to Public Resources Code (PRC) §5024.1 and California Code of Regulations Title 14, State CEQA Guidelines §15064.5. A Qualified Archaeologist is one who meets the Secretary of the Interior Professional Qualification Standards in archeology. The Qualified Archaeologist or an archaeologist working under their direction would have the authority to stop or divert construction excavation elsewhere on the site while the find is being assessed. Upon discovery, the Project proponent would notify the City of Gardena (the City). At the direction of the Project proponent and in consultation with the City, the Qualified Archaeologist shall prepare plans for feasible mitigation of impacts to the find, pursuant to State CEQA Guidelines §15064.5.

See **Section 4.14: Tribal Cultural Resources**, for the following measures:

- **MM TCR-1: Retain a Native American Monitor/Consultant**
- **MM TCR-2: Unanticipated Discovery of Tribal Cultural and Archaeological Resources**
- **MM TCR-3: Public Resources Code §21083.2(b)**
- **MM TCR-4: Unanticipated Discovery of Human Remains and Associated Funerary Objects**.
- **MM TCR-5: Resource Assessment & Continuation of Work Protocol**
- **MM TCR-6: Kizh-Gabrieleno Procedures for burials and funerary remains**
- **MM TCR-7: Treatment Measures**
- **MM TCR-8: Professional Standards**

Impact 4.3-3: Would the project disturb any human remains, including those interred outsides of dedicated cemeteries?

Level of Significance: Less Than Significant Impact With Mitigation Incorporated

The archaeological records search and field survey did not reveal any resources known to contain human remains within or near the Project site. The Project area is not considered sensitive for archaeological resources due to the urbanized nature of the surrounding and long history of ground-disturbing activities. As discussed above, the Kizh Nation considers the area culturally significant. Therefore, the potential exists for Project construction to reveal unknown human remains. If human remains are found, those remains would require proper treatment in accordance with applicable laws, including Health and Safety Code (HSC) §§7050.5-7055 and PRC §5097.98 and §5097.99. HSC §§7050.5-7055 describe the general provisions for treatment of human remains. Specifically, HSC §7050.5 prescribes the requirements for the treatment of any human remains that are accidentally discovered during excavation of a site. HSC §7050.5 also requires that all activities cease immediately, and a qualified archaeologist and Native American monitor be contacted immediately. As required by state law, the procedures set forth in PRC §5087.98 would be implemented, including evaluation by the County Coroner and notification of the NAHC. The NAHC would then designate the Most Likely Descendant (MLD) of the unearthed human remains.

Removal and recompaction of the existing artificial fill to approximately three feet below grade is assumed over the entire Project site, except for internal ramp and parking, and elevator shaft construction, where construction is anticipated to require the following excavation:

- The internal ramp and parking are assumed in this EIR to require excavation to approximately 8.0 feet below the current grade in an area that measures approximately 112 by 42 feet.
- Three elevator shafts are anticipated to require excavation to approximately 5.0 feet below current grade, each shaft would be approximately six feet by six feet in area.

It is unlikely that any human remains would be encountered during ground disturbing activities given that the Project site is already developed, and, except for parking ramp and elevator shaft construction, which would be up to 8.0 feet, excavations are not anticipated to exceed 3.0 feet. However, previously undiscovered human remains could be encountered during construction activities. If human remains are found during excavation, excavation would be halted in the vicinity of the find and any area that is reasonably suspected to overlay adjacent remains shall remain undisturbed until the County Coroner has investigated, and appropriate recommendations have been made for the treatment and disposition of the remains. Following compliance with the established regulatory framework (i.e., HSC §§7050.5-7055 and PRC §§5097.98 and 5097.99), the Project's impacts concerning potential to disturb human remains, would be reduced to a less than significant. Compliance with MM TCR-4 would further minimize potential impacts to human remains.

MITIGATION MEASURES

See **Section 4.14: Tribal Cultural Resources**, for **MM TCR-4: Unanticipated Discovery of Human Remains and Associated Funerary Objects**.

4.3.6 CUMULATIVE IMPACTS

For purposes of the cultural resource impact analysis, cumulative impacts are considered for cumulative development within Gardena and Hawthorne, according to the related projects; see **Table 3-1: List of Cumulative Projects**.

As concluded above, the Project would not cause an adverse change in the significance of a historical resource pursuant to State CEQA Guidelines §15064.5, as none are present on the Project site. Therefore, no cumulative impact concerning historical resources would occur.

As discussed above, the potential exists for undiscovered archaeological resources to be adversely impacted during Project construction. With implementation of MM CUL-1 and MM TCR-1 through MM TCR-8, the Project would not cause a substantial adverse change in the significance of archaeological resources. Cumulative projects could involve actions that damage known or as-yet undiscovered archaeological and tribal cultural resources specific to those development sites. However, as with the Project, all cumulative development would undergo environmental and design review on a project-by-project basis pursuant to CEQA to evaluate potential impacts to cultural resources. This would include studies of historical, archaeological, and tribal cultural resources that are present or could be present within a development site. Additionally, cumulative development would be subject to compliance with the established federal, state, and local regulatory framework concerning the protection of cultural resources on a project-by-project basis. Where significant or potentially significant impacts are identified,

implementation of all feasible site-specific mitigation would be required to avoid or reduce impacts. The Project's cumulative impacts to archaeological and tribal cultural resources would be less than significant given compliance with the established regulatory framework and site-specific mitigation would be required.

As concluded above, previously undiscovered human remains could be encountered during Project construction activities; however, a less than significant impact would occur in this regard following compliance with the established state regulatory framework. Cumulative development could impact previously undiscovered human remains during construction. However, all cumulative development would undergo environmental review on a project-by-project basis to evaluate the site-specific archaeological sensitivity. Additionally, cumulative development would be subject to compliance with the established state regulatory framework concerning the discovery of human remains on a project-by-project basis. The Project's cumulative impacts concerning the potential to disturb human remains would be less than significant given compliance with the established regulatory framework would be required.

4.3.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts to cultural resources have been identified.

4.3.8 REFERENCES

City of Gardena. (2006). *Gardena General Plan 2006: Community Resources Element, Conservation Plan*. Retrieved from https://www.cityofgardena.org/wp-content/uploads/2016/04/generalplan7.pdf.

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SWCA. (2020a). *Archaeological Resources Assessment for the 12850 and 12900 Crenshaw Boulevard Project, Gardena, California*. Pasadena, CA.

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4.4 ENERGY

4.4 ENERGY

The purpose of this section is to describe the existing regulatory and environmental conditions related to energy, identify potential impacts that could result from Project implementation and, as necessary, recommend mitigation to avoid or reduce the significance of impacts.

Information in this section is based primarily on energy data provided in **Appendix 9.5: Energy Data** and data in **Appendix 9.3: Air Quality**. Additional resource information was obtained from available public resources, including, among others, the Gardena General Plan 2006 (GGP).

4.4.1 AFFECTED ENVIRONMENT

The Project site is in the City's northwestern corner in a predominantly industrial area, with some residential uses to the east of the Laguna Dominguez Trail (Dominguez Trail) and Dominguez Flood Control Channel (Dominguez Channel). The Project site is bound by a gas station to the north, commercial and industrial uses to the south, residential uses to the east across the Dominguez Channel and Dominguez Trail, and commercial and industrial uses to the west in the City of Hawthorne. El Segundo Boulevard forms a northern City boundary with the City of Hawthorne approximately 170 feet to the north of the site, and Crenshaw Boulevard forms a western City boundary with Hawthorne immediately adjacent to and west of the site. The site is currently occupied by a one-story, approximately 24,990-square-foot (SF) warehouse used to store both vintage cars and auto parts.

4.4.2 REGULATORY FRAMEWORK

FEDERAL

National Energy Conservation Policy Act

The National Energy Conservation Policy Act serves as the underlying authority for federal energy management goals and requirements. Signed into law in 1975, it has been regularly updated and amended by subsequent laws and regulations. Pursuant to the Act, the National Highway Traffic Safety Administration is responsible for establishing additional vehicle standards. In 2012, new fuel economy standards for passenger cars and light trucks were approved for model years 2017 through 2021 (77 Federal Register [FR] §§62624–63200). Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

Energy Policy Act of 2005

The Energy Policy Act of 2005 seeks to reduce reliance on non-renewable energy resources and provide incentives to reduce current demand on these resources. For example, under this Act, consumers and businesses can obtain federal tax credits for purchasing fuel-efficient appliances and products, including buying hybrid vehicles, building energy-efficient buildings, and improving the energy efficiency of commercial buildings. Additionally, tax credits are available for the installation of qualified fuel cells, stationary microturbine power plants, and solar power equipment.

Energy and Independence Security Act of 2007

The Energy and Independence Security Act of 2007 sets federal energy management requirements in several areas, including energy reduction goals for federal buildings, facility management and

benchmarking, performance and standards for new buildings and major renovations, high-performance buildings, energy savings performance contracts, metering, energy-efficient product procurement, and reduction in petroleum use and increase in alternative fuel use. This Act also amends portions of the National Energy Policy Conservation Act. In addition to setting increased Corporate Average Fuel Economy standards for motor vehicles, the Energy and Independence Security Act includes the following other provisions related to energy efficiency:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and Lighting Efficiency Standards (Sections 301–325)
- Building Energy Efficiency (Sections 411–441)

STATE

State of California Integrated Energy Policy

In 2002, the Legislature passed Senate Bill (SB) 1389, which required the California Energy Commission (CEC) to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels, for the California Energy Policy Report. The plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for Zero-Emission Vehicles and their infrastructure needs, and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

The CEC has adopted the 2015 Integrated Energy Policy Report, which assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources, protect the environment, ensure reliable, secure, and diverse energy supplies, enhance the state's economy, and protect public health and safety. The 2015 Integrated Energy Policy Report covers a broad range of topics, including energy efficiency, building energy efficiency standards, achieving 50 percent renewables by 2030, and the California Energy Demand Forecast (CEC, 2016d).

California Building Standards

Building Energy Efficiency Standards

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6, of the California Code of Regulations (CCR), were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2019 Title 24 standards are the current applicable building energy efficiency standards and became effective on January 1, 2020. Under the 2019 standards, homes use about 53 percent less energy and nonresidential buildings would use about 30 percent less energy than buildings under the 2016 Title 24 standards.

California Green Building Standards Code

The California Green Building Standards Code (CCR, Title 24, Part 11), commonly referred to as the CALGreen Code, is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community

Development. CALGreen standards require new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen also provides voluntary measures (CALGreen Tier 1 and Tier 2) that local governments may adopt which encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code was adopted in 2019 and went into effect January 1, 2020.

Specific to construction waste reduction, disposal, and recycling, Subsection 4.408.1: Construction Waste Management of the CALGreen Code requires the recycling and/or salvage for reuse of a minimum of 65 percent of nonhazardous construction and demolition waste, or compliance with a local construction and demolition waste management ordinance, if more stringent. The City's solid recycling requirements are addressed later in this section. Exceptions to CalGreen requirements are:

1. Excavated soil and land-clearing debris.
2. Alternate waste reduction methods developed by working with local agencies if diversion or recycle facilities capable of compliance with this item do not exist or are not located reasonably close to the jobsite.
3. The enforcing agency may make exceptions to the requirements of this section when isolated jobsites are located in areas beyond the haul boundaries of the diversion facility.

2006 Appliance Efficiency Regulations

The California Energy Commission adopted Appliance Efficiency Regulations (Title 20, CCR §§1601 through 1608) on October 11, 2006. The regulations were approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non-federally regulated appliances. While these regulations are now often viewed as "business-as-usual," they exceed the standards imposed by all other states and they reduce greenhouse gas (GHG) emissions by reducing energy demand.

Assembly Bill 32 and Senate Bill 32

California's major initiative for reducing GHG emissions is outlined in Assembly Bill 32 (AB 32), the "California Global Warming Solutions Act of 2006." AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 (essentially a 15 percent reduction below 2005 emission levels; the same requirement as under S-3-05[1]), and requires the California Air Resources Board (CARB) to prepare a Scoping Plan that outlines the main state strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Reductions in overall energy consumption have been implemented to reduce emissions.

In September 2016, then-Governor Brown signed into legislation SB 32, which builds on AB 32 and requires the State to cut GHG emissions to 40 percent below 1990 levels by 2030. With SB 32, the Legislature also passed AB 197, which provides additional direction for updating the Scoping Plan to meet the 2030 GHG reduction target codified in SB 32. CARB adopted the update to the Scoping Plan in 2017.

[1] S-3-05 established GHG emissions reduction targets which included reducing GHG emissions to 1990 levels by 2020 and 80 percent below 1990 levels by 2050.

Additional energy efficiency measures beyond the current regulations are needed to meet these goals as well as the AB 32 GHG reduction goal of reducing statewide GHG emissions to 1990 levels by 2020 and the SB 32 goal of 40 percent below 1990 levels by 2030 (see **Section 4.6: Greenhouse Gas Emissions**), for a discussion of AB 32 and SB 32). Part of the effort in meeting California's long-term reduction goals include reducing petroleum use in cars and trucks by 50 percent, increasing from one-third to more than one-half of California's electricity derived from renewable sources, doubling the efficiency savings achieved at existing buildings and making heating fuels cleaner; reducing the release of methane, black carbon, and other short-lived climate pollutants, and managing farm and rangelands, forests, and wetlands so they can store carbon.[2]

2014 Scoping Plan Update

The first update to the Scoping Plan was approved by CARB in May 2014 and built upon the initial Scoping Plan with new strategies and recommendations (CARB, 2013). As required by HSC Division 25.5, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions limit for 2020. CARB also updated the state's projected 2020 emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions required by regulation that were recently adopted for motor vehicles and renewable energy.

2017 Climate Change Scoping Plan

CARB adopted the 2017 Climate Change Scoping Plan at a public meeting held in December 2017 (CARB, 2017b). The 2017 Scoping Plan outlines the strategies the state would implement to achieve the 2030 GHG reduction target of 40 percent below 1990 levels by 2030 established by SB 32. The 2017 Scoping Plan is also intended to "substantially advance" toward the EO S-3-05 2050 climate goal to reduce GHG emissions by 80 percent below 1990 levels by 2050.

The 2017 Scoping Plan builds on the Cap-and-Trade Regulation, the Low Carbon Fuel Standard (LCFS), improved vehicle, truck and freight movement emissions standards, increasing renewable energy, and strategies to reduce methane emissions from agricultural and other wastes by using it to meet our energy needs. The 2017 Scoping Plan also comprehensively addresses GHG emissions from natural and working lands of California, including the agriculture and forestry sectors. The 2017 Scoping Plan considered a number of different alternatives to achieve the 2030 GHG reduction goal. The "Scoping Plan Scenario" was ultimately adopted and relies on the continuation of ongoing and statutorily required programs and the continuation of the Cap-and-Trade Program. The Scoping Plan Scenario was modified from the January 2017 Proposed Scoping Plan to reflect AB 398, including removal of the 20 percent GHG reduction measure for refineries (CARB, 2017b).

CARB states that the Scoping Plan Scenario "is the best choice to achieve the State's climate and clean air goals" (CARB, 2017b). Under the Scoping Plan Scenario, the majority of the reductions would result from the continuation of the Cap-and-Trade Regulation. Additional reductions are achieved from electricity sector standards (i.e., utility providers to supply 50 percent renewable electricity by 2030), doubling the energy efficiency savings at end uses, additional reductions from the LCFS, implementing the short-lived climate pollutant strategy (e.g., hydrofluorocarbons), and implementing the mobile source strategy and sustainable freight action plan.

[2] California Energy Commission (CEC), *Final Integrated Energy Policy Report Update,* 2016.

In the 2017 Climate Change Scoping Plan Update, CARB provides the estimated projected statewide 2030 emissions and the level of reductions necessary to achieve the 2030 target of 40 percent below 1990 levels. CARB's projected statewide 2030 emissions take into account 2020 GHG reduction policies and programs.

Renewable Portfolio Standard and Senate Bills SBX1-2, 350, and 100

In 2002, California established its Renewable Portfolio Standard program with the goal of increasing the annual percentage of renewable energy in the state's electricity mix by the equivalent of at least 1 percent of sales, with an aggregate total of 20 percent by 2017. The California Public Utilities Commission (CPUC) subsequently accelerated that goal to 2010 for retail sellers of electricity (Public Utilities Code §399.15(b)(1)). Then-Governor Schwarzenegger signed Executive Order S-14-08 in 2008, increasing the target to 33 percent renewable energy by 2020. In September 2009, then-Governor Schwarzenegger continued California's commitment to the Renewable Portfolio Standard by signing Executive Order S-21-09, which directs the California Air Resources Board under its AB 32 authority to enact regulations to help the state meet its Renewable Portfolio Standard goal of 33 percent renewable energy by 2020. In September 2010, the California Air Resources Board adopted its Renewable Electricity Standard regulations, which require all of the state's load-serving entities to meet this target.

On April 12, 2011, then-Governor Brown signed SB X1-2 to increase California's Renewables Portfolio Standard to 33 percent by 2020. SB 350 (Chapter 547, Statutes of 2015) advanced these goals through two measures. First, the law increases the renewable power goal from 33 percent renewables by 2020 to 50 percent by 2030. Second, the law requires the CEC to establish annual targets to double energy efficiency in buildings by 2030. The law also requires the CPUC to direct electric utilities to establish annual efficiency targets and implement demand-reduction measures to achieve this goal. In 2018, SB 100 revised the goal of the program to achieve the 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

Sustainable Communities Strategy

The Sustainable Communities and Climate Protection Act of 2008, or SB 375, coordinates land use planning, regional transportation plans, and funding priorities to help California meet its GHG emissions reduction mandates. As codified in California Government Code §65080, SB 375 requires metropolitan planning organizations (e.g., SCAG) to include a Sustainable Communities Strategy in their regional transportation plan. The main focus of the Sustainable Communities Strategy is to plan for growth in a fashion that would ultimately reduce GHG emissions, but the strategy is also part of a bigger effort to address other development issues, including transit and VMT, which influence the consumption of petroleum-based fuels.

REGIONAL

Southern California Association of Governments (SCAG) Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS)

On September 3, 2020, SCAG's Regional Council approved and adopted the 2020-2045 RTP/SCS. This long-range vision plan balances future mobility and housing needs with economic, environmental, and public health goals. It outlines over $638 billion in transportation investments. The RTP/SCS's objective is to

reduce GHG emissions per capita by 19 percent by 2035 (compared to 2005 levels). Additionally, it calls for reducing VMT per capita by five percent and Vehicle Hours Traveled (VHT) per capita by nine percent (for automobiles and light/medium duty trucks). Connect SoCal projects that population growth in the SCAG region would slow down from about 0.85 percent in 2020 to about 0.45 percent by 2045.

LOCAL

City of Gardena General Plan

The GGP Community Resource Element provides a Conservation Plan with the following goals and policies for the treatment of energy resources:

- CN **Goal 4**: Conserve energy resources through the use of technology and conservation methods
  - **Policy CN 4.1**: Encourage innovative building designs that conserve and minimize energy consumption.
  - **Policy CN 4.2**: Require compliance with Title 24 regulations to conserve energy.

City of Gardena Climate Action Plan

The City of Gardena's Climate Action Plan (CAP) was adopted in December 2017 as a joint effort between Gardena and the South Bay Cities Council of Governments. The CAP was developed as a guide to reduce GHG emissions by identifying strategies at the local level to help the state meet long-term GHG emission reduction goals. These strategies are separated into five main categories including Land Use and Transportation, Energy Efficiency, Energy Generation, Solid Waste, and Urban Greening. Goals and strategies applicable to the Project are as follows:

- **Goal LUT: B – Encourage Ride Sharing**
  - **Sub-strategy LUT: B1.2** Facilitate ride-hailing and ride-sharing.
- **Goal LUT: D – Adopt Active Transportation Initiatives**
  - **Sub-strategy LUT: D2.2** Require new developments to provide pedestrian, bicycle, and transit amenities.
  - **Sub-strategy LUT: D2.3** Require commercial and multi-family residential projects to provide permanent bicycle parking facilities.
- **Goal LUT: E – Parking Strategies**
  - **Sub-strategy LUT: E2.2** Encourage developers of new development to unbundle parking and eliminate the assignment of specific stalls.
- **Goal LUT: G – Land Use Strategies**
  - **Sub-strategy LUT: G1.1** Encourage higher density through general plan appropriately in targeted areas.
  - **Sub-strategy LUT: G1.2** Encourage higher density through zoning code appropriately in targeted areas.
  - **Sub-strategy LUT: G1.3** Increase housing density near transit.

- **Goal EE: B – Increase Energy Efficiency in New Residential Developments**
  - **Sub-strategy EE: B1.1** Educate City staff, developers, etc. on future Title 24 updates and the additional energy efficiency opportunities for new residential development.
- **Goal EE: E – Increase Energy Efficiency Through Water Efficiency**
  - **Sub-strategy EE: E1.2** Require low-irrigation landscaping.

City of Gardena Municipal Code Chapter 8.20 Solid Waste and Recyclable Collection and Disposal

GMC §8.20.060 of Chapter 8.20 describes the City's solid waste disposal and diversion requirements. More specifically, §8.20.060 Section G requires 100 percent of organic waste, asphalt, concrete, dirt, and rock associated with construction and demolition activities must be diverted from landfills.

4.4.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning energy. The issues presented in the Environmental Checklist have been used as significance criteria in this section. The Project would have a significant environmental impact if it would:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation (see Impact 4.4-1);
- Conflict with or obstructs a state or local plan for renewable energy or energy efficiency (see Impact 4.4-2)

METHODOLOGY AND ASSUMPTIONS

This section analyzes construction and operational diesel fuel use as the source of energy that is relevant to the Project. Project operation would include natural gas and electricity use associated with residences and the digital billboard on the building's north facade. Construction electricity use would be associated with water use for dust control and electric vehicles projected to be in the on-road fleet. The analysis of the Project's construction fuel use is based on the California Emissions Estimator Model (CalEEMod), which quantifies construction equipment activity. Fuel usage associated with off-road construction equipment and on-road construction mobile trips is calculated based on VMT from vehicle trips (i.e., worker, vendor, and hauling), the CalEEMod default diesel fleet percentage, and vehicle fuel efficiency in miles per gallon. Fuel consumption is based on VMT for the entire construction period. Construction fuel consumption was calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry. The CalEEMod emissions are specific to construction year and include fleet adjustments based on current regulations and equipment turnover. The results of CalEEMod and energy calculations are included in **Appendix 9.5: Energy Data**.

4.4.4 IMPACTS AND MITIGATION MEASURES

Impact 4.4-1: Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Level of Significance: Less Than Significant Impact

CONSTRUCTION

The energy associated with Project construction includes electricity use associated with water used for dust control, diesel fuel from on-road hauling trips, vendor trips, and off-road construction diesel equipment, as well as gasoline fuel from on-road worker commute trips. The methodology for each category is discussed below. This analysis relies on the construction equipment list and operational characteristics, as stated in **Section 4.2: Air Quality** and **Section 4.6: Greenhouse Gas Emissions**.

Electricity

Water for Construction Dust Control. Electricity use associated with water use for construction dust control is calculated based on total water use and the energy intensity for supply, distribution, and treatment of water. The total number of gallons of water used is calculated based on acreage disturbed during grading and site preparation, as well as the daily watering rate per acre disturbed.

- The total acres disturbed are calculated using the methodology described in Chapter 4.2 of Appendix A of the CalEEMod User's Guide, available at: http://www.caleemod.com.
- The water application rate of 3,020 gallons per acre per day is from the *Air and Waste Management Association's Air Pollution Engineering Manual* (1992).

The energy intensity value is based on the CalEEMod default energy intensity per gallon of water for Los Angeles County. As summarized in **Table 4.4-1: Project Energy Use During Construction**, the total electricity associated with water use for construction dust control would be approximately 0.001 gigawatt hours (GWh) over the duration of Project construction.

Petroleum Fuel

On-Road Diesel Construction Trips. The diesel fuel associated with on-road construction mobile trips is calculated based on VMT from vehicle trips (i.e., worker, vendor, and hauling), the CalEEMod default diesel fleet percentage, and vehicle fuel efficiency in miles per gallon (MPG). VMT for the entire construction period is calculated based on the number of trips multiplied by the trip lengths for each phase shown in CalEEMod. Construction fuel was calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry. The total diesel fuel associated with on-road construction trips would be approximately 112,802 gallons over the duration of buildout of the Project (**Table 4.4-1: Project Energy Use During Construction**).

Table 4.4-1: Project Energy Use During Construction

Project Source	Total Construction Energy	Los Angeles County Annual Energy	Percentage Increase Countywide
Electricity Use		**GWh**	
Water Use[1]	0.001	68,486	0.000 %
Diesel Use		**Gallons**	
On-Road Construction Trips[2]	112,802	643,495,000	0.018 %
Off-Road Construction Equipment[3]	82,984		0.013 %
Construction Diesel Total	118,412		0.184 %
Gasoline		**Gallons**	
On-Road Construction Trips	75,611	3,975,477,800	0.002 %

GWh = gigawatt hours
[1] Construction water use based on acres disturbed per day per construction sequencing and estimated water use per acre.
[2] On-Road mobile source fuel use based on VMT from CalEEMod and fleet-average fuel use in MPG from EMFAC in Los Angeles County.
[3] Construction fuel use was calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry.

Source: See energy calculations in **Appendix 9.5: Energy Data**.

Off-Road Diesel Construction Equipment. Similarly, the construction diesel fuel associated with the off-road construction equipment is calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry. The total diesel fuel associated with off-road construction equipment is approximately 82,984 gallons for duration of buildout of the Project (**Table 4.4-1**).

On-Road Gasoline Construction Trips. The gasoline fuel associated with on-road construction mobile trips is calculated based on VMT from vehicle trips (i.e., worker, vendor, and hauling), the CalEEMod default gasoline fleet percentage, and vehicle fuel efficiency in MPG using the same methodology as the construction on-road trip diesel fuel calculation discussed previously. The total gasoline fuel associated with on-road construction trips would be approximately 75,611 gallons over the duration of buildout of the Project (**Table 4.4-1**).

Construction Energy Use Analysis

In total, construction of the Project would use approximately 0.001 GWh of electricity, 75,611 gallons of gasoline, and 118,412 gallons of diesel. Californians used 285,436 GWh of electricity in 2018, of which Los Angeles County used 68,486 GWh. Project construction electricity use would represent approximately less than $0.3x10^{-6}$ percent of current electricity use in the state, and $0.1x10^{-5}$ percent of the current electricity use in the County.

In 2018, Californians used approximately 15,589,042,965 gallons of gasoline and approximately 3,107,823,655 gallons of diesel fuel. Los Angeles County's annual gasoline fuel use in 2019 was 3,975,477,800 gallons and diesel use was 643,495,000 gallons. Total Project construction gasoline fuel would represent 0.0005 percent of annual gasoline used in the County, and total Project construction diesel fuel would represent 0.004 percent of annual diesel used in the County. Based on the total Project's relatively low construction fuel use proportional to annual state and County use, the Project would not

substantially affect existing energy fuel supplies or resources. New capacity or additional sources of construction fuel are not anticipated to be required.

There are no unusual characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or state. In addition, some energy conservation would occur during construction through compliance with state requirements that equipment not in use for more than five minutes be turned off. Project construction equipment would also be required to comply with the latest EPA and CARB engine emissions standards. These engines use highly efficient combustion engines to minimize unnecessary fuel use.

The Project would entail construction activities that would use energy, primarily in the form of diesel fuel (e.g., mobile construction equipment) and electricity (e.g., power tools). Contractors would be required to monitor air quality emissions of construction activities using applicable regulatory guidance such as from SCAQMD CEQA Guidelines. This requirement indirectly relates to construction energy conservation because when air pollutant emissions are reduced from the monitoring and the efficient use of equipment and materials, energy use is reduced. There are no aspects of the Project that would foreseeably result in the inefficient, wasteful, or unnecessary use of energy during construction activities.

Due to increasing transportation costs and fuel prices, Contractors and Owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary use of energy during construction. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive and that there is a significant cost-savings potential in green building practices. Substantial reduction in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. The Project-related incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes, and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials. It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest in minimizing the costs of business.

As described previously, the Project's fuel from the entire construction period would increase fuel use in the County by less than one percent. It should be noted that CEQA Guidelines Appendix G and Appendix F criteria require the Project's effects on local and regional energy supplies and on the requirements for additional capacity to be addressed. A less than one percent increase in construction fuel demand is not anticipated to trigger the need for additional capacity. Additionally, use of construction fuel would be temporary and would cease once the Project is fully developed. As such, Project construction would have a nominal effect on the local and regional energy supplies.

As stated previously, there are no unusual characteristics that necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or state. Therefore, it is expected that construction fuel use associated with the Project would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature. Therefore, potential impacts are considered less than significant.

OPERATIONS

The energy consumption associated with Project operations would occur from building energy (electricity and natural gas) use, water use, and transportation-related fuel use. The methodology for each category is discussed below. Quantifications of operational energy use are provided for the Project.

Petroleum Fuel

The gasoline and diesel fuel associated with on-road vehicular trips is calculated based on total VMT calculated for the analyses within **Section 4.2: Air Quality**, and **Section 4.6: Greenhouse Gas Emissions**, and average fuel efficiency from the EMFAC model. The EMFAC fuel efficiency data incorporates the Pavley Clean Car Standards and the Advanced Clean Cars Program[3]. As summarized in **Table 4.4-2: Project Annual Energy Use During Operations**, the total gasoline and diesel fuel associated with on-road trips would be approximately 195,048 gallons per year and 32,763 gallons per year, respectively.

Electricity

The electricity use during Project operations is based on CalEEMod defaults. As summarized in **Table 4.4-2**, the mid-rise apartment land use along with the digital display and parking lot would use approximately 1.90 GWh of electricity per year. It should be noted that the electricity consumption identified in the table conservatively does not include reductions associated with compliance with the latest building code. Under the standards in the 2019 Title 24 building code nonresidential buildings would use about 30 percent less energy than buildings under the 2016 standards.

The electricity associated with operational water use is estimated based on the annual water use and the energy intensity factor is the CalEEMod default energy intensity per gallon of water for Los Angeles County. Project area water use is based on the CalEEMod default rates. The Project would use approximately 28 million gallons annually of water annually which would require approximately 0.13 GWh per year for conveyance and treatment.

Natural Gas

The methodology used to calculate the natural gas use associated with the Project is based on CalEEMod default rates. The building envelope would use 3,012,610 thousand British Thermal Units (kBTU), or approximately 30,126 therms of natural gas per year (**Table 4.4-2**).

Operational Energy Use Analysis

Annual Project operations would use approximately 1.90 GWh of electricity, 30,126 therms of natural gas, 195,408 gallons of gasoline, and 32,763 gallons of diesel.

Californians used 284,436 GWh of electricity in 2018, of which Los Angeles County used 68,486 GWh. The Project's operational electricity use would represent $0.47x10^{-3}$ percent of electricity used in the state, and $0.2x10^{-2}$ percent of the energy use in Los Angeles County. The Project's estimated electricity consumption conservatively does not include reductions associated with compliance with the 2019 Title 24 building

[3] The CARB EMFAC 2017 Technical Documentation from March 2018 notes that emissions are estimated with all current controls active, except Low Carbon Fuel Standards (LCFS). The reason for excluding LCFS is that most of the emissions benefits due to the LCFS come from the production cycle (upstream emissions) of the fuel rather than the combustion cycle (tailpipe). As a result, LCFS is assumed to not have a significant impact on CO2 emissions from EMFAC's tailpipe emission estimates.

code, which requires homes to use 53 percent less energy and nonresidential buildings to use 30 percent less energy than buildings under the 2016 standards. Regarding natural gas, Californians used 12.67 billion therms of natural gas and 2.92 billion therms of natural gas in Los Angeles County in 2019. Therefore, the Project's operational natural gas use would represent less than $0.2x10^{-3}$ percent of the natural gas use in the state and $0.1x10^{-2}$ percent of the natural gas use in the County.

Table 4.4-2: Project Annual Energy Use During Operations

Project Source	Annual Operational Energy	Los Angeles County Annual Energy	Percentage Increase Countywide
Electricity Use	**GWh**		
Area[1]	1.22	68,486	0.0018 %
Water[1]	0.13		0.0002 %
Digital Billboard[2]	0.55		0.0008 %
Total Electricity	*1.90*		*0.0028 %*
Natural Gas Use	**Therms**		
Area[1]	30,126	2,921,446,642	0.0010 %
Diesel Use	**Gallons**		
Mobile[3]	32,763	643,495,000	0.0051 %
Gasoline Use	**Gallons**		
Mobile[3]	195,408	3,975,477,800	0.0049 %

[1] The electricity, natural gas, and water usage are based on Project-specific estimates and CalEEMod defaults.
[2] SNA Displays, the billboard provider, has estimated hourly energy demand to be 63 kWh.
[3] Calculated based on the mobile source fuel use based on VMT and fleet-average fuel consumption MPG from EMFAC.
Source: See energy calculations in **Appendix 9.5: Energy Data.**

In 2021, Californians are anticipated to use approximately 14,045,354,075 gallons of gasoline and approximately 3,446,523,083 gallons of diesel fuel. Los Angeles County annual gasoline fuel use in 2021 is anticipated to be 3,975,477,800 gallons and diesel fuel is anticipated to be 643,495,000 gallons. Expected Project operational use of gasoline and diesel would represent 0.0013 percent of current gasoline use and less than 0.0014 percent of current diesel use in the state. Project operational use of gasoline and diesel would represent 0.0049 percent of gasoline use and 0.0051 percent of diesel use in the County.

None of the Project energy uses exceed one percent of their corresponding County use. Project operations would not substantially affect existing energy or fuel supplies or resources. The Project would comply with applicable energy standards and new capacity would not be required. Impacts would be less than significant.

Energy Efficiency Measures

The Project would be required to adhere to all federal, state, and Local requirements for energy efficiency, including the latest Title 24 standards. Considering these requirements and design features, the Project would not result in the inefficient, wasteful, or unnecessary use of building energy. Therefore, potential impacts are considered less than significant.

MITIGATION MEASURES

No mitigation is required.

Impact 4.4-2: Conflict with or obstruct state or local plan for renewable energy or energy efficiency?

Level of Significance: Less Than Significant Impact

CONSTRUCTION AND OPERATIONS

Project design and operation would comply with State Building Energy Efficiency Standards, appliance efficiency regulations, and green building standards. As discussed in Impact 4.4-1, Project development would not cause inefficient, wasteful or unnecessary energy use, and impacts would be less than significant.

Regional Plans

As discussed in **Section 4.6: Greenhouse Gas Emissions**, the Project would be consistent with the primary goals and strategies in the City of Gardena CAP, which maintains the Energy Efficiency Climate Action Plan (EECAP) previously adopted by the City of Gardena. The Project is consistent with the CAP's primary strategies that are related to land use development, including land use and transportation, energy efficiency, solid waste, and urban greening. The Project would be constructed to meet the strict standards of California Building Standards Code Title 24 and make use of renewable energy through a solar pool heater, which are consistent with the CAP and EECAP's efficiency measures.

Additionally, the Project is consistent and would comply with various applicable statewide regulatory programs designed to reduce energy consumption and greenhouse gas emissions consistent with AB 32 and SB 32. The energy efficient programs include California Title 20 (Appliance Efficiency Regulations), Title 24 Part 6 (Building Energy Efficiency Standards) and Part 11 (Green Building Standards Code), California Renewable Portfolio Standards, the California Cap-and-Trade Program, Executive Order B-29-15 (statewide 25 percent reduction in potable urban water), Senate Bill X7-7 (water use efficiency). Therefore, the Project is consistent with AB 32, which aims to decrease emissions statewide to 1990 levels by 2020, and SB 32 which requires the state to cut GHG emissions to 40 percent below 1990 levels by 2030. The Project would not conflict with the City of Gardena CAP, EECAP, and CARB Scoping Plan. Impacts are considered less than significant.

SCAG's 2020-2045 RTP/SCS, adopted on September 3, 2020, integrates transportation, land use and housing to meet GHG reduction targets set by CARB. The document establishes GHG emissions goals for automobiles and light-duty trucks, as well as an overall GHG target for the Project region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of SB 375. Increasing residential land uses near major employment centers is a key strategy to reducing regional VMT. Therefore, in addition to generating a net reduction in GHG emissions, the Project would be consistent with regional goals to reduce potential future trips and VMT. The Project would not conflict with the stated goals of 2020-2045 RTP/SCS. Therefore, the Project would not result in wasteful, inefficient, or unnecessary use of transportation fuel. Potential impacts are considered less than significant without mitigation.

MITIGATION MEASURES

No mitigation is required.

4.4.5 CUMULATIVE IMPACTS

For purposes of the energy analysis, cumulative impacts are considered for cumulative development within Gardena and Hawthorne, according to the related projects; see **Table 3-1: List of Cumulative Projects**.

As concluded previously, construction and operation associated with implementation of the Project would result in the consumption of fuel and energy, but it would not do so in a wasteful manner. The consumption of fuel and energy would not be substantial in comparison to statewide electricity, natural gas/propane, gasoline, and diesel demand; see **Table 4.4-1** and **Table 4.4-2**. New capacity or supplies of energy resources would not be required. Additionally, the Project would be subject to compliance with all federal, state, and local requirements for energy efficiency, and would not conflict with or obstruct state or local plan for renewable energy or energy efficiency.

Project impacts, in conjunction with cumulative development in the site vicinity, would increase urbanization and result in increased energy consumption. Potential land use impacts are site-specific and require evaluation on a case-by-case basis. Each cumulative project would require separate discretionary approval and CEQA assessment, which would address potential energy consumption impacts and identify necessary mitigation measures, where appropriate.

As concluded previously, the Project would not result in significant energy consumption impacts. The Project would not be considered inefficient, wasteful, or unnecessary with regard to energy. Thus, the Project and identified cumulative projects would not result in a significant cumulative impact.

4.4.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts to energy have been identified.

4.4.7 REFERENCES

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4.5 GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES

4.5 GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES

The purpose of this section is to describe the existing regulatory and environmental conditions related to paleontological resources, identify potential impacts that could result from Project implementation, and as necessary, recommend mitigation to avoid or reduce the significance of impacts. Information in this section is based primarily on the *Paleontological Resources Assessment for the 12850 and 12900 Crenshaw Boulevard Project,* prepared by SWCA (2020). The report is summarized in this EIR section and provided in **Appendix 9.6: Paleontological Resources Data**.

Kimley-Horn conducted a third-party review of the Project's paleontological resources analysis on behalf of the City; see **Appendix 9.6**. The third-party review concluded the analysis meets the applicable provisions of CEQA and the State CEQA Guidelines.

The Project's potential impacts concerning geology and soils are addressed in **Section 7.0: Effects Found Not to be Significant**.

4.5.1 AFFECTED ENVIRONMENT

GEOLOGICAL SETTING

The Project site is located in the Los Angeles Basin, a structural depression approximately 50.0 miles long and 20.0 miles wide in the northernmost Peninsular Ranges Geomorphic Province. The Los Angeles Basin developed as a result of tectonic forces and the San Andreas fault zone, with subsidence occurring 18 to 3 million years ago (MYA). While sediments dating back to the Cretaceous (66 MYA) are preserved in the basin, continuous sedimentation began in the middle Miocene (around 13 MYA). Since that time, sediments have been eroded into the basin from the surrounding highlands, resulting in thousands of feet of accumulation. Most of these sediments were marine, until sea level dropped in the Pleistocene, and began depositing of the alluvial sediments that compose the uppermost units in the Los Angeles Basin.

The Los Angeles Basin is subdivided into four structural blocks, with the Project site in the westernmost edge of the Central Block, where sediments range from 32,000 to 35,000 feet in depth. The Central Block is wedge-shaped, extending from the Santa Monica Mountains to the northwest, where it is about 10.0 miles wide, to the San Joaquin Hills to the southeast, where it widens to around 20.0 miles wide.

The area's geology is composed of elevated and dissected alluvial sediments that date from the early Holocene to late Pleistocene (Qae) at the surface, which transitions to older alluvium (Qoa) that dates to the late Pleistocene approximately 0.31 mile east of the Project site, near the West El Segundo Boulevard at Purche Avenue intersection. These units are very similar in their lithology, with both consisting of gravel, sand, and clay. While the elevated alluvial sediments (Qae) at the Project site's surface are slightly younger than the subsurficial older alluvium (Qoa), both are of an age to preserve fossil resources, which the Society of Vertebrate Paleontology (SVP) defines as being over 5,000 years in age, or middle Holocene. The site's geotechnical study confirmed the presence of alluvial sediments underlying artificial fill at a maximum depth of 3.0 feet.

Ice Age sediments such as these have a rich fossil history in Southern California, including the Los Angeles Basin. The most common Pleistocene terrestrial mammal fossils include the bones of mammoth, bison,

deer, and small mammals, but other taxa, including horse, lion, cheetah, wolf, camel, antelope, peccary, mastodon, capybara, and giant ground sloth, have been reported, as well as reptiles such as frogs, salamanders, and snakes. In addition to illuminating the differences between Southern California in the Pleistocene and today, this abundant fossil record has been vital in studies of extinction, ecology, and climate change. There are numerous fossil localities in Pleistocene-aged alluvium throughout the Los Angeles Basin, the closest of which is approximately 1.2 miles southwest of the Project site. Therefore, these sediments are assigned high paleontological potential.

4.5.2 REGULATORY FRAMEWORK

FEDERAL

Paleontological Resources Preservation Act

The federal Paleontological Resources Preservation Act of 2002 codified the generally accepted practice of limiting collection of vertebrate fossils and other rare and scientifically significant fossils on public (federal) land. As the Project area is not located on federal lands, the provisions of this Act are not applicable to the Project, unless a federal agency is determined to control a portion of a project site.

STATE

Public Resources Code §5097.5

Requirements for paleontological resource management are included in the Public Resources Code (PRC) Division 5, Chapter 1.7, §5097.5, and Division 20, Chapter 3, §30244, which states:

> *"No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor."*

These statutes prohibit the removal, without permission, of any paleontological site or feature from lands under the jurisdiction of the state or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, local agencies are required to comply with PRC §5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others. PRC §5097.5 also establishes the removal of paleontological resources as a misdemeanor and requires reasonable mitigation of adverse impacts to paleontological resources from developments on public (state, county, city, and district) lands.

4.5.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning geology, soils, and paleontological resources. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, the Project may create a significant environmental impact if it would:

- 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? See Division of Mines and Geology Special Publication 42.

  ii) Strong seismic ground shaking.

  iii) Seismic-related ground failure, including liquefaction.

  iv) Landslides

  (see **Section 7.0: Effects Found Not to be Significant**)

- Result in substantial soil erosion or the loss of topsoil (see **Section 7.0**).
- 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 (see **Section 7.0**).
- 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 (see **Section 7.0**).
- Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater (see **Section 7.0**).
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature (see Impact 4.5-1).

4.5.4 IMPACTS AND MITIGATION MEASURES

Impact 4.5-1:	Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
Level of Significance: Less Than Significant Impact With Mitigation Incorporated	

CONSTRUCTION AND OPERATIONS

Project implementation includes the demolition of the existing onsite building and pavement and the construction a new residential building. The Project would require subsurface ground disturbance. Project construction is anticipated to require the following excavation:

- The internal ramp and parking are assumed in this EIR to require excavation to approximately 8.0 feet below the current grade in an area that measures approximately 112 by 42 feet.
- Three elevator shafts are anticipated to require excavation to approximately 5.0 feet below current grade, each shaft would be approximately six feet by six feet in area.
- Removal and recompaction of the existing artificial fill, which is estimated at three feet below grade.

As discussed previously, the Project site's surface area consists of elevated alluvial sediments dating from the early Holocene to the late Pleistocene, which are of an age to preserve fossil resources and have high paleontological potential. Other geologic formations that crop out near the Project site and are likely present in the site's subsurface at an undetermined depth include older alluvial deposits from the late Pleistocene, which also has high paleontological potential. No previously recorded fossil localities were identified at the Project site or surrounding area by the Natural History Museum of Los Angeles County records search. However, the Natural History Museum of Los Angeles County has records of numerous fossil localities from the same geologic units in the area.

Should fossil resources be present in the Project site's subsurface, ground-disturbing activities associated with excavations could directly or indirectly destroy a unique paleontological resource. To address potential impacts to paleontological resources that may be discovered during ground-disturbing activities, the City would impose Mitigation Measure (MM) GEO-1, which pertains to retaining a Project Paleontologist and preparation of a monitoring plan; MM GEO-2, which pertains to paleontological resources monitoring, and MM GEO-3, which details the appropriate steps should paleontological resources be encountered during ground-disturbing activities. Following compliance with the City's MMs, the Project would not destroy a unique paleontological resource or site or unique geologic feature. Therefore, impacts would be less than significant with mitigation incorporated.

PL1. Prior to commencement of ground-disturbing activities a qualified vertebrate paleontologist (as defined by the Society for Vertebrate Paleontology) shall develop Worker Awareness and Environmental Program (WEAP) Training for construction personnel. This training shall be presented to construction personnel and include what fossil remains may be found within the Project area and policies and procedures that must be followed in case of a discovery. Verification of the WEAP Training shall be provided to the Gardena Community Development Department.

Paleontological resources monitoring by a qualified vertebrate paleontologist (as defined by the Society for Vertebrate Paleontology) shall be required during ground disturbances greater than 5.0 feet below the historic surface elevation in native sediments. Auguring, potholing, and pile driving activities do not need to be monitored as these activities are unlikely to produce significant fossil because information about formation, depth, or context is impossible to discern. Should similar activities be planned, the qualified paleontologist shall be consulted prior to commencement so they may determine if that activity requires monitoring.

PL2. If fossils or fossil bearing deposits are encountered during ground-disturbing activities, work within a 25-foot radius of the find shall halt and a professional vertebrate paleontologist (as defined by the Society for Vertebrate Paleontology) shall be contacted immediately to evaluate the find. The paleontologist shall have the authority to stop or divert construction, as necessary. Documentation and treatment of the discovery shall occur in accordance with Society of Vertebrate Paleontology standards. The significance of the find shall be evaluated pursuant to the State CEQA Guidelines. If the discovery proves to be significant, before construction activities resume at the location of the find, additional work such as data recovery excavation may be warranted, as deemed necessary by the paleontologist.

MITIGATION MEASURES

MM GEO-1: **Retain a Project Paleontologist and Prepare a Monitoring Plan:** A Project Paleontologist shall prepare a Paleontological Resources Monitoring and Mitigation Plan (PRMMP). A Project Paleontologist is defined as one who meets the Society of Vertebrate Paleontology (SVP) standards for a Qualified Professional Paleontologist. The PRMMP shall conform to SVP standards and address the specifics of monitoring and procedures to follow in the event of a fossil discovery. The PRMMP shall include a repository agreement with an accredited paleontological repository, such as the Natural History Museum of Los Angeles County. The PRRMP shall also include a Worker's Environmental Awareness Program that shall describe the legal requirements for preserving fossil resources, procedures to follow in the event of a fossil discovery, and other relevant sections of the PRMMP. This training program shall be given to the crew before ground-disturbing work commences and shall include handouts to be given to new workers.

MM GEO-2: **Monitor for Paleontological Resources:** Monitoring shall be conducted by a Paleontological Monitor, defined as one who meets the SVP standards for a Paleontological Resource Monitor. The Paleontological Monitor shall be under the supervision of the Project Paleontologist. As defined in the PRMMP, Paleontological monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments that occur in previously undisturbed sediment, which has been estimated as any portion of the Project site where excavation exceeds 0.9 m (3.0 feet) in depth. The frequency of monitoring shall be based on consultation with or periodic inspection by the Project Paleontologist, and shall depend on the rate of excavation and grading activities and the materials being excavated.

MM GEO-3: **Evaluate and Treat Fossil Discoveries:** In the event of a fossil discovery work shall cease in a 15-m (50-foot) radius of the find while the Project Paleontologist assesses the significance of the fossil and documents its discovery. Work outside this radius may continue. Should the fossil be determined significant, it shall be salvaged following the procedures and guidelines of the SVP and recommendations of the Project Paleontologist. Recovered fossils shall be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and reposited with the paleontological curation facility identified in the PRMMP. The Project Paleontologist shall prepare a report of the monitoring work and any findings after construction is completed.

4.5.5 CUMULATIVE IMPACTS

For purposes of the paleontological resource impact analysis, cumulative impacts are considered for cumulative development within Gardena and Hawthorne, according to the related projects; see **Table 3-1: List of Cumulative Projects**.

As concluded above, should fossil resources be present in the Project site's subsurface, ground-disturbing activities associated with excavations could directly or indirectly destroy a unique paleontological resource. With implementation of the MMs, the Project's potential impacts to paleontological resources would be reduced to less than significant. Cumulative projects could involve excavations that destroy known or as-yet undiscovered paleontological resources specific to those development sites. However, as

with the Project, cumulative development would undergo environmental and design review on a project-by-project basis pursuant to CEQA to evaluate potential impacts to paleontological resources. All development would be subject to compliance with the established federal, state, and local regulatory framework concerning protection of paleontological resources on a project-by-project basis. Where significant or potentially significant impacts are identified, implementation of all feasible site-specific mitigation would be required to avoid or reduce impacts. The Project's cumulative impacts to paleontological resources would be less than significant given compliance with the established regulatory framework and site-specific MM requirements.

4.5.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts to paleontological resources have been identified.

4.5.7 REFERENCES

SWCA. (2020). *Paleontological Resources Assessment for the 12850 and 12900 Crenshaw Boulevard Project, Gardena, California*. Pasadena, CA.



4.6 GREENHOUSE GAS EMISSIONS

4.6 GREENHOUSE GAS EMISSIONS

The purpose of this section is to describe the existing regulatory and environmental conditions related to greenhouse gas (GHG) emissions, identify potential impacts that could result from Project implementation, and as necessary, recommend mitigation to avoid or reduce the significance of impacts.

Information in this section is based primarily on the *Greenhouse Gas Technical Report* (Ramboll US Corporation, 2020), which includes the GHG emissions calculations for model outputs; see **Appendix 9.7: Greenhouse Gas Emissions Data.** Additional resource information was obtained from available public resources, including among others, the Southern California Association of Governments (SCAG) Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) and the City of Gardena's Climate Action Plan (CAP).

Kimley-Horn conducted a third-party review of the Project's greenhouse gas emissions analysis on behalf of the City; see **Appendix 9.7**. The third-party review concluded the analysis meets the applicable provisions of CEQA and the State CEQA Guidelines.

4.6.1 AFFECTED ENVIRONMENT

REGIONAL SETTING

Certain gases in the earth's atmosphere classified as GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

Carbon Cycle and Greenhouse Effect

The global carbon cycle is comprised of large carbon flows to and from various reservoirs (e.g., atmosphere, ocean, and biomass). Billions of tons of carbon are absorbed by oceans and living biomass (i.e., sinks) and are emitted to the atmosphere annually through natural processes (i.e., sources). When in equilibrium, carbon fluxes (i.e., the net exchange) among these various reservoirs are roughly balanced.

When solar radiation extends to the earth's surface, it can either be reflected back into space or absorbed by earth. Once absorbed, the planet releases some of the energy back into the atmosphere in the form of longwave infrared radiation (i.e., heat). GHGs absorb energy, slowing or preventing the loss of heat to space. In this way, GHGs act like a blanket, making earth warmer than it would otherwise be. This process is commonly known as the "greenhouse effect."[1] Through man-made activities such as fossil fuel

[1] U.S. Environmental Protection Agency (U.S. EPA). 2017. *Causes of Climate Change*. Retrieved from https://archive.epa.gov/epa/climate-change-science/causes-climate-change.html#Greenhouse (accessed November 2020).

combustion and other industrial processes, the increase in GHG emissions is outpacing the natural carbon sources and sinks, increasing the planet's greenhouse effect, and effectively disrupting this balance.

Greenhouse Gas Emissions and Global Warming Potential

GHGs trap heat in the atmosphere. GHGs are emitted by natural processes and human activities. GHG accumulation in the atmosphere regulates the earth's temperature. The seven major GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons (HFCs), perfluorocarbon (PFCs), and water vapor.

The most abundant GHGs are water vapor and CO_2.[2] Many other trace gases have greater ability to absorb and re-radiate longwave radiation; however, these gases are not as plentiful. For this reason, and to gauge the potency of GHGs, scientists have established a Global Warming Potential (GWP) for each GHG based on its ability to absorb and re-radiate longwave radiation.

The GWP is a dimensionless metric that determines the relative ability of any gas to trap heat in the atmosphere and propagate the greenhouse effect. It quantifies the climate change impact of emitting 1 kilogram (kg) of a GHG, normalized by the impact of emitting 1 kg of CO_2 for a specific timeframe (e.g., 20 years, 100 years, 500 years). This time dependence is set to reflect the different values of atmospheric persistence based on each GHG's chemistry and structure. GWP values from the Intergovernmental Panel on Climate Change's (IPCC) Fourth Assessment Report (AR4) on a 100-year timeframe are provided in **Table 4.6-1: Second Assessment Report GWP Values (100-Year Time Horizon)**.

Table 4.6-1: Second Assessment Report GWP Values (100-Year Time Horizon)

Gas Name	Formula	GWP (CO_2e)
Carbon Dioxide	CO_2	1
Methane	CH_4	25
Nitrous Oxide	N_2O	298
HFC-23	CHF_3	14,800
Sulfur Hexafluoride	SF_6	22,800

CO_2e = carbon dioxide equivalent
Source: Intergovernmental Panel on Climate Change, *Fifth Assessment Report*, 2014.

The GHGs that would be normally associated with the Project are the following:[3]

- **Carbon Dioxide (CO_2)** is primarily generated by fossil fuel combustion in stationary and mobile sources. Due to the emergence of industrial facilities and mobile sources in the past 250 years, CO_2 emissions from fossil fuel combustion increased by 7.4 percent between 1990 and 2014.[4] CO_2 is the most widely emitted GHG and is the reference gas (GWP of 1) for determining the GWP for other GHGs.

2 U.S. EPA, Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2014 (accessed April 15, 2016).
3 All Global Warming Potentials (GWP) are given as 100-year GWP. Unless noted otherwise, all GWPs were obtained from the Intergovernmental Panel on Climate Change. (Intergovernmental Panel on Climate Change, Climate Change, Climate Change 2007: Synthesis Report. Contribution of Working Groups I, II and III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change, 2007).
4 U.S. EPA, Inventory of United States GHG Emissions and Sinks 1990 to 2014 (accessed April 15, 2016).

- **Methane (CH_4)** is emitted from biogenic sources, incomplete combustion in forest fires, landfills and manure management, and leaks in natural gas pipelines. The United States' top three CH_4 sources are landfills, natural gas systems, and enteric fermentation. CH_4 is the primary component of natural gas, used for space and water heating, steam production, and power generation. The GWP of CH_4 is 25.
- **Nitrous Oxide (N_2O)** is produced by natural and human-related sources. Primary human-related sources include agricultural soil management, animal manure management, sewage treatment, mobile and stationary fossil fuel combustion, adipic acid production, and nitric acid production. The GWP of N_2O is 298.
- **Hydrofluorocarbons (HFCs)** are typically used as refrigerants for stationary refrigeration and mobile air conditioning. Hydrofluorocarbon use for cooling and foam blowing (insulation) is increasing as the continued phase-out of chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs) gains momentum. The 100-year GWP of HFCs range from 12 for HFC-161 to 14,800 for HFC-23.[5]
- **Perfluorocarbons (PFCs)** are compounds consisting of carbon and fluorine that are primarily created as a byproduct during aluminum production and semiconductor manufacturing. Perfluorocarbons are potent GHGs with a GWP several thousand times that of CO_2, depending on the specific PFC. Another concern regarding PFCs is their long atmospheric lifetime (up to 50,000 years).[6] The GWP of PFCs range from 7,390 to 12,200.[7]
- **Sulfur hexafluoride (SF_6)** is a colorless, odorless, nontoxic, nonflammable gas. Sulfur hexafluoride is the most potent GHG that the IPCC has evaluated with a GWP of 22,800.[8]
- **Water Vapor (H_2O)**, although it has not historically received the scrutiny of other GHGs, it is the primary contributor to the greenhouse effect. Natural processes, such as evaporation from oceans and rivers, and transpiration from plants, contribute 90 percent and 10 percent of the H_2O in our atmosphere, respectively. The primary human-related source of H_2O is fuel combustion in motor vehicles; however, it does not contribute a significant amount (less than one percent) to atmospheric H_2O concentrations. The IPCC has not determined a GWP for H_2O.

In addition to the six major GHGs discussed above (excluding water vapor), many other compounds could potentially contribute to the greenhouse effect. Some of these substances have been identified as stratospheric ozone (O_3) depletors, and they are gradually being phased-out. These compounds are listed below.

- **Hydrochlorofluorocarbons (HCFCs)** are solvents, similar in use and chemical composition to CFCs. The main uses of HCFCs are for refrigerant products and air conditioning systems. As part of the Montreal Protocol, all developed countries that adhere to the Montreal Protocol are subject to a HCFC consumption cap and gradual phase-out. The United States is scheduled to achieve a 100

5 Ibid.
6 U.S. EPA. 2020. Overview of Greenhouse Gases. Retrieved from https://www.epa.gov/ghgemissions/overview-greenhouse-gases (accessed November 2020).
7 Ibid.
8 Ibid.

percent reduction to the cap by 2030. The 100-year GWPs of HCFCs range from 90 for HCFC-123 to 1,800 for HCFC-142b.

- **1,1,1 trichloroethane** or methyl chloroform ($C_2H_3Cl_3$) is a solvent and degreasing agent commonly used by manufacturers. The GWP of $C_2H_3Cl_3$ is 146.
- **Chlorofluorocarbons (CFCs)** are used as refrigerants, cleaning solvents, and aerosols spray propellants. CFCs were also part of the U.S. EPA Final Rule (57 FR 3374) for phasing-out O_3 depleting substances. Currently, CFCs have been replaced by HFCs in cooling systems and a variety of alternatives for cleaning solvents. Nevertheless, CFCs remain suspended in the atmosphere contributing to the greenhouse effect. CFCs are potent GHGs with 100-year GWPs ranging from 3,800 for CFC 11 to 14,400 for CFC 13.

To better understand the Project's anticipated emissions, it is useful to understand the extent of statewide GHG emissions as reflected in the California GHG emission inventory data for years 2010 through 2016, which is the most current data available. The emissions are presented according to inventory category (as defined in the Assembly Bill [AB] 32 Scoping Plan); see **Table 4.6-2: California GHG Emissions Inventory**.

Table 4.6-2: California GHG Emissions Inventory (Million Metric Tons Of CO_2e)

Category	2010	2011	2012	2013	2014	2015	2016
Transportation	165.07	161.51	161.22	160.90	162.28	166.14	169.38
Industrial	91.50	90.94	91.07	93.73	93.96	91.58	89.61
Electric Power	90.34	88.06	95.09	89.65	88.24	83.67	68.58
Commercial and Residential	45.05	45.50	42.89	43.54	37.37	37.94	39.36
Agriculture	34.27	34.89	36.08	34.61	35.95	34.41	33.84
High GWP	13.52	14.54	15.54	16.65	17.70	18.93	19.78
Recycling and Waste	8.37	8.47	8.49	8.52	8.59	8.73	8.81
Total	**448.11**	**443.91**	**450.38**	**447.59**	**444.10**	**441.40**	**429.35**

Notes: Gases with high GWPs include fluorinated gases and include HFCs, PFCs, SF6, and nitrogen trifluoride (NF3). High GWP gas emissions occur from substitutes for ozone-depleting substances (ODS) use in the refrigeration, air conditioning, and heat pump systems; losses from the electricity transmission and distribution system from electrical gas (insulated switchgears); and gases that are emitted in the semiconductor manufacturing process.

Source: California Air Resources Board, California Greenhouse Gas Emission Inventory–2018 Edition, arb.ca.gov/cc/inventory/data/data.htm, July 11, 2018.

4.6.2 REGULATORY FRAMEWORK

STATE

California Air Resources Board

California Air Resources Board (CARB), a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, CARB conducts research, sets state ambient air quality standards (California Ambient Air Quality Standards [CAAQS]), compiles emission inventories, develops

suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

In 2004, CARB adopted an Airborne Toxic Control Measure (ATCM) to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other toxic air contaminants (Title 13 California Code of Regulations [CCR], §2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure generally does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given location with certain exemptions for equipment in which idling is a necessary function such as concrete trucks. While this measure primarily targets diesel particulate matter emissions, it has co-benefits of minimizing GHG emissions from unnecessary truck idling.

On July 26, 2007, CARB adopted emission standards for off-road diesel construction equipment of greater than 25 horsepower such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. This regulation aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models. Additionally, in 2008, CARB approved the Truck and Bus regulation to reduce particulate matter and nitrogen oxide emissions from existing diesel vehicles operating in California (13 CCR, §2025, subsection (h)). In April 2014, amendments to the Truck and Bus Regulation were approved by CARB to help ensure that the air quality benefits originally envisioned by the regulation would be achieved, by providing some additional compliance flexibility and options to vehicle owners (CARB, 2014). See Section 4.2, Air Quality (see specifically section 4.2.2), of this Draft EIR for additional details regarding these regulations. While these regulations primarily target reductions in criteria air pollutant emission, they have co-benefits of minimizing GHG emissions due to improved engine efficiencies.

Executive Order S-3-05

On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order S-3-05, which proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce snowpack in the Sierra Nevada Mountains; could further exacerbate California's air quality problems; and could potentially cause a rise in sea levels. In an effort to avoid or reduce the impacts of climate change, Executive Order S-3-05 calls for a reduction in GHG emissions to the year 2000 level by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. Executive Orders are binding on state agencies only.

Assembly Bill 32

In 2006, the California State Legislature adopted AB 32 32 (codified in the California Health and Safety Code [HSC], Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. HSC Division 25.5 defines GHGs as CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6 and represents the first enforceable statewide program to limit emissions of these GHGs from all major industries with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost-effective. Under HSC Division 25.5, CARB has the primary

responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing state actions that would achieve GHG emissions reductions equivalent to 1990 statewide levels by 2020.

2008 Climate Change Scoping Plan

A specific requirement of AB 32 was to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020 (HSC §38561 (h)). CARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap.[9] The initial scoping plan was approved in 2008, and contained a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission reduction programs calculated to meet the 2020 statewide GHG emission limit and initiate the transformations needed to achieve the State's long-range climate objectives.[10]

2014 Scoping Plan Update

The first update to the Scoping Plan was approved by CARB in May 2014 and built upon the initial Scoping Plan with new strategies and recommendations.[11] As required by HSC Division 25.5, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions limit for 2020. CARB also updated the State's projected 2020 emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions required by regulation that were recently adopted for motor vehicles and renewable energy.

Senate Bill 32

In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197, and both were signed by Governor Brown (Office of Governor Edmund G. Brown Jr., 2016). SB 32 and AB 197 amend HSC Division 25.5, establish a new GHG reduction target of 40 percent below 1990 levels by 2030, and include provisions to ensure the benefits of state climate policies reach into disadvantaged communities.

2017 Climate Change Scoping Plan

CARB adopted the 2017 Climate Change Scoping Plan in December 2017. The 2017 Scoping Plan outlines the strategies the State would implement to achieve the 2030 GHG reduction target of 40 percent below 1990 levels by 2030 established by SB 32. The 2017 Scoping Plan is also intended to "substantially advance" toward the Executive Order S-3-05 2050 climate goal to reduce GHG emissions by 80 percent below 1990 levels by 2050.

The 2017 Scoping Plan builds on the Cap-and-Trade Regulation, the Low Carbon Fuel Standard (LCFS), improved vehicle, truck and freight movement emissions standards, increasing renewable energy, and strategies to reduce methane emissions from agricultural and other wastes by using it to meet our energy needs. The 2017 Scoping Plan also comprehensively addresses GHG emissions from natural and working lands of California, including the agriculture and forestry sectors. The 2017 Scoping Plan considered a

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9 CARB. (2014). *First update to the Climate Change Scoping Plan*. page 93. Retrieved from https://ww2.arb.ca.gov/sites/default/files/classic//cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf (accessed November 2020).

10 Ibid.

11 Ibid., page 35.

number of different alternatives to achieve the 2030 GHG reduction goal. The "Scoping Plan Scenario" was ultimately adopted and relies on the continuation of ongoing and statutorily required programs and continuation of the Cap-and-Trade Program. The Scoping Plan Scenario was modified from the January 2017 Proposed Scoping Plan to reflect AB 398, including removal of the 20 percent GHG reduction measure for refineries.[12]

CARB states that the Scoping Plan Scenario "is the best choice to achieve the State's climate and clean air goals."[13] Under the Scoping Plan Scenario, the majority of the reductions would result from continuation of the Cap-and-Trade regulation. Additional reductions are achieved from electricity sector standards (i.e., utility providers to supply 50 percent renewable electricity by 2030), doubling the energy efficiency savings at end uses, additional reductions from the LCFS, implementing the short-lived climate pollutant strategy (e.g., hydrofluorocarbons), and implementing the mobile source strategy and sustainable freight action plan.

In the 2017 Climate Change Scoping Plan Update, CARB provides the estimated projected statewide 2030 emissions and the level of reductions necessary to achieve the 2030 target of 40 percent below 1990 levels. CARB's projected statewide 2030 emissions take into account 2020 GHG reduction policies and programs.

Cap-and-Trade Program

The Climate Change Scoping Plan identifies a Cap-and-Trade Program as a key strategy CARB would employ to help California meet its GHG reduction targets for 2020 and 2030, and ultimately achieve an 80 percent reduction from 1990 levels by 2050. Pursuant to its authority under HSC Division 25.5, CARB designed and adopted a California Cap-and-Trade Program to reduce GHG emissions from major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve the State's emission-reduction mandate of returning to 1990 levels of emissions by 2020 and 40 percent below 1990 levels by 2030 (17 CCR §§95800 to 96023). Under the Cap-and-Trade Program, an overall limit is established for GHG emissions from capped sectors (e.g., electricity generation, petroleum refining, cement production, and large industrial facilities that emit more than 25,000 metric tons CO_2e per year), caps decline over time, and facilities subject to the cap can trade permits to emit GHGs. The statewide cap for GHG emissions from the capped sectors commenced in 2013 and declines over time, achieving GHG emission reductions throughout the Program's duration (17 CCR §§95800 to 96023). On July 17, 2017 the California legislature passed AB 398, extending the Cap-and-Trade Program through 2030.

The Cap-and-Trade Regulation provides a firm cap, ensuring that the 2020 statewide emission limit would not be exceeded. An inherent feature of the Cap-and-Trade Program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on a statewide basis.

If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program would be responsible for relatively fewer emissions reductions. If California's direct

[12] CARB. (2017). *California's 2017 Climate Change Scoping Plan*. page 4. Retrieved from https://ww2.arb.ca.gov/sites/default/files/classic//cc/scopingplan/scoping_plan_2017.pdf (accessed November 2020).
[13] Ibid., page 22.

regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program would be responsible for relatively more emissions reductions. In other words, the Cap-and-Trade Program functions similarly to an insurance policy for meeting California's GHG emissions reduction mandates.

Transportation Sector

California AB 1493, enacted on July 22, 2002, required the CARB to develop and adopt regulations that reduce emissions from passenger vehicles and light duty trucks. The standards phased in during the 2009 through 2016 model years. The near term (2009–2012) standards were expected to result in about a 22 percent reduction compared with the 2002 fleet, and the mid-term (2013–2016) standards were expected to result in about a 30 percent reduction. Several technologies stand out as providing significant reductions in emissions at favorable costs. These include discrete variable valve lift or camless valve actuation to optimize valve operation rather than relying on fixed valve timing and lift as has historically been done; turbocharging to boost power and allow for engine downsizing; improved multi-speed transmissions; and improved air conditioning systems that operate optimally, leak less, and/or use an alternative refrigerant.

In January 2012, CARB approved the Advanced Clean Cars program, a new emissions-control program for model years 2015 through 2025. The program includes components to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars. The zero-emissions vehicle (ZEV) program would act as the focused technology of the Advanced Clean Cars program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid electric vehicles (PHEV) in the 2018 to 2025 model years.[14]

In May 2016, CARB released the updated Mobile Source Strategy that demonstrates how the State can simultaneously meet air quality standards, achieve GHG emission reduction targets, decrease health risk from transportation emissions, and reduce petroleum consumption over the next fifteen years, through a transition to zero-emission vehicles (ZEVs), cleaner transit systems and reduction of vehicle miles traveled (VMT). The Mobile Source Strategy calls for 1.5 million ZEVs (including plug-in hybrid electric, battery-electric, and hydrogen fuel cell vehicles) by 2025 and 4.2 million ZEVs by 2030. It also calls for more stringent GHG requirements for light-duty vehicles beyond 2025 as well as GHG reductions from medium-duty and heavy-duty vehicles and increased deployment of zero-emission trucks primarily for class 3 – 7 "last mile" delivery trucks in California. Statewide, the Mobile Source Strategy would result in a 45 percent reduction in GHG emissions, and a 50 percent reduction in the consumption of petroleum-based fuels.[15]

LCFS regulations were approved by CARB in 2009 and established a reduction in the carbon intensity of transportation fuels by 10 percent by 2020 with implementation beginning on January 1, 2011. In September 2015, CARB approved the re-adoption of the LCFS, which became effective on January 1, 2016. In 2018, CARB approved amendments to the carbon intensity benchmarks through 2030, consistent with SB 32.

[14] CARB. (2017). *California's 2017 Climate Change Scoping Plan*. page 25. Retrieved from https://ww2.arb.ca.gov/sites/default/files/classic//cc/scopingplan/scoping_plan_2017.pdf (accessed November 2020).

[15] CARB. (2016*). Mobile Source Strategy*. page 6. Retrieved from https://ww3.arb.ca.gov/planning/sip/2016sip/2016mobsrc.pdf (accessed November 2020).

Land Use and Transportation Planning

SB 375 (Chapter 728, Statutes of 2008), which establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions, was adopted by the State on September 30, 2008. Under SB 375, CARB is required, in consultation with the State's Metropolitan Planning Organizations (MPO), to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. In February 2011, CARB adopted the final GHG emissions reduction targets for the State's Metropolitan Planning Organizations, including SCAG, which is the MPO for the region in which the County of Los Angeles is located; CARB updated these targets in 2018.[16] Of note, the reduction targets explicitly exclude emission reductions expected from the AB 1493 and the low carbon fuel standard regulations.

SB 375 requires MPOs such as SCAG to incorporate a "sustainable communities strategy" in their RTPs that would achieve GHG emission reduction targets set by CARB. Certain transportation planning and programming activities would then need to be consistent with the 2020-2045 RTP/SCS; however, SB 375 expressly provides that the SCS does not regulate the use of land, and further provides that local land use plans and policies (e.g., general plan) are not required to be consistent with either the RTP or SCS.

Energy Sector

The CEC first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically (typically every three years) to allow for the consideration and inclusion of new energy efficiency technologies and methods.

Part 11 of the Title 24 Building Energy Efficiency Standards is referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality" (California Building Standards Commission, 2010). The CALGreen Code was updated in 2016 to include new mandatory measures for residential and nonresidential uses including energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The new measures took effect on January 1, 2017 (California Building Standards Commission, 2010). The CALGreen code was most recently updated in 2018, to go through final approval at the end of 2018, with new measures taking effect on January 1, 2020.

On April 12, 2011, Governor Jerry Brown signed SB X1-2 to increase California's Renewables Portfolio Standard to 33 percent by 2020. SB 350 (Chapter 547, Statues of 2015) further increased the Renewables

[16] CARB. (2018). *California's Sustainable Communities and Climate Protection Act*. page 29. Retrieved from https://ww2.arb.ca.gov/sites/default/files/2018-11/Final2018Report_SB150_112618_02_Report.pdf (accessed November 2020).

Portfolio Standard to 50 percent by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027.

On September 2018, Governor Jerry Brown signed SB 100, which is now known as the 100 Percent Clean Energy Act of 2018. The Act declares that CARB should plan for 100 percent total retail sales of electricity in California come from eligible renewable energy resources and zero-carbon resources by December 31, 2045. SB 100 also set interim goals, accelerating the Renewable Portfolio Standard (RPS), to 50 percent from renewable energy sources by 2026 and 60 percent by 2030.

Executive Order B-55-18

On September 10, 2018, Governor Brown signed EO B-55-18. This Executive Order sets a new statewide goal directs to achieve carbon neutrality no later than 2045 and achieve and maintain net negative emissions thereafter. This goal is in addition to existing statewide GHG reduction targets.

Senate Bill 1383

SB 1383 (Chapter 395, Statutes of 2016) creates goals for short-lived climate pollutant (SLCP) reductions in various industry sectors. The SLCPs included under this bill – including methane, fluorinated gases, and black carbon – are GHGs that are much more potent than carbon dioxide and can have detrimental effects on human health and climate change. SB 1383 requires the CARB to adopt a strategy to reduce methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030. The methane emission reduction goals include a 75 percent reduction in the level of statewide disposal of organic waste from 2014 levels by 2025. In 2017, CARB adopted a SLCP Reduction Strategy to implement SB 1383.[17]

REGIONAL

South Coast Air Quality Management District

The Project site is located in the South Coast Air Basin (Air Basin), which consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western, non-desert portions of San Bernardino and Riverside Counties, in addition to the San Gorgonio Pass area in Riverside County. The South Coast Air Quality Management District (SCAQMD) is responsible for air quality planning in the Air Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

SCAQMD CEQA Guidelines and Proposed GHG Thresholds

SCAQMD is principally responsible for comprehensive air pollution control in the Basin, which includes Los Angeles, Orange, and the urbanized portions of Riverside and San Bernardino Counties, including the Project site. SCAQMD works directly with SCAG, County transportation commissions, and local

[17] CARB. (2017). *California's 2017 Climate Change Scoping Plan*. page 90. Retrieved from https://ww2.arb.ca.gov/sites/default/files/classic//cc/scopingplan/scoping_plan_2017.pdf (accessed November 2020).

governments and cooperates actively with all federal and State government agencies to regulate air quality.

In April 2008, SCAQMD convened a Working Group to develop GHG significance thresholds. On December 5, 2008, the SCAQMD Governing Board adopted its staff proposal for an interim CEQA GHG significance threshold for projects where the SCAQMD is the lead agency. As to all other projects, where the SCAQMD is not the lead agency, the Board has, to date, only adopted an interim threshold of 10,000 $MTCO_2e$ per year for industrial stationary source projects.[18]

For all other projects, SCAQMD staff proposed a multiple tier analysis to determine the appropriate threshold to be used. The draft proposal suggests the following tiers: Tier 1 is any applicable CEQA exemptions, Tier 2 is consistency with a GHG reduction plan, Tier 3 is a screening value or bright line, Tier 4 is a performance-based standard, and Tier 5 is GHG mitigation offsets.[19]

According to the presentation given at the September 28, 2010 Working Group meeting, SCAQMD staff reviewed the tiered significance threshold approach.[20] The proposed tiers are as follows:

Tier 1: Determine if CEQA categorical exemptions are applicable. If not move to Tier 2;

Tier 2: Consider whether or not a proposed project is consistent with a locally adopted GHG reduction plan (often called a Climate Action Plan) that has gone through public hearings and CEQA review, which has an approved inventory that includes monitoring, etc. If not move to Tier 3;

Tier 3: For all land use types, if projects are less than 3,000 metric tons/year of CO_2e, the project is presumed to be less than significant for GHGs. If the project exceeds 3,000 metric tons of CO_2 equivalent per year ($MTCO_2e$/yr); move to Tier 4. More specific screening thresholds were also provided, which include 1,400 $MTCO_2e$/yr for commercial projects and 3,500 $MTCO_2e$/yr for residential projects. These thresholds were based on a review of the Office of Planning and Research database which included 711 CEQA projects using a 90 percent capture approach;

Tier 4: The proposed performance standards include three options:

1) Percent Emission Reduction Target (no further recommendation)
2) Early Implementation of Applicable AB 32 Scoping Plan Measures (incorporated into option 3)
3) SCAQMD Efficiency Target

For option 3, there are targets for 2020 and 2035. The proposed 2020 target is:

- 4.8 MT/year CO_2e per service population for project-level threshold (land use employment only)

[18] SCAQMD. (2008). *Board Meeting Date: December 5, 2008, Agenda No. 31, Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans for use by the AQMD*. Table 1. Retrieved from http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2http://www.aqmd.gov/hb/2008/December/081231a.htm (accessed Nov. 2020).

[19] Ibid., pages 5-8.

[20] SCAQMD. (2010). *CEQA Significance Thresholds Working Group Meeting #15*. September 28, 2010. Page 1. Retrieved from http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf?sfvrsn=2 (accessed November 2020).

- 6.6 MT/year CO_2e per service population for plan level threshold

The proposed 2035 target is:

- 3.0 MT/year CO_2e per service population for project-level threshold
- 4.1 MT/year CO_2e per service population for plan level threshold
- Incorporate Sustainable Communities and Climate Protection Act of 2008 or SB 375 regional targets.

Tier 5: Off-site mitigation for life of project (30 years), if this threshold is to be used, GHG emissions must be mitigated to less than the Tier 3 screening significance threshold. The SCAQMD clarified that offsets should have a 30-year project life, should be real, quantifiable, verifiable, and surplus and would be considered in the following prioritized manner:

- Project design feature/on-site reduction measures;
- Off-site within neighborhood;
- Off-site within district;
- Off-site within state;
- Off-site out of state; and
- Substitution allowed via enforceable commitment (e.g., when an offset project ends prematurely).

If the Project cannot meet any of the tiers, it is presumed to be significant for GHG emissions.

The Tier 4 percent emission reduction target is based on a percent reduction target that is based on consistency with AB 32. This is because the Tier 4 percent emission reduction target is based on the same numeric reductions calculated in the Scoping Plan to reach 1990 levels by 2020.

The Working Group has not convened since the fall of 2010. As of April 2020, the proposal has not been considered or approved for use by the SCAQMD Board. In the meantime, no GHG significance thresholds are approved for use in the Basin.

SCAG Connect SoCal: 2020-2045 RTP/SCS

As previously discussed, SB 375 requires SCAG to incorporate an SCS into its RTP that achieves the GHG emission reduction targets set by CARB. As required by SB 375, CARB adopted year 2020 and 2035 GHG reduction targets for each metropolitan region. The SB 375 targets for the Southern California region under SCAG's jurisdiction in 2020 and 2035 are reductions in per capita GHG emissions of 8 percent and 19 percent, respectively as compared to 2005.[21]

Pursuant to Government Code §65080(b)(2)(K), an SCS does not: (i) regulate the use of land; (ii) supersede the land use authority of cities and counties; or (iii) require that a city's or county's land use policies and regulations, including those in a general plan, be consistent with it.

[21] CARB. 2020 *SB 375 Regional Plan Climate Targets*. Available at: https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets (accessed April 2020).

SCAG adopted the 2020-2045 RTP/SCS on September 3, 2020.[22] This update to the 2016-2040 RTP/SCS is also expected to meet the state's goal of 19 percent reductions per capital transportation emissions in 2035 as compared to 2005. Additionally, it calls for reducing VMT per capita by five percent and Vehicle Hours Traveled (VHT) per capita by nine percent (for automobiles and light/medium duty trucks).

LOCAL

City of Gardena Climate Action Plan

The City of Gardena's CAP was adopted in December 2017 as a joint effort between the City of Gardena and the South Bay Cities Council of Governments. The CAP was developed as a guide to reduce GHG emissions by identifying strategies at the local level to help the State meet long-term GHG emission reduction goals. These strategies are separated into five main categories including Land Use and Transportation, Energy Efficiency, Energy Generation, Solid Waste, and Urban Greening.

4.6.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, *Environmental Checklist Form*, includes questions concerning GHGs. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, the Project would have a significant environmental impact if it would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment (see Impact 4.6-1)
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs (see Impact 4.6-2)

The amendments to State CEQA Guidelines §15064.4(b) that resulted from SB 97 indicate that a lead agency should consider the following factors when assessing the significance of impacts from GHG emissions on the environment:

- The extent to which the Project may increase or reduce GHG emissions as compared to the existing environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the Project.
- The extent to which the Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

4.6.4 METHODOLOGY AND ASSUMPTIONS

This section describes the methods used to develop the GHG emissions inventories associated with the Project, which include construction emissions and operational emissions. Sub-categories of GHG operational emissions include: vegetation change, area sources, energy use, water and wastewater, solid waste, and mobile sources. These emissions are compared to applicable statewide and local regulatory programs designed to reduce GHG emissions consistent with AB 32. Legislation and rules regarding climate change, as well as the scientific understanding of the extent to which different activities emit

[22] SCAG. 2020. Connect SoCal. Available at: https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx (accessed May 2020).

GHGs, continue to evolve; as such, the inventories in this report reflect the guidance and knowledge currently available.

UNITS OF MEASUREMENT: METRIC TONS OF CO_2 AND CO_2E

The term "GHGs" includes gases that contribute to the natural greenhouse effect, such as CO_2, CH_4, N_2O, and water, as well as gases that are only man-made and that are emitted through the use of modern industrial products, such as HFCs and CFCs. The most important GHG in human-induced global warming is CO_2. While many gases have much higher GWPs than CO_2, CO_2 is emitted in such vastly higher quantities that it accounts for 81.6 percent of the GWP of all GHGs emitted by the United States.[23]

The effect each of these gases has on global warming is a combination of the volume of their emissions and their GWP. GWP indicates, on a pound for pound basis, how much a gas would contribute to global warming relative to how much warming would be caused by the same mass of CO_2. CH_4 and N_2O are substantially more potent than CO_2, with GWPs of 25 and 298, respectively. GHG emissions are typically measured in terms of mass of CO_2e. CO_2e are calculated as the product of the mass of a given GHG and its specific GWP.[24]

Emissions are presented in units of CO_2e either because the GWPs of CH_4 and N_2O were accounted for explicitly, or the CH_4 and N_2O are assumed to contribute a negligible amount of GWP when compared to the CO_2 emissions from that particular emissions category.

Emissions are also presented as metric tons (1,000 kilograms). Additionally, exact totals presented in all tables and report sections may not equal the sum of components due to independent rounding of numbers.

METHODOLOGY RESOURCES

CalEEMod

California Emission Estimator Model version 2016.3.2 (CalEEMod)[25] was used to assist in quantifying the GHG emissions in the inventories presented in this report for the Project. CalEEMod is a statewide program designed to calculate both criteria and GHG emissions from development projects in California.

CalEEMod is based upon CARB-approved Off-Road and On-Road Mobile-Source Emission Factor models (OFFROAD and EMFAC, respectively), and is designed to estimate construction and operational emissions for land use development projects and allows for the input of project-specific information. OFFROAD2011[26] is an emissions factor model used to calculate emission rates from off-road mobile

[23] U.S. EPA. (2018). *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2016.* Retrieved from https://www.epa.gov/sites/production/files/2018-01/documents/2018_complete_report.pdf (accessed November 2020).

[24] In the updated Draft Climate Change Scoping Plan published by CARB in 2014, the GWPs for CH4 and N2O were updated from 21 to 25 and from 310 to 298, respectively. This report relies upon the newly proposed GWPs in the Draft Climate Change Scoping Plan.

[25] CAPCOA. (2017). *California Emissions Estimator Model.* Retrieved from http://www.CalEEMod.com/

[26] CARB. (2007). *Off Road Mobile Source Emission factors*. Retrieved from http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/off-road-mobile-source-emission-factors (accessed November 2020).

sources (e.g., construction equipment, agricultural equipment). EMFAC2014[27] is the emissions factor model used in CalEEMod to calculate emissions rates from on-road vehicles (e.g., passenger vehicles, haul trucks). Given that a newer version of EMFAC (EMFAC2017) is available and approved, mobile source operational emissions were estimated based on CalEEMod methodology and EMFAC2017 emission factors along with project-specific values where available.

CalEEMod provides a simple platform to calculate both construction emissions and operational emissions from a land use project. It calculates both the daily maximum and annual average for criteria pollutants as well as total or annual GHG emissions. The model provides default values for water and energy use.

CalEEMod contains default values and existing regulation methodologies to use in each specific local air district region. Appropriate statewide default values can be used if regional default values are not defined. The analysis used default factors for the Los Angeles County area that is within the SCAQMD jurisdiction for the GHG emission inventory, unless otherwise noted in the methodology descriptions below. Details regarding the specific methodologies used by CalEEMod can be found in the CalEEMod User's Guide and associated appendices.[28] The CalEEMod output files are provided in **Appendix 9.7**.

INDIRECT GHG EMISSIONS FROM ELECTRICITY USE

Project-related electricity use results in indirect emissions, due to electricity generation activities occurring at off-site power plant locations. For the Project, electrical power would be supplied by Southern California Edison (SCE). The indirect GHG emissions created as a result of Project-related electricity use are estimated through application of the methodology presented below.

Using CalEEMod, the electricity intensities are multiplied by the emission intensity factors for the GHGs and are classified as indirect emissions. Emission intensity factors are GHG emission rates from a given source relative to the intensity of a specific activity in terms of the amount of GHG released per megawatt of energy produced. The default electricity intensity factors for SCE in CalEEMod for CO_2, CH_4, and N_2O are 702.44, 0.029, and 0.006 pounds (lbs) per megawatt-hour (MWh), respectively. The CO_2 default factor is based on the 2012 SCE Corporate Responsibility and Sustainability Report.[29] The CH_4 and N_2O default factors are based on CARB's and U.S. EPA's e-Grid values as included in CalEEMod.[30]

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27 CARB. (2015). *EMFAC 2014 Release* (updated May 2015). Retrieved from https://ww3.arb.ca.gov/msei/downloads/emfac2014/emfac2014-vol3-technical-documentation-052015.pdf (accessed November 2020).

28 CAPCOA. (2017). *California Emissions Estimator Model User's Guide*. Version 2016.3.2. November 2017. Retrieved from http://www.caleemod.com/ (accessed November 2020).

29 SCE. (2012). *Corporate Responsibility and Sustainability Report*. Retrieved from https://www.edison.com/content/dam/eix/documents/sustainability/2012-sce-corporate-responsibility-report.pdf (accessed November 2020).

30 U.S. EPA. eGRID2012 Version 1.0. Year 2009 Summary Table. Retrieved from https://www.epa.gov/sites/production/files/2015-01/documents/egrid2012v1_0_year09_summarytables.pdf (accessed November 2020).

While CalEEMod's intensity factors for CH_4 and N_2O were used for this Project, CalEEMod's CO_2 intensity factor was modified based on the SCE's 2019 energy delivery identified in **Appendix 9.7** to account for the improvements made by SCE towards meeting the requirements of the RPS.[31, 32]

ONE-TIME EMISSIONS

One-time emissions are those emissions that are not recurring over a project's life. This includes emissions associated with construction and changes in on-site vegetation. The emission estimation methodology for both construction and vegetation changes are described in this EIR section.

Construction Activities

Emissions from construction are largely attributable to fuel use from construction equipment and worker commuting. The Project's major construction phases included in this analysis are:

- Demolition: tearing down of the existing building on the Project site.
- Site Preparation: clearing vegetation (grubbing and tree/stump removal) and stones prior to grading.
- Grading: the cut and fill of land to ensure the proper base and slope for the construction foundation.
- Building Construction: the construction of structures and buildings.
- Architectural Coating: the application of coatings to both the interior and exterior of buildings or structures.
- Paving: the laying of concrete or asphalt such as in parking lots or roads.

Construction-related GHG emissions were estimated using CalEEMod. Default on-site equipment lists in CalEEMod supplemented with Project specific modifications were used for the various construction phases. CalEEMod default values were used for equipment and vehicle emission factors, equipment load factors, and vehicle trip lengths.

The construction start date, duration, and CalEEMod defaults were used to estimate the phasing schedule and numbers and types of equipment that would be used in each Project construction phase (i.e., demolition, grading, etc.). The emission calculations are intended to estimate annual emissions. Each piece of equipment was assumed to operate based on CalEEMod default assumptions (i.e., load factor and operational hours). The duration of the Project's construction activities is estimated to be approximately two years, beginning in the third quarter of 2021 with completion in the third quarter of 2023. The construction schedule and equipment list are shown in **Table 4.6-3: Construction Schedule**, and **Table 4.6-4: Construction Equipment Mix Assumptions**, respectively. The Project assumes 8,000 cubic yards of export with no import of soils. Construction emissions are estimated assuming one shift working up to 11 hours per day, six days a week. The CalEEMod output files are included in **Appendix 9.7**.

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[31] SCE's 2019 intensity factor per total energy delivered. Retrieved from https://www.edison.com/content/dam/eix/documents/sustainability/eix-2019-sustainability-report.pdf (accessed November 2020).

[32] The CH_4 and N_2O intensity factors from CalEEMod® are based on emissions from California's mix of power generation sources in 2009. As more renewable energy is integrated into the electricity grid, these intensity factors will also decrease .

Table 4.6-3: Construction Schedule

Construction Phase Name[1]	CalEEMod Phase Type[1]	Start Date[1]	End Date[1]	Phase Duration[2] (days)
Demolition[3]	Demolition	7/1/2021	8/16/2021	40
Site Preparation	Site Preparation	8/17/2021	8/22/2021	5
Grading	Grading	8/23/2021	9/2/2021	10
Building Construction	Building Construction	9/3/2021	7/25/2023	592
Architectural Coating	Architectural Coating	7/26/2023	8/28/2023	29
Paving	Paving	8/29/2023	9/29/2023	28

[1] Construction phases and duration are based on Project-specific estimates.
[2] The construction workweek was assumed to be 6 days per week.
[3] Demolition phase assumes demolition of the existing onsite building (24,000 SF).
CalEEMod = California Emissions Estimator Model

Source: Ramboll US Corporation, 2020. Table 4.

Table 4.6-4: Construction Equipment Mix Assumptions

Construction Phase Name[1]	CalEEMod Phase Type[1]	Equipment Type	Equipment[1]	Hours per Day[1]
Demolition	Demolition	Concrete/Industrial Saws	1	11.0
	Demolition	Rubber Tired Dozers	1	11.0
	Demolition	Tractors/Loaders/Backhoes	3	11.0
Site Preparation	Site Preparation	Graders	1	11.0
	Site Preparation	Rubber Tired Dozers	1	9.6
	Site Preparation	Tractors/Loaders/Backhoes	1	11.0
Grading	Grading	Graders	1	8.3
	Grading	Rubber Tired Dozers	1	8.3
	Grading	Tractors/Loaders/Backhoes	1	9.6
Building Construction	Building Construction	Cranes	1	8.3
	Building Construction	Forklifts	1	8.3
	Building Construction	Generator Sets	1	11.0
	Building Construction	Tractors/Loaders/Backhoes	1	8.3
	Building Construction	Welders	3	11.0
Architectural Coating	Architectural Coating	Air Compressors	1	8.3
Paving	Paving	Cement and Mortar Mixers	1	8.3
	Paving	Pavers	1	8.3
	Paving	Paving Equipment	1	11.0
	Paving	Rollers	1	9.6
	Paving	Tractors/Loaders/Backhoes	1	11.0

[1] Equipment mix is based on CalEEMod® defaults for the project-specific land use and construction schedule shown in **Appendix 9.7** and Error! Reference source not found., respectively. Equipment operational hours are based on project-specific information.
CalEEMod = California Emissions Estimator Model

Source: Ramboll US Corporation, 2020. Table 5.

Construction Equipment GHG Emissions

The emission calculations associated with construction equipment are from off-road equipment engine use based on the equipment list and phase length.

Since most of the off-road construction equipment used for construction projects are diesel-fueled, CalEEMod assumes all of the equipment operates on diesel fuel. The construction equipment calculations include the running exhaust emissions from off-road equipment. Since the equipment is assumed to be diesel, there are no starting or evaporative emissions associated with the equipment as these are *de minimis* for diesel-fueled equipment. CalEEMod calculates the exhaust emissions based on default values for horsepower and load factor from CARB's OFFROAD2011 model.[33]

The GHG emissions associated with off-road construction equipment are shown in CalEEMod output files in **Appendix 9.7.** Most of the emissions occur during the building construction phase.

GHG Emissions from On-Road Trips

Construction generates on-road vehicle exhaust (including evaporative emissions) from personal vehicles for worker/vendor commuting and trucks for soil/material hauling. These emissions are calculated using CalEEMod methodology based on the number of trips and VMT along with emission factors from EMFAC2017. The numbers of worker and vendor trips represent defaults from CalEEMod based on the construction equipment to be used. The number of haul trips was estimated based on the volume of soil to be imported and exported as well as the CalEEMod default assumption for haul truck capacity of 16 cubic yards per truck.

The emissions associated with on-road activities are shown in the tables in **Appendix 9.7**. Worker, vendor, and hauling construction trips emissions were not calculated in CalEEMod in order to incorporate EMFAC2017 emission factors and CARB SAFE Rule adjustment factors; therefore, the CalEEMod output files show zero for these related emissions. Most of the emissions were estimated to occur from worker and vendor trips during the building construction phase.

Total Construction Emissions

Total emissions from Project-related construction activities by calendar year are summarized in **Table 4.6-7.** Total GHG emissions from the construction activities are 1,811 $MTCO_2e$. When amortized over 30-year Project lifetime, the construction GHG emissions are 60 $MTCO_2e$/year.[34] Detailed emission inventories from the CalEEMod output files are included in **Appendix 9.7**.

Regulatory Measures

The construction emissions would comply with the applicable regulations and programs. These include the CARB ATCM to limit diesel-fueled commercial motor vehicle idling, CARB in-use Off-Road and On-Road regulations, and the California Cap-and-Trade Program.

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[33] CAPCOA. (2017). *California Emissions Estimator Model User's Guide. Appendix A.* Page 32. Version 2016.3.2. November. Retrieved from http://www.caleemod.com (accessed November 2020).

[34] This approach to one-time construction GHG emissions is based on the GHG Threshold Working Group Meeting #13 Minutes from August 26, 2009. Retrieved from http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-13/ghg-meeting-13-minutes.pdf?sfvrsn=2 (accessed November 2020).

Vegetation Changes

The Project site has a one-story warehouse surrounded by little to no vegetation. Planting trees would sequester CO_2 and is considered to result in a one-time carbon-stock change. Trees sequester CO_2 while they are actively growing. The amount of CO_2 sequestered depends on the type of tree. In this case, new trees would be planted at the Project site. This would result in carbon sequestration. Therefore, planting of new trees results in decrease in overall GHG emissions. GHG emissions associated with planting of new trees are amortized over a 30-year Project lifetime.

Regulatory Measures

No applicable regulatory measures related to GHG emissions from vegetation changes were identified.

ANNUAL OPERATIONAL EMISSIONS

Operational emissions are emissions that would occur after Project build-out. This analysis identifies operational emissions for source categories including direct emissions from area and mobile sources and indirect emissions from energy use, water/wastewater, and waste management.

Area Sources

Area sources are those emission sources that are generally too small to be uniquely identified as point sources and are thus generally aggregated as a group. CalEEMod estimates emissions for the following sources, which are included under the category of "area" sources: landscaping equipment (e.g., lawnmowers), consumer products, and architectural coatings. There are no GHG emissions from consumer product and architectural coating activities. The area source GHG emissions included in this analysis result from landscaping maintenance equipment related fuel combustion sources, such as lawnmowers. Based on CalEEMod defaults, all operational days (i.e., 250 days per year) were assumed to be summer days, with no snow days. GHG emissions due to natural gas combustion in buildings are excluded from this section since they are included in the emissions associated with building energy use (described in the Energy Use section below). The Project's GHG emissions were calculated using CalEEMod defaults based upon the Project's proposed land uses. The resulting GHG emissions from the use of landscape maintenance equipment are provided in the CalEEMod output files in **Appendix 9.7**.

Regulatory Measures

No applicable regulatory measures related to GHG emissions from landscape maintenance equipment were identified.

Energy Use

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Climate Zone 8 was selected based on the Project location and CalEEMod Forecast Climate Zone Map. As stated above, the Project's GHG emissions from electricity use have been calculated using SCE's 2019 CO_2 intensity emission factor that accounts for the progress made by SCE towards meeting the RPS requirements. The default CalEEMod emission factors for building energy were adjusted to reflect the

requirement that new buildings meet the 2019 Title 24 Part 6 building code. **Table 4.6-5: Building Energy Use Assumptions** summarizes the CalEEMod inputs used to model GHG emissions from the Project's energy use.

Table 4.6-5: Building Energy Use Assumptions

Project Land Use Type	Land Use Size	Land Use Size Metric	Title 24 Electricity[1]	Lighting Electricity[1]	Title 24 Natural Gas1
			kWh/DU or kWh/SF	kWh/DU or kWh/SF	kBTU/DU or kBTU/SF
Multi-Family Housing	265	DU	160.53	662.11	5,852.35
Unenclosed Parking[2]	275[3]	spaces	0.00	1.56	0.00

[1] A 10.7% reduction in CalEEMod® default values for 2016 Title 24 electricity and lighting electricity usage, and a 1.0% reduction in CalEEMod® defaults values for 2016 Title 24 natural gas consumption were applied to represent the 2019 Title 24 Standards for non-residential and high-rise residential land use categories. These reductions were estimated based on information provided in California Energy Commission Impact Analysis: 2019 Update to the California Energy Efficiency Standards for Residential and Nonresidential Buildings, dated June 2018. Available at: https://ww2.energy.ca.gov/title24/2019standards/post_adoption/.
[2] Garage referred to as "unenclosed" because it will be naturally ventilated, which is the primary distinguishing factor between enclosed and unenclosed structures.
[3] This number of parking spaces is more conservative than the Project, which proposes 267 spaces.
CalEEMod = California Emissions Estimator Model; kWh = kilowatt-hour; DU = dwelling units; SF = square foot; kBTU = 1000 British thermal unit

Source: Ramboll US Corporation. (2020). Greenhouse Gas Technical Report, included as **Appendix 9.7**. Table 8.

Table 4.6-6 summarizes the annual electricity demand for the digital billboard for the Project, as estimated by the billboard provider, SNA Displays.

Table 4.6-6: Billboard Electricity Use Assumptions

Project Component	Electricity Demand[1]	Emissions[2]
	kWh/year	MT CO_2e/year
Digital Billboard	551,880	134.3

[1] Electricity demand for the digital billboard was estimated by SNA Displays, the billboard provider.
[2] CO_2e weighted intensity factor estimated using SCE's 2019 CO_2 intensity factor shown in Table 3 of the GHG technical report in **Appendix 9.7** and CalEEMod default CH_4 and N_2O intensity factors for SCE.

Source: Ramboll US Corporation, 2020. Table 9.

Energy Use Emissions Estimate

As mentioned above, GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. Electricity and natural gas 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. The Project's CO_2e emissions from electricity and natural gas usage are shown in CalEEMod output file in **Appendix 9.7**.

Regulatory Measures

In California, Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting.[35] The 2019 Title 24 standards are the currently applicable building energy efficiency standards and became effective on January 1, 2020. In general, high-rise multi-family homes and non-residential uses built to the 2019 standards are anticipated to use about 10.7 percent less energy for electricity and lighting, 1.0 percent less natural gas use for heating than those built to the 2016 standards. The Project's GHG emissions calculations reflect that the Project is meeting the 2019 Title 24 Part 6 Building Code for residential and non-residential construction.

Emission factors for electricity are dependent on statewide renewable energy generation targets. The RPS established a target of 33 percent energy from renewable sources for all electricity providers in California by 2020. SCE-specific electricity intensity factors for CO_2, CH_4, and N_2O mass emissions per kilowatt-hour are described in Sections 3.3 and 3.5.2 of the GHG technical report in **Appendix 9.7** were used in this analysis.

Water Supply, Treatment and Distribution

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of the water. Additional emissions from wastewater treatment include CH_4 and N_2O, which are emitted directly from the wastewater.

CalEEMod default assumptions were used to represent the Project's total water demand and to calculate the GHG emissions associated with water conveyance, treatment, and distribution, as well as wastewater treatment. The Project's indoor and outdoor water usage's resulting GHG emissions are presented in the CalEEMod output file in **Appendix 9.7**.

Regulatory Measures

While the Project is expected comply with the California Green Building Code, which requires that indoor potable water use be reduced by 20 percent through the use of water-saving fixtures and/or flow restrictors, the analysis conservatively uses the CalEEMod default assumptions to estimate GHG emissions associated with the Project's water usage.

Solid Waste

Municipal solid waste is the amount of material that is disposed of by landfilling, recycling, or composting. CalEEMod calculates the indirect GHG emissions associated with waste that is disposed of at a landfill. The program uses annual waste disposal rates from the CalRecycle data for individual land uses. The emission estimates for this Project were based on CalEEMod default factors. CalEEMod uses the overall California Waste Stream composition to generate the necessary types of different waste disposed into landfills. The program quantifies the GHG emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon. The program quantifies the CO_2 emissions associated with the combustion of methane, if applicable. Default landfill gas concentrations

[35] Title 24, Part 6, of the California Code of Regulations: California's Energy Efficiency Standards for Residential and Nonresidential Buildings. Retrieved from http://www.energy.ca.gov/title24/ (accessed November 2020).

were used as reported in Section 2.4 of AP-42. The IPCC has a similar method to calculate GHG emissions from municipal solid waste in its 2006 Guidelines for National Greenhouse Gas Inventories.

The CalEEMod solid waste module determines the GHG emissions associated with the disposal of solid waste into landfills, in quantities that are based upon land use type according to waste disposal studies conducted by CalRecycle. For this module, CalEEMod default values were used since site-specific information was not available. GHG emissions associated with non-landfill diverted waste streams are not considered, because it is generally assumed that these diversions do not result in any appreciable amounts of GHG emissions when operated effectively.[36] These waste diversion alternatives may result in differences in life-cycle emissions of GHGs, but it is not appropriate to combine life-cycle emissions for only one category of emissions.[37] As mentioned previously, biogenic CO_2 emissions were not included when CARB analyzed the GHG emissions inventory under AB 32. Therefore, they are not included in the Project emissions inventory.

Regulatory Measures

While the Project is expected to comply with the state's waste diversion goal of 75 percent waste diversion by 2020,[38] this analysis conservatively uses the default CalEEMod assumptions for estimates GHG emissions associated with waste disposal.

Mobile Source Emissions

The GHG emissions associated with on-road mobile sources are generated by employees and trucks visiting the Project. The emissions associated with on-road mobile sources includes running exhaust emissions, starting emissions and idling exhaust emissions. Running exhaust emissions are dependent on VMT. Starting emissions are associated with the number of starts or time between vehicle uses and the assumptions used in determining these values are described below. Idling exhaust emissions are based on the amount of time a vehicle spends idling. All other emissions are dependent upon VMT. Project-specific trip rates provided in the Local Transportation Assessment (see **Appendix 9.11: Transportation Data**) were used as inputs for the CalEEMod model run.

Vehicle Trip Type

In CalEEMod, the trip type breakdown describes the purpose of the trip generated at each land use. For example, the trip type breakdown indicates the percentage of trips generated at single-family homes for work, for shopping, and for other purposes. Residential trips were used for this analysis.[39]

Residential Trips – These trips include home-work (H-W), home-shop (H-S), or home-other (H-O). An H-W trip represents the trip from the home to the workplace. An H-S trip represents the trip from the home to a land use where shopping takes place (generally retail). An H-O represents all other types of

[36] CARB. (2010). Local Government Operations Protocol. Chapter 9.4. Retrieved from https://ww3.arb.ca.gov/cc/protocols/localgov/pubs/lgo_protocol_v1_1_2010-05-03.pdf (accessed November 2020).

[37] This inventory represents scope 1 and 2 emission categories. A life-cycle analysis of waste diversion would be a scope 3 inventory. CARB's Local Government Operations Protocol Version 1.1 (May 2010) clearly states that scope 3 emissions should not be combined with scope 1 and 2 emissions.

[38] California Department of Resources Recycling and Recovery (CalRecycle). (2020). *California's 75 Percent Initiative*. Retrieved from http://www.calrecycle.ca.gov/75percent/ (accessed November 2020).

[39] SCAQMD. (2017). *California Emissions Estimator Model User's Guide, Appendix A*. page 21. Version 2016.3.2. Retrieved from http://www.CalEEMod.com/ (accessed November 2020).

trips generated from the resident such as school, entertainment, etc. The trip type breakdown in CalEEMod is from district-supplied information or the 1999 Caltrans Statewide Travel Survey is used as default or specific information obtained from the various Districts.

Trip Rates

Trip rates are one of the parameters used to calculate Project mobile source emissions. CalEEMod relies upon trip generation rates by land use types and associated average trip length by trip type to estimate GHG (and air quality) emissions. Project-specific trip rates provided in the Local Transportation Assessment (see **Appendix 9.11: Transportation Data**) were used as input for the CalEEMod model run. These are presented in **Appendix 9.7.**

Trip Lengths

Trip lengths are another factor used to calculate Project mobile source emissions. Annual VMT is estimated as a product of annual average trips and trip length for each vehicle type. The default CalEEMod trip length for the portion of Los Angeles County located within SCAQMD jurisdiction were used.

Vehicle Fleet Mix

Vehicle fleet mix is another parameter used to estimate mobile source emissions from a project's operations. Each vehicle type has a different emission factor for each pollutant, so CalEEMod relies upon vehicle fleet mixes by land use type to estimate the GHG emissions for each land use. The CalEEMod default fleet mix for residential multi-family land use for the portion of Los Angeles County located within SCAQMD jurisdiction was used in this analysis.

Estimated Emissions from Mobile Sources

Operational emissions associated with operational mobile sources of the Project are shown in the CalEEMod output file in **Appendix 9.7**. The mobile source emissions include trips related to residential multi-family housing as evaluated by CalEEMod.

Regulatory Measures

AB 1493 required that CARB establish GHG emission standards for automobiles, light-duty trucks, and other vehicles determined by CARB to be vehicles whose primary use is non-commercial personal transportation in the state. In addition, the NHTSA and U.S. EPA have established corporate fuel economy standards and GHG emission standards, respectively, for automobiles, and light-, medium-, and heavy-duty vehicles. Implementation of these standards and fleet turnover (replacement of older vehicles with newer ones) would gradually reduce emissions from a proposed project's motor vehicles. The effectiveness of fuel economy improvements and the GHG emission standards over time was evaluated by using the EMFAC2014 emission factors for motor vehicles that are built into the CalEEMod model. As stated in the technical documentation for EMFAC2014, state and federal regulations aimed at lowering fleet average emission rates such as California's Pavley regulation mandating higher fuel efficiency standards for cars and light-duty vehicles, Fuel Standard (LCFS) and the Advanced Clean Car Program, the

Tractor-Trailer Greenhouse Gas regulation and federal heavy duty vehicle GHG regulations are included in vehicle emissions estimate for the Project.[40]

Stationary Sources

Stationary sources, such as generators, are direct sources of GHG emissions. This analysis conservatively incorporates the stationary source GHG emissions from the maintenance activity of a diesel-powered emergency generator for the Project.

PROJECT DESIGN FEATURES

Emission reductions associated with the following Project design features (PDF) were incorporated into the analysis.

- **PDF AQ 2/PDF GHG-1:** The Project would install seven Level 2 electric vehicle (EV) charging stations in the parking structure for the building tenants. The installation of EV charging stations corresponds to a reduction in GHG emissions as quantified in **Appendix 9.7** and summarized below.
- **PDF AQ-3/PDF GHG-2:** The Project would implement transportation demand management strategies in the Gardena Transit Oriented Development Specific Plan area to advance the vision for multi-modal transportation. These strategies include:
  - **Unbundled Parking:** There shall be a charge for parking spaces. The property owner shall unbundle automobile parking charges from the rents or other fees charged for leasing residential units in the Specific Plan area.
  - **Pre-Leasing for Area Employees:** Residential units within the Specific Plan area shall be marketed exclusively for a thirty-day period to employees working within a 0.5-mile radius of the development, before the units are offered for rent to the general public. The developer shall submit a pre-leasing marketing plan to the Community Development Director for review and approval prior to issuance of a temporary certificate of occupancy. The developer must then demonstrate compliance with the approved thirty-day exclusive marketing plan prior to issuance of a final certificate of occupancy.
  - **Transit Information:** To ensure that residential tenants are aware of transit options and transportation demand management programs available to them, an information board or kiosk shall be posted in a central location in the building.
  - **On-site Residential Bicycle Parking:** One bicycle parking space shall be provided for every residential unit (located in secured facilities accessible only by residents). There would also be unsecured bicycle parking spaces for guests, provided at-grade on a first-come, first-serve

[40] In 2018, the U.S. EPA and NHTSA proposed to amend certain existing Corporate Average Fuel Economy (CAFE) standards and tailpipe carbon dioxide emissions standards for passenger cars and light trucks and establish new standards, covering model years 2021-2026. Compared to maintaining the post-2020 standards now in place, the pending proposal would increase U.S. fuel consumption. California and other states have announced their intent to challenge federal actions that would delay or eliminate GHG reductions. Because the pending proposal is still in the rulemaking phase, and because legal challenges to any future adoption of the proposal is likely, the timing and consequences of the pending proposal are speculative at this time.

basis. All bicycle parking shall be located in a safe, convenient location, encouraging the use of bicycle transportation by residents and guests.

- **Ride-Sharing Pick-Up/Drop-Off**: A designated loading area within the Gardena Transit Oriented Development Specific Plan area shall be signed and distinguished (e.g., with paving and/or paint) so that it may be used as a pick-up and drop-off zone for ride-sharing services.

- **PDF AQ 4/PDF GHG-3:** The Project would install a solar swimming pool heating system. The emissions savings from the solar swimming pool heating system were not quantified for this analysis.

4.6.5 IMPACTS AND MITIGATION MEASURES

Impact 4.6-1: Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Level of Significance: Less Than Significant Impact

CONSTRUCTION

The Project's construction GHG emissions were calculated for each year of construction activity using CalEEMod. Results of the GHG emissions calculations are presented in **Table 4.6-7: Summary of Construction GHG Emissions**. It is noted that the GHG emissions shown in **Table 4.6-7** are based on construction equipment operating continuously throughout the workday. In reality, construction equipment tends to operate periodically or cyclically throughout the workday. Therefore, the calculated GHG emissions reflect a conservative estimate. A complete listing of the equipment by phase, emission factors, and calculation parameters used in this analysis is included within the emissions calculation worksheets that are provided in **Appendix 9.7**.

Although the Project's construction-related GHG emissions are considered one-time emissions, it is important to include them when assessing all of the Project's long-term GHG emissions. Draft SCAQMD GHG analysis methodologies recommend that construction-related GHG emissions be amortized over a project's 30-year lifetime in order to include these emissions as part of a project's annualized lifetime total emissions, so that GHG reduction measures would address construction GHG emissions as part of the operational GHG reduction strategies.[41] In accordance with this methodology, the Project's estimated construction GHG emissions have been amortized over a 30-year period and are included in the annualized operational GHG emissions.

[41] SCAQMD. (2008). *Final Localized Significance Threshold Methodology*. Appendix C. July. Retrieved from http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2 (accessed November 2020).

Table 4.6-7: Summary of Construction GHG Emissions

Calendar Year	Total Off-Road Emissions	Total On-Road Emissions			Total Construction Emissions[1]
		Worker	Vendor	Hauling	
	(MT CO2e)				
2021	201	121	48	37	407
2022	392	348	142	0	882
2023	249	197	76	0	522
Total	**842**	**666**	**266**	**37**	**1,811**
				30-year Amortized	**60**

[1] Construction emissions include on-site and off-site (worker/vendor/hauling) emissions, estimated using CalEEMod. CO_2e includes CO_2, CH_4, and N_2O emissions, weighted by their respective global warming potentials. See **Appendix 9.7** for further details.
[2] CalEEMod - California Emissions Estimator Model
CH_4 = methane; CO_2 = carbon dioxide; CO_2e = carbon dioxide equivalents; GHG = greenhouse gases; MT = metric tons; N_2O = nitrous oxide; yr = year

Source: Ramboll US Corporation. (2020). Greenhouse Gas Technical Report, included as **Appendix 9.7**. Table 7.

Due to the potential persistence of GHGs in the environment, Project impacts are based on annual emissions and, in accordance with draft SCAQMD methodology, construction-period impacts are not assessed for significance independent of operational-period impacts, which are discussed in the following *Operations* section.

OPERATIONS

The Project's operational emissions are those that would occur after Project build-out. This analysis identifies operational emissions for source categories including direct emissions from area and mobile sources and indirect emissions from energy use, water/wastewater, and waste management. The Project's maximum annual GHG emissions resulting from area sources, energy (i.e., electricity, natural gas), water conveyance and wastewater treatment, solid waste, and traffic were calculated for the expected opening year (2023).

The Project's operational maximum opening year GHG emissions are included in **Table 4.6-8: Summary of GHG Emissions**. Operational or long-term emissions occur over the Project's lifetime. GHG emissions would result from direct emissions such as Project generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from the Project site, the emissions associated with solid waste generated at the Project site, and any fugitive refrigerants from air conditioning or refrigerators.

As shown in **Table 4.6-8**, the Project would result in a small increase in GHG emissions as compared to the existing conditions (operation of the Project site with an auto parts warehouse). The City of Gardena and the SCAQMD have not adopted a GHG threshold specific to this project. The SCAQMD Working Group had discussed a "bright-line" screening-level threshold of 3,000 $MTCO_2e$ annually for residential and commercial projects or 3,500 $MTCO_2e$ for residential only projects, however, it was not formally

adopted.[42] For comparison purposes, the net new emissions are less than 100 $MTCO_2e$. Thus, the Project's impacts from GHG emissions would be less than significant and no mitigation is required.

Table 4.6-8: Summary of GHG Emissions

Emission Source	Annual Average GHG Emissions[1,2,3] ($MTCO_2e$/year)	
	Project	Existing Conditions[7]
Area Sources	5	0
Energy Usage	593	29
Water	108	25
Waste Disposed	61	11
Traffic	1,663	2,243
EV Charging Stations[4]	-100	--
Stationary	7	--
Operational Subtotal	2,337	2,309
Construction Amortized[5]	60	--
Vegetation[5]	-1	--
Total[6]	**2,397**	**2,309**
Net GHG Emissions: Project minus Existing Conditions	**88**	

[1] Operational emissions (from area sources, energy use, water use, waste disposed and mobile sources) and one-time emissions (from construction and vegetation) were calculated using CalEEMod. See **Appendix 9.7** for further details. Emissions are presented as CO_2e, which include CO_2, CH_4, and N_2O emissions, weighted by their respective global warming potentials.
[3] Numbers are rounded for reporting purposes.
[4] Emissions reductions associated with EV charging stations are shown as negative values due to the decrease in emissions. See Table 10 in **Appendix 9.7** for details on emission reduction estimation.
[5] One-time emissions from construction and vegetation sequestration were amortized over a 30-year period. It is noted, construction emissions modeling was completed based on 24,000 SF, and not 24,990 SF, the existing building's actual size, the 990 SF difference (approximately four percent) is considered negligible and would not cause either the duration of the demolition phase or the construction equipment mix assumptions to change. Additionally, even if the construction emissions were increased by four percent, the net new emissions would still be less than 100 $MTCO_2e$, which would be below the screening-level threshold of 3,500 $MTCO_2e$ for residential only projects, although not adopted. Thus, the changed emissions will not change the conclusions of the AQ Technical Report (or GHG Technical Report). These findings are substantiated in the Supplemental Guidance on Air Quality and Greenhouse Gas Analyses for the Gardena Transit-Oriented Development Specific Plan (Ramboll, January 14, 2021); see **Appendix 9.3**.
[6] Sum of annualized one-time emissions and operational emissions may not add up due to rounding.
[7] For the existing condition, this analysis assumes that the existing use is a warehouse. The CalEEMod Land Use Type is Industrial, and Land Use Subtype is Unrefrigerated Warehouse – No Rail.

Source: Ramboll US Corporation. (2020). Greenhouse Gas Technical Report, included as **Appendix 9.7.** Table ES-1.

MITIGATION MEASURES

No mitigation is required.

[42] SCAQMD. 2008. SCAQMD Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold. Retrieved from http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf. (accessed November 2020)

Impact 4.6-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

Level of Significance: Less Than Significant Impact

CONSISTENCY WITH APPLICABLE GHG REDUCTION PLANS AND POLICIES

A significant impact would occur if the Project would generate GHG emissions, either directly or indirectly, that would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Plans and policies evaluated are AB 32 and SB 32 regulatory programs, the City of Gardena CAP, and SB 375 (SCAG RTP/SCS).

Consistency with AB 32 and SB 32 Regulatory Programs

The Project is consistent and compliant with applicable statewide and local regulatory programs. As discussed in **Section 4.6.3: Regulatory Framework**, the Project would be subject to regulatory programs designed to reduce GHG emissions consistent with AB 32 and SB 32. The list below summarizes the regulations and programs related to the emission source categories.

- Energy Use:
  - California Title 20 Standards
  - California Title 24, Part 6 Standards (2016 and 2019)
  - California Title 24, Part 11 Standards
  - California Renewable Portfolio Standard (SB X1 2)
  - California Cap-and-Trade Program
- Water Supply, Treatment and Distribution:
  - Executive Order B-29-15
  - California Title 24, Part 11 Standards
  - Senate Bill X7-7
- Solid Waste:
  - California AB 341 (waste diversion)
- Mobile Sources:
  - California AB 1493/Pavley Standards (through model year 2025)
  - California Advanced Clean Cars Standards (through model year 2025)
  - California Low Carbon Fuel Standard
  - U.S. EPA/NHTSA CAFÉ Standards (through model year 2018)
  - California Cap-and-Trade Program

- Construction:
  - CARB In-Use Off-Road Regulation
  - CARB In-Use On-Road Heavy-Duty Diesel Vehicles Regulation
  - California Cap-and-Trade Program

As previously addressed, the net new Project emissions are less than 100 $MTCO_2$, which is substantially less than the "bright-line" screening-level threshold of 3,500 $MTCO_2e$ for residential projects. In addition, the Project's compliance with the regulations and programs noted above would result in consistency with AB 32 and SB 32.

Consistency Evaluation with City of Gardena CAP

The City of Gardena's CAP seeks to identify community-wide strategies to lower GHG emissions, which maintains the Energy Efficiency Climate Action Plan (EECAP) previously adopted by the City of Gardena. The Project is consistent with the CAP's primary strategies concerning land use development, including land use and transportation, energy efficiency, solid waste, and urban greening. **Table 4.6-9: Consistency with City of Gardena Climate Action Plan** details the Project's consistency with the City of Gardena CAP.

The Project is a proposed infill development located near alternative transportation modes (e.g., public transit and bicycle use) and incorporates EV charging to reduce related mobile emissions. The Project would comply with Title 24, which is consistent with the CAP and EECAP's efficiency measures. Renewable energy would be used for a solar pool heater. Landscaping would absorb more carbon than is released.

Table 4.6-9: Consistency with City of Gardena Climate Action Plan

Strategy	Goal	Goals	Consistency Analysis
Land Use and Transportation	**A**	Accelerate the market for EV vehicles	**Consistent**. The Project would install seven Level 2 electric vehicle charging stations in the parking structure for the building tenants.
	B	Encourage ride-sharing	**Consistent**. A designated loading area within the GTODSP shall be signed and distinguished (e.g., with paving and/or paint) so that it may be utilized as a pick-up and drop-off zone for ride-sharing services.
	C	Encourage transit usage	**Consistent**. To ensure that residential tenants are aware of transit options and TDM programs available to them, an information board or kiosk shall be posted in a central location in the building. The developer shall offer future residents a one-time monthly Metro transit pass to encourage and help facilitate a culture of transit use by Project residents.
	D	Adopt active transportation initiatives	**Consistent**. One bicycle parking space shall be provided per DU[1] (located in secured facilities accessible only by residents). All bicycle parking shall be located in a safe, convenient location,

Strategy	Goal	Goals	Consistency Analysis
			encouraging the use of bicycle transportation by residents and guests.
	E	Parking strategies	**Consistent**. There shall be a charge for parking spaces. The property owner shall unbundle automobile parking charges from the rents or other fees charged for leasing residential units in the specific plan area.
	F	Organizational strategies	**Consistent**. The developer shall offer future residents a one-time monthly Metro transit pass to encourage and help facilitate a culture of transit use by Project residents.
	G	Land use strategies	**Consistent**. The residential development is planned to be built at a density of 199[2] dwelling units per acre.
	H	Digital technology strategies	**Consistent**. The Project includes a digital billboard.
Energy Efficiency	**A**	Increase energy efficiency in existing residential units	**Not Applicable**. The Project does not involve existing residential units.
	B	Increase energy efficiency in new residential developments	**Consistent**. The Project would install a solar swimming pool heating system.
	C	Increase energy efficiency in existing commercial units	**Not Applicable**. The Project is replacing a 24,990[3] square foot warehouse building.
	D	Increase energy efficiency in new commercial developments	**Consistent**. The Project parking structure is unenclosed[4], requiring lighting but not ventilation, and would meet the 2019 Title 24 Part 5 building code..
	E	Increase energy efficiency through water efficiency	**Consistent**. The Project is expected to comply with the California Green Building Code, which requires that indoor potable water use be reduced by 20 percent through the use of water saving fixtures and/or flow restrictions.
	F	Decrease energy demand through reducing urban heat island effect	**Consistent**. The residential development is planned to be built with 5.5 levels of residential development over 2.5 levels of parking to limit the urban sprawl of the development. The Project would also have shade from a net new 22 trees.
	G	Participate in education, outreach, and planning for energy efficiency	**Not Applicable**. The Project is a new residential development, so would not directly be involved in planning for energy efficiency.
	H	Increase energy efficiency in municipal buildings	**Not Applicable**. The Project is a new residential development.
	I	Increase energy efficiency in city infrastructure	**Not Applicable**. The Project is a new residential development.
	J	Reduce energy consumption in the long term	**Consistent**. New residential and non-residential buildings would be the 2019 Title 24 Part 6 building code.

Strategy	Goal	Goals	Consistency Analysis
Solid Waste	**A**	Increase Diversion and Reduction of Residential Waste	**Consistent**. The Project is expected to comply with the state's waste diversion goal of 75% waste diversion by 2020.
	B	Increase Diversion and Reduction of Commercial Waste	**Not Applicable**. The Project is a new residential development.
	C	Reduce and Divert Municipal Waste	**Not Applicable**. The Project is a new residential development.
Urban Greening	**A**	Increase and maintain urban greening in the community	**Consistent**. The Project includes approximately 8,500 square feet of open space and plans to plant 22 net new trees.
	B	Increase and maintain urban greening in municipal facilities	**Not Applicable**. The Project does not involve municipal facilities.
Energy Generation & Storage	**A**	Support energy generation and storage in the community	**Consistent**. The Project would install a solar swimming pool heating system.

Abbreviations
GHG – greenhouse gas
GTODSP – Garden Transit-Oriented Development Specific Plan
TDM – transportation demand management

Source: Ramboll US Corporation. (2020). Greenhouse Gas Technical Report, included as **Appendix 9.7.** Appendix C.

Notes:
1. After the GHG technical report was prepared, in response to a comment from Caltrans, the Project applicant revised the Project to include one space per DU. The Project remains consistent.
2. The Specific Plan uses a density of 200 du/acre, but limits the Specific Plan to 265 DU, which equates to 199.25 du/acre. The Project remains consistent.
3. The building is actually 24,990 square feet. However, the goal is still not applicable.
4. Garage is referred to as "unenclosed" because it will be naturally ventilated, which is the primary distinguishing factor between enclosed and unenclosed structures.

Consistency Evaluation with SB 375 (SCAG RTP/SCS)

The SCAG RTP is a long-range transportation plan that is developed and updated by SCAG every four years. The RTP provides a vision for transportation investments throughout the region. The SCS would integrate land use and transportation strategies that would achieve GHG emissions reduction targets that are forecasted to achieve reduction in GHG emissions to achieve the state's 2035 and 2040 GHG reduction goals.

The 2020-2045 RTP/SCS projects an increase of 1.6 million households in the region from 2016 to 2045 (the projected increase for Los Angeles County between 2020 and 2030, which is the period in which the Project would be built out, is 277,000 households). As proposed, the Project would have up to 265 apartment units, which is less than 0.02 percent of the projected household growth for the region and less than 0.1 percent of the projected household growth for Los Angeles County. Therefore, the Project is consistent with SCAG's 2020-2045 RTP/SCS and the SCAQMD 2016 AQMP.

In summary, the Project would comply with GHG reduction policies, strategies, and regulations outlined in the AB 32 and SB 32 regulatory programs, the City of Gardena CAP, and SB 375 (RTP/SCS). Therefore, the Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Impacts would be less than significant.

MITIGATION MEASURES

No mitigation is required.

4.6.6 CUMULATIVE IMPACTS

A single project's emissions would not cause or exacerbate global climate change. Climate change is a global phenomenon and the significance of a project's GHG emissions is inherently cumulative in nature. CEQA requires that lead agencies consider evaluating the cumulative impacts of GHGs from even relatively small (on a global basis) increases in GHG emissions. Small contributions to this cumulative impact (from which significant effects are occurring and are expected to worsen over time) may be potentially considerable and therefore significant. A cumulatively considerable impact is the impact of a project in addition to impacts of the related projects. However, in the case of global climate change, a project's proximity to other GHG-generating activities is not directly relevant to the determination of global GHG cumulative impacts.

As presented in **Table 4.6-8**, the Project would result in a slight increase in GHG emissions as compared to the GHG emissions associated with the existing on-site land use. Because GHG emissions are considered cumulative in nature, the Project would not result in a significant cumulative impact concerning GHG emissions.

The Project would not conflict with the state's ability to achieve the AB 32 and SB 32 GHG reduction targets and would be consistent with the City's CAP. In addition, the Project would support and be consistent with relevant and applicable GHG emissions reduction strategies in SCAG's RTP/SCS.

As discussed above, the Project would not result in significant GHG impacts. Thus, the Project when combined with cumulative projects would not result in a significant cumulative impact concerning GHG emissions.

4.6.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning GHG emissions have been identified.

4.6.8 REFERENCES

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4.7 HAZARDS AND HAZARDOUS MATERIALS

4.7 HAZARDS AND HAZARDOUS MATERIALS

The purpose of this section is to describe the existing regulatory and environmental conditions related to hazards and hazardous materials, and wildfires, identify potential impacts that could result from Project implementation, and as necessary, recommend mitigation to avoid or reduce the significance of impacts. This section is based on data from the following resources:

- Hillman Consulting, *Phase I Environmental Site Assessment 12850 and 12900 Crenshaw Boulevard*, Gardena, California, October 7, 2019 (Phase I)
- Hillman Consulting, *Limited Phase II Subsurface Investigation Report 12850 and 12900 Crenshaw Boulevard*, Gardena, California, December 17, 2019 (Phase II)
- Hillman Consulting, *Technical Memorandum Vapor Intrusion Risk Evaluation 12850 and 12900 Crenshaw Boulevard*, Gardena, California, June 4, 2020 (VIRE)

The resources above are included in their entirety in **Appendix 9.8: Hazards and Hazardous Materials Data**.

Kimley-Horn conducted a third-party review of the Project's hazards and hazardous materials analyses on behalf of the City; see **Appendix 9.8**. The third-party review concluded the analyses meet the applicable provisions of CEQA and the State CEQA Guidelines.

The Phase I Environmental Site Assessment (ESA) was conducted in accordance with: (1) the U.S. Environmental Protection Agency (U.S. EPA) Standards and Practices for All Appropriate Inquiries, 40 Code of Federal Regulations (CFR) Part 312) and (2) guidelines established by the American Society for Testing and Materials (ASTM) in the *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process / Designation E 1527-13* (ASTM Standard Practice E 1527-13).

ASTM Standard Practice E 1527-13 defines a Recognized Environmental Condition (REC) as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any 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. A Controlled REC (CREC) is as defined as,"…resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls)." A Historical REC (HREC) is defined as, "a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls)."

The limited Phase II subsurface investigation was conducted, which included soil and soil gas sampling to identify potential contamination from unknown but probable former onsite sources, or from the existing service station to the north. The objective was to determine the current representative subsurface conditions in targeted areas of the Project site.

4.7.1 AFFECTED ENVIRONMENT

SITE RECONNAISSANCE

Methodology and Limiting Conditions

On September 27, 2019, Hillman Consulting conducted a field reconnaissance of the Project site as part of the Phase I ESA. The site reconnaissance consisted of visual and/or physical observations of the Project site and improvements, adjoining properties as viewed from the Project site boundaries and the surrounding area based on visual observations from adjoining public thoroughfares. Building exteriors were observed at ground level, unless otherwise indicated. Where applicable, representative areas of building interiors were accessed and observed to the extent they were made safely accessible with the cooperation of the site escort.

Current Use

The Project site is occupied by an approximately 24,990-square-foot warehouse used to store both vintage cars and auto parts. The site also includes an associated parking lot. The building is concrete tilt-up construction and was built in 1958.

Five storage containers are located on the southern parking lot. No access was available to visually inspect the interior of the storage containers. Because these containers are mobile and would be hauled off of the site, they are not considered a REC. No staining on the parking lot was noted near the containers.

Past Use(s) of the Site

As identified in **Section 4.3: Cultural Resources**, the Project was in agricultural use from the 1930s to the 1950s. The property was acquired in 1954 and the extant building was constructed in 1958 as a bowling alley. The bowling alley operated through the 1980s under different ownerships. Building permits issued in 1986 document a series of alterations to the interior, construction of a new fence, and signage, at which point the use of the building as a bowling alley appears to have ceased. The 1995 city directory listed I & D Auto Parts, U-Haul Co., and Rebuilt Masters at the property. More recent city directories list I & D Auto Parts warehouse, Kim's Import & Domestic Auto Parts, and Rebuilt Masters at the property. No obvious indication of past property usage likely to have involved the use, treatment, storage, disposal or generation of hazardous substances or petroleum products was observed at the time of the site visit.

Current Offsite Conditions and Use

Table 4.7-1: Current Uses of Adjoining Properties, identifies surrounding land uses.

Table 4.7-1: Current Uses of Adjoining Properties

Direction	Street Address	Description
Northwest	12801-12831 Crenshaw Boulevard	Commercial strip mall, includes Super 1 HR Cleaners
North	12810 Crenshaw Boulevard	Shell Gas Station
East	Various	Residential
South	13012 Crenshaw Boulevard	Ramda Metal Specialties Inc.
West	12901 Crenshaw Boulevard 12921 Crenshaw Boulevard/ 3133 West 131st Street	Unnamed business Condor Cargo

Interior and Exterior Observations

Storage/Use of Hazardous Substances and Petroleum Products. The following hazardous substances and petroleum products were observed to be stored and used by the Project site's property occupants:

- Spray paint in multiple/retail sized containers. The spray cans were stored on a shelf and appeared in good condition.
- Two 1-gallon cans of WD-40. The cans were stored on a shelf and appeared in good condition.
- Three 55-gallon plastic drums with small amounts of an unknown substance located at the building's northeastern portion. The drums were not stored within secondary containment; however, there were no visible evidence of spills, leaks, or staining in the drums' vicinity. The drums would need to be identified and properly disposed of under applicable rules and regulations.

Polychlorinated biphenyls (PCBs) in Electrical/Hydraulic Equipment. There are three poles with mounted transformers on the Project site: one pole at the site's northwestern corner; one pole is adjoining to the north of the building; and one pole is located at the southwestern corner. Evidence of spills or leaks in the transformers' vicinity was not observed and they are not considered to be RECs. No other electrical or hydraulic equipment suspected of containing PCBs was identified at the Project site.

Odors, Interior Stains, and Corrosion. A mild gasoline-like odor was noted in the vicinity of several of the vehicles stored in the warehouse. The odor is unlikely to be a significant issue. No other strong, unusual or pungent odors were noted on the Project site at the time of site reconnaissance. Surficial staining on the concrete floor was observed around some of the stored vehicles and an oily stain by the pallets at the southeastern corner of the building at the time of site reconnaissance. The stains are considered to be *de minimis* conditions. De *minimis* conditions are environmental conditions, which generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of the appropriate governmental agencies. Conditions determined to be *de minimis* are not RECs.

Pools of Liquid. No standing water or pools of liquid likely to contain hazardous substances or petroleum products were observed at the Project site at the time of site reconnaissance.

Interior Drains and Sumps. No floor drains or sump pits were noted at the Project site other than for storm water or sewage management at the time of site reconnaissance.

Exterior Pits, Ponds, Lagoons. No evidence of exterior pits, ponds or lagoons was identified on the Project site in connection with waste treatment or disposal at the time of site reconnaissance.

Stained Soil, Pavement, and Stressed Vegetation. Surficial staining was observed on the concrete pavement at the northern parking lot at the time of site reconnaissance. The staining is considered to be a *de minimis* condition. No stained soil, pavement or stressed vegetation was observed at the Project site at the time of site reconnaissance.

Solid Waste Disposal/Fill Materials. Trash and debris were observed littered throughout the northern parking lot. A large stockpile of waste wallboard material was observed at the northeastern portion of the building. No evidence of recently deposited fill materials was observed at the Project site at the time of site reconnaissance.

Wastewater. Sanitary sewage and storm water runoff generated on the site are discharged into the municipal sewer systems. No other waste discharges were observed at the Project site at the time of site reconnaissance.

Septic Systems. No indication of a septic system was noted on the Project site.

Wells. Evidence of a former groundwater monitoring well was observed at the property's northwestern corner at the time of site reconnaissance. The well appeared to have been abandoned by over drilling and filling with cement. This former well is associated with the groundwater monitoring activities at the north adjoining gas station. No other indication of wells was observed on the Project site.

Railroad Spurs. No railroad spurs were observed on the Project site.

RECORDS REVIEW

A database search report was obtained from Environmental Data Resources, Inc. (EDR). The report documents findings of various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials or petroleum hydrocarbons. The searches were performed according to ASTM standards for Phase I ESA database searches.

Project Site

The Project site was identified in the databases searched by EDR.

- U.S. Brownfields, Facility Index System (FINDS) – Parking Lot (12850 Crenshaw Boulevard). The Project site is listed on the local US Brownfields database identifying the parking lot portion as being in agricultural use prior to the early 1950s. The listing indicates that environmental sampling would be needed to screen for the presence of agricultural chemicals if land use were to change. The FINDS database references the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) which is a federal online database for Brownfield Grantees to electronically submit data to the U.S. EPA. Because the Project site is proposed for residential uses, the Brownfields listing requiring sampling for agricultural chemicals is considered a REC.
- FINDS, Hazardous Waste Facility and Manifest Data (HAZNET), Los Angeles Co. HMS (Industrial Waste and Underground Storage Tank Sites)– I & D Auto Parts (12900 Crenshaw Boulevard). The FINDS listing references the California EnviroStor database and does not track violators and therefore is not considered an issue. The HAZNET database identifies manifested waste generated in 1997 and 1998 and does not track violators; the reported wastes were unspecified sludge waste, hydrocarbon solvents, and other organic solids. The Los Angeles County Hazardous Material Site (HMS) listing indicates this business is registered with the County Hazardous Materials Division. Based on the absence of reported violations or releases, these listings are not considered to be a REC.
- HAZNET – Kim's Import and Domestic (12900 Crenshaw Boulevard). The HAZNET database identifies manifested waste generated in 2002, 2004, 2005, and 2011 and does not track violators; the reported wastes were unspecified oil containing waste, waste oil and mixed oil, and contaminated soil from site cleanup. Based on the absence of reported violations or releases, this listing is not considered to be a REC.

- California Integrated Water Quality System (CIWQS) – Rebuilt Master (12900 Crenshaw Boulevard). The CIWQS database is associated with industrial stormwater permitting with a terminated status. Based on the absence of reported violations or releases, this listing is not considered to be a REC.

Historical Use – Project Site and Adjoining Properties

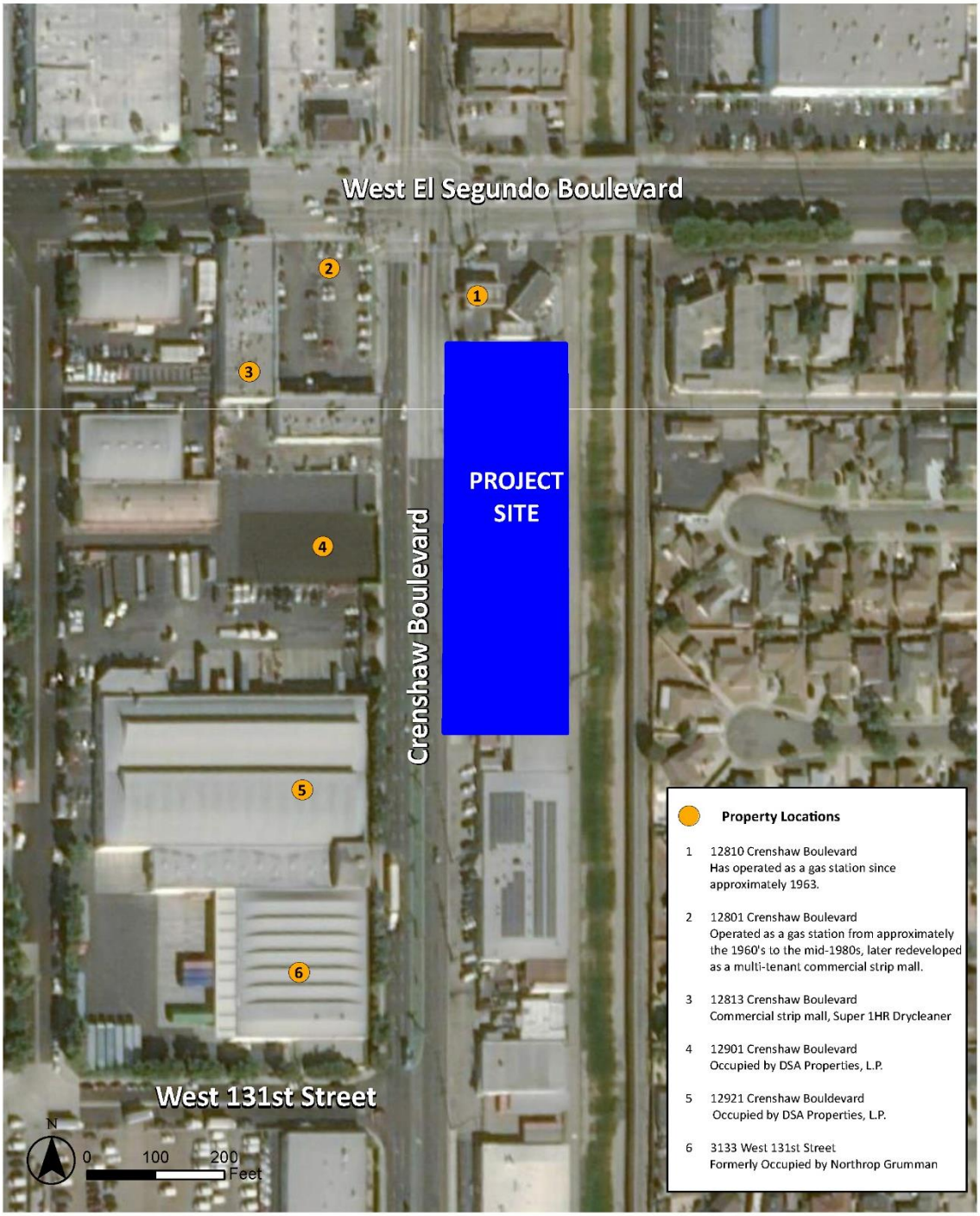
Research was conducted during the Phase I ESA to identify the likelihood of past uses having led to RECs in connection with the Project site. Standard historical sources, including fire insurance maps, city directories, historical topographic maps, and historical aerial photographs, have been reviewed to document the Project site's past uses, as far back as it can be shown that the Project site contained structures; or from the time the Project site was first used for residential, agricultural, commercial, industrial, or governmental purposes. The results of the research are presented below, and locations are shown on **Exhibit 4.7-1: Property and Adjoining Properties Location Map**.

Project Site. The Project site was in agricultural use from the 1930s to the 1950s. This suggests the historical application of pesticides during this time, which could have accumulated in the shallow soils at that time. The Project site was eventually redeveloped in 1958 with a warehouse-type building and a parking lot and used as a bowling alley. The Project site was eventually occupied by I & D Auto Parts Warehouse / Rebuilt Master from approximately 1995 until at least 2010 and Kim's Import & Dom Auto Parts from approximately 2001 to at least 2010, which are auto parts manufacturing businesses.

As previously noted, the Project site is listed on the U.S. Brownfields listing, which specifically requires environmental sampling to screen for the presence of agricultural chemicals, if land use were to change. Additionally, the Project site's historical operations as auto parts manufacturing businesses and the reported wastes generated at the Project site suggests that use of solvents in the cleaning and manufacturing processes may have contributed to contaminated soil at the Project site. The Project site's historical uses as agricultural land is considered a REC and the historical use as auto parts manufacturing operations is considered to be potential vapor encroachment conditions and are considered to be RECs.

12810 Crenshaw Boulevard. The adjacent property to the north has operated as a gas station since approximately 1963. Two leaking underground storage tank (LUST) cases are associated with the historical operation of the gas station. The first LUST case occurred in 1995 when gasoline impacted soil was discovered. This case received regulatory closure on December 5, 1996. In 2001, gasoline from this site impacted groundwater. Site monitoring and remediation occurred from 2003 to 2014 and the site received regulatory closure in February 2014. According to the regulatory documentation "low threat" levels of benzene and total petroleum hydrocarbons were left in the groundwater. According to the plume maps, contaminants were mostly confined to the gas station site with some migration to the northwest. Considering that some impacts remain and the contaminant plume's close proximity (within 50 feet), this site poses a potential vapor encroachment condition and is considered to be a REC in connection with the Project site.

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Source: ESRI World Imagery

Transit-Oriented Development Specific Plan Project
Environmental Impact Report

Exhibit 4.7-1
Property and Adjoining Properties Location Map

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12901 Crenshaw Boulevard. The adjacent property to the west is occupied by DSA Properties, L.P. This property is identified as a small quantity generator of hazardous waste from manufacturing operations. Historical site uses have contributed potential impacts volatile organic compounds (VOCs) at this site. This site is currently undergoing open site assessment as a Spills Leaks, Investigation and Cleanups (SLIC) database site. Considering the identified impacts, the currently open site assessment, and the close proximity to the Project site (within 100 feet), this site poses a potential vapor encroachment condition and is considered to be a REC in connection with the Project site.

12801 Crenshaw Boulevard. The adjacent site to the northwest was a gas station from approximately the 1960s until the mid-1980s when it was eventually redeveloped with a multi-tenant commercial strip mall. Considering this site is down gradient and located over 200 feet away, the absence of violations, and the subsequent redevelopment, this former gas station is not considered to be a REC.

12813 Crenshaw Boulevard. The adjacent site to the northwest is a commercial strip mall. Super 1-Hour Cleaners has been a mall tenant operating as a dry cleaners since approximately 1988. There is reported usage of Perchloroethylene (PCE) in the dry cleaning equipment. The dry cleaners is 225 feet and downgradient from the Project site. This site does not pose a vapor encroachment concern and is not considered to be a REC in connection with the Project site.

12921 Crenshaw Boulevard and 3133 West 131st Street. The adjacent properties to the southwest were formerly occupied by Northrop Grumman (3133 West 131st Street) and DSA Properties (12921 Crenshaw Boulevard). Historical site operations included manufacturing of aircraft parts. During removal of a 2,000-gallon waste underground storage tank (UST) in 1997, various VOC impacts were identified and a LUST case was opened. According to the LUST closure documentation, the UST was located to the northwest of Simms Avenue and West 131st Street, more than 550 feet away from the Project site. The LUST case received regulatory closure on August 10, 2010. Based on the regulatory closure, the distance and cross-gradient position from the Project site, this site is not considered to be a REC in connection with the Project site.

PHASE II SUBSURFACE INVESTIGATION

Subsequent to Phase I ESA preparation, a Phase II Investigation was performed on the Project site that included soil and soil gas sampling to identify potential contamination from unknown but probable former onsite sources, or from the existing gas station to the north. The investigation featured soil gas sampling to determine possible vapor intrusion impacts. Results from soil sampling indicated no detectable levels of organochlorine pesticides or actionable levels of heavy metals in the soil. Results from soil gas sampling indicated detectable levels of PCE in seven of the eight samples collected. The PCE concentrations exceeded California Department of Toxic Substances Control (DTSC) screening levels for residential applications, suggesting a possible vapor intrusion threat to future Project site residents. The Phase II Investigation recommended conducting a Vapor Intrusion Risk Evaluation (VIRE) to determine if remediation and/or mitigation is warranted.

A VIRE was conducted in June 2020. The VIRE's purpose was to assess whether the presence of VOCs detected in soil gas under the Project site area are likely to exceed levels considered acceptable to California health and environmental protection agencies. The VIRE evaluated the potential for VOC vapor intrusion into a future onsite residential building. The cancer risk estimated to result from unmitigated vapor intrusion into onsite buildings is below the DTSC acceptable cancer risk of one-in-a-million (1E-06). Similarly, the estimated non-cancer hazard is within acceptable levels and below the benchmark

value of 1.0. No significant cancer risks or non-cancer hazards are anticipated to occur as a result of exposures to detected concentrations of VOCs in soil gas at the Project site. However, the VIRE noted that groundwater contamination has been documented for neighboring facilities and VOCs originating offsite could migrate into the Project site in the future. Therefore, the VIRE recommends that an engineered vapor mitigation measure (such as an impermeable membrane) be included in the design of any proposed slab on grade residential structure on the Project site.

ASBESTOS-CONTAINING CONSTRUCTION MATERIALS

A building material is considered to be asbestos-containing material (ACM) if at least one sample collected from the homogenous material shows asbestos present in an amount greater than one percent (>1%). Materials with less than one percent (<1%) asbestos are not regulated by the U.S. EPA or federal Occupational Safety and Health Administration (OSHA). However, the California Division of Occupational Safety and Health (DOSH) does regulate materials with greater than one-tenth of one percent (>0.1%) under California Code of Regulations (CCR) Title 8, §1529. These materials are considered asbestos-containing construction materials (ACCM). Prior to the 1980s, a variety of building construction materials commonly used asbestos for insulation and as a fire retardant. No ACM survey of the existing onsite building has been conducted. However, because this building was operational in 1958, this EIR assumes the building contains ACCM.

LEAD-BASED PAINT

The California Department of Public Health (CDPH) (as defined in Title 17 CCR) and United States Department of Housing and Urban Development (HUD) define lead-based paint (LBP) as paints containing greater than 1.0 mg/cm2, as well as paints containing greater than or equal to 0.5 percent lead by weight or 5,000 mg/kg or ppm total lead. Paint containing less than these amounts but greater than the limit of detection is generally termed “lead-containing paint” (LCP). LBP and LCP generally do not pose a health risk unless the material is disturbed or sufficiently deteriorated to produce dust, which may be airborne and inhaled or ingested. Structures constructed prior to 1978 may contain LBP. In 1978, the federal government banned the consumer use of lead-containing paint. No LBP survey of the existing onsite building has been conducted. Because of the age of the building, the EIR assumes the presence of LBP.

PROXIMITY TO SCHOOLS

There are no schools located within 0.25 mile of the Project site. The schools nearest the Project site are:

- Purche Avenue Elementary School, 13210 Purche Avenue, located approximately 0.37 mile southeast of the Project site.
- Kornblum Elementary School, 3620 West El Segundo Boulevard, located approximately 0.52 mile west of the Project site.
- Zela Davis Elementary School, 13435 Yukon Avenue, located approximately 0.53 mile southwest of the Project site.

PROXIMITY TO AIRPORTS

The nearest airport to the Project site is Hawthorne Municipal Airport/Jack Northrop Field, approximately 0.45 mile to the north. Review of the Hawthorne Airport's Airport Influence Area Map[1] indicates the Project site is outside of the Airport Influence Area boundaries. Therefore, no further analysis concerning this Airport is warranted. Additionally, there are no other airports or airstrips within 2.0 miles of the Project site.

DISASTER AND EVACUATION ROUTES

Disaster routes are transportation routes, such as freeway, highway, or arterial routes, that are pre-identified for use during times of crisis (County of Los Angeles, 2017). These routes are used to bring in emergency personnel, equipment, and supplies to impacted areas, to save lives, protect property, and minimize environmental impacts. During a disaster, these routes have priority for clearing, repairing, and restoration over all other roads. The County of Los Angeles states that "Disaster Routes are not Evacuation Routes. Although an emergency may warrant a road be used as both a disaster and evacuation route, they are completely different. An evacuation route is used to move the affected population out of an impacted area." Evacuation routes depend on the nature and location of the emergency or disaster. The County of Los Angeles designates Crenshaw Boulevard adjacent to the Project site a Disaster Route (County of Los Angeles, 2008). The City of Gardena does not designate disaster or evacuation routes.

WILDFIRES

The California Department of Forestry and Fire Protection (CalFire) maps identify fire hazard severity zones in state and local responsibility areas for fire protection. The Project site is not within an area designated as a very high fire hazard severity area (CalFire, 2020).

4.7.2 REGULATORY FRAMEWORK

See **Section 4.8: Hydrology and Water Quality**, for regulations pertaining to flood hazards and **Section 4.5: Geology and Soils**, for regulations pertaining to geologic and soil-related hazards.

FEDERAL

The management of hazardous materials and hazardous wastes is regulated at federal, state, and local levels, including, among others, through programs administered by the U.S. EPA; agencies within the California Environmental Protection Agency (CalEPA), such as the DTSC; federal and state occupational safety agencies; and Los Angeles County Division of Environmental Health.

At the federal level, the U.S. EPA is the principal regulatory agency, while at the State level, DTSC is the primary agency governing the storage, transportation, and disposal of hazardous wastes. The Regional Water Quality Control Board (RWQCB) has jurisdiction over discharges into waters of the State. The federal OSHA and the California Occupational Safety and Health Administration (Cal/OSHA) regulate many aspects of worker safety.

[1] Los Angeles County Dept. of Regional Planning. (2003). *Hawthorne Airport Airport Influence Area*. Retrieved from http://planning.lacounty.gov/assets/upl/project/aluc_airport-hawthorne.pdf.

Toxic Substances Control Act/Resource Conservation and Recovery Act/Hazardous and Solid Waste Act

The Federal Toxic Substances Control Act of 1976 and Resource Conservation and Recovery Act (RCRA) established a program administered by the U.S. EPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act (HSWA), which affirmed and extended the "cradle to grave" system of regulating hazardous wastes.

Comprehensive Environmental Response, Compensation, and Liability Act/Superfund Amendments and Reauthorization Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, was enacted by Congress on December 11, 1980. This law (U.S. Code Title 42, Chapter 103) provides broad Federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites; provides for liability of persons responsible for releases of hazardous waste at these sites; and establishes a trust fund to provide for cleanup when no responsible party can be identified. CERCLA also enables the revision of the National Contingency Plan (NCP). The NCP (Title 40, Code of Federal Regulation [CFR], Part 300) provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, and/or contaminants. The NCP also established the National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.

Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) and the National Priorities List

The U.S. EPA also maintains the Comprehensive Environmental Response Compensation (CERCLIS) and Liability Information System list. This list contains sites that are either proposed to be or on the National Priorities List (NPL), as well as sites that are in the screening and assessment phase for possible inclusion on the NPL. The NPL is a list of the worst hazardous waste sites that have been identified by Superfund.

Emergency Planning and Community Right-to-Know Act

The federal Emergency Planning and Community Right-To-Know Act (EPCRA) was enacted to inform communities and residents of chemical hazards in their area. Businesses are required to report the locations and quantities of chemicals stored onsite to both State and local agencies. EPCRA requires the U.S. EPA to maintain and publish a digital database list of toxic chemical releases and other waste management activities reported by certain industry groups and Federal facilities. This database, known as the Toxic Release Inventory, gives the community more power to hold companies accountable for their chemical management.

Hazardous Materials Transportation Act

The U.S. Department of Transportation (DOT) receives authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act, as amended and codified (49 U.S.C. 5101 et seq.). The DOT is the primary regulatory authority for the interstate transport of hazardous materials and establishes regulations for safe handling procedures (i.e., packaging, marking, labeling, and routing).

In California, California Vehicle Code §31303 states that any hazardous material being moved from one location to another must use the route with the least travel time. This, in practice, means major roads and highways, although secondary roads are permitted to be used for local delivery. These policies are enforced by both the California Highway Patrol and the California Department of Transportation (Caltrans).

Clean Water Act/SPCC Rule

The Clean Water Act (CWA) (33 U.S.C. §1251 et seq., formerly the federal Water Pollution Control Act of 1972), was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the U.S. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and certain non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). In California, NPDES permitting authority is delegated to, and administered by, the nine RWQCBs. The Project is within the Los Angeles RWQCB's jurisdiction.

Clean Water Act Section 402 authorizes the California State Water Resources Control Board (SWRCB) to issue NPDES General Construction Storm Water Permit (Water Quality Order 99-08-DWQ), referred to as the "General Construction Permit." Construction activities can comply with and be covered under the General Construction Permit provided that they:

- Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs) that would prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving offsite into receiving waters
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation; and
- Perform inspections of all BMPs.

NPDES regulations are administered by the RWQCB. Projects that disturb one or more acres are required to obtain NPDES coverage under the Construction General Permits.

Occupational Safety and Health Administration (OSHA)

Congress passed the Occupational and Safety Health Act to ensure worker and workplace safety. Their goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. To establish standards for workplace health and safety, OSHA also created the National Institute for Occupational Safety and Health as the research institution for OSHA. The Administration is a division of the U.S. Department of Labor that oversees the administration of OSHA and enforces standards in all states. OSHA standards are listed in Title 29 CFR Part 1910.

OSHA's Hazardous Waste Operations and Emergency Response Standard apply to five groups of employers and their employees. This includes any employees who are exposed or potentially exposed to hazardous substances (including hazardous waste) and who are engaged in clean-up operations; corrective actions; voluntary clean-up operations; operations involving hazardous wastes at treatment, storage, and disposal facilities; and emergency response operations.

STATE

California Environmental Protection Agency

CalEPA has jurisdiction over hazardous materials and wastes at the state level. DTSC is the department of CalEPA responsible for implementing and enforcing California's own hazardous waste laws, which are known collectively as the Hazardous Waste Control Law. DTSC regulates hazardous waste in California primarily under the authority of the federal RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Although similar to RCRA, the California Hazardous Waste Control Law and its associated regulations define hazardous waste more broadly and regulate a larger number of chemicals. Hazardous wastes regulated by California but not by the U.S. EPA are called "non-RCRA hazardous wastes." Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Government Code Section 65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, Department of Health Services lists of contaminated drinking water wells, sites listed by the SWRCB as having underground storage tank leaks and have had a discharge of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites that have had a known migration of hazardous waste/material.

Enforcement of directives from DTSC is handled at the local level, in this case the Los Angeles County Division of Environmental Health. The RWQCB also has the authority to implement regulations regarding the management of soil and groundwater investigation.

California Fire Code

California Code of Regulations, Title 24, also known as the California Building Standards Code, contains the California Fire Code (CFC), included as Title 24, Part 9. The CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution.

Hazardous Waste Control Act

The Hazardous Waste Control Act created the State hazardous waste management program, which is similar to but more stringent than the Federal RCRA program. The act is implemented by regulations contained in CCR Title 26, which describes the following required aspects for the proper management of hazardous waste: identification and classification; generation and transportation; design and permitting of recycling, treatment, storage, and disposal facilities; treatment standards; operation of facilities and staff training; and closure of facilities and liability requirements. These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under the Hazardous Waste Control Act and Title 26, the generator of hazardous waste must complete a manifest that accompanies the waste from generator to transporter to the ultimate disposal location. Copies of the manifest must be filed with the DTSC.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) required the administrative consolidation of six hazardous materials and waste programs (Program Elements) under one agency, a Certified Unified Program Agency (CUPA). The Program Elements consolidated under the Unified Program are Hazardous Waste Generator and On-site Hazardous Waste

Treatment Programs (known as Tiered Permitting); Aboveground Petroleum Storage Tank SPCC; Hazardous Materials Release Response Plans and Inventory Program (a.k.a. Hazardous Materials Disclosure or "Community-Right-To-Know"); California Accidental Release Prevention Program (Cal ARP); Underground Storage Tank (UST) Program; and Uniform Fire Code Plans and Inventory Requirements.

The Unified Program is intended to provide relief to businesses complying with the overlapping and sometimes conflicting requirements of formerly independently managed programs. The Unified Program is implemented at the local government level by CUPAs. Most CUPAs have been established as a function of a local environmental health or fire department. Some CUPAs have contractual agreements with another local agency, a participating agency, which implements one or more Program Elements in coordination with the CUPA. The CUPA designated for Los Angeles County is the Los Angeles County Fire Department (LACFD) – Health Hazardous Materials Division.

Department of Toxic Substance Control

DTSC is a department of CalEPA and is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of the Federal RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Government Code Section 65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, Department of Health Services lists of contaminated drinking water wells, sites listed by the SWRCB as having UST leaks and have had a discharge of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites that have had a known migration of hazardous waste/material.

California Office of Emergency Services (OES)

To protect the public health and safety and the environment, the California OES is responsible for establishing and managing statewide standards for business and area plans relating to the handling and release or threatened release of hazardous materials. Basic information on hazardous materials handled, used, stored, or disposed of (including location, type, quantity, and the health risks) needs to be available to firefighters, public safety officers, and regulatory agencies. The information must be included in these institutions' business plans to prevent or mitigate the damage to the health and safety of persons and the environment from the release or threatened release of these materials into the workplace and environment.

These regulations are covered under Chapter 6.95 of the California Health and Safety Code Article 1 – Hazardous Materials Release Response and Inventory Program (§§25500 to 25520) and Article 2 – Hazardous Materials Management (§§25531 to 25543.3). CCR Title 19, Public Safety, Division 2, Office of Emergency Services, Chapter 4 – Hazardous Material Release Reporting, Inventory, and Response Plans, Article 4 (Minimum Standards for Business Plans) establishes minimum statewide standards for Hazardous Materials Business Plans (HMBP). These plans shall include the following: (1) a hazardous material inventory in accordance with §§2729.2 to 2729.7; (2) emergency response plans and procedures in accordance with §2731; and (3) training program information in accordance with §2732. Business plans contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of in the state. Each business shall prepare a HMBP if that business

uses, handles, or stores a hazardous material or an extremely hazardous material in quantities greater than or equal to the following: 500 pounds of a solid substance, 55 gallons of a liquid, 200 cubic feet of compressed gas, a hazardous compressed gas in any amount, or hazardous waste in any quantity.

California Occupational Safety and Health Administration

Cal/OSHA is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than Federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR Sections 337-340). The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings.

In addition, Cal/OSHA regulates medical/infectious waste, including management of sharps, requirements for containers that hold or store medical/infectious waste, labeling of medical/infectious waste bags/containers, and employee training.

2019 California Fire Code

CCR Title 24, Part 9 (2019 California Fire Code) contains regulations relating to construction and maintenance of buildings, the use of premises, and the management of WUI areas, among other issues. The California Fire Code is updated every three years by the California Building Standards Commission and was last updated in 2019 (effective January 1, 2020). The California Fire Code sets forth regulations regarding building standards, fire protection and notification systems, fire protection devices such as fire extinguishers and smoke alarms, high-rise building standards, and fire suppression training. It contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code also include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises.

Los Angeles County adopted the 2019 California Fire Code with certain amendments, additions, and deletions, as Los Angeles County Code Title 32 (Los Angeles County Fire Code).

REGIONAL

County Department of Public Health, Division of Environmental Health, Emergency Response Team

The Los Angeles County Emergency Preparedness and Response Unit ensures that the Los Angeles County Division of Environmental Health is able to protect the public from health hazards that occur after emergencies or disasters. The agency develops plans and establishes procedures to coordinate responses with partner agencies. The agency provides training and conducts exercises to create a workforce that is able to manage the health effects of any emergency.

County Fire Department Hazardous Materials Response Team

The LACFD Health Hazardous Materials Division is the lead agency (CUPA) for hazardous materials within Los Angeles County. Any business that handles a hazardous material or hazardous waste of quantities at any one time during a year equal to or greater than a total volume of 55 gallons, a total weight of 500 pounds, or a total volume of 200 cubic feet of a compressed gas is a hazardous materials handler and

must report Owner/Operator, Business Activities, Inventory, Site Map, and Emergency Response and Contingency Plan and Employee Training Plan information in the California Environmental Reporting System.

LOCAL

City of Gardena General Plan

The Project relevant General Plan policy concerning hazards and hazardous materials is addressed below.

- **Goal CN 2:** Conserve and protect groundwater supply and water resources.
  - **Policy CN 2.6**: Encourage and support the proper disposal of hazardous waste and waste oil. Monitor businesses that generate hazardous waste materials to ensure compliance with approved disposal procedures.

City of Gardena Municipal Code

The City adopted the Los Angeles County Fire Code with certain amendments, additions, and deletions, as Gardena Municipal Code (GMC) Chapter 8.08.010 – Adoption of the County Fire Code. The City currently operates under the 2020 Los Angeles County Fire Code.

Pursuant to GMC Chapter 8.08.030 - Fire Fighting, the City's Emergency Medical Services' transferred responsibility of providing fire protection, EMS services, and protection from hazardous materials in the City to the LACFD. The Los Angeles County Fire Code provides standards to ensure that the use, handling, storage, and transportation of hazardous materials comply with all applicable State laws (including but not limited to, California Government Code §65850.2 and California Health and Safety Code §25505 et seq.) and that appropriate information is reported to the County of Los Angeles, as the regulatory authority. This section of the Fire Code includes reporting requirements; standards regarding underground and aboveground storage of hazardous materials; and standards for new development.

City of Gardena Emergency Operations Plan

The purpose of the Emergency Operations Plan is to provide guidance for the City's response to emergency situations from natural disasters, technological incidents, and National security emergencies. The Emergency Operations Plan describes procedures for the effective and efficient allocation response to a hazardous materials emergency. It establishes an emergency organization, assigns tasks, specifies policy and general procedures, and provides coordination of planning for all phases of emergency planning for a hazardous materials emergency.

4.7.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines *Appendix G, Environmental Checklist Form*, includes questions concerning hazards and hazardous materials, and wildfires. The issues presented in the Environmental Checklist have been used as significance criteria in this section. Accordingly, the Project could have a significant effect on the environment if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (see Impact 4.7-1);

- 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 (see Impact 4.7-2);
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school (see Impact 4.7-3);
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment (see Impact 4.7-2);
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area (see Impact 4.7-4);
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan (see Impact 4.7-5); or
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires (see **Section 7.0**).

4.7.4 IMPACTS AND MITIGATION MEASURES

Impact 4.7-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Level of Significance: Less Than Significant Impact

CONSTRUCTION AND OPERATIONS

Project construction and operation would involve the transport, use, and disposal of hazardous materials onsite and offsite, including fuels, paints, mechanical fluids, and solvents. The materials would not be present in such a quantity or used in such a manner that would pose a significant hazard to the public. The use of these materials during Project construction would be short term and would occur in accordance with standard construction practices, as well as with applicable federal, state, and local regulations. Potentially hazardous materials would be contained, stored, and used during construction in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Examples of such activities include fueling and servicing construction equipment, and applying paints and other coatings. Project construction would be temporary and onsite activities would be governed by existing regulations of several agencies. Construction activities would be subject to compliance with relevant regulatory requirements and restrictions concerning the transport, use, or disposal to prevent a significant hazard to the public or environment. The primary regulatory requirements include South Coast Air Quality Management District Rules 1166 (volatile organic compound emissions) and 1466 (fugitive dust-toxic air contaminants).

Hazardous materials used during operations would be stored, handled, and disposed of in accordance with applicable regulations. These uses would not involve the routine transport, use, or disposal of quantities of hazardous materials that may create a significant hazard to the public or environment. The Project would also be reviewed by LACFD for hazardous material use, safe handling and storage, as

appropriate. LACFD would impose COAs on the Project to reduce hazardous material impacts. Therefore, following compliance with the regulatory requirements and COAs, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Compliance with all applicable federal, state, and local regulations regarding hazardous material generation and usage on the site, potential impacts related to transport, use, or disposal of hazardous materials would be reduced to less than significant levels.

MITIGATION MEASURE

No mitigation is required.

Impact 4.7-2:	**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?** **Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?**
Level of Significance: Less Than Significant Impact With Mitigation	

CONSTRUCTION

The Project site is not included on the hazardous sites list compiled pursuant to California Government Code Section 65962.5.[2] However, as previously addressed, the Phase I ESA identified four RECs (as defined by ASTM Practice E 1527-13) that required additional investigation:

- The Project site's historical agricultural use (i.e., the Brownfields listing requiring sampling for agricultural chemicals) is considered a REC.
- The historical use as an auto parts manufacturing operation is considered to be potential vapor encroachment condition and is considered a REC.
- 12810 Crenshaw Boulevard has operated as a gas station since approximately 1963. Because the gas station contaminant plume is within 50 feet, this site poses a potential vapor encroachment condition and is considered to be a REC in connection with the Project site.
- 12901 Crenshaw Boulevard is identified as a small quantity generator of hazardous waste from manufacturing operations. Considering the identified impacts, the currently open site assessment, and its proximity to the Project site (within 100 feet), this site poses a potential vapor encroachment condition and is considered to be a REC in connection with the Project site.

The Phase II Investigation identified PCE concentrations that exceed DTSC screening levels for residential applications and recommended conducting a VIRE to determine a possible vapor intrusion threat to future residents on the Project site. The VIRE conducted in June 2020 did not result in an exceedance of DTSC cancer risk and non-cancer hazards thresholds; therefore, no significant impacts are anticipated to occur as a result of exposures to detected concentrations of VOCs in soil gas at the Project site. However, the

[2] California, State of, Department of Toxic Substances Control, DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List). Available at: https://dtsc.ca.gov/dtscs-cortese-list/. Accessed: August 27, 2020.

VIRE noted that groundwater contamination has been documented for neighboring facilities and VOCs originating offsite could migrate into the Project site in the future. Therefore, the VIRE recommended that an engineered vapor mitigation measure (such as an impermeable membrane) be included in the design of any proposed slab on grade residential structures on the Project site.

While the VIRE analysis did not result in an exceedance of DTSC cancer risk and non-cancer hazards thresholds, mitigation measure is recommended to reduce the potential vapor intrusion impacts. Mitigation Measure (MM) HAZ-1 requires that an engineered vapor measure (such as an impermeable membrane) be included in the design of any proposed slab on grade residential structures on the Project site. With implementation of MM HAZ-1, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving soil and groundwater contamination. With mitigation, impacts would be less than significant.

MM HAZ-2 requires a construction management plan that includes provisions for responding to the disturbance of undocumented contamination. Responsibility for responding to the discovery of undocumented contamination is delegated to the CUPA, LACFD. If soil, groundwater, or other environmental media with suspected contamination is encountered unexpectedly during construction (for example, identified by odor or visual staining, or by unearthing any underground storage tanks, abandoned drums, or other hazardous materials and wastes), work would immediately cease in the vicinity of the suspect materials. The area would then be secured as necessary, and all appropriate measures would be taken to protect human health and the environment. Appropriate measures include notifying regulatory agencies and complying with the various agencies' laws, regulations, and policies. MM HAZ-2 confirms that the Applicant and its contractors would work with these agencies should undocumented contamination be encountered during construction. These provisions would minimize the potential for hazardous materials to be released into the environment.

Condition of Approval (COA) HAZ-1 requires an ACM and LBP survey of the existing onsite building. Demolition of the onsite building has the potential to cause airborne asbestos and LBP concentrations that would exceed federal and state thresholds and may pose an exposure risk for construction workers. Therefore, ACM and LBP would be removed or stabilized prior to demolition. Therefore, the potential presences of these materials would not be present during construction or operation of the Project. COA HAZ-1 includes measures for the safe dismantling and removal of building components and debris and prevents the accidental release of lead and asbestos, thereby protecting workers and the public from potential exposure to hazardous materials and wastes during demolition.

With implementation of the conditions of approval and mitigation measures, impacts would be less than significant in this regard.

OPERATIONS

Project operations would involve the use of typical hazardous materials/chemicals associated with residential uses such household cleaners, paints, solvents, and fertilizers and pesticides for site landscaping. As discussed above, any routine transport, use, and disposal of these materials during Project operations must adhere to federal, state, and local regulations for transport, handling, storage, and disposal of hazardous substances. Further, hazardous materials/chemicals such as household cleaners, paints, solvents and fertilizers in low quantities do not pose a significant threat related to the release of hazardous materials into the environment. Therefore, it is not anticipated that Project operations would

create a significant hazard through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant.

CONDITIONS OF APPROVAL

COA HAZ-1 Prior to issuance of a demolition permit of the onsite structure, preparation of a demolition plan for the safe dismantling and removal of building components and debris including a plan for lead and asbestos abatement shall be required. The demolition plan shall be submitted to the City for review and approval prior to commencement of construction activities.

Prior to demolition activities, an asbestos survey shall be conducted by an Asbestos Hazard Emergency Response Act (AHERA) and California Division of Occupational Safety and Health (Cal/OSHA) certified building inspector to determine the presence or absence of asbestos-containing materials (ACMs). The sampling method to be used shall be based on the statistical probability that construction materials similar in color and texture contain similar amounts of asbestos. In areas where the material appears to be homogeneous in color and texture over a wide area, bulk samples shall be collected at discrete locations from within these areas. In unique or nonhomogeneous areas, discrete samples of potential ACMs shall be collected. The survey shall identify the likelihood that asbestos is present in concentrations greater than 1 percent in construction materials. If ACMs are located, abatement of asbestos shall be completed prior to any activities that would disturb ACMs or create an airborne asbestos hazard.

Asbestos removal shall be performed by a State certified asbestos containment contractor in accordance with the South Coast Air Quality Management District (SCAQMD) Rule 1403. Common asbestos abatement techniques involve removal, encapsulation, or enclosure. The removal of asbestos is preferred when the material is in poor physical condition and there is sufficient space for the removal technique. The encapsulation of asbestos is preferred when the material has sufficient resistance to ripping, has a hard or sealed surface, or is difficult to reach. The enclosure of asbestos is to be applied when the material is in perfect physical condition, or if the material cannot be removed from the site for reasons of protection against fire, heat, or noise.

COA HAZ-2 If paint is separated from building materials (chemically or physically) during demolition of the structures, the paint waste shall be evaluated independently from the building material by a qualified Environmental Professional. A portable, field X-ray fluorescence (XRF) analyzer shall be used to identify the locations of potential lead paint, and test accessible painted surfaces. The qualified Environmental Professional shall identify the likelihood that lead is present in concentrations greater than 1.0 milligrams per square centimeter (mg/cm2) in/on readily accessible painted surfaces of the buildings.

If lead-based paint is found, abatement shall be completed by a qualified Lead Specialist prior to any activities that would create lead dust or fume hazard. Potential methods to reduce lead dust and waste during removal include wet scraping, wet planning, use of electric heat guns, chemical stripping, and use of local High-Efficiency Particulate Air (HEPA) exhaust systems. Lead-based paint removal and disposal shall be performed in

accordance with California Code of Regulation Title 8, §1532.1, which specifies exposure limits, exposure monitoring and respiratory protection, and mandates good worker practices by workers exposed to lead. Contractors performing lead-based paint removal shall provide evidence of abatement activities to the City Engineer.

MITIGATION MEASURES

MM HAZ-1 Prior to issuance of a Building Permit, the building plans shall include an impermeable vapor membrane (or equivalent). The building plans shall be submitted to the City for review and approval prior to commencement of construction activities. The impermeable vapor membrane shall not underlay non-slab areas, such as landscaping and the dog run area, because these spaces are not enclosed. The local Building Department would have oversight/sign-off responsibility for the vapor barrier.

MM HAZ-2 Prior to issuance of a demolition permit of the onsite structure, preparation of a construction management plan addressing procedures and requirements for responding to disturbance of undocumented contaminated soil shall be required. The construction management plan shall be submitted to the City for review and approval prior to commencement of construction activities.

Impact 4.7-3: 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?

Level of Significance: No Impact

Project construction would involve the transport, use, and disposal of hazardous materials on-site and off-site, which include fuels, paints, mechanical fluids, and solvents, but would not be present in such a quantity or used in such a manner that would pose a significant hazard to nearby schools. However, there are no existing schools or known proposed schools within 0.25 mile of the Project site. The school nearest the Project site, Purche Avenue Elementary School, is approximately 0.37 mile to the southeast. Notwithstanding, the routine transport, use, and disposal of hazardous materials during construction must adhere to federal, state, and local regulations for transport, handling, storage, and disposal of hazardous substances. Compliance with the regulatory framework would ensure Project construction would not create a significant hazard to nearby schools.

The Project does not propose any uses, which could generate hazardous emissions or involve the handling of hazardous materials, substances, or waste in significant quantities that could potentially impact surrounding schools. The types of hazardous materials that would be routinely handled would be limited to household cleaners, paints, solvents, and fertilizers and pesticides for site landscaping. Moreover, there are no existing schools or known proposed schools within 0.25 mile of the Project site. The routine transport, use, and disposal of hazardous materials during operations must adhere to federal, state, and local regulations for transport, handling, storage, and disposal of hazardous substances. Compliance with the regulatory framework would ensure Project operations would not create a significant hazard to nearby schools.

Impact 4.7-4:	**For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

Level of Significance: No Impact

The airport located nearest the Project site is Hawthorne Municipal Airport/Jack Northrop Field, approximately 0.45 mile to the north. The Project site is outside of the Airport Influence Area boundaries and there are no other airports or airstrips within two miles of the Project site. Thus, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area.

Impact 4.7-5:	**Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Level of Significance: Less Than Significant Impact

CONSTRUCTION AND OPERATIONS

Project implementation would not impair or physically interfere with an adopted emergency response or evacuation plan, including the City of Gardena Emergency Operations Plan. No revisions to the adopted Emergency Operations Plan would be required as a result of Project implementation. Primary access to all major roads would be maintained during Project construction except the partial closure of Crenshaw Boulevard's western lanes for approximately two-years. The partial closure is not expected to require a complete blockage of the roadway. As discussed in **Section 4.13: Transportation**, emergency vehicle access would be maintained at all times to the construction worksite and adjacent businesses and emergency vehicle access would be maintained at all times to and from fire stations, hospitals, and medical facilities near the construction site and along the haul routes. Impacts would be less than significant. Emergency services and access is further described in **Section 4.12: Public Services and Recreation**.

MITIGATION MEASURES

No mitigation is required.

4.7.5 CUMULATIVE IMPACTS

Cumulative impacts related to hazards and hazardous materials would result from projects that combine to increase exposure to hazards and hazardous materials. The potential for cumulative impacts to occur is limited since the impacts from hazardous materials use on site are site-specific. The EIR evaluates environmental hazards in connection with the Project site and surrounding area. Regarding the offsite environmental hazards, the database search documents the findings of various governmental database searches regarding properties with known or suspected releases of hazardous materials within a search radius of up to 1.0 mile from the site and serves as the basis for defining the cumulative impacts study area.

Although some of the cumulative projects and other future projects associated with buildout of the surrounding communities also have potential site-specific impacts associated with hazardous materials, it

is expected that future development would comply with all federal, state, and local statutes and regulations applicable to hazardous materials.

No Project impacts from hazards and hazardous materials related to the hazardous emissions or hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school; safety hazards or excessive noise for people residing or working in the project area within an airport land use plan or 2.0 miles of a public airport or public use airport; or exposure of people or structures to a significant risk of loss, injury or death involving wildland fires would occur. Therefore, the Project would not cumulatively contribute to impacts with respect to these thresholds.

Impacts related to the routine transport, use, or disposal of hazardous materials and interfere with an adopted emergency response plan or emergency evacuation plan would be less than significant in consideration of compliance with existing laws, ordinances, regulations and standards. Therefore, no cumulative impact would occur.

As addressed in this EIR section, the Phase I and Phase II ESA identified four RECs (as defined by ASTM Practice E 1527-13) in association with the Project site. The Phase II Investigation concluded that PCE concentrations in soil exceeded DTSC screening levels for residential development. The Phase II Investigation recommended conducting a VIRE to determine a possible vapor intrusion threat to future residents on the Project site. The VIRE did not result in an exceedance of DTSC cancer risk and non-cancer hazards thresholds. However, the VIRE noted that groundwater contamination has been documented for neighboring facilities and VOCs originating offsite could migrate into the Project site in the future. Therefore, the Project requires compliance with MM HAZ-1 to provide an engineered vapor barrier (such as an impermeable membrane) to reduce impacts to a less than significant level.

The condition of approval and mitigation would also be required to reduce potential impacts related to ACCM and LBP. Preparation of a preparation of an Environmental Management System, demolition plan and construction management plan would be required to reduce impacts related to a release of hazardous materials into the environment during construction or operations.

With the implementation of mitigation and compliance with the condition of approval, the Project would not contribute to a cumulatively significant impact with respect to hazardous materials.

4.7.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning hazards and hazardous materials would occur.

4.7.7 REFERENCES

City of Gardena (2006). *Gardena General Plan*. Gardena, CA: City of Gardena.

City of Gardena, *Gardena Municipal Code* (City Municipal Code Chapter 17). Accessed August 27, 2020.Gardena, CA: https://www.codepublishing.com/CA/Gardena/#!/Gardena08/Gardena0808.html#8.08.

Hillman Consulting, *Phase I Environmental Site Assessment 12850 and 12900 Crenshaw Boulevard, Gardena, California*, October 7, 2019.

Hillman Consulting, *Limited Phase II Subsurface Investigation Report 12850 and 12900 Crenshaw Boulevard, Gardena, California*, December 17, 2019.

Hillman Consulting, *Technical Memorandum Vapor Intrusion Risk Evaluation 12850 and 12900 Crenshaw Boulevard, Gardena, California*, June 4, 2020.

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4.8 HYDROLOGY AND WATER QUALITY

4.8 HYDROLOGY AND WATER QUALITY

The purpose of this section is to describe the existing regulatory and environmental conditions related to hydrology and water quality, identify potential impacts that could result from Project implementation, and as necessary, recommend mitigation to avoid or reduce the significance of impacts.

Information in this section is based primarily on hydrology and water quality data provided in **Appendix 9.9: Hydrology and Water Quality Data**. Additional resource information was obtained from available public resources, including among others, the State Water Resources Control Board (SWRCB) GeoTracker website.

Kimley-Horn conducted a third-party review of the Project's hydrology and water quality analysis on behalf of the City; see **Appendix 9.9**. The third-party review concluded the analysis meets the applicable provisions of CEQA and the State CEQA Guidelines.

4.8.1 AFFECTED ENVIRONMENT

REGIONAL SETTING

Surface Water Hydrology

The Project site is within the Dominguez Watershed, which covers approximately 133 square miles and is largely built out. The watershed's land uses generally consist of commercial, industrial, and residential uses. Stormwater collected from the Dominguez Watershed is conveyed south and west before discharging into the Pacific Ocean via the Los Angeles Harbor.

Surface drainage generally flows to the south through the Dominguez Watershed before it outlets to the Port of Los Angeles. The Los Angeles Regional Water Quality Control Board (LARWQCB) regulates water quality within the watershed.

Groundwater

The Project site and City of Gardena (City) overlie the Los Angeles Coastal Plain Groundwater Basin (Coastal Plain Basin), which consists of four major subbasins: Hollywood, Santa Monica, Central, and West Coast. Replenishment of the Coastal Plain Basin occurs primarily through percolation of rainfall throughout the watershed via permeable surfaces, spreading grounds, and groundwater migration from adjacent basins. Injection wells are also used to pump freshwater along specific seawater barriers to prevent seawater intrusion. Groundwater within the Coastal Plain Basin generally flows in a south/ southwesterly direction.

LOCAL SETTING

The Project site is developed with a warehouse used to store both vintage cars and auto parts and a surface parking lot. There are no known existing water quality best management practices (BMPs) on the site. Existing potential pollutants at the Project site are likely to exist based upon current uses. Likely existing pollutants include oil and grease, trash, and hydrocarbons from the parking areas as well as metals from the warehouse.

Surface Water Hydrology

In the Project vicinity, stormwater runoff is collected and conveyed in Crenshaw Boulevard adjacent to the Project site. Stormwater sheet flows to Crenshaw Boulevard and then travels along the curb gutter to the south. Runoff then enters the City's catch basin near the West 131st Street at Crenshaw Boulevard intersection on the street's eastern edge. From there, runoff is piped to the Los Angeles County Flood Control District (LACFCD) catch basin near the West 134th Street at Crenshaw Boulevard intersection, where it enters a storm drainpipe within the public right-of-way. After flowing into the LACFCD storm drainpipe, the runoff then flows eastward within the Dominguez Flood Control Channel (Dominguez Channel). The stormwater then continues southerly through Dominguez Channel where it eventually discharges into the Dominguez Channel Estuary, the Los Angeles Harbor, the San Pedro Bay Near/Offshore Zones, and then to the Pacific Ocean.

The Project site's paved parking areas are in the north and south portions of the site. Stormwater runoff sheet flows to the south/southwest towards Crenshaw Boulevard. Runoff from the roof is captured by a series of drains and is discharged directly to the ground where all stormwater sheet flows and discharges to Crenshaw Boulevard. Hydrology analysis was conducted as a part of the EIR to determine peak flows during the 10-year, 25-year and 50-year storm event in the existing and proposed conditions. **Table 4.8-1: Existing Drainage Conditions**, contains existing conditions hydrology analysis results; see **Appendix 9.9** for existing condition hydrology calculations.

Table 4.8-1: Existing Drainage Conditions

Drainage Area	Area (acres)	% Impervious	Q10 (cfs)	Q25 (cfs)	Q50 (cfs)
A1	1.33	100	2.70	3.32	3.79
Existing Total	1.33	-	2.70	3.32	3.79
Source: Fuscoe Engineering Inc., 2020.					

Groundwater

Groundwater depth is monitored at various stations throughout the County of Los Angeles (County) with monitoring data accessible on the Los Angeles County Department of Public Works (LACDPW) website (Groundwater Well Map). There is a monitoring well (County Well ID: 1378B) approximately 1,200 feet north of the Project site in the City of Hawthorne. As of May 28, 2019, groundwater levels were 41 feet below ground surface (bgs) level.[1] Groundwater levels have been gradually increasing across sampling measurements from 2011.

The SWRCB's Geotracker website indicates there are no significant sources of soil or groundwater pollution within the Project site. However, there are three closed leaking underground storage tank sites within 250 feet of the Project site. The last of these three sites to complete necessary soil remediation activities was in February 2014.[2] See **Section 4.7: Hazards and Hazardous Materials**, for further discussion concerning existing site conditions.

[1] Los Angeles County Department of Public Works. (No date). Retrieved from https://dpw.lacounty.gov/general/wells/ (accessed November 2020)

[2] State Water Resources Control Board. GeoTracker. Retrieved from https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=12850%20Crenshaw%20Boulevard (accessed April 2020).

The West Coast Subbasin covers approximately 160 square miles in the southwestern portion of the Coastal Plain Basin. The Coastal Plain Basin was adjudicated in 1961, with the California Department of Water Resources serving as Watermaster for the Coastal Plain Basin and maintaining Sustainable Groundwater Management Act (SGMA) reporting requirements. Groundwater replenishment and recharge is managed by the Water Replenishment District of Southern California (WRD) 12. The West Coast Basin's groundwater is replenished from stormwater percolation and through imported and recycled water that is injected to prevent seawater intrusion.

The Southwest System is supplied by two active, Golden State Water Company (GSWC)-owned wells in the Central Basin, and 12 active, GSWC-owned wells in the West Coast Basin. GSWC monitors well capacity, status, and water quality.

In 2014, the California SGMA was passed, which provides authority for agencies to develop and implement GSPs or alternative plans that demonstrate water basins are being managed sustainably.[3] Under the SGMA, the West Coast Basin is exempted from the requirement to form a Groundwater Sustainability Agency (GSA) since it's an adjudicated basin.

The West Coast Basin adjudication limit for groundwater extraction across the entire basin is 64,468 acre feet per year (AFY). The GSWC maintains legal rights to 7,502 AFY. Three agencies, LACDPW, Water Replenishment District of Southern California (WRDSC), and West Basin Municipal Water District (WBMWD), collaborate with the groundwater producers such as GSWC to ensure that the allowed pumping allocations (APA) is available to be pumped from West Coast Basin wells.

GSWC currently operates 14 active wells in the Southwest System, 12 of which are in the West Coast Basin, and the remaining two are in the Central Basin. The Southwest System has a total normal year active well capacity of 10,865 gallons per minute (gpm) (17,525 AFY), of which 8,715 gpm (14,057 AFY) is in the West Coast Basin, and 2,150 gpm (3,468 AFY) is in the Central Basin.

Groundwater levels are managed within a safe basin operating range to protect the Los Angeles Basin's long-term sustainability and to protect against land subsidence. The Southwest System is supplied by two active, GSWC-owned wells in the Central Basin and 12 active, GSWC-owned wells in the West Coast Basin. The Central Basin's groundwater storage capacity is approximately 13.8 million AF. The storage capacity of the West Coast Basin's primary water producing aquifer, the Silverado aquifer, is estimated to be 6.5 million AF.

As previously discussed, SGMA requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, that would be 2040. For the remaining high and medium priority basins, 2042 is the deadline. The latest basin prioritization project, SGMA 2019 Basin Prioritization, was completed in December 2019. SGMA 2019 Basin Prioritization identified 94 basins/sub-basins as medium or high priority. The Project site is in a very low priority basin.[4] Additionally, the Southwest System's water use in 2015 (most recent UWMP) was 87 gallons per capita per day (GPCD), well below the SBX7-7 2020

[3] California SWRCB. (2020). *Groundwater Management Program*. Retrieved from https://www.waterboards.ca.gov/water_issues/programs/sgma/ (accessed November 2020).

[4] California Department of Water Resources. (2020). *SGMA Basin Prioritization Dashboard*. Retrieved from: https://gis.water.ca.gov/app/bp-dashboard/final/ (accessed November 2020).

target of 121 GPCD. Further, the City would continue to comply with SBX7-7 requirements. Therefore, no further analysis is warranted.

Flood Hazard, Tsunami, or Seiche Zone

The Project site is located entirely in a Federal Emergency Management Agency (FEMA) Flood Zone X, is inland, and is not at risk for inundation by seiche. The Project site is in an area of minimal flood hazard. See **Appendix 9.9** for FEMA FIRM map exhibit. Tsunamis are sea waves that are generated in response to large-magnitude earthquakes. When these waves reach shorelines, they sometimes produce coastal flooding. Seiches are the oscillation of large bodies of standing water, such as lakes, that can occur in response to ground shaking. The Project site is approximately 5.9 miles inland of the Pacific Ocean and there are no nearby bodies of standing water. Tsunamis and seiches do not pose hazards due to the Project site's inland location, elevation above sea level, and lack of nearby bodies of standing water. The Project site is not within a flood hazard, tsunami, or seiche zone; therefore, no further analysis is warranted.

4.8.2 REGULATORY FRAMEWORK

FEDERAL

Clean Water Act (CWA)

The CWA (33 U.S.C. Section 1251 et seq.), formerly the Federal Water Pollution Control Act of 1972, was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the U.S. The CWA establishes the basic structure for regulating discharges of pollutants into the waters of the U.S. and has given the U.S. Environmental Protection Agency (U.S. EPA) the authority to implement pollution control programs. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and certain non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402).

In California, NPDES permitting authority is delegated to, and administered by, the nine Regional Water Quality Control Boards (RWQCBs). The City of Gardena operates under their Municipal Regional Stormwater NPDES Permit (Order No. R4-2012-0175-A01, NPDES Permit No. CAS004001). The NPDES Permit covers much of the Los Angeles basin watershed.

Clean Water Act Section 402

Section 402 of the Clean Water Act authorizes the California SWRCB to issue NPDES General Construction Storm Water Permit (Water Quality Order 99-08-DWQ), referred to as the "General Construction Permit." Construction activities can comply with and be covered under the General Construction Permit provided they:

1. Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs) that would prevent all construction pollutants from contacting storm water and with the intent of keeping all products of erosion from moving off-site into receiving waters;

2. Eliminate or reduce non-storm water discharges to storm sewer systems and other waters of the nation; and
3. Perform inspections of all BMPs.

The SWPPP must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the construction site discharges directly to a water body listed on the 303(d) list for sediment. Increased compliance tasks under the adopted 2009 Construction General Permit include project risk evaluation, effluent monitoring, receiving water monitoring, electronic data submission of the SWPPP and all other permit registration documents, and a Rain Event Action Plan (REAP), which must be designed to protect all exposed portions of a Project site within 48 hours prior to any likely precipitation event.

Clean Water Act Section 303(d)

Section 303(d) of the CWA (CWA, 33 USC 1250, et seq., at 1313(d)) requires states to identify "impaired" water bodies as those which do not meet water quality standards. States are required to compile this information in a list and submit the list to U.S. EPA for review and approval. An affected waterbody, and associated pollutant or stressor, is then prioritized in a list of impaired water bodies known as the 303(d) List. The CWA further requires the development of a Total Maximum Daily Load (TMDL) for each listing.

National Flood Insurance Program (NFIP)

The NFIP, implemented by Congress in 1968, enables participating communities to purchase flood insurance. Flood insurance rates are set according to flood-prone status of property as indicated by FIRMs developed by FEMA. FIRMs identify the estimated limits of the 100-year floodplain for mapped watercourses, among other flood hazards. As a condition of participation in the NFIP, communities must adopt regulations for floodplain development intended to reduce flood damage for new development through such measures as flood proofing, elevation on fill, or floodplain avoidance.

STATE

California Porter-Cologne Act

The Porter-Cologne Water Quality Control Act established the legal and regulatory framework for California's water quality control. The California Water Code (CWC) authorizes the SWRCB to implement the provisions of the CWA, including the authority to regulate waste disposal and require cleanup of discharges of hazardous materials and other pollutants.

As discussed above, under the CWC, the State of California is divided into nine RWQCBs, governing the implementation and enforcement of the CWC and CWA. The Project site is located within Region 4, also known as the Los Angeles Region (LARWQCB). Each RWQCB is required to formulate and adopt a Basin Plan for its region. The LARWQCB's Basin Plan is a comprehensive document that reports beneficial uses for surface and ground waters, defines narrative and numeric parameters to protect water quality, and describes implementation programs to protect waters throughout the Region. This Plan must adhere to the policies set forth in the CWC and established by the SWRCB. The RWQCB is also given authority to include within its regional plan water discharge prohibitions applicable to conditions, areas, or types of waste.

Low Impact Development – Sustainable Storm Water Management

On January 20, 2005, the SWRCB adopted sustainability as a core value for all activities and programs carried out by the SWRCB (SWRCB, 2017a). Low Impact Development (LID) is a sustainable practice that promotes water retention and the protection of water quality. LID design techniques include features that increase infiltration, filtration, storing of water, reduce evaporation, and detain runoff. Ten common LID practices are:

1. Bioretention and Rain Gardens
2. Rooftop Gardens
3. Sidewalk Storage
4. Vegetated Swales, Buffers and Strips; Tree Preservation
5. Roof Leader Disconnection
6. Rain Barrels and Cisterns
7. Permeable Pavers
8. Soil Amendments
9. Impervious Surface Reduction and Disconnection
10. Pollution Prevention and Good Housekeeping

California Toxics Rule

In 2000, the U.S. EPA promulgated the California Toxics Rule, which establishes water quality criteria for certain toxic substances to be applied to waters in the State. In 1994, a California state court revoked the State's water quality control plans, which contained numeric criteria for water quality. This was in direct violation of the CWA and required EPA action. The EPA then implemented the California Toxics Rule. The EPA promulgated this rule based on Section 303(c)(2)(B) of the Clean Water Act, which dictates that states must adopt numeric criteria in order to protect human health and the environment. The California Toxics Rule establishes acute (i.e., short-term) and chronic (i.e., long-term) standards for bodies of water such as inland surface waters and enclosed bays and estuaries that are designated by the LARWQCB as having beneficial uses protective of aquatic life or human health.

Sustainable Groundwater Management Act (SGMA)

In 2014, the State of California adopted the SGMA to help manage its groundwater. The SGMA requires that local GSAs be formed for all high and medium priority basins in the state. These GSAs must develop and implement Groundwater Sustainability Plans (GSPs) for managing and using groundwater without causing undesirable results: significant groundwater-level declines, groundwater-storage reductions, seawater intrusion, water-quality degradation, land subsidence, and surface-water depletions; these are also referred to as sustainability indicators.

SGMA requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, that would be 2040. For the remaining high and medium priority basins, 2042 is the deadline. The latest basin prioritization project, SGMA 2019 Basin Prioritization, was completed in December 2019. SGMA 2019 Basin Prioritization identified 94 basins/sub-basins as medium or high priority. The Project Site is located within a "low priority" California Statewide Groundwater Elevation Monitoring groundwater basin that is also part of an adjudicated groundwater. Basins prioritized as low- or very low

priority are not required to form a GSA and prepare a GSP. However, these basins are still encouraged to form GSAs and develop GSPs, update existing groundwater management plans, and coordinate with others to develop a new groundwater management plan in accordance with Water Code Section 10750 et seq.

Water Conservation Bill of 2009 (SBX7-7)

The Water Conservation Bill of 2009 (SBX7-7), requires a statewide 20 percent reduction in urban per capita water use by December 31, 2020. It requires that urban water retail suppliers determine baseline water use and set reduction targets according to specified requirements, and requires agricultural water suppliers to prepare plans and implement efficient water management practices.

REGIONAL

County Waste Discharge Requirements

The LACFCD, the County of Los Angeles, and the City along with 83 other incorporated cities therein (Permittees) discharge pollutants from their municipal separate storm sewer (drain) systems (MS4s). Stormwater and non-stormwater enter and are conveyed through the MS4 and discharged to Los Angeles Region surface water bodies. These discharges are regulated under countywide waste discharge requirements contained in Order No. R4-2012-0175[5] (NPDES Permit No. CAS004001), *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges Within the Coastal Watersheds of Los Angeles County, Except Discharges Originating from the City of Long Beach MS4*, which was adopted November 8, 2012.[6] The MS4 Permit Order provides the revised waste discharge requirements for MS4 discharges within the Los Angeles County watersheds, which includes Gardena. The MS4 Permit Order, which became effective December 28, 2012, supersedes Order No. 01-182. Los Angeles County uses its Low Impact Development (LID) Ordinance to require that projects comply with NPDES MS4 Permit water quality requirements.

The MS4 Permit Order requires development and implementation of a Planning and Land Development Program for all "New Development" and "Redevelopment" projects subject to the Order. New development and redevelopment projects/activities subject to Los Angeles County's LID Ordinance include all development projects equal to 1.0 acre or greater of disturbed area and residential new or redeveloped projects that create, add, or replace 10,000 SF or greater impervious surface area. The Project involves approximately 1.33 gross-acres of disturbed area and would replace 10,000 SF or more of impervious surface area.

LOCAL

City of Gardena General Plan

The GGP Community Resource Element provides a Conservation Plan with the following goals and policies for the treatment of hydrology and water quality resources:

- **CN Goal 2:** Conserve and protect groundwater supply and water resources.

[5] State of California Water Quality Control Board. (undated). *Order No. R4-2012-0175 NPDES Permit NO. CAS004001*. Los Angeles, CA: State of California Water Quality Control Board.

[6] Ibid.

- **Policy CN 2.2**: Comply with the water conservation measures set forth by the California Department of Water Resources.
- **Policy CN 2.6**: Encourage and support the proper disposal of hazardous waste and waste oil. Monitor businesses that generate hazardous waste materials to ensure compliance with approved disposal procedures.

City of Gardena Municipal Code

City of Gardena Municipal Code (GMC) Chapter 8.70: Stormwater and Runoff Pollution Control, addresses stormwater and runoff pollution control and is intended to reduce the quantity of pollutants being discharged to waters of the United States. GMC §8.70.110.B.1: Development Construction, specifies that no Grading Permit would be issued to construction projects that disturb 1.0 or more acres of soil without obtaining a General Construction Activity Stormwater Permit (GCASWP) from the State Water Resources Control Board. Additionally, GMC §8.70.110.B.2: Standard Urban Stormwater Mitigation, specifies that new development subject to the MS4 Permit must comply with post-construction runoff pollution reduction BMPs implemented through the Standard Urban Stormwater Mitigation Plan (SUSMP). SUSMP conditions assigned by the City shall consist of: (a) low impact development (LID) BMPs; (b) source control BMPs; and (c) structural and nonstructural BMPs for specific types of uses.

4.8.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning hydrology and water quality. The issues presented in the Environmental Checklist have been used as significance criteria in this section. The Project could have a significant effect on the environment if it would:

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality (see Impact 4.8-1);
- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin (see Impact 4.8-2);
- 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 (see Impact 4.8-3);
- In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation (see **Section 7.0: Effects Found Not to be Significant**);

- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan (see **Section 7.0**)

4.8.4 IMPACTS AND MITIGATION MEASURES

Impact 4.8-1: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Level of Significance: Less Than Significant Impact

CONSTRUCTION

The Project's construction-related activities would include excavation, grading, and trenching, which would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. Construction-related erosion effects would be addressed through compliance with the NPDES program's Construction General Permit. Construction activity subject to the Construction General Permit includes any construction or demolition activity, including, but not limited to, clearing, grading, grubbing, or excavation, or any other activity that results in a land disturbance of equal to or greater than 1.0 acre. The Project would disturb approximately 1.33 gross acres and would be subject to the Construction General Permit. To obtain coverage under the Construction General Permit, dischargers are required to file with the State Water Board the Permit Registration Documents, which include a Notice of Intent (NOI) and other compliance-related documents. The Construction General Permit requires development and implementation of a SWPPP and monitoring plan, which must include erosion-control and sediment-control BMPs that would meet or exceed measures required by the Construction General Permit to control potential construction-related pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized. The types of required BMPs would be based on the amount of soil disturbed, the types of pollutants used or stored at the Project site, and proximity to water bodies. GMC Chapter 8.70: Stormwater and Runoff Pollution Control, addresses stormwater and runoff pollution control and is intended to reduce the quantity of pollutants being discharged to waters of the United States. GMC §8.70.110.B.1: Development Construction, specifies that no Grading Permit would be issued to construction projects that disturb 1.0 or more acres of soil without obtaining a *General Construction Activity Stormwater Permit* (GCASWP) from the State Water Resources Control Board.

Following compliance with NPDES and GMC requirements, which include implementation of BMPs as a Condition of Approval, the Project's construction-related activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Therefore, a less than significant impact would occur in this regard, and no mitigation is required.

OPERATIONS

The LACFCD, the County of Los Angeles, and the City of Gardena along with 83 other incorporated cities therein (Permittees) discharge pollutants from their MS4s. Stormwater and non-stormwater enter and are conveyed through the MS4 and discharged to Los Angeles Region surface water bodies. These discharges are regulated under countywide waste discharge requirements contained in Order

No. R4-2012-0175[7] (NPDES Permit No. CAS004001), *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges Within the Coastal Watersheds of Los Angeles County, Except Discharges Originating from the City of Long Beach MS4*, which was adopted November 8, 2012.[8] The MS4 Permit Order provides the revised waste discharge requirements for MS4 discharges within the Los Angeles County watersheds, which includes Gardena. The MS4 Permit Order, which became effective December 28, 2012, supersedes Order No. 01-182. Los Angeles County uses its LID Ordinance to require that projects comply with NPDES MS4 Permit water quality requirements.

The MS4 Permit Order requires development and implementation of a Planning and Land Development Program for all "New Development" and "Redevelopment" projects subject to the Order. As previously noted, new development and redevelopment projects/activities subject to Los Angeles County's LID Ordinance include all development projects equal to 1.0 acre or greater of disturbed area and residential new or redeveloped projects that create, add, or replace 10,000 SF or greater impervious surface area. The Project involves approximately 1.33 gross-acres of disturbed area and would replace 10,000 SF or more of impervious surface area; as such, the Project is subject to Los Angeles County's LID Ordinance. Additionally, GMC §8.70.110.B.2: *Standard Urban Stormwater Mitigation*, specifies that new development subject to the MS4 Permit must comply with post-construction runoff pollution reduction BMPs implemented through the SUSMP. SUSMP conditions assigned by the City would consist of LID BMPs, source control BMPs, and structural and nonstructural BMPs for specific types of uses. LID controls effectively reduce the amount of impervious area of a completed project site and promote the use of infiltration and other controls that reduce runoff. Source control BMPs prevent runoff contact with pollutant materials that would otherwise be discharged to the MS4. Specific structural controls are also required to address pollutant discharges from certain uses including but not limited to housing developments, parking lots, and new streets, among others.

The following is a list of materials anticipated during Project operations, which could contribute to pollutants, other than sediment, to stormwater runoff:

- Vehicle fluids, including oil, grease, petroleum, and coolants from personal vehicles;
- Landscaping materials and wastes (topsoil, plant materials, herbicides, fertilizers, mulch, pesticides);
- General trash debris and litter; and
- Pet waste (bacteria/fecal coliforms).

The Project proposes Site Design concepts intended to achieve the following:

- Minimize Urban Runoff,
- Conserve Natural Areas, and
- Minimize Directly Connected Impervious Areas.

Infiltration is Los Angeles County's first option when screening potentially feasible LID BMPs. Infiltration systems collect stormwater runoff and conduct it into permeable soils beneath the site; effectively

[7] State of California Water Quality Control Board. (undated). *Order No. R4-2012-0175 NPDES Permit NO. CAS004001*. Los Angeles, CA: State of California Water Quality Control Board.

[8] Ibid.

reducing pollution, reducing runoff and flooding, and recharging groundwater. The Project would treat site runoff in accordance with the Los Angeles County Low Impact Development Manual, 2014. To do so, runoff resulting from the 85th percentile rain event would be treated prior to leaving the site. As determined from the Project's LID Plan, the Project site's 85-percentile rain event is 0.95 inch, which is used as the design storm for LID.

The Project would meet the City of Gardena LID standards. Specifically, the City has adopted the County of Los Angeles Department of Public Works *Low Impact Development Standards Manual* (County LID Manual), February 2014, to use as its guidelines for stormwater quality mitigation. In accordance with these LID standards, the Project would be required to provide on-site stormwater management techniques that are properly sized, at a minimum, to infiltrate, evapotranspire, store for use, and/or treat through a high removal efficiency biofiltration/biotreatment system, without any stormwater runoff leaving the Project site to the maximum extent feasible, for at least the volume of water produced by the 85th percentile, 24-hour rain event.

Sizing of all stormwater treatment systems and calculation of stormwater quality design volume (SWQDV) would occur in accordance with the Low Impact Development Standards Manual and would utilize the Hydrocalc program to ensure accuracy.

In tandem with infiltration, the Project would utilize biofiltration methods of stormwater treatment. For biofiltration, the rest of the required SWQDV (approximately 10 percent) would be treated within biofiltration planter areas located throughout the Project site, particularly on the perimeter of the proposed building. Water captured in these planter areas would be filtered through the soil and treated prior to ultimate discharge into the public storm drain system. The final footprint of the biofiltration planter areas would reflect the standard 1.5 volume multiplier for non-infiltration LID features. A preliminary LID design is included in **Appendix 9.9**. This schematic LID design and associated treatment sizing and layout would ultimately be refined as part of site-specific final design within the LID Plan that would be required for the Project. The Final LID Plan would be reviewed by City staff for compliance with the LID manual and for adequate selection and sizing of LID systems.

The Project's design would ensure all proposed LID BMPs meet applicable County LID Manual requirements to the maximum extent practical. The proposed LID BMP systems are designed to safely convey stormwater runoff into the sub-surface soil without the threat of contaminant mobilization. Additionally, the West Coast Subbasin is managed by the WRD and CDWR, and is anticipated to meet all groundwater requirements. Groundwater pumping and storage are managed through a robust master planning process. The Project would follow all requirements regarding groundwater quality to ensure that no impacts from proposed stormwater infiltration occur. Based on the design of the Project's stormwater storage tank systems, operational effects to groundwater quality are considered less than significant.

Refer to Impact 4.8-3ii for a description of existing and proposed site drainage. **Appendix 9.9** identifies the Project BMPs. Following compliance with NPDES and GMC requirements, which include implementation of BMPs as a Condition of Approval, the Project's operational activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Therefore, a less than significant impact would occur in this regard, and no mitigation is required.

Impact 4.8-2: 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?

Level of Significance: Less Than Significant Impact

CONSTRUCTION

Because the proposed site excavation is limited to a depth of approximately 8.0 feet bgs or less, it is not expected groundwater would be encountered. It is possible that perched water zones could potentially be encountered elsewhere on the Project site during excavation. If perched groundwater was to be encountered, it would be directed to a dewatering system and discharged in accordance with all applicable rules and regulations under the NPDES General Construction Permit regulations and City grading permit conditions. As a result, potential construction-related groundwater hydrology impacts would be less than significant.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The proper management of any resultant hazardous wastes would decrease the opportunity for hazardous materials releases into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. Therefore, impacts would be less than significant, and no mitigation is required.

OPERATIONS

There are no groundwater supply wells located on the Project site. Impervious conditions would decrease under Project conditions. Further, proposed LID BMPs would increase infiltration of stormwater runoff. The West Coast Subbasin, which is managed by the WRD and CDRW, is anticipated to meet all groundwater demands. The WRD's master plan addresses pumping and storage capacity in this subbasin.[9] Therefore, impacts to groundwater sources or implementation of a sustainable groundwater management plan would be less than significant.

[9] Water Replenishment District of Southern California. (2016). *Groundwater Basins Master Plan*. Retrieved from https://www.wrd.org/sites/pr/files/GBMP_FinalReport_Text%20and%20Appendicies.pdf (accessed November 2020).

Impact 4.8-3: 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?**

Level of Significance: Less Than Significant Impact

(i) Result in a substantial erosion or siltation on- or off-site;

The Project would not alter existing drainage patterns nor cause substantial erosion or siltation on or off the site. The Project site is located in a largely built-out, impervious area and is not expected to contribute any additional sediment to water bodies or increase the risks of erosion. LID features would retain sediment on-site and prevent its movement into local water bodies. The greatest on-site erosion risk would occur during construction. As discussed in Impact 4.8-1, the Project would be subject to compliance with the Construction General Permit and is not expected to generate excess sediment or be at risk of erosion.

(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

As shown **Table 4.8-2: Existing Versus Proposed Drainage Conditions**, the Project would decrease the existing peak flow rates. This would occur because the Project would increase infiltration through underground infiltration basins and BMPs.

Table 4.8-2: Existing Versus Proposed Drainage Conditions

Condition	Area (acres)	Q10 (cfs)	Q25 (cfs)	Q50 (cfs)
Existing	1.33	2.70	3.32	3.79
Proposed	1.33	2.69	3.31	3.78
Difference	0	-0.01	-0.01	-0.01
% Increase or Decrease from Existing to Proposed Conditions	-	-0.37%	-0.30%	-0.26%
Source: Fuscoe Engineering Inc., 2020.				

Drainage from rooftops and landscape areas would be collected through area drains and entered the proposed catch basins. All curb inlet catch basins would be equipped with trash racks for pretreatment and Divert System to divert low flows to proposed Modular Wetlands System (MWS) Biofiltration Vaults for water quality treatment.

Roof gutters would discharge to landscape areas using splash blocks when possible creating a passive biotreatment in small planter areas prior to interception by an area drain system, catch basin, and storm drain system. Runoff from the site would be tributary to the proposed on-site MWS.

As indicated in **Table 4.8-2**, the Project would reduce peak flows for the 10-, 25-, and 50-year design storm events based on a decrease in impervious surfaces, as compared to the existing condition. Peak flows would be reduced, and the time of concentration of peak flows would be increased as more runoff would be retained on the site. The proposed on-site stormwater detention tanks would also reduce off-site flow rates and volumes.

(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems; or

The Project would reduce peak flows for the 10-, 25-, and 50-year design storm events based on a decrease in impervious surfaces, as compared to the existing condition. Therefore, the Project would not significantly impact existing or planned stormwater drainage systems.

(iv) Impede or redirect flood flows?

The Project would reduce peak flows based on a decrease in impervious surfaces. Therefore, the Project would not impede or redirect flows.

Overall, the Project would not substantially alter the site or area's existing drainage patterns, either through the alteration of a water body or through addition of impervious surfaces. A less than significant impact would occur and no mitigation is required.

4.8.5 CUMULATIVE IMPACTS

For purposes of the hydrology and water quality impact analysis, cumulative impacts are considered for cumulative development within Gardena and Hawthorne, according to the related projects; see **Table 3-1: List of Cumulative Projects**.

The criteria for analyzing Project cumulative impacts is any project that could violate water quality standards, impact groundwater supplies, alter existing drainage patterns in a manner that would result in substantial erosion or siltation or result in flooding, impede or redirect flood flows or otherwise contribute to a risk of loss, injury, or death involving water-related hazards. The Project site is within the Dominguez Watershed, which covers approximately 133 square miles and is largely built out. The geographic extent for considering cumulative impacts concerning hydrology and water quality includes all of Gardena and Hawthorne, because these areas are within the Dominguez Watershed, where the Project is located.

As concluded above, following compliance with NPDES and GMC requirements, the Project's construction-related and operational activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Nor 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. Impervious conditions would decrease under Project conditions and proposed LID BMPs would increase infiltration of stormwater runoff. Stormwater would be treated by proposed BMPs prior to discharging into the public storm drain system, treating potential pollutants and reducing peak flows leaving the site. BMPs would be located and designed to effectively retain and treat runoff before it is discharged to the storm drain system. All proposed BMPs, including infiltration and biotreatment, would be appropriately sized and located to treat the design storm event. Therefore, it is anticipated that all downstream infrastructure would be able to adequately convey Project runoff. Therefore, a less than significant impact would occur in this regard.

Gardena and Hawthorne are mostly built out with a high existing impervious condition. Cumulative projects would increase construction activities, potentially resulting in construction-related water quality impacts from increased pollutant concentrations. Post construction, cumulative projects could increase pollutant concentrations and impervious surfaces, potentially resulting in operational water quality impacts, changes in drainage patterns, and increased stormwater flows with potential downstream capacity issues. However, cumulative development would be subject to compliance with the established federal, state, and local regulatory framework (e.g., NPDES and GMC and Hawthorne Municipal Code) concerning hydrology and water quality. Most new developments require minimum landscaping square footage as well as the implementation of LID BMPs which typically increase perviousness and consequently reduce peak flows in stormwater runoff. All new development within the City of Gardena is subject to City-specific and regional water quality and peak flow mitigation requirements and would be reviewed on a per-project basis to ensure that storm drain infrastructure and water quality are not adversely impacted. If needed, the City can require on-site detention or upgrades to regional infrastructure. Where significant or potentially significant impacts are identified, implementation of all feasible site-specific mitigation would be required to avoid or reduce impacts. The Project's cumulative impacts concerning hydrology and water quality would be less than significant given compliance with the established regulatory framework and use of site-specific BMPs would be required.

4.8.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts to hydrology and water quality have been identified.

4.8.7 REFERENCES

California Department of Water Resources. (2020). *Basin Prioritization Dashboard*. Retrieved from: https://gis.water.ca.gov/app/bp-dashboard/final/.

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4.9 LAND USE AND PLANNING

4.9 LAND USE AND PLANNING

The purpose of this section is to describe the existing regulatory and environmental conditions related to land use and planning, identify potential impacts that could result from Project implementation, and as necessary, recommend mitigation to avoid or reduce the significance of impacts. Information in this section is based primarily on land use and zoning data provided below. Additional resource information was obtained from available public resources, including among others, the Gardena General Plan 2006 (GGP) and City of Gardena Municipal Code (GMC).

4.9.1 AFFECTED ENVIRONMENT

REGIONAL SETTING

The Project site is located in the City of Gardena (City), approximately 8.8 miles southwest of downtown Los Angeles. The Project site consists of one 1.33-acre parcel (APN #4060-004-039) on Crenshaw Boulevard south of West El Segundo Boulevard, at 12850 - 12900 Crenshaw Boulevard. The City encompasses approximately 6.0 square miles in the County's South Bay region.

LOCAL SETTING

Gardena is a fully urbanized city with a mix of residential densities, although low density residential uses predominate. The City also contains a mix of retail, commercial, office, and industrial uses. The Project site is in the City's northwestern corner in a predominantly industrial area, with some residential uses to the east of the Project Site, separated from the Project site by the Dominguez Flood Control Channel (Dominguez Channel) and Laguna Dominguez Trail (Dominguez Trail). The Project site is bound by a gas station to the north, commercial and light industrial uses to the south, residential uses to the east across the Dominguez Channel, and commercial and industrial uses to the west in the City of Hawthorne. Vermont Avenue forms a western City boundary with the City of Los Angeles approximately 2.0 miles to the east of the site, and Crenshaw Boulevard forms the western City boundary with Hawthorne immediately adjacent to and west of the site.

The land uses bordering the Project site are shown on **Exhibit 2-2: Site Vicinity Map**, and described as follows:

- **North**: With the exception of the adjacent gas station, properties north of the Project site are in the City of Hawthorne. The gas station is immediately north of the Project site and is zoned General Commercial (C-3). El Segundo Boulevard (103- to 130-foot right-of-way) is 125 feet north of the Project site. Properties north of West El Segundo Boulevard are predominately light to heavy industrial land uses, which are zoned M-2 (General Industrial). Properties to the north/ northeast of the Project site are zoned Trucking Intensive Overlay and Green Line Mixed Use Specific Plan (for uses in support of the Green Line bus route. Northwest of the Project site in the City of Hawthorne is a development in the Century Business Center Specific Plan and the Airport Master Plan.
- **South**: Properties south of the Project site are located in Gardena, Hawthorne, and unincorporated Los Angeles County. Land uses southeast of the Project site in Gardena are primarily commercial and light industrial and are zoned C-3. There is also an unincorporated Los Angeles County island southwest of the Project site. Referred to as "Hawthorne Island," the

unincorporated area extends from West 135th Street to south of West 131st Street. Properties within Hawthorne Island are zoned Two-Family Residence (R-2), with uses on Crenshaw Boulevard within Hawthorne Island are zoned Neighborhood Business (C-2) and Limited Density Multiple Residence (R-3-P). Properties within Hawthorne are zoned Limited Industrial (M-1) and High Density Residential (R-3).

- **East**: Dominguez Channel and Dominguez Trail are immediately east of the Project site and are zoned O (Official). Uses east of Dominguez Trail are zoned Low Density Residential Zone (R-1) and High Density Multiple-Family Residential Zone (R-4).
- **West**: Land uses west of the Project site are within Hawthorne and are primarily zoned General Industrial (M-2), with some smaller areas zoned General Commercial (C-3).

4.9.2 REGULATORY FRAMEWORK

REGIONAL

Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

As the metropolitan planning organization for the region's six counties and 191 cities, the Southern California Association of Governments (SCAG) is mandated by law to develop a long-term regional transportation and sustainability plan every four years. On September 3, 2020, SCAG's Regional Council approved and fully adopted Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS). The RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It identifies ten goals that fall into four categories: economy, mobility, environment and healthy/complete communities. The goals are as follows:

1. Encourage regional economic prosperity and global competitiveness
2. Improve mobility, accessibility, reliability, and travel safety for people and goods
3. Enhance the preservation, security, and resilience of the regional transportation system
4. Increase person and goods movement and travel choices within the transportation system
5. Reduce greenhouse gas emissions and improve air quality
6. Support healthy and equitable communities
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel
9. Encourage development of diverse housing types in areas that are supported by multiple transportation options
10. Promote conservation of natural and agricultural lands and restoration of habitats

Goal 10 is not applicable to the Project on a direct or indirect basis because the Project site does not include any agricultural uses or biological resources.

LOCAL

Gardena General Plan 2006

The City adopted the comprehensive GGP in 2006 and the Community Development Element's Land Use Plan was updated in June 2012 and March 2013, with additional changes to The Land Use Map having been made since 2013. Additionally, the City's 2014-2021 Housing Element was adopted in November 2013 and found to comply with the Department of Housing and Community Development in December 2013. The GGP has four elements within which there are plans. The four elements are Community Development, Housing, Community Resources, and Community Safety. The Community Development Element includes the Land Use Plan, Economic Development Plan, Community Design Plan, and Circulation Plan. The Community Resources Element including the Open Space Plan and Conservation Plan. The Community Safety Element includes the Public Safety Plan and the Noise Plan. Goals and policies applicable to the Project are identified in **Table 4.9-1: Gardena General Plan 2006 Consistency**.

City of Gardena Municipal Code

GMC Title 17, Subdivisions. GMC Title 17 regulates the design and improvement of subdivisions in conformance with the California Government Code. GMC §17.08.120 establishes a procedure where land taken for one parcel is added to an adjacent parcel, and where a greater number of parcels than originally existed is not thereby created.

GMC Title 18, Zoning. GMC Title 18 encourages and regulates development standards to encourage the most appropriate use of land and to promote the public health, safety and general welfare.

GMC Chapter 18.39, Specific Plans. GMC Chapter 18.39 establishes procedures for consideration of specific plans as authorized by Government Code §65450 et seq. and other applicable provisions of law. It also describes the relationship between an adopted specific plan and the provisions of GMC Title 18.

GMC Chapter 18.44, Site Plan Review. GMC Chapter 18.44 establishes the procedure for site plan review, prior to issuance of a Building Permit. GMC Chapter 18.44 specifies that Site Plans are required to be submitted for any development project for which a General Plan Amendment, Zone Change, Conditional Use Permit, Variance, Tract Map, or other discretionary permit is being sought.

GMC Chapter 18.52, Amendments. GMC Chapter 18.52 establishes the process to amend, supplement, or change the land use designation, regulations, zone boundaries, or classifications of a property in accordance with the procedures of the California Government Code.

GMC Chapter 18.58, Signs. This Chapter regulates signs, as defined in this Chapter, which are placed on private property, or on property owned by public agencies other than the City and over which the City has zoning authority, whenever such signs or devices are visible from any public right of way. GMC §18.58.018G, Billboard Policy, currently specifies "it is a fundamental policy of the City of Gardena to completely prohibit the construction, erection or use of any billboards, as defined herein, other than those that legally exist in the City, or for which a valid permit has been duly issued and has not expired, as of the date on which this provision is first adopted. No permit shall be issued for any billboard that violates this policy…."

GMC §18.58.020, Definitions, includes these relevant definitions:

- "Animated sign" means any sign which is designed and constructed to give a message through a sequence of progressive changes of parts by either action or motion, flashing, or color changes requiring electrical energy or electronic or manufacturers' sources of supply. Does not include hand-held signs or commercial mascots.
- "Billboard" means a permanent structure sign, located on private property, on which is displayed offsite commercial messages, as well as any permanent structure which is a principal use (as opposed to an accessory use) of the property on which it is built, on which messages may be displayed. A billboard may be freestanding or attached to other structures.

GMC §18.58.050, Prohibited Signs, currently specifies the following signs shall not be permitted, constructed, erected or allowed to remain on display in the City:

A. Billboards, as defined herein.
B. Signs displaying offsite commercial messages.
C. Commercial mascots.
D. Abandoned signs.
E. Expired signs.
F. Traffic hazards. Signs which pose significant hazards to the safety of vehicle and pedestrian traffic by virtue of any of the following factors, or any combination of them:
    1. The sign is confusingly or deceptively similar to a recognized traffic sign;
    2. The sign is located so as to block or impair drivers' view of the road, sidewalk, or traffic signs and signals.
    3. The physical structure of the sign is in such a dilapidated or structurally unsound state that it poses an immediate threat to the safety of persons or property, from events such as falling down, being blown by wind, etc.
G. Flashing or animated signs, unless expressly authorized by other provisions of this Chapter.

4.9.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions pertaining to land use and planning. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, may have created a significant environmental impact if it would:

- Physically divide an established community (see **Section 7.0: Effects Found Not to be Significant**);
- 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:
    - Gardena General Plan 2006 (see Impact 4.9-1),
    - Gardena Municipal Code (see Impact 4.9-2),
    - Connect SoCal: 2020-2045 RTP/SCS (see Impact 4.9-3).

4.9.4 IMPACTS AND MITIGATION MEASURES

Impact 4.9-1: Would the project cause a significant environmental impact due to a conflict with any Gardena General Plan 2006 including land use plan, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect?

Level of Significance: Less Than Significant Impact

LAND USE DESIGNATION

The GGP Land Use Plan designates the Project site as General Commercial, which provides for a wide range of larger-scale commercial uses to serve both the needs of the City and the region. The Project proposes a multi-family residential development, which conflicts with the intent of the Project site's General Commercial designation. Therefore, a GGP amendment is required to: (i) change the land use designation on the GGP Land Use Map from "General Commercial" to "Specific Plan;" and (ii) amend the Land Use Element text relating to specific plans and update the Land Use Plan Tables LU-1, to account for this new Specific Plan. The Project Applicant seeks approval of General Plan/General Plan Map Amendment (GPA #1-20) to implement the necessary changes. This proposed amendment would occur pursuant to GMC Chapter 18.52, which establishes procedures to amend, supplement, or change a property's land use designation; see Impact 4.9-2. Following approval of the requested GGP amendment, no conflict with the GGP Land Use Plan would occur.

GARDENA GENERAL PLAN 2006

An analysis of the Project's consistency with the relevant GGP goals and policies is provided in **Table 4.9-1**. The analysis concludes that the Project would not conflict with the relevant General Plan goals and policies. The Project would require a General Plan land use amendment for the GTODSP. Therefore, the Project would not result in a significant environmental impact concerning a conflict with the GGP.

Table 4.9-1: Gardena General Plan 2006 Consistency

General Plan Policy	Project Consistency
Community Development Element: Land Use Plan	
LU Goal 1: Preserve and protect existing single-family and low/medium-density residential neighborhoods while promoting the development of additional high-quality housing types in the City.	
Policy LU 1.1: Promote sound housing and attractive and safe residential neighborhoods.	**Consistent**. The GTODSP would implement new zoning and development standards to promote the development of a high-quality housing development in the City. The GTODSP facilitates the transition of the surrounding neighborhood into a more complete community, in that it would bring new residents to the neighborhood, brings new housing to this area, improve the streetscape, activate the pedestrian realm, and help transition an automobile-oriented corridor to transit-oriented development.
Policy LU 1.2: Protect existing sound residential neighborhoods from incompatible uses and development.	**Consistent**. Factors influencing land use compatibility include aesthetics, air quality, noise, and traffic. As concluded in **Section 4.1: Aesthetics**, **Section 4.2: Air**

General Plan Policy	Project Consistency
	Quality, **Section 4.10: Noise**, and **Section 4.13: Transportation**, the Project would result in less than significant operational impacts concerning these resource areas influencing land use compatibility. Therefore, the Project would protect the existing single-family residential neighborhood to the east from incompatible uses and development, and is not within an existing residential neighborhood. The Project design and access are oriented to Crenshaw Boulevard and away from the nearest residential neighborhood. In addition, the Dominguez Channel and related improvements would provide an additional physical separation of approximately 100 feet between the Project and the nearest residential neighborhood.
Policy LU 1.4: Locate new medium- and high-density residential developments near neighborhood and community shopping centers with commensurate high levels of community services and facilities.	**Consistent**. The Project would cluster urban-density housing at an appropriate location near the Crenshaw Station, technology firms, and other large local employment centers. The Project also proposes new housing within walking distance of various retail opportunities and local eateries, many of which are in a large commercial center immediately south of the Crenshaw Station and I-105. These Project features would increase future residents' convenience and reduce their automobile dependence.
Policy LU 1.5: Provide adequate residential amenities such as open space, recreation, off-street parking and pedestrian features in multi-family residential developments.	**Consistent**. The Project would incorporate various residential amenities, including private and common open spaces. The Project's amenities include a dog park on the ground level, a 4,600-square foot (SF) pool courtyard on Level 3 adjacent to a fitness room and clubhouse, and two additional courtyards on Level 4 with a combined area of approximately 4,000 SF. These amenities would create more attractive and livable spaces for residents.
Policy LU 1.6: Ensure residential densities are compatible with available public service and infrastructure systems.	**Consistent**. The GTODSP permits residential density compatible with available public service and infrastructure systems. As described in **Section 4.12: Public Services and Recreation**, and **Section 4.15: Utilities and Service Systems**, the GTODSP includes measures to ensure that the plan area is served by adequate public services, infrastructure, and utilities.
Policy LU 1.8: Minimize through-traffic on residential streets.	**Consistent.** The Project minimizes through-traffic on residential streets by orienting vehicular access towards Crenshaw Boulevard, a major divided arterial primarily developed with commercial and light industrial uses in the vicinity of the Project site. The Project does not disrupt any existing traffic patterns on residential streets.

General Plan Policy	Project Consistency
Community Development Element: Economic Development Plan	
ED Goal 3: Attract desirable businesses to locate in the City.	
Policy ED 3.3: Maintain a multidisciplinary proactive approach to improve the City's image as a desirable business location.	**Consistent.** The Project facilitates the development of high-quality housing in proximity to local technology and creative sector companies and other employment centers to further attract desirable businesses to locate in the City. Innovative technology firms and their employees place a premium on quality-of-life and livability factors, including access to high-quality housing options; social, cultural, and environmental amenities; access to shops and restaurants; and low-stress commutes. Implementation of the Project would help alleviate the negative impacts of a lack of housing for local technology and creative sector employees. Consistent with Policy 3.3, the Project adopts a multi-disciplinary, proactive approach, balancing job growth in the expanding technology sector with new high-quality housing opportunities to enable local employees to live close to where they work.
Community Development Element: Community Design Plan	
DS Goal 1: Enhance the visual environment and create a positive image of the City.	
Policy DS 1.3: Promote a stronger design review process to ensure that public and private projects comply with best design practices and standards.	**Consistent**. The GTODSP has been subject to City review and approval to ensure that high-quality design practices and standards are used in the future development.
Policy DS 1.4: Provide a sense of arrival to Gardena through entry monument signs, landscaping features, architectural and motifs at key gateway locations.	**Consistent**. The Project would enhance the visual environment by replacing an obsolete, automobile-oriented light industrial building and surface parking lot with a new transit-oriented multi-family development project. The Project would incorporate high-quality design and landscaping consistent with the standards of the GTODSP to further enhance the visual environment. Developing new residential uses in proximity to growing local technology and creative sector industries would help create a positive image of the City. Consistent with Policy 1.4, the Project would provide on-site landscaping features and a high-quality sign identifying the Project, consistent with the sign standards identified in this Specific Plan, at a key gateway location in the City.
DS Goal 2: Enhance the aesthetic quality of the residential neighborhoods in the City.	
Policy DS 2.1: Provide stronger design guidelines for residential development, including both new construction and additions to existing single-family units or multi-family dwellings.	**Consistent**. The GTODSP is intended to achieve quality and attractively designed development that can serve as a model for future multi-family, transit-oriented development in the City. The Project would replace an aged light industrial building with a residential development that is intended to serve as a catalyst to transform northwest Gardena into a transit-oriented neighborhood.
Policy DS 2.2: Ensure that new and remodeled dwelling units are designed with architectural styles, which are varied and are compatible in scale and character with existing buildings and the natural surroundings.	

General Plan Policy	Project Consistency
Policy DS 2.3: Encourage a variety of architectural styles, massing, floor plans, color schemes, building materials, façade treatments, elevation and wall articulations.	
Policy DS 2.7: Require appropriate setbacks, massing, articulation and height limits to provide privacy and compatibility where multiple-family housing is developed adjacent to single-family housing.	**Consistent**. The Project design and access are oriented towards Crenshaw Boulevard and away from the single-family housing located to the east of the Project site. Furthermore, the Project does not directly abut any residential neighborhood; the Project abuts public facilities and open space. In addition, the Dominguez Channel and related improvements provide an additional physical separation of approximately 100 feet between the Project and the nearby single-family housing.
Policy DS 2.9: Integrate new residential developments with the surrounding built environment. In addition, encourage a strong relationship between the dwelling and the street.	
Policy DS 2.10: Provide landscape treatments (trees, shrubs, groundcover, and grass areas) within multi-family development projects in order to create a "greener" environment for residents and those viewing from public areas.	**Consistent**. The Project would provide landscape treatments that would create a "greener" environment. The Project would replace an existing light industrial warehouse used to store both vintage cars and auto parts that has no landscaping and an expansive surface parking area with a multi-family residential building that incorporates street trees to shade the street and sidewalk and create a pedestrian-scale screen between the ground level and upper levels of the building. The upper-level courtyards would all be landscaped and visible from the street, further enhancing the "green" environment for residents and those viewing from public areas.
Policy DS 2.11: Incorporate quality residential amenities such as private and communal open spaces into multi-unit development projects in order to improve the quality of the project and to create more attractive and livable spaces for residents to enjoy.	**Consistent**. The Project would incorporate quality residential amenities, including private and communal open spaces. The Project's amenities include a dog park on the ground level, a 4,600-SF pool courtyard on Level 3 adjacent to a fitness room and clubhouse, and two additional courtyards on Level 4 with a combined area of approximately 4,000 SF. These amenities would create more attractive and livable spaces for residents.
Policy DS 2.12: Provide well-designed and safe parking areas that maximize security, surveillance, and efficient access to building entrances.	**Consistent**. The Project would provide parking in an unenclosed garage consisting of 2.5 vertical floors, starting at the ground level. The parking garage would be accessible only to residents and would be secured by a key fob entry system. Residents would be able to enter the building directly from the parking garage.
Policy DS 2.14: Require design standards be established to provide for attractive building design features, safe egress and ingress, sufficient parking, adequate pedestrian amenities, landscaping, and proper signage.	**Consistent**. The GTODSP includes design guidelines to ensure that the Project is designed with a varied, yet compatible architectural style. These design standards would ensure that the Project would be designed with attractive building design features, safe ingress and egress, sufficient parking, adequate pedestrian amenities, and landscaping. Approval of a master sign program and zone code amendment for the billboard as

General Plan Policy	Project Consistency
	proposed by the GTODSP would provide for proper identification signage for the Project.
Policy DS 2.15: Promote innovative development and design techniques, new material and construction methods to stimulate residential development that protects the environment.	**Consistent**. The Project would provide a new high-quality residential use, which would conform to the latest CALGreen sustainability standards and use attractive architectural design and features to stimulate residential development and protect the environment.
Community Development Element: Circulation Plan	
CI Goal 1: Promote a safe and efficient circulation system that benefits residents and businesses, and integrates with the greater Los Angeles/South Bay transportation system.	
Policy CI 1.1: Prioritize long-term sustainability for the City of Gardena, in alignment with regional and state goals, by promoting infill development, reduced reliance on single-occupancy vehicle trips, and improved multi-modal transportation networks, with the goal of reducing air pollution and greenhouse gas emissions, thereby improving the health and quality of life for residents.	**Consistent.** The Project is a TOD project and promotes reduced reliance on single-occupancy vehicle trips and convenient access to the multi-modal transportation network. The Project would provide 267 parking spaces, which does not exceed the parking required by the City. The Project would provide 1 parking space per unit; discouraging multi-vehicle households. Providing 1 parking space per unit could encourage residents to carpool or seek alternative modes of transportation. Additionally, there shall be a charge for parking spaces. The property owner would unbundle automobile parking charges from the rents or other fees charged for leasing residential units in the GTODSP area. The Project promotes use of multi-modal transportation networks through its close proximity to such networks. See Section 4.13.2, *Affected Environment* for a discussion of the Project area transportation system, including discussion on pedestrian, bicycle, and transit facilities closely accessible from the Project site. Lastly, a designated loading area within the GTODSP shall be signed and distinguished (e.g., with paving and/or paint) so that it may be utilized as a pick-up and drop-off zone for ride-sharing services.
CI Goal 3: Develop Complete Streets to promote alternative modes of transportation that are safe and efficient for commuters, and available to persons of all income levels and disabilities.	
Policy CI 3.1**:** Work with Gardena Municipal Bus Lines and MTA to increase the use of public transit, establish or modify routes, and improve connectivity to regional services.	**Consistent.** The Project site is also located within a quarter mile of nine bus stops and is well-served by transit service via LA Metro, Torrance Transit, and the City of Gardena's Transit Service, GTrans. Access to light rail is also available at the Green Line Station, located less than one mile north of the project at Crenshaw Boulevard/I-105.The Project therefore promotes alternative modes of transportation for residents.
Policy CI 3.3: Maintain and expand sidewalk installation and repair programs, particularly in areas where sidewalks link residential neighborhoods to local schools, parks, and shopping areas.	**Consistent.** Consistent with Policy CI 3.3, the sidewalks, curbs, and gutters adjoining the Project site would be reconstructed as part of the Project.

General Plan Policy	Project Consistency
Policy CI 3.4: Maintain a citywide bicycle route and maintenance plan that promotes efficient and safe bikeways integrated with the MTA's regional bicycle system.	**Consistent.** The Project promotes bicycle usage through its close proximity to the Dominguez Trail, which is located behind the Project site on the east side of the waterway channel. The Dominguez Trail spans almost three miles between Lawndale and Hawthorne. It provides direct bicycle access between the Project site and the Green Line Station.
Housing Element	
Goal 3.0: Minimize the impact of governmental constraints on housing construction and cost.	
Policy 3.3: Encourage the use of special development zones and other mechanisms to allow more flexibility in housing developments.	**Consistent.** The Project reduces the impact of governmental constraints on housing construction and cost. Consistent with Policy 3.3, the Project implements special zoning and development standards to permit more flexibility in housing developments in northwest Gardena. The Project offers an opportunity to create a vibrant, transit-oriented neighborhood. The Project facilitates more diverse multi-family housing options to serve the City's growing and evolving technology industry, and balances job growth with new high-quality housing opportunities. By permitting denser development than would otherwise be permitted under existing zoning, the Project incentivizes construction of new multi-family housing with a variety of unit types thereby reducing costs, consistent with Policy 3.4.
Goal 4.0: Provide adequate residential sites through appropriate land use and zoning to accommodate the City's share of regional housing needs.	
Policy 4.1: Implement land use policies that allow for a range of residential densities.	**Consistent.** Upon adoption of the General Plan Amendment and zone change, the Project would be consistent with land use designations to provide for the development of multi-family, transit-oriented residential development. The provision of up to 265 residential units proximate to regional serving public transit infrastructure assists the City in meeting its share of the regional housing needs allocation. Currently, residential development in northwest Gardena primarily consists of single-family housing with multi-family housing along major arterials. The Project permits a greater range of residential densities than is currently permitted in this area of the City, consistent with Policy 4.1.
Community Resources Element: Conservation Plan	
CN Goal 2: Conserve and protect groundwater supply and water resources.	
Policy CN 2.2: Comply with the water conservation measures set forth by the California Department of Water Resources.	**Consistent**. The Project conserves and protect groundwater supply and water resources through compliance with all applicable regulations, including the water conservation measures set forth by the Department of Water Resources. The Project would increase the permeable area of the Project site by approximately 5.0 percent. Consistent with Policy 2.6,
Policy CN 2.6: Encourage and support the proper disposal of hazardous waste and waste oil. Monitor businesses that generate hazardous waste materials	

General Plan Policy	Project Consistency
to ensure compliance with approved disposal procedures.	the Project must comply with all applicable regulations regarding the disposal of hazardous waste and waste oil during construction.
CN Goal 3: Reduce the amount of solid waste produced in Gardena.	
Policy CN 3.1: Comply with the requirements set forth in the City's Source Reduction and Recycling Element.	**Consistent**. The Project would comply with all applicable local and state requirements for waste diversion during both construction and operations.
CN Goal 4: Conserve energy resources through the use of technology and conservation methods.	
Policy CN 4.1: Encourage innovative building designs that conserve and minimize energy consumption.	**Consistent**. The Project would be a multi-family development that meets Title 24 requirements. The Project would be designed to achieve best practices for architectural design and land development that enhance the City's infrastructure, reduce consumption of non-renewable resources, and limit pollutants and greenhouse gas emissions. Consistent with Policy 4.2, the Project would comply with the 2019 CALGreen sustainability standards, or those in effect at the time that plans are submitted.
Policy CN 4.2: Require compliance with Title 24 regulations to conserve energy.	
CN Goal 5: Protect the City's cultural resources.	
Policy CN 5.3: Protect and preserve cultural resources of the Gabrielino Native American Tribes found or uncovered during construction.	**Consistent.** The Project would incorporate measures to protect and preserve any cultural resources of the Gabrielino Native American Tribe, or any other Tribe, found or uncovered during construction.
Community Safety Element: Public Safety Plan	
PS Goal 1: Maintain a high level of fire and police protection for residents, businesses and visitors.	
Policy PS 1.6: Ensure that law enforcement, crime prevention, and fire safety concerns are considered in the review of planning and development proposals in the City.	**Consistent**. The City has considered law enforcement, crime prevention, and fire safety concerns in its review of the Project. The building and parking structure would be accessible only to residents. The Project would comply with all applicable Fire Code and fire safety regulations.
PS Goal 2: Protect the community from dangers associated with geologic instability, seismic hazards and other natural hazards.	
Policy PS 2.3: Require compliance with seismic safety standards in the Uniform Building Code.	**Consistent.** All projects within the GTODSP are required to comply with the seismic safety standards in the Uniform Building Code.
Policy PS 2.4: Require geotechnical studies for all new development projects located in an Alquist-Priolo Earthquake Fault Zone or areas subject to liquefaction.	**Consistent.** A geotechnical study was prepared for the Project area.
PS Goal 4: Increase public awareness of crime and fire prevention, and emergency preparedness and procedures.	
Policy PS 4.3: Promote professional management of multi-family residential buildings.	**Consistent.** The proposed multi-family residential building within the Project area would be professionally managed and the property managers would develop standard emergency preparedness plans and procedures for the Project.

General Plan Policy	Project Consistency
Community Safety Element: Noise Plan	
N Goal 2: Incorporate noise considerations into land use planning decisions.	
Policy N 2.4: Require mitigation of all significant noise impacts as a condition of project approval.	**Consistent**. The City incorporated noise considerations into its review of the GTODSP. The Project's potential for generating noise impacts on the surrounding environment both during construction and operation are described in **Section 4.10: Noise.** As described in the section, impacts associated with Project on-site construction activities would be significant and unavoidable. In accordance with Policy 2.4, mitigation would be provided to minimize construction noise impacts. Consistent with Policies 2.5 and 2.6, the Project would conduct interior noise level studies and achieve interior noise level standards as required by the Building Code. In addition, the Project would incorporate design features necessary to control residential interior noise levels and minimize exposure of residents to nearby commercial and industrial uses in accordance with the Building Code standards for interior noise levels.
Policy N 2.5: Require proposed projects to be reviewed for compatibility with nearby noise-sensitive land uses with the intent of reducing noise impacts.	
Policy N 2.6: Require new residential developments located in proximity to existing commercial/industrial operations to control residential interior noise levels as a condition of approval and minimize exposure of residents in the site design.	
Policy N 2.9: Encourage the creative use of site and building design techniques as a means to minimize noise impacts.	
N Goal 3: Develop measures to control non-transportation noise impacts.	
Policy N 3.2: Require compliance with noise regulations. Review and update Gardena's policies and regulations affecting noise.	**Consistent.** The Project complies with the City's noise ordinance.
Policy N 3.3: Require compliance with construction hours to minimize the impacts of construction noise on adjacent land.	**Consistent.** The Project complies with the City's regulations regarding permitted construction hours.
GTODSP = Gardena Transit-Oriented Development Specific Plan; TOD = Transit-Oriented development	
Source: Gardena General Plan, 2006; Draft City of Gardena TOD Specific Plan, 2020.	

MITIGATION MEASURES

No mitigation is required.

Impact 4.9-2: Would the project cause a significant environmental impact due to a conflict with any Gardena Municipal Code land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Level of Significance: Less Than Significant Impact

An analysis of the Project's consistency with the relevant GMC standards is provided below.

GMC Title 18, Zoning. The Project Applicant also seeks approval of the Gardena Transit-Oriented Development Specific (GTODSP) (SP #1-20), Zone Change (ZC #1-20) changing the zoning from General Commercial (C-3) to Gardena Transit-Oriented Development Specific Plan, and Zoning Code Amendment (ZCA #3-20) that would create the new zoning designation of GTODSP and make amendments to GMC Chapter 18.58 to allow the installation of a digital sign. These approvals are needed to allow development

of the Project, which proposes an eight-story residential building with up to 265 DUs at a density of just under 200 DU/acre.

Adoption of the GTODSP (SP #1-20) would establish the Project area's zoning regulations and development standards. The proposed changes would occur pursuant to GMC Chapter 18.39, which establishes procedures for consideration of Specific Plans, and GMC Chapter 18.52, which establishes procedures to amend, supplement, or change a property's regulations, zone boundaries, or classifications. Following approval of the requested zoning amendments and the GTODSP, the zoning would be consistent with the General Plan.

GMC Chapter 18.58 regulates the City's signs, whenever such signs or devices are visible from any public right-of-way. The Project proposes an approximately 2,500-SF (42- x 60-foot) digital, animated, and moving sign on the building's north façade. The digital sign would be used for offsite commercial advertising, as well as community events. The City would share in a portion of the offsite advertising revenue generated as a community benefit of the Project.

The proposed Project signage conflicts with GMC Chapter 18.58 provisions relating to billboards and the display of commercial messages. As part of the Project approvals, the Project Applicant seeks a GMC amendment to Chapter 18.58, which would also be adopted pursuant to GMC Chapter 18.52. The amendments would allow installation of digital billboards when they are allowed in the zone and pursuant to a Development Agreement (DA), which provides a benefit to the City. The GTODSP allows digital billboards and the display standards are set forth in the Specific Plan. The DA would further memorialize the Project Applicant's commitment to provide public benefits to the City and the community in return for ensuring that the Project can be developed pursuant to the GTODSP.

Following all of the Zoning changes, the GTODSP would be consistent with the City's zoning.

GMC Chapter 18.44, Site Plan Review. Pursuant to GMC Chapter 18.44, review of the proposed development's physical design would occur through the City's Site Plan Review process. Accordingly, the Project Applicant seeks approval of Site Plan Review (SPR #1-20) to verify compliance with GMC standards. Following approval of the Project's proposed Site Plan, no conflict with GMC §18.44 would occur.

GMC §17.08.120, Lot Line Adjustment. GMC §17.08.120 establishes a procedure where land taken for one parcel is added to an adjacent parcel, and where a greater number of parcels than originally existed is not thereby created. The Project Applicant seeks approval of Lot Line Adjustment (LLA#1-20) to combine the Project site's four legal lots into a single development site. Following approval of the requested Lot Line Adjustment, no conflict with GMC §17.08.120 would occur.

As evidenced by the discussions presented above, the Project would not conflict with the GMC following approval of the Project's proposed amendments; therefore, the Project would not cause a significant environmental impact due to a conflict with the GMC. Impacts would be less significant impact, and no mitigation is required.

MITIGATION MEASURES

No mitigation is required.

Impact 4.9-3:	**Would the project cause a significant environmental impact due to a conflict with any Connect SoCal 2020-2045 RTPS/SCS land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

Level of Significance: Less Than Significant Impact

As discussed previously, the goals of the 2020-2045 RTP/SCS fall into four core categories: economy, mobility, environment and healthy/complete communities. See **Section 4.9.2** for the 2020-2045 RTP/SCS goals.[1] Specifically, Goal 9 states "Encourage development of diverse housing types in areas that are supported by multiple transportation options."

The Project proposes the construction of new multi-family residential building with up to 265 DUs, including a mix of studio, one- and two-bedroom apartment homes. The Project includes Transportation Demand Management (TDM) strategies to reduce single-occupant auto travel and encourage alternate means of transportation. Project TDM strategies include unbundled parking, pre-leasing for area employees who work within a one-half mile radius of the development, transit information kiosks, on-site residential bicycle parking (one space per DU), and ride-sharing pick-up/drop-off loading areas. Additionally, the Project includes a co-working space, which is essentially a tenant work/office space, which would enable residents to work from the Project site.

This TOD is an infill development located within a quarter-mile of nine bus stops and transit service provided by LA Metro and the City of Gardena's Transit Service, GTrans. Access to light rail is available at the Green Line Station, located less than one mile north of the Project site at Crenshaw Boulevard/I-105. Existing sidewalks are provided along the Project frontage and within a continuous and complete pedestrian network in the surrounding area. An existing bike path (Class I) is provided along the Dominguez Trail behind the Project site on the east side of the waterway channel. The Dominguez Trail extends almost three miles between Lawndale and Hawthorne. It provides direct bicycle access between the Project site and the Green Line Station.

As evidenced above, the Project is consistent with applicable goals of the 2020-2045 RTP/SCS. Impacts would be less than significant, and no mitigation is required.

MITIGATION MEASURES

No mitigation is required.

4.9.5 CUMULATIVE IMPACTS

As concluded above, the Project would not conflict with any applicable GGP, GMC, or RTP/SCS land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, following approval of the requested amendments pursuant to GMC requirements. Although other changes in land use plans and regulations may be necessary for other individual future projects, such changes would be required to demonstrate consistency with General Plan and other policies. Given that, upon adoption, the proposed Project would be consistent with the land use policies of the applicable

[1] See the following link for the 2020-2045 RTP/SCS: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.

plans, the Project would not combine with any past, present, or reasonably foreseeable future projects to cause a significant adverse cumulative land use impact based on a conflict with a plan or policy. Any associated physical impacts are addressed in the individual EIR topic sections.

As part of their review process, each cumulative project would be required to demonstrate compliance with the provisions of the applicable land use designation(s) and zoning district(s). It is assumed that cumulative development would progress in accordance with the general plan and municipal code of the respective jurisdictions. Each cumulative project would be analyzed to ensure that the goals, objectives, and policies of the respective general plans, and regulations and guidelines of the respective municipal codes are consistently upheld. Project-specific measures would be identified, as needed. Because the Project's impacts would be less than significant, and since each cumulative project would undergo separate review on a project-by-project basis for consistency with the relevant jurisdiction's policies and standards, cumulative impacts would be less than significant.

4.9.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts to land use and planning have been identified.

4.9.7 REFERENCES

City of Gardena. 2006. *Gardena General Plan 2006*. https://www.cityofgardena.org/general-plan/ (accessed May 2020).

City of Gardena. 2020. *Gardena Municipal Code*. https://www.codepublishing.com/CA/Gardena/ (accessed November 2020).

SCAG. 2020. *Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy*. https://www.connectsocal.org/Documents/Adopted/0903fConnectSoCal-Plan.pdf (accessed November 2020).

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4.10 NOISE

4.10 NOISE

The purpose of this section is to describe the existing regulatory and environmental conditions related to noise, identify potential impacts that could result from Project implementation, and as necessary, recommend mitigation to avoid or reduce the significance of impacts.

Information in this section is based primarily on noise and vibration data provided in the Noise Impact Study (Acoustical Engineering Services, Inc. (AES), 2020); see **Appendix 9.10: Noise Data**.

Kimley-Horn conducted a third-party review of the Project's noise analysis on behalf of the City; see **Appendix 9.10**. The third-party review concluded the analysis meets the applicable provisions of CEQA and the State CEQA Guidelines.

4.10.1 AFFECTED ENVIRONMENT

Characteristics of Noise

Sound is mechanical energy transmitted by pressure waves through a medium such as air or water; the manner in which sound travels through this medium is influenced by the physical properties of the medium (such as temperature, density, and humidity). Noise is often defined as unwanted sound. Of the various noise descriptors used to characterize the loudness of a sound, the sound pressure level has become the most common.

The human ear is not equally sensitive to all frequencies on the audible sound spectrum; for this reason, human response is factored into sound descriptions in a process called "A-weighting," expressed as "dBA." The dBA, or A-weighted decibel, is a scale of noise measurement that approximates the human ear's range of sensitivity to sounds of different frequencies. On this scale, the normal range of human hearing extends from about 0 dBA to about 140 dBA. Sound can vary in intensity by over 1 million times within the range of human hearing; for this reason, the decibel scale is based on logarithms (a system used to shorten calculations in mathematics), which keeps sound pressure measurements within a convenient and manageable range. Because the decibel scale is logarithmic in nature, two noise sources do not combine in a simple additive fashion. For example, if two sources each produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA. The noise levels presented in this section are expressed in dBA, unless otherwise indicated.

Stationary noise sources such as idling vehicles or onsite construction equipment are considered "point sources," and noise originating from these sources "attenuates," or decreases, based on certain physical principles (e.g., spherical spreading). In accordance with these principles, this analysis assumes that noise originating from a point source within 200 feet of a receiver attenuates at a rate of 6.0 dBA per doubling of distance, and noise from a point source greater than 200 feet away attenuates at a rate of 7.5 dBA per doubling of distance (Caltrans, 2009). Application of these attenuation rates account for such factors as the absorption of noise waves into ground surfaces, vegetation, and intervening structures.

Noise Exposure and Community Noise

The sound pressure level is a measure of noise experienced by an individual at a given moment, and noise exposure is a measure of noise experienced over a period of time. However, consistent noise levels rarely persist over a long period of time. In fact, community noise varies continuously with time and in relation

to the contributing sources of sound within the noise environment. Community noise is primarily the product of many distant noise sources that combine to create a relatively stable background noise environment, and individual contributors to the community noise level are generally unidentifiable. Background noise levels change throughout a typical day, but do so gradually, corresponding with the addition and subtraction of distant noise sources as well as changes in atmospheric conditions. The addition of short duration, single-event noise sources (e.g., aircraft flyovers, motor vehicles, sirens) makes community noise constantly variable throughout a day.

To appropriately characterize the community noise environment and evaluate noise impacts, noise exposure must be measured over a period of time. This time-varying nature of environmental noise is characterized using statistical noise descriptors. In addition to dBA, the following noise descriptors are used in this evaluation:

dB — The decibel (dB) scale is used to quantify sound intensity, with 0 dB corresponding roughly to the threshold of human hearing, and 120 to 140 dB corresponding to the threshold of pain.

dBA — A-weighted decibels (dBA) are measured using a filter that de-emphasizes the frequencies below 1,000 hertz (Hz) and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to low and extremely high frequencies.

L_{eq} — The energy-equivalent sound level (Leq) provides a single numerical value for noise measured over a specified period of time. The Leq is the average noise exposure level for the given time period.

L_{max} — The instantaneous maximum noise level (Lmax) measured during the measurement period.

DNL — The day-night average sound level (DNL) is the average of the A-weighted sound levels occurring during a 24-hour period and accounts for the greater sensitivity of most people to noise at night. DNL "penalizes" noise occurring between 10:00 p.m. and 7:00 a.m. by adding 10 dBA to nighttime noise levels.

CNEL — Similar to DNL, the community noise equivalent level (CNEL) treats each evening noise event as though it were three, which adds a 4.77-dB "penalty" for noise events occurring between 7:00 p.m. and 10:00 p.m. Nighttime events are multiplied by ten, which adds a 10-dB penalty to noise events occurring between 10:00 p.m. and 7:00 a.m.

Effects of Noise on People

The effects of noise on people can be placed into three categories: the subjective effects of annoyance, nuisance, and dissatisfaction; interference with activities such as speech, sleep, and learning; and physiological effects such as hearing loss or sudden startling. Environmental noise typically produces effects in the first two categories. Workers at industrial plants often experience noise in the third category. A wide variation exists in the individual thresholds of annoyance, and different tolerances to noise tend to develop based on an individual's past experiences with noise. Therefore, an important method of predicting human reactions to a new noise environment is to compare the new noise level to the existing noise level to which one has adapted (i.e., the ambient noise level). In general, the more a new noise level exceeds the former ambient noise level, the less acceptable the new noise environment would be judged.

The California Department of Transportation (Caltrans) Technical Noise Supplement to the Traffic Noise Analysis Protocol (September 2013) reports the following human responses to changes in noise levels:

- Except in carefully controlled laboratory experiments, a change of 1 dBA cannot be perceived.
- Outside the laboratory, a 3 dBA increase is considered a "barely perceptible" difference (i.e., the change in noise is perceived but does not cause a human response).
- An increase of at least 5 dBA is required before any noticeable change in human response is expected.
- A 10 dBA increase is subjectively heard as an approximate doubling in loudness.

Groundborne Vibration

Vibration is an oscillatory motion through a solid medium. In contrast to airborne noise, groundborne vibration is not a common environmental problem. It is unusual for individuals to perceive vibration from sources such as buses and trucks, even in locations near major roads. However, some common vibration sources produce groundborne vibration that can be felt (e.g., construction activities such as blasting, pile driving, and operating heavy equipment). There are several methods employed to quantify vibration. The measurement used in this analysis—peak particle velocity (PPV)—is defined as the vibration signal's maximum instantaneous peak. PPV is used to describe vibration impacts on buildings and structures and is expressed in inches per second (in/sec). Typically, groundborne vibration generated by human activity attenuates rapidly with distance from the vibration source. Sensitive receptors for vibration include structures (especially older masonry structures); people (residents, especially the elderly and sick); and locales with vibration-sensitive equipment such as hospitals, research labs, and production facilities for computer-chip manufacturing.

The responses of human receptors and structures to vibration are influenced by a combination of factors, including soil/rock type, distance from the source, duration, and the number of perceived events. Energy transmitted through the ground as vibration can reach levels that cause structural damage; however, humans are very sensitive, and the vibration amplitudes that can be perceived by humans are well below the levels that cause architectural or structural damage. The Caltrans Transportation and Construction Vibration Guidance Manual (September 2013) characterizes the annoyance potential of vibration as follows: 0.01 in/sec PPV is "barely perceptible," 0.04 in/sec PPV is "distinctly perceptible," 0.1 in/sec PPV is "strongly perceptible," and 0.4 in/sec PPV is "severe" for continuous/frequent intermittent sources.

Mobile Noise Sources

Mobile noise sources in the Project vicinity consist of vehicular traffic along the area's roadways. Most of the Project area's existing mobile noise is generated from vehicles on Crenshaw Boulevard immediately adjacent/west of the Project site and El Segundo Boulevard approximately 100 feet north of the Project site. Traffic-related mobile source noise is a function of the roadways' traffic volumes and vehicle speeds. Existing off-site traffic noise is shown in **Table 4.10-9: Offsite Roadway Traffic Noise Impacts**.

Stationary Noise Sources

Gardena is highly urbanized and comprised of a mix of residential and non-residential land uses (i.e., commercial and industrial). The Project area's primary stationary noise sources are urban-related activities (i.e., mechanical equipment, parking areas, and commercial and industrial areas). The noise

associated with these stationary sources may represent a single-event noise occurrence, short-term or long-term/continuous noise.

Noise Sensitive Receptors and Existing Ambient Noise Levels

Human response to noise varies widely depending on the type of noise, time of day, and receptor sensitivity. The effects of noise on humans can range from temporary or permanent hearing loss to mild stress and annoyance due to such things as speech interference and sleep deprivation. Prolonged stress, regardless of the cause, is known to contribute to a variety of health disorders. Noise, or the lack thereof, is a factor in the aesthetic perception of some settings, particularly those with religious or cultural significance. Certain land uses are particularly sensitive to noise, including schools, hospitals, rest homes, long-term medical and mental care facilities, and parks and recreation areas. Residential areas are also considered noise-sensitive, especially during the nighttime hours. Additionally, Gardena has various public and private educational facilities, churches, a library, senior housing, and park and recreation facilities that are considered noise sensitive. Based on a review of the land uses in the Project area, the noise-sensitive receptors nearest the Project site are the single- and multi-family residential uses located approximately 110 feet to the east.

Three off-site noise receptor locations were selected to represent noise-sensitive receptors surrounding the Project area. These noise-sensitive receptors (i.e., R1, R2, and R3) are described in **Table 4.10-1: Existing Ambient Noise Levels**, and depicted in **Exhibit 4.10-1: Receptor Locations**. The existing ambient noise environment at the off-site noise-sensitive uses are based on the City established exterior noise standards for single- and multi-family residential uses, as ambient noise measurements are not available, due to the current shelter in place (from the Covid-19) conditions.

Table 4.10-1: Existing Ambient Noise Levels

Existing Ambient Noise Levels	Approximate Distance to Project Site[1] (Feet)	Ambient Noise Levels[2] dBA L_{eq}	
		Daytime Hours (7 a.m. to 10 a.m.)	Nighttime Hours (10 p.m. to 7 a.m.)
R1 – Multi-family residential use located at 2936 El Segundo Boulevard, northeast of the Project site	120	55	50
R2 – Single-family residential use at the cul-de-sac of West 129th Street, east of the Project site	100	55	50
R3 – Single-family residential use at the cul-de-sac of 129th Place, southeast of the Project site	100	55	50

1. Distances are estimated based on Google Earth map and are referenced to the Project nearest boundary.
2. Ambient noise levels are based on the City's exterior noise standard (see **Table 4.10-3**).

Source: AES, 2020. Table 4.



Source: AES. 2020. Figure 1.

Transit-Oriented Development Specific Plan Project
Environmental Impact Report

Exhibit 4.10-1
Receptor Locations

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4.10.2 REGULATORY FRAMEWORK

STATE

California Noise Standards

The State of California does not have statewide standards for environmental noise, but the California Department of Health Services (DHS) has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. The purpose of these guidelines is to maintain acceptable noise levels in a community setting for different land use types. Noise compatibility by different land uses types is categorized into four general levels: "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable." For instance, a noise environment ranging from 50 dBA CNEL to 65 dBA CNEL is considered to be "normally acceptable" for multi-family residential uses, while a noise environment of 75 dBA CNEL or above for multi-family residential uses is considered to be "clearly unacceptable." In addition, California Government Code Section 65302(f) requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(g) requiring a noise element to be included in the general plan. The noise element must: (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels.

California Vibration Standards

There are no State-established vibration standards. Moreover, according to the Caltrans' Transportation and Construction Vibration Guidance Manual, there are no official Caltrans standards for vibration.[1] However, this manual provides guidelines that can be used as screening tools for assessing the potential for adverse vibration effects related to structural damage and human perception. The manual is meant to provide practical guidance to Caltrans engineers, planners, and consultants who must address vibration issues associated with the construction, operation, and maintenance of Caltrans projects.

LOCAL

City of Gardena General Plan

The City of Gardena General Plan 2006 (GGP) includes a Community Safety Element that provides a Noise Plan, the basis of which is to achieve and maintain environmental noise control. The following goals and policies for the treatment of noise are applicable to the Project:

- **N Goal 2:** Incorporate noise considerations into land use planning decisions
  - **Policy N 2.4**: Require mitigation of all significant noise impacts as a condition of project approval.
  - **Policy N 2.5**: Require proposed projects to be reviewed for compatibility with nearby noise-sensitive land uses with the intent of reducing noise impacts.

[1] California Department of Transportation. (2013). *Transportation and Construction Vibration Guidance Manual*. page 21. Retrieved from http://website.dot.ca.gov/env/noise/docs/tcvgm-sep2013.pdf.

- **Policy N 2.6**: Require new residential developments located in proximity to existing commercial/industrial operations to control residential interior noise levels as a condition of approval and minimize exposure of residents in the site design.
- **Policy N 2.9**: Encourage the creative use of site and building design techniques as a means to minimize noise impacts.

- **N Goal 3:** Develop measures to control non-transportation noise impacts.
  - **Policy N 3.2**: Require compliance with noise regulations. Review and update Gardena's policies and regulations affecting noise.
  - **Policy N 3.3**: Require compliance with construction hours to minimize the impacts of construction noise on adjacent land.

Further, the City has adopted noise compatibility guidelines for land use planning. The types of land uses the acceptable noise categories for each land use are included in the GGP Noise Plan. The level of acceptability of the noise environment is dependent upon the activity associated with the particular land use. **Table 4.10-2: Gardena Noise and Land Use Compatibility** provides the exterior noise standard associated with various land uses, as provided in the City Noise Plan. According to the City, an exterior noise environment up to 65 dBA CNEL is "conditionally acceptable" for single- and multi-family residential uses. In addition, noise levels up to 75 dBA CNEL are "normally unacceptable," while noise levels at 75 dBA CNEL and above are "clearly unacceptable" for residential.

Table 4.10-2: Gardena Noise and Land Use Compatibility

Land Use Category	CNEL, dBA[1]						
	<	55	60	65	70	75	80
Residential – Single-family, multi-family, duplex	A	A	B	C	C	NA	NA
Residential – Mobile homes	A	A	B	C	C	NA	NA
Transient Lodging – Motels, hotels	A	A	B	B	C	C	NA
Schools, Libraries, Churches, Hospitals, Nursing Homes	A	A	B	C	C	NA	NA
Auditoriums, concert Halls, Amphitheaters, Meeting Halls	B	B	C	C	NA	NA	NA
Sports Arenas, Outdoor Spectator Sports, Amusement Parks	A	A	A	B	B	NA	NA
Playgrounds, Neighborhood Parks	A	A	A	B	C	NA	NA
Golf Courses, Riding Stables, Cemeteries	A	A	A	A	B	C	C
Office and Professional Buildings	A	A	A	B	B	C	NA
Commercial Retail, Banks, Restaurants, Theaters	A	A	A	A	B	B	C
Industrial, Manufacturing Utilities, Wholesale, Service Stations	A	A	A	A	B	B	B
Agriculture	A	A	A	A	A	A	A

[1] CNEL = Community Equivalent Noise Level; dBA = Decibel

Land Use Category	CNEL, dBA[1]						
	<	55	60	65	70	75	80
A = Normally Acceptable – Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements. B = Conditionally Acceptable – New construction or development should be undertaken only after a detailed analysis of the noise requirements is made and needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice. C = Normally Unacceptable – New construction or development should generally be discouraged. If it does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design. D = Clearly Unacceptable – New construction or development should generally not be undertaken. NA = Not Applicable							
Source: City of Gardena General Plan, 2006.							

City of Gardena Municipal Code

City of Gardena Municipal Code (GMC) §8.36.040 and §8.36.050 state the exterior and interior noise standards for the City in terms of L_{eq}(15) and Lmax. **Table 4.10-3: City of Gardena Exterior Noise Limits**, provides the allowable noise levels at land uses receiving noise. GMC §8.36.050(C) states that if the ambient noise level exceeds the noise standard, then the ambient noise level shall become the noise standard. GMC §8.36.080(G) states that noise associated with construction, repair, remodeling, grading, or demolition between the hours of 7:00 a.m. and 6:00 p.m. on weekdays and between the hours of 9:00 a.m. and 6:00 p.m. on Saturday are exempt from these noise standards. GMC §8.36.070: Prohibited Acts, prohibits the operation of a device that generates vibration which is above the perception threshold of an individual at or beyond the property line if the source is on private property.

Table 4.10-3: City of Gardena Exterior Noise Limits

Type of Land Use	15-minute Average Noise Level, dBA (Leq)		Maximum Noise Level, dBA (Lmax)	
	7 AM - 10 PM	10 PM - 7 AM	7 AM - 10 PM	10 PM - 7 AM
Residential	55	50	75	70
Residential portions of mixed-use	60	50	80	70
Commercial	65	60	85	80
Industrial or manufacturing	70	70	90	90
Source: GMC §8.36.040, 2020.				

In accordance with the GMC §8.36.040.C, if the existing measured ambient level exceeds the noise standard, the ambient noise level shall become the noise standard.

GMC §8.36.080 Exemptions—The provisions of the City noise standard shall not apply to the following:

> Item G - Noise associated with construction, repair, remodeling, grading or demolition of any real property, provided said activities do not take place between the hours of 6:00 p.m. and 7:00 a.m. on weekdays, between the hours of 6:00 p.m. and 9:00 a.m. on Saturdays or anytime on Sunday or Federal holiday.

Item H – Operation of refuse and recyclable collection vehicles, provided:

1) Collection of residential refuse/recyclables does not occur between the hours of 6:00 p.m. and 7:00 a.m. on weekdays, or at any time on weekend or holiday, except as provided below.
2) Collection from commercial premises, audible in residential areas, and which does not occur between the hours of 6:00 p.m. and 7:00 a.m. on weekdays, or at any time on a weekend or holiday, except as provided below.
3) When a collection day occurs on a holiday, alternative collections may be made on the following Saturday, between the hours of 7:00 a.m. and 6:00 p.m.

Applicable Vibration Standards

GMC §8.36.070 prohibits the operation of any device that creates vibration which is above the vibration perception threshold of an individual at or beyond the real property boundary of the source if on private property or at 150 feet from the source if on a public space or public right-of-way. The vibration perception threshold as defined by the GMC is 0.01 in/sec over the range of 1 to 100 Hz.

4.10.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning noise. The questions presented in the Environmental Checklist have been used as threshold of significance in this section. Accordingly, the Project may create a significant environmental impact and it would:

- 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 (see Impact 4.10-1);
- Result in the generation of excessive groundborne vibration or groundborne noise levels (see Impact 4.10-2);
- For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels (see **Section 7.0: Effects Found Not to be Significant**).

METHODOLOGY AND ASSUMPTIONS

Temporary Construction Noise

Construction noise impacts due to onsite construction activities associated with the Project were evaluated by calculating the construction-related noise levels at representative sensitive receptor locations and comparing these estimated construction-related noise levels associated with construction of the Project to the existing ambient noise levels (i.e., noise levels without construction noise from the Project). Construction noise associated with the Project was analyzed based on the Project's potential construction equipment inventory, construction durations, and construction schedule. The construction equipment noise levels are based on the published noise data (equipment source levels) by Federal

Highway Administration (FHWA) "Roadway Construction Noise Model."[2] The construction noise levels were then calculated for sensitive receptor locations based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance.

In addition, the construction-related off-site trucks noise impacts were analyzed using the FHWA's Traffic Noise Model (TNM). The TNM noise model calculates the hourly L_{eq} noise levels generated by construction-related trucks. Noise impacts were determined by comparing the predicted noise level with that of the existing ambient noise levels.

Temporary Construction Vibration

Ground-borne vibration impacts due to the Project's construction activities were evaluated by identifying potential vibration sources (i.e., construction equipment), estimating the vibration levels at the potentially affected receptors, and comparing the Project's activities to the applicable vibration significance thresholds.

Operation Noise

Off-site roadway noise was analyzed using the FHWA's TNM, based on the roadway traffic data provided in the Project's transportation study. The TNM is the current Caltrans standard computer noise model for traffic noise studies. The model allows for the input of roadway parameters, noise receivers, and sound barriers (if any). Roadway noise attributable to the project "existing plus project" was calculated and compared to "existing without project" noise levels to determine project noise impacts.

Onsite stationary point-source noise impacts were evaluated by (1) identifying the noise levels that would be generated by the Project's stationary noise sources, such as rooftop mechanical equipment, outdoor activities (e.g., use of the outdoor courtyard), parking facilities, and trash compactor; (2) calculating the noise level from each noise source at surrounding sensitive receptor property line locations; and (3) comparing such noise levels to ambient noise levels to determine significance. The onsite stationary noise sources were calculated using the SoundPLAN, a 3-dimensional computer noise prediction model.

PROJECT DESIGN FEATURE (PDF)

The Project's outdoor pool/courtyard at Level 3 would include the use of an amplified sound system. The Project includes the following PDF to mitigate any potential noise impacts associated with the use of amplified sound system.

- **PDF NOI-1**: The amplified sound system at the Level 3 pool deck/courtyard shall be designed such that it does not exceed a maximum noise level of 85 dBA (L_{eq}) at a distance of 25 feet from the amplified sound system.

[2] FHWA. (2006). *FHWA Roadway Construction Noise Model User's Guide*. page 1. Retrieved from https://www.gsweventcenter.com/Draft_SEIR_References/2006_01_Roadway_Construction_Noise_Model_User_Guide_FHWA.pdf.

4.10.4 IMPACTS AND MITIGATION MEASURES

Impact 4.10-1: 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?

Level of Significance: Significant and Unavoidable Impact

CONSTRUCTION (NOISE)

Noise impacts from Project construction activities would be a function of the noise generated by construction equipment, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to noise-sensitive receptors. Construction activities for the Project would generally include demolition, site grading, building construction, and landscaping. Each stage of construction would involve the use of various types of construction equipment and would, therefore, have its own distinct noise characteristics. Demolition generally involves the use of backhoes, front-end loaders, and heavy-duty trucks. Grading and excavation typically require the use of earth-moving equipment, such as excavators, front-end loaders, and heavy-duty trucks. Building construction typically involves the use of forklifts, concrete trucks, concrete pumps, and delivery trucks. Noise from construction equipment would generate both steady-state and episodic noise that could be heard within and adjacent to the Project site. The duration of the Project's construction activities is estimated to be approximately two years, beginning in the third quarter of 2021 with completion in the third quarter of 2023.

Table 4.10-4: Construction Equipment Noise Emission Reference Levels and Usage Factors shows individual pieces of construction equipment that would be used for construction produce maximum noise levels of 74 dBA to 81 dBA at a reference distance of 50 feet from the noise source. The construction equipment noise levels at 50 feet distance (Referenced Maximum Noise Levels) are based on the FHWA Roadway Construction Noise Model User's Guide,[3] which is a technical report containing actual measured noise data for construction equipment. These maximum noise levels would occur when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). However, equipment used on construction sites often operates under less than full power conditions, or part power. To more accurately characterize construction-period noise levels, the average (Hourly L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage.[4] These noise levels are typically associated with multiple pieces of equipment operating simultaneously.

[3] FHWA. (2006). *FHWA Roadway Construction Noise Model User's Guide*. page 2. Retrieved from https://www.gsweventcenter.com/Draft_SEIR_References/2006_01_Roadway_Construction_Noise_Model_User_Guide_FHWA.pdf.

[4] Pursuant to the FHWA Roadway Construction Noise Model User's Guide, 2005, the usage factor is the percentage of time during a construction noise operation that a piece of construction is operating at full power.

Table 4.10-4: Construction Equipment Noise Emission Reference Levels and Usage Factors

Type of Equipment	Acoustical Usage Factor (%)	Reference Maximum Noise Levels at 50 Feet,[1] Lmax (dBA)
Backhoe	40	78
Concrete Mixer Truck	40	79
Concrete Pump Truck	20	81
Forklift	20	75
Generator	50	81
Dump/Haul Truck	40	76
Excavator	40	81
Man Lift	20	75
Roller	20	80
Rubber Tired Loader	40	79
Delivery Truck	40	74
Welders	40	74
[1] Construction equipment noise levels are based on the FHWA RCNM.		
Source: FHWA Roadway Construction Noise Model User's Guide. Table 1, 2006.		

Table 4.10-5: Construction Noise Levels provides the estimated construction noise levels for various construction phases at the off-site noise-sensitive receptors. To present a conservative analysis, the estimated noise levels were calculated for a scenario in which all pieces of construction equipment were assumed to operate simultaneously and be located at the construction area nearest to the sensitive receptors. These assumptions represent the worst-case noise scenario because construction activities would typically be spread out throughout the Project site, and, thus, some equipment would be farther away from the affected receptors.

Table 4.10-5: Construction Noise Levels

Location	Estimated Noise Levels by Construction Phase[1] dBA (L_{eq})					
	Demolition	Grading	Foundation/ Slab	Podium/ Garage	Building Construction	Paving/ Landscape
R1	72.6	74.5	72.3	71.4	63.4	60.4
R2	73.8	75.5	73.4	72.5	64.6	61.6
R3	73.4	75.2	73.1	72.1	64.2	61.2
[1] Detailed calculation worksheets, are included in **Appendix 9.10**.						
Source: AES, 2020. Table 6.						

As specified in GMC §8.36.080, construction activities are exempt from the noise standards, provided that construction activities do not take place between the hours of 6:00 p.m. and 7:00 a.m. on weekdays, between 6:00 p.m. and 9:00 a.m. on Saturday or any time on Sunday and Federal holiday. Project construction would comply with the City allowable construction hours of 7:00 a.m. to 6:00 p.m. on Monday through Friday and 9:00 a.m. to 6:00 p.m. on Saturday. As described above, the GMC does not have a quantitative construction noise limit (i.e., increase over ambient level). Although, the estimated

construction noise levels (73.8 dBA at R2, the nearest noise-sensitive receptor to the east) would exceed the City's exterior noise standard (presumed daytime ambient noise level) of 55 dBA by up to 20.5 dBA, construction activities are exempt from noise standards pursuant to GMC §8.36.080. Notwithstanding, because construction activities would occur over an extended period (i.e., approximately 27 months) and up to eight stories (100 feet), the Project's construction-related activities could arguably be called a significant impact and is treated as such. Therefore, Mitigation Measure (MM) NOI-1, which requires an impermeable sound barrier is recommended. The approximately 10 dBA attenuation (i.e., noise reduction) that would be achieved by MM NOI-1 would be substantial for the noise-sensitive receptors east of the Project site. However, the construction noise levels would still exceed the ambient noise levels. Therefore, given the extended construction period, building height, and construction-related noise levels exceeding the City's standard by up to 20.5 dBA despite MM NOI-1, it is conservatively concluded that the Project's temporary construction-related noise impacts would remain significant and unavoidable.

In addition to onsite construction noise sources, materials delivery, concrete mixing, and haul trucks (construction trucks), and construction worker vehicles would require access to the Project site during the Project construction period. The major noise sources associated with off-site construction trucks would be from haul trucks during the site grading/excavation (for import and export), which would require approximately 24 daily truck trips (12 incoming trips and 12 outgoing trips). Construction-related trucks would be fewer during other construction phases with up to ten delivery truck trips per day. Therefore, the noise analysis is based on the peak period (site grading phase) with a maximum of 24 truck trips per day. Based on an eight-hour haul period and a uniform distribution of trips, there would be three truck trips per hour. Haul trucks would generally access the Project site via Crenshaw Boulevard to I-105.

The off-site construction trucks would generate noise levels of approximately 55 dBA L_{eq} along Crenshaw Boulevard between the Project site and I-105. The estimated noise from off-site construction trucks would be lower than the existing ambient noise levels along Crenshaw Boulevard, based on existing traffic volume. As such, significant noise impacts would not be expected from off-site construction traffic.

OPERATIONS (NOISE)

Noise associated with Project operations would include: (a) onsite stationary noise sources, including outdoor mechanical equipment (e.g., HVAC equipment), activities within the proposed outdoor spaces (e.g., outdoor pool deck and courtyard), parking facilities, loading and trash compactor; and (b) off-site mobile (roadway traffic) noise sources.

Mechanical Equipment

The Project would include new mechanical equipment (e.g., air ventilation equipment), which would be located at the roof level and/or within the building structure. Project-related outdoor mechanical equipment would be designed to comply with the GMC, which limits the noise from the mechanical equipment such that it does not exceed the City's exterior noise standards. As shown in **Table 4.10-6: Mechanical Equipment Noise Levels,** the estimated noise levels from the mechanical equipment would range from 25.1 dBA (L_{eq}) at receptor location R1 to 26.6 dBA (L_{eq}) at receptor location R2, which would be below the Project significance thresholds. As such, noise impacts from the Project's mechanical equipment would be less than significant.

Table 4.10-6: Mechanical Equipment Noise Levels

Receptor Location	Ambient Noise Levels,[1] dBA (L_{eq})	Estimated Noise from Project Mechanical Equipment[2] dBA (L_{eq})	Significance Threshold[3] dBA (L_{eq})	Exceed over Significance Threshold	Significant Impact?
R1	50.0	25.1	50.0	0.0	No
R2	50.0	26.6	50.0	0.0	No
R3	50.0	25.5	50.0	0.0	No

[1] Based on City nighttime exterior noise limits.
[2] Noise levels associated with the Project outdoor mechanical equipment were calculated based on manufacturer's published sound data for typical outdoor condenser units. Detailed calculation worksheets, are included in **Appendix 9.10**.
[3] Significance thresholds are equivalent to the City's permissible exterior noise limits.

Source: AES. 2020. Table 7.

Outdoor Spaces

The Project would include several common outdoor spaces: an outdoor pool/courtyard at Level 3, and two small courtyards at Level 4. Noise sources associated with outdoor uses typically include noise from people gathering and conversing. For this operational noise analysis, reference noise levels of 65 dBA for a male and 62 dBA for a female speaking in a raised voice were used for analyzing potential noise impacts from people gathering at the outdoor spaces.[5] Another potential noise source associated with the outdoor spaces would be the possible use of an outdoor amplified sound system. The amplified sound system may be used for background music and intended to be heard by people in the immediate vicinity of the pool deck/courtyard. The amplified sound system would be designed so as not to exceed a maximum noise level of 85 dBA (L_{eq}) at a distance of 25 feet from the amplified sound system at the Level 3 pool deck/courtyard, thereby ensuring amplified sound would not exceed the significance threshold at any off-site noise-sensitive receptors. No amplified sound is anticipated for the Level 4 courtyard. In addition, the hours of operation for use of the outdoor areas were assumed to be from 9:00 A.M. to 10:00 P.M.

Table 4.10-7: Outdoor Uses Noise Levels presents the estimated noise levels at the off-site sensitive receptors, resulting from the use of outdoor areas. The estimated noise levels were calculated with the assumption that the outdoor spaces would be fully occupied and operating concurrently to represent a worst-case noise analysis. As presented in **Table 4.10-7**, the estimated noise levels from the outdoor spaces would range from 34.9 dBA (L_{eq}) at receptor location R3 to 43.0 dBA (L_{eq}) at receptor location R2, which would be below the City's significance thresholds. Therefore, noise impacts from the outdoor uses would be less than significant.

[5] Cyril M. Harris. (1991). *Handbook of Acoustical Measurements and Noise Control*, Table 16.1.

Table 4.10-7: Outdoor Uses Noise Levels

Receptor Location	Ambient Noise Levels[1] dBA (L_{eq})	Estimated Noise from Project Outdoor Uses[2] dBA (L_{eq})	Significance Threshold[3] dBA (L_{eq})	Exceed over Significance Threshold	Significant Impact?
R1	50.0	40.0	50.0	0.0	No
R2	50.0	43.0	50.0	0.0	No
R3	50.0	34.9	50.0	0.0	No

[1] Based on City nighttime exterior noise limits.
[2] Detailed calculation worksheets, are included in **Appendix 9.10.**
[3] Significance thresholds are equivalent to the City's permissible exterior noise limits.

Source: AES, 2020. Table 8.

Parking Facilities

Parking for the Project would be provided within three parking levels, with a total of approximately 267 parking spaces. The parking structure would be naturally ventilated along the east and west sides. The parking structure would have 3.0-foot high screening walls along the east and west sides. As indicated in **Table 4.10-8: Parking Facilities Noise Levels**, the estimated noise levels from the Project parking garage would be at most 44 dBA at receptor location R2, which would be below the Project significance thresholds. Therefore, noise impacts from the parking garage would be less than significant.

Table 4.10-8: Parking Facilities Noise Levels

Receptor Location	Ambient Noise Levels[1] dBA (L_{eq})	Estimated Noise from Project Parking Uses[2] dBA (L_{eq})	Significance Threshold[3] dBA (L_{eq})	Exceed over Significance Threshold	Significant Impact?
R1	50.0	39.2	50.0	0.0	No
R2	50.0	44.0	50.0	0.0	No
R3	50.0	39.7	50.0	0.0	No

[1] Based on City nighttime exterior noise limits.
[2] Detailed calculation worksheets are included in **Appendix 9.10**.
[3] Significance thresholds are equivalent to the City's permissible exterior noise limits.

Source: AES, 2020. Table 9.

Trash Compactor

The Project trash compactor would be located within an enclosed room inside Level 1 parking, at the building's interior, by the loading areas. The noise levels from the trash compactor operation would be effectively shielded to the off-site sensitive receptor locations. Therefore, noise impacts from the trash compactor operations would be less than significant.

Off-site Traffic

As discussed in the Local Transportation Assessment in **Appendix 9.11: Transportation Data**, the Project is expected to generate approximately 1,370 net daily trips. Project-generated traffic noise impacts were evaluated by comparing the increase in noise levels from the "existing" condition to the "existing plus

project" condition with the significance threshold. Traffic noise levels at the off-site noise-sensitive receptors were calculated using FHWA's Traffic Noise Model and the Project's traffic volume data. The traffic noise impact analysis is based on the 24-hour CNEL noise descriptor.

As shown in **Table 4.10-9: Offsite Roadway Traffic Noise Impacts**, traffic from the Project would result in a maximum noise increase of 0.1 dBA CNEL and 0.2 dBA CNEL along El Segundo Boulevard (between Crenshaw Boulevard and Van Ness Avenue) and along Crenshaw Boulevard (between El Segundo Boulevard and W. 135th Street). As previously noted, a 3-dBA increase is considered a "barely perceptible" difference (i.e., the change in noise is perceived but does not cause a human response). As such, the estimated noise increases, which are at most 0.2 dBA CNEL, are considered negligible. Therefore, off-site traffic noise impacts associated with the Project would be less than significant.

Table 4.10-9: Offsite Roadway Traffic Noise Impacts

Roadway Segment	Estimated Traffic Noise Levels[1] CNEL		Increase in Noise Levels, CNEL	Significant Impact?
	Existing	Existing + Project		
Crenshaw Boulevard Between El Segundo Blvd. and W 135th St.	69.8	70.0	0.2	No
El Segundo Boulevard Between Crenshaw Blvd. and Van Ness Ave	68.9	69.0	0.1	No
W 135th Street Between Crenshaw Blvd. and Van Ness Ave.	67.3	67.3	0.0	No
[1] Detailed calculation worksheets, are included in **Appendix 9.10**.				
Source: AES, 2020. Table 10.				

Composite Noise Impacts from Project Operations

An evaluation of composite noise levels, including all Project related noise sources, was conducted to identify the potential maximum Project-related noise level increase that may occur at the Project noise-sensitive receptor locations. The overall sound environment at the areas surrounding the Project site would include contributions from each onsite individual stationary noise source associated with typical daily Project operations. Principal onsite noise sources associated with the Project would include mechanical equipment, parking facility, and outdoor uses. As indicated in **Table 4.10-10: Composite Noise Impacts**, the Project composite noise levels would range from 41.1 dBA at receptor R3 to 46.6 dBA at receptor R2, which would be below the 50.0 dBA significance thresholds. Therefore, the Project operations' composite noise level impact would be less than significant.

Table 4.10-10: Composite Noise Impacts

Receptor Location	Ambient Noise Levels[1] dBA (L_{eq})	Calculated Project-Related Noise Levels, L_{eq} (dBA)			Project Composite Noise Levels, L_{eq} (dBA)	Significance Threshold,[3] dBA (L_{eq})	Significant Impact?
		Mechanical	Outdoor Uses[2]	Parking			
R1	50.0	25.1	40.0	39.2	42.7	50.0	No
R2	50.0	26.6	43.0	44.0	46.6	50.0	No
R3	50.0	25.5	34.9	39.7	41.1	50.0	No

[1] Based on City nighttime exterior noise limits.
[2] Detailed calculation worksheets, are included in **Appendix 9.10**.
[3] Significance thresholds are equivalent to the City's permissible exterior noise limits.

Source: AES, 2020. Table 11.

MITIGATION MEASURES

MM NOI-1 A temporary and impermeable sound barrier shall be constructed along the Project eastern property line prior to construction, and shall remain during construction. The temporary sound barrier shall be a minimum of 8.0-feet high and shall have a minimum Sound Transmission Class rating of STC-25. The sound barrier must be designed to meet a minimum 10dB(A) attenuation.

Impact 4.10-2: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Level of Significance: Less Than Significant Impact

CONSTRUCTION (VIBRATION)

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures and the type of construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies, depending on soil type, ground strata, and construction characteristics of the receptor buildings.

The Project would generate ground-borne construction vibration forces during building demolition and site excavation/grading activities when heavy construction equipment, such as large bulldozer/excavator and loaded trucks, would be used. The FTA has published standard vibration velocities levels for various construction equipment operations.[6] It is noted that Project construction would not use impact pile driving methods, therefore, impact pile driving vibration is not included in the onsite construction vibration analysis. As indicated in **Table 4.10-11: Construction Vibration Impacts – Human Annoyance**, the estimated vibration velocity levels from all construction equipment would be below the significance criteria at all off-site sensitive receptors. Therefore, the onsite vibration impacts, pursuant to the significance criteria for human annoyance, during Project construction would be less than significant.

[6] FTA. (2018). *Transit Noise and Vibration Impact Assessment*. Retrieved from https://www.transit.dot.gov/regulations-and-guidance/environmental-programs/noise-and-vibration

Table 4.10-11: Construction Vibration Impacts – Human Annoyance

Receptor Location	Estimated Vibration Velocity Levels at the Off-site Sensitive Uses, VdB[1]			Significance Threshold[2] VdB	Significant Impact?
	Large Bulldozer	Loaded Trucks	Small Bulldozer		
FTA Reference Vibration Levels at 25 feet	87	86	58	--	--
R1	67	66	38	80	No
R2	68	67	39	80	No
R3	68	67	39	80	No

[1] Vibration level calculated based on FTA reference vibration level at 25 foot distance.
[2] Significance threshold is based on City vibration limit of 0.01 in/sec converted to VdB, 20*log(0.01*1,000,000).

Source: FTA, 2018; AES, 2020. Table 12.

In addition, vibration impacts associated with potential building damage were analyzed at buildings nearest the Project site. The City currently does not have any adopted standards, guidelines, or thresholds relative to vibration impacts associated with building damage. Therefore, criteria from the Federal Transit Administration (FTA) are utilized as threshold to assess impacts associated with potential building damage.[7] **Table 4.10-12: Construction Vibration Impacts – Building Damage** provides the estimated vibration levels at the nearest off-site buildings. As indicated in **Table 4.10-12**, the estimated vibration velocity levels from construction equipment would be below the significance criteria at the nearest off-site buildings. Therefore, the onsite vibration impacts, pursuant to the significance criteria for building damage, during Project construction would be less than significant.

Table 4.10-12: Construction Vibration Impacts – Building Damage

Receptor Location	Estimated Vibration Velocity Levels at the Off-site Buildings, PPV[1]			Significance Threshold VdB	Significant Impact?
	Large Bulldozer	Loaded Trucks	Small Bulldozer		
FTA Reference Vibration Levels at 25 feet	0.089	0.076	0.003	--	--
Single-story building to the North	0.068	0.058	0.002	0.3[2]	No
Single-story commercial building to the South	0.089	0.076	0.003	0.3[2]	No
Single-story residential buildings to the East	0.010	0.009	<0.001	0.2[3]	No
Single-story commercial building to West	0.010	0.009	<0.001	0.3[2]	No

[1] Vibration level calculated based on FTA reference vibration level at 25 foot distance.
[2] Significance threshold is based on FTA criteria for engineered concrete and masonry buildings.
[3] FTA criteria for non-engineered timber and masonry buildings.

Source: FTA, 2018; AES, 2020. Table 13.

MITIGATION MEASURES

No mitigation is required.

[7] FTA. (2018). Transit Noise and Vibration Impact Assessment. Retrieved from https://www.transit.dot.gov/regulations-and-guidance/environmental-programs/noise-and-vibration.

4.10.5 CUMULATIVE IMPACTS

For purposes of the noise and vibration impact analysis, cumulative impacts are considered for cumulative development within Gardena and Hawthorne, according to the related projects; see **Table 3-1: List of Cumulative Projects**.

CONSTRUCTION (NOISE)

As concluded above, the Project would have a significant and unavoidable impact related to temporary construction noise. Noise from construction of cumulative projects is typically localized and has the potential to affect noise-sensitive uses within 500 feet from the construction site, as construction noise would be attenuated by distance and intervening buildings, typical in an urban setting. Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to a cumulative noise impact for receptors located midway between the two construction sites.

There are total of 24 related projects identified in the Project's vicinity. There are three related projects within the City of Hawthorne, which are at least 2,200 feet from the Project site. Therefore, given the distance to these related projects (over 2,200 feet from the Project site) the cumulative construction noise impact would be less than significant.

The related project at 12540 Crenshaw Boulevard is approximately 750 feet north of the Project site. There are existing noise-sensitive uses, including residential uses along El Segundo Boulevard, approximately 680 feet from the related project. However, this related project is under construction and would likely be completed prior to the Project's construction. Therefore, this related project would not contribute to cumulative construction-related noise impacts. As such, no cumulative construction noise impact would occur in this regard.

CONSTRUCTION (VIBRATION)

As concluded above, the Project would have a less than significant impact related to groundborne vibration during construction. As discussed above, most related projects are located at least 2,200 feet from the Project site, which would not contribute to the cumulative construction vibration impacts. The nearest related project is located approximately 750 feet from the Project site and is currently under construction, which would not contribute to the cumulative construction vibration impacts. As such, no cumulative construction vibration impact would occur.

OPERATIONS (NOISE)

As concluded above, the Project would have a less than significant impact related to operational noise. The Project along with overall development in the surrounding area would generate noise that would contribute to cumulative noise from a number of community noise sources including onsite mechanical/electrical equipment, parking facilities, loading/trash collections, and occupational activities (i.e., people and amplified sound); and off-site mobile sources (i.e., traffic). The related projects are of a residential, retail, or commercial nature, and these uses are not typically associated with excessive exterior noise levels.

Noise levels from stationary sources would be less than significant at the property line for each related project, as set forth in the respective City noise regulations that limit stationary noise sources. In addition, due to the distance attenuation and intervening structures (between the related projects and the Project)

and the Project's onsite stationary noise sources (i.e., building mechanical equipment, parking facility, loading/trash compactor, and outdoor services) would result in less than significant impacts, stationary-source noise impacts attributable to cumulative development combined with the Project would be less than significant.

Traffic noise level is dependent on the traffic volume. That is, doubling the traffic volume would result in a 3 dBA noise increase (Project significance threshold). As analyzed above, the Project would result in a maximum 0.2 dBA increase in off-site traffic noise along Crenshaw Boulevard, well below the 3 dBA significance. The traffic volume from the related projects would not double the existing traffic volume on Crenshaw Boulevard, based on the relative located of the related projects to Crenshaw Boulevard. As such, the cumulative traffic noise impact from the related projects combined with the Project would be less than significant.

4.10.6 SIGNIFICANT UNAVOIDABLE IMPACTS

The Project would result in a temporary significant and unavoidable construction-related noise impact due to the increase in ambient noise levels and given the extended construction period, building height, and construction-related noise levels exceeding the City's standard by up to 20.5 dBA despite MM NOI-1, it is conservatively concluded that the Project's construction-related noise impacts associated with Project onsite construction activities would remain significant and unavoidable.

4.10.7 REFERENCES

Acoustical Engineering Services, Inc. (2020). *Noise Impact Study for Gardena T.O.D. Project*. Woodland Hills, CA.

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Federal Aviation Administration. (2017). *Hawthorne Municipal Airport 14 CFR Part 150 Noise Compatibility Program.* Figure 5B 2017 65 CNEL Noise Contour.

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Federal Transit Administration. (2018). *Transit Noise and Vibration Impact Assessment*. Retrieved from https://www.transit.dot.gov/regulations-and-guidance/environmental-programs/noise-and-vibration.

Fehr & Peers Transportation Consultants, personal communication, May 5, 2020.

Harris, Cyril M. (1991). *Handbook of Acoustical Measurements and Noise Control*, Table 16.1.

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4.11 POPULATION AND HOUSING

4.11 POPULATION AND HOUSING

The purpose of this section is to describe the existing regulatory and environmental conditions related to the Project area's population and housing, identify potential impacts that could result from Project implementation, and as necessary, recommend mitigation to avoid or reduce the significance of impacts The Project area's demographics are examined in the context of existing and projected population, housing, and employment for the City of Gardena (City) and the County of Los Angeles (County).

4.11.1 ENVIRONMENTAL SETTING

The Specific Plan area's demographics are examined in the context of existing and projected population and housing for the City of Gardena and Los Angeles County. This section is based on data contained in the Housing and Land Use Elements of the Gardena General Plan 2006 (GGP), the California Department of Finance Population and Housing Report (2020), 2010-2020 U.S. Census, and the Southern California Association of Governments (SCAG) Growth Forecasts.

POPULATION

The Department of Finance (DOF) identifies the current (2020) County population as 10,172,951 persons and the City population as 60,937persons. The DOF population estimates are derived by multiplying the number of occupied housing units by persons per household. The persons per household estimates are based on 2010 Census benchmark data.

Table 4.11-1: Population Projections: 2020-2045, shows the 2020 County and City populations as reported by the DOF and 2045 population forecasted by SCAG in the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG's forecasts are based on jurisdictions' existing land uses and General Plan land use designations. Population projections are calculated based on household growth and household size. SCAG's 2020-2045 RTP/SCS, Connect SoCal, forecasts that the County and City population would increase by approximately 12 and 8 percent, respectively, between 2020 and 2045. The 2020-2045 RTP/SCS provides population, household, and employment data for the counties in the SCAG region for 2020 and 2045. The respective city data is for 2016 and 2045 using DOF data for 2020.

Table 4.11-1: Population Projections: 2020-2045

Jurisdiction	2020	2045	Percent Change
County of Los Angeles	10,172,951[1]	11,674,000[2]	12
City of Gardena	60,937[1]	65,700[2]	8
Note: percent is rounded			
Sources: [1] State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2010-2020 (includes group quarters population). Sacramento, California, June 2020; [2] SCAG Connect SoCal 2020-2045 RTP/SCS Technical Report – Demographics and Growth Forecast.			

HOUSING

Table 4.11-2: Housing Projections (2020-2040) shows the 2020 County and City households reported by the DOF and the projected household estimates for 2045 in the 2020-2045 RTP/SCS.

Table 4.11-2: Housing Projections (2020-2040)

Jurisdiction	2020[1]	2045[2]
County of Los Angeles	3,590,574	4,119,000
City of Gardena	21,982	23,700

1. Source: Total housing units. State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2010-2020.
2. SCAG Connect SoCal 2020-2045 RTP/SCS Technical Report;

As identified in **Table 4.11-3: 2020 Housing Units,** the DOF estimates that the County's housing stock totals 3,590,574 housing units with an average of 2.96 persons per household and the City's housing stock totals 21,982 housing units with an average of 2.83 persons per household. The DOF estimates housing units by adding new construction and land annexations and subtracting housing that is removed (e.g., demolition) and adjusting for units lost or gained by conversions. Annual housing unit change data are supplied to the DOF by local jurisdictions and the U.S. Census Bureau. As reported by the DOF, the vacancy rate is a measure of the availability of housing in a community. The vacancy rate also correlates the types of units available to the market demand. A low vacancy rate suggests that households may have difficulty finding housing within their price range; a high supply of vacant units may indicate either the existence of a high number of desired units or an oversupply of units. The County's and City's vacancy rates are estimated at approximately 6.1 percent and 3.4 percent, respectively.

Table 4.11-3: 2020 Housing Units

	County of Los Angeles	City of Gardena
Single-Family Homes: Attached and Detached	1,966,152	11,494
Multi-Family Homes: Two to more than Five Units	1,566,125	9,243
Mobile Homes	58,297	1,245
Total Housing Units	**3,590,574**	**21,982**
Vacancy Rate	6.1%	3.4%
Persons per Household	2.96[1]	2.83[1]

Note: DOF household population estimates are derived by multiplying the number of occupied housing units by the current persons per household. The persons per household estimates are based on 2010 census benchmark data and are adjusted by the current county population assumptions in these estimates. The factors are taken into account to determine persons per household. Because many factors are included in the calculations, there is not a direct correlation between persons per household and population.

Source: State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2010-2020. Sacramento, California, June 2020.

SCAG forecasts total housing need for each community in southern California based on three general factors: (1) the number of housing units needed to accommodate future population and employment growth; (2) the number of additional units needed to allow for housing vacancies; and (3) the number of

very low, low, moderate, and above moderate income units needed in the community. Additional factors used to determine the Regional Housing Needs Assessment (RHNA) include tenure, the average rate of units needed to replace housing units demolished, proximity to high quality transit areas, and other factors.

The City's draft RHNA allocation for the October 2021 through October 2029 period is shown in **Table 4.11-4: City of Gardena Draft RHNA Allocation**. The City is required to ensure that sufficient sites that are planned and zoned for housing are available to accommodate its need and to implement proactive programs that facilitate and encourage the production of housing commensurate with its housing needs.

Table 4.11-4: City of Gardena Draft RHNA Allocation

Income Level	Percent of AMI	Target (Units)	Percent
Very Low	0-50%	1,481	26%
Low	51-80%	759	13%
Moderate	81-120%	892	16%
Above Moderate	120%+	2,589	45%
Total		5,721	**100%**
AMI = Area Median Income			
Source: SCAG. 2020. *SCAG 6th Cycle Draft RHNA Allocation Based on Final RHNA Methodology & Final Connect SoCal*. http://www.scag.ca.gov/programs/Documents/RHNA/RHNA-Draft-Allocations-090320-Updated.pdf (accessed November 2020).			

EMPLOYMENT

Because of the effects that COVID-19 on local and regional employment, the California Economic Development Department employment numbers for 2019 have been used because they more accurately represent employment in the area. As shown in **Table 4.11-5: Employment Projections: 2020-2045,** the County's 2019 employment totaled 4,894,000 jobs and is forecast to increase by approximately 12.1 percent to 5,225,800 jobs between 2020 and 2040. The City's 2019 employment totaled 30,400 jobs and is forecast to increase by 7.4 percent to 33,500 jobs between 2020 and 2040.

Table 4.11-5: Employment Projections: 2020-2045

Jurisdiction	2020	2045	Percent Change
County of Los Angeles	4,894,300[1]	5,382,000[2]	10%
City of Gardena	30,400[1]	32,100[2]	6%
Note: Percent is rounded.			
1. Source: California Economic Development Department, Annual Average 2019 employment. 2. Source: SCAG Connect SoCal 2020-2045 RTP/SCS Technical Report – Demographics and Growth Forecast.			

JOBS TO HOUSING BALANCE

SCAG states that "a balance between jobs and housing in a metropolitan region can be defined as a provision of an adequate supply of housing to house workers employed in a defined area (i.e., community or subregion). Alternatively, a jobs/housing balance can be defined as an adequate provision of

employment in a defined area that generates enough local workers to fill the housing supply." Jobs and housing are considered in balance when a subregion has enough employment opportunities for most people who live there and enough housing opportunities for most of the people who work there. The jobs/housing balance is one indicator of a project's effect on growth and quality of life in a project area. SCAG uses the jobs/housing ratio to assess the relationship between housing and employment growth.

Alternatively, the 2020-2045 RTP/SCS states that "an imbalance between employment and housing in a community is a key contributor to local traffic congestion. These types of origin/destination disparities may also be considered an impediment to environmental justice."[1] According to SCAG, improvements in the jobs to housing balance may result in a reduction of transportation congestion and related air quality problems. Communities with more than 1.5 jobs per dwelling unit (DU) are considered "jobs rich" and those with fewer than 1.5 jobs per DU are considered "housing rich." As identified in **Table 4.11-6: Jobs to Housing Balance**, comparatively, the City's jobs to housing balance is higher (more jobs rich) than the County's. Review of the County's and City's jobs-to-housing ratios indicates both are housing rich and would need more job growth to provide greater balance. Nevertheless, SCAG provided the City with a draft RHNA allocation of 5,721 DU.

Table 4.11-6: Jobs To Housing Balance

Jurisdiction	2020	2045
County of Los Angeles		
Jobs	4,894,300[1]	5,382,000[2]
Housing Units	3,590,574	4,119,000[2]
Jobs/Housing Ratio	1.36	1.31
City of Gardena		
Jobs	30,400[1]	32,100[2]
Housing Units	21,982	23,700[2]
Jobs/Housing Ratio	1.38	1.35

1. Source: California Economic Development Department, Annual Average 2019 employment. Because of the effects that COV-19 on local and regional employment, the California Economic Development Department employment numbers for 2019 have been used because they more accurately represent employment in the area.
2. Source: SCAG Connect SoCal 2020-2045 RTP/SCS Technical Report – Demographics and Growth Forecast.

4.11.2 Regulatory Framework

STATE

California Housing Element Law

The Housing Element is one of the seven General Plan Elements that are mandated by the State of California (California Government Code §§65580 to 65589.8). California State law requires that the Housing Element provides, "an identification and analysis of existing and projected housing needs and a

[1] Southern California Association of Governments. (2020). Connect SoCal 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy Plan. Los Angeles, CA: SCAG.

statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing" (Government Code §65580).

State law requires that each city and county identify and analyze existing and forecasted housing needs within its jurisdiction and prepare goals, policies, and programs to further the development, improvement, and preservation of housing for all economic segments of the community, commensurate with local housing needs.

REGIONAL AND LOCAL

Southern California Association of Governments

SCAG is a Joint Powers Agency established under Sections 6502 et seq. of the California Government Code. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency, and a Metropolitan Planning Organization (MPO) for the six-county region of Los Angeles, Orange, Ventura, San Bernardino, Riverside, and Imperial Counties. The region encompasses a population exceeding 18 million persons in an area that encompasses more than 38,000 square miles. As the designated MPO, SCAG is the responsible agency for developing and adopting regional housing, population, and employment growth forecasts for local governments. Gardena is a member of the Gateway Cities COG, one of the 14 subregional organizations in the SCAG region.

SCAG's demographic data is developed to enable the proper planning of infrastructure and facilities to adequately meet the needs of anticipated growth in the region. In September 2020, SCAG adopted Connect SoCal, its 2020 - 2045 RTP/SCS. Major themes in the 2020-2045 RTP/SCS include integrating strategies for land use and transportation; striving for sustainability; protecting and preserving existing transportation infrastructure; increase capacity through improved systems managements; providing more transportation choices; leveraging technology; responding to demographic and housing market changes; supporting commerce, economic growth and opportunity; promoting the links between public health, environmental protection and economic opportunity; and incorporating the principles of social equity and environmental justice into the plan.

Regional Housing Needs Assessment

The RHNA is an assessment process performed periodically as part of the General Plan Housing Element updates at the local level. The RHNA process begins with the California Department of Housing and Community Development's projection of future statewide housing growth need, and the apportionment of this need of regional councils of governments throughout the State. SCAG is the agency responsible for developing an allocation methodology to allocation the region's assigned share of statewide need to cities and counties by income level.

This "fair share" allocation concept seeks to ensure that each jurisdiction accepts responsibility for the housing needs of its resident population, as well as the jurisdiction's projected share of regional housing growth across all income categories. Regional growth needs are defined as the number of units that would have to be added in each jurisdiction to accommodate the forecasted number of households, as well as the number of units that need to be added to compensate for anticipated demolitions and changes to achieve an ideal vacancy rate. SCAG defines a "household" as an occupied DU.

The current RHNA cycle covers the planning period from October 2013 to October 2021. The housing construction need is determined for four broad household income categories: very low (households making less than 50 percent of area median income), low (50 to 80 percent of area median income), moderate (80 to 120 percent of area median income), and above moderate (more than 120 percent of area median income). The intent of the future needs allocation by income groups is to relieve the undue concentrations of very low-income and low-income households in a single jurisdiction and to help allocate resources in a fair and equitable manner.

With the adoption of the Connect SoCal: 2020-2045 RTP/SCS on September 3, 2020, SCAG distributed the 6th cycle (2021-2029) draft RHNA Allocation to local jurisdictions. Jurisdictions are permitted to appeal their allocations to the SCAG RHNA Appeals Board. On October 23, 2020, the City filed an appeal. Hearings are scheduled through January 2021. After SCAG reallocates units to all local jurisdictions resulting from successful appeals, SCAG's Regional Council would review and consider adoption of the Final RHNA Plan for SCAG's 6th cycle RHNA. This is scheduled to occur in February 2021.

Gardena General Plan 2006

The GGP Community Development Element provides a Land Use Plan with goals and policies associated with housing. The following goals and policies are applicable to the Project:

- **LU Goal 1:** Preserve and protect existing single-family and low/medium-density residential neighborhoods while promoting the development of additional high quality housing types in the City.
    - **Policy LU 1.1**: Promote sound housing and attractive and safe residential neighborhoods.
    - **Policy LU 1.2**: Protect existing sound residential neighborhoods from incompatible uses and development.
    - **Policy LU 1.4**: Locate new medium- and high-density residential developments near neighborhood and community shopping centers with commensurate high levels of community services and facilities.
    - **Policy LU 1.5**: Provide adequate residential amenities such as open space, recreation, off-street parking and pedestrian features in multifamily residential developments.
    - **Policy LU 1.6**: Ensure residential densities are compatible with available public service and infrastructure systems.
    - **Policy LU 1.8**: Minimize through-traffic on residential streets.

The GGP Community Development Element also provides an Economic Development Plan. The following goal and policy are applicable to the Project:

- **ED Goal 3**: Attract desirable businesses to locate in the City.
    - **Policy ED 3.3**: Maintain a multidisciplinary proactive approach to improve the City's image as a desirable business location.

The GGP Housing Element provides the following goals and polices for the treatment of housing:

- **Goal 3.0:** Minimize the impact of governmental constraints on housing construction and cost.

- **Policy 3.3**: Encourage the use of special development zones and other mechanisms to allow more flexibility in housing developments.

- **Goal 4.0:** Provide adequate residential sites through appropriate land use and zoning to accommodate the City's share of regional housing needs.
  - **Policy 4.1**: Implement land use policies that allow for a range of residential densities.

4.11.3 Significance Criteria and Thresholds

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning population and housing. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, the Project may create a significant environmental impact if it would:

- 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) (see Impact 4.11-1).
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere (see **Section 7.0: Effects Found Not to be Significant**).

4.11.4 Impacts and Mitigation Measures

Impact 4.11-1: 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)?

Level of Significance: Less Than Significant Impact

The GGP designates the Project site as General Commercial and the Zoning Map classifies the site as General Commercial Zone (C-3), which is consistent with the GGP. Project implementation would require both a General Plan amendment and a zone change to allow for development of the site with up to 265 DUs.

As previously identified, the City's population and housing stock, as of January 1, 2020 was 60,937 persons and 21,982 DUs, respectively.[2] The Project proposes studio, one and two bedroom apartments. Assuming 2.0 persons per studio and one-bedroom apartment and 2.83 persons per two bedroom apartment, the Project has the potential to have 562 residents. The Project's forecast population growth of approximately 562 persons would increase the City's existing population by less than 1.0 percent. The estimated population increase is well within the forecasted population increase for the City of 4,763 residents (or 8%) between 2020 and 2045 (**Table 4.11-1**). Therefore, the Project's population growth is consistent with projections for the City and is not considered substantial population growth.

The City's housing projections identify an increase of 1,720 DUs between 2020 and 2045, based on DOF 2020 housing data and SCAG's 2045 forecast data. SCAG's Connect SoCal RTP/SCS assumes 23,700 DUs in the City by 2045. SCAG's Draft RHNA Allocation for 2021-2029 is 5,721 DUs. Based on the Draft RHNA

[2] California Department of Finance. (2020). E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark.

Allocation, the Project represents approximately 4.6 percent of the total allocation. The proposed 265 apartment units is within the forecasted housing growth in the City. The Project is the first large apartment project in numerous years in Gardena and is providing a needed product.

As previously discussed, communities with more than 1.5 jobs per DU are considered "jobs rich" and those with fewer than 1.5 jobs per DU are considered "housing rich." The City's jobs-to-housing ratio indicates it is housing rich and needs job growth. The City's employment is forecast to increase by 6 percent between 2020 and 2045. The jobs to housing ratio is projected to trend slightly towards "housing rich" in 2045 (1.35) as it is in 2020 (1.38). In addition, by providing this type of housing (multi-family TOD), new with amenities, it is anticipated to encourage job growth in the area as employers look to housing opportunities in developing areas to attract potential employees.

The GGP Housing Element's Housing Needs Assessment states that:

- New housing is needed as regional employment and population growth generate a demand for new housing throughout Southern California.
- New housing is needed as Gardena's current population increases and ages.
- New construction housing is needed to replace some of Gardena's older housing stock that is too severely deteriorated to rehabilitate.
- New housing is needed when vacancy rates are low to ensure reasonable levels of choice and mobility in the marketplace

It is also the City's goal (GGP Land Use Goal 1) to "preserve and protect existing single-family and low/medium-density residential neighborhoods while promoting the development of additional high-quality housing types in the City." The Project would be in furtherance of this goal by providing additional housing types in the City. GGP Housing Element Goal 4 states "provide adequate residential sites through appropriate land use and zoning to accommodate the City's share of regional housing needs" by encouraging "a range of residential densities." Please see **Table 4.9-1 of Section 4.9: Land Use and Planning**, which provides a consistency analysis of the Project to the applicable goals and policies of the GGP. With respect to population and housing, the Project is consistent with the GGP. With respect to the threshold of significance set forth in this section of the EIR, the introduction of housing to the site would result in a less than significant impact, and no mitigation is required.

MITIGATION MEASURES

No mitigation is required.

4.11.5 Cumulative Impacts

Potential cumulative population and housing impacts are assessed relative to the GGP and regional plans, including SCAG's Connect SoCal 2020-2045 RTP/SCS population, housing, and employment projections. SCAG's regional growth projections reflect recent and past trends, key demographic and economic assumptions and include local and regional policies. Local justifications participate in the growth forecast development process.

Cumulative impacts would occur if development of the Project, together with other cumulative projects would induce substantial unplanned population growth. The Project would be consistent with GGP Land

Use Goal 1 and the City's Housing Element, which identify the need for new housing to meet demands throughout southern California and specifically within the City, to account for a growing and aging population, replacement of older housing stock, and to ensure reasonable levels of choice and mobility in the marketplace. Other projects under development (see **Table 3-1: List of Cumulative Projects**) would also be subject to project-level review and project-specific measures would be required, as needed, to reduce significant impacts. Given the Project's consistency, as well as the potential for other projects identified in **Section 3.0** to be generally consistent with the population and housing policies, the Project would not result in significant population and housing impacts, and therefore, taken with past, present, and reasonably foreseeable future projects, Project impacts are not considered cumulatively considerable, and no mitigation is required.

4.11.6 Significant Unavoidable Impacts

No significant unavoidable impacts concerning population and housing have been identified.

4.11.7 References

California Department of Finance. (2020). *Report E-5 Population and Housing Estimates for Cities, and Counties, and the State*. Sacramento, CA: California Department of Finance.

California Economic Development Department Labor Market Information Division. (2019). *Monthly Labor Data for Cities and Census Designated Places,* Sacramento, CA: Employment Development Department.

City of Gardena. (2011). *City of Gardena 2014-2021 Housing Element*. Gardena, CA.

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4.12 PUBLIC SERVICES AND RECREATION

4.12 PUBLIC SERVICES AND RECREATION

The purpose of this section is to describe the existing regulatory and environmental conditions related to public services (i.e., fire and police protection services, schools, and libraries) and recreational facilities. This section focuses on the Project's potential to cause the need for new or physically altered public service facilities that would have significant environmental impacts. Additionally, the section analyzes whether the Project would increase the use of existing recreational facilities.

4.12.1 AFFECTED ENVIRONMENT

REGIONAL SETTING

Fire Protection

The City contracts with Los Angeles County Fire Department (LACFD) to provide fire protection and emergency medical services. The LACFD operates two fire stations within the City: Fire Station 158, located at 1650 West 162nd Street, and Fire Station 159, located at 2030 West 135th Street. The fire station nearest the Project site is Fire Station 159, approximately 1.2 miles to the southeast.

Police Protection

Police protection services would be provided by the City of Gardena Police Department (GPD). The GPD has 86 officers and 87 budgeted. The GPD station nearest the Project site is at 1718 West 162nd Street, approximately 3.4 miles to the south.

Schools

The Project site is within the boundaries of the Los Angeles Unified School District (LAUSD). **Table 4.12-1: School Facilities**, lists the public schools that would serve the Project, as well as their capacity and enrollment. There are also private schools serving Kindergarten through 12th grades in the Project area.

Table 4.12-1: LAUSD School Facilities

School	Capacity[1]	Enrollment (2019-2020)
Purche Avenue Elementary School (Kindergarten-5)	626	468
Robert E. Peary Middle School (6-8)	1,426	1,220
Gardena Senior High School (9-12)	1,707	1,385
Note: 1. Capacity is based on 2016-2017 enrollment.		
Source: Ed-data.org		

Parks and Recreation

Similar to many cities in the Los Angeles County, Gardena is a developed community with limited opportunities to expand its parks and recreation resources. Gardena has six public parks, one community center, one municipal pool, one parkette, and two gymnasiums. The City park nearest the Project site is Rowley Park and Gymnasium, located 0.5 mile to the southeast, at 13220 Van Ness Avenue. The 18.7-acre Rowley Park and Gymnasium is the City's largest park. The Gardena Recreation and Human Services

Department also hosts various recreational and after-school programs in City parks and community buildings.

In addition to public parks, there is a natural willows wetland in the City. The Gardena Willows Wetland Preserve is an 8.0-acre protected natural habitat in the southeast part of the City. The preserve is currently gated, and access is allowed only through guided tours. There are several regional recreation and park facilities near the City that are available to Gardena residents including Chester L. Washington Golf Course to the north, Helen Keller Park to the northeast, Rosecrans Recreation Center to the east, and Alondra Park and Golf Course to the west. These regional facilities offer a wide range of recreational amenities including basketball courts, baseball and soccer fields, volleyball courts, a golf course, lake fishing, playgrounds, and picnic and barbeque areas.

Other Public Facilities

Los Angeles County Library operates 84 community-based library outlets, including four cultural resource centers and four bookmobiles in 51 of 88 cities and unincorporated areas.[1] Los Angeles County Library is responsible for maintenance and library improvements to meet library service's demands. County Library's Strategic Plan identifies goals and objectives including financial management and fundraising strategies to maintain and enhance library facilities to meet future demands. The nearest library in Gardena to the Project site is the Gardena Mayme Dear Library located at 1731 West Gardena Boulevard. Other libraries, not located in Gardena but closer to the Project site, include Masao W. Satow Library, Lawndale Library, and Hawthorne Library.

4.12.2 REGULATORY FRAMEWORK

STATE

2019 California Fire Code

The 2019 California Fire Code (California Code of Regulations [CCR] Title 24 Part 9) sets forth requirements including those for building materials and methods pertaining to fire safety and life safety, fire protection systems in buildings, emergency access to building, and handling and storage of hazardous materials. The Fire Code also is intended to aid firefighters and other emergency responders during their operations. The code is updated every 3 years and was last updated in 2019, and adopted in 2020.

California State Assembly Bill 2926: Facilities Act of 1986

To assist in providing school facilities to serve students generated by new development, Assembly Bill (AB) 2926 was enacted in 1986 and authorizes a levy of impact fees on new residential, commercial, and industrial development. The bill was expanded and revised in 1987 through the passage of AB 1600, which added §§66000 et seq. to the Government Code. Under this statute, payment of school impact fees by developers serves as CEQA mitigation to satisfy the impact of development on school facilities.

Senate Bill 50

Senate Bill (SB) 50 (1998), which is funded by Proposition 1A, limits the power of cities and counties to require mitigation of developers as a condition of approving new development and provides instead for a standardized fee. SB 50 generally provides for a 50/50 State and local school facilities match. SB 50 also

[1] LA County Library. (2020). Public Libraries. https://lacountylibrary.org/.

provides for three levels of statutory impact fees. The application level depends on whether State funding is available; whether the school district is eligible for State funding; and whether the school district meets certain additional criteria involving bonding capacity, year-round schools, and the percentage of moveable classrooms in use.

REGIONAL

Refer to **Section 4.13: Transportation**, for a discussion of the South Bay Bicycle Master Plan.

2020 Los Angeles County Fire Code – Title 32

According to Los Angeles County Fire Code §101.3 – Intent, this code's purpose is to establish the minimum requirements consistent with nationally recognized good practice for providing a reasonable level of life safety and property protection from the hazards of fire, explosion or dangerous conditions in new and existing buildings, structures and premises. It also provides a reasonable level of safety to firefighters and emergency responders during emergency operations. This code establishes regulations affecting or relating to structures, processes, premises and safeguards regarding, but not limited to, fire hydrant systems, water supply, fire equipment access, and posting of fire equipment access.

LOCAL

Gardena 2006 General Plan

The Gardena 2006 General Plan (GGP) Community Safety Element provides a Public Safety Plan with the following goals and policies concerning public services:

- **PS Goal 1**: Maintain a high level of fire and police protection for residents, businesses and visitors.
  - **Policy PS 1.6**: Ensure that law enforcement, crime prevention, and fire safety concerns are considered in the review of planning and development proposals in the City.
- **PS Goal 4:** Increase public awareness of crime and fire prevention, and emergency preparedness and procedures.
  - **Policy PS 4.3**: Promote professional management of multi-family residential buildings.

4.12.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions pertaining to public services and recreation. The issues presented in the Environmental Checklist have been used as significance criteria in this section. The Project would have a significant environmental impact if it would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
  - fire protection (see Impact 4.12-1),
  - police protection (see Impact 4.12-2),
  - schools (see Impact 4.12-3),
  - parks (see Impact 4.12-4),

- other public facilities (see Impact 4.12-5),

- 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 (see Impact 4.12-4), or
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment (see Impact 4.12-4).

4.12.4 IMPACTS AND MITIGATION MEASURES

Impact 4.12-1: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, 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?

Level of Significance: Less Than Significant Impact

The Project's forecast population growth would incrementally increase the demand for fire protection and emergency medical services to the Project site. The LACFD Fire Prevention Division has reviewed the Project and Site Plan and provided requirements regarding firefighter and fire truck access, water system, fire flow, fire hydrant type/location, building address numbers, etc. The Project includes a 26-foot-wide fire lane on the north and south side of the Project site as the fire apparatus roadway. The location and width of the fire lane has been accepted by the LACFD.[2] LACFD also reviewed the Project's NOP and provided Conditions of Approval of which the Project would be required to comply. See **Appendix 9.1** for a copy of the LACFD response letter.

The Project does not propose, and would not create a need for, new or physically altered fire protection facilities to maintain acceptable service ratios and response times. Therefore, the Project would not result in adverse physical impacts associated with such facilities. Given the Project's nature and scope, impacts would be less than significant impact with respect to fire protection facilities, and no mitigation is required.

MITIGATION MEASURES

No mitigation is required.

[2] Jaikowski, Marion, Los Angeles County Fire Department, Personal Communication, November 5, 2020.

Impact 4.12-2: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, 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?

Level of Significance: Less Than Significant Impact

The Project's forecast population growth would incrementally increase the demand for police protection services to the Project site. Through the City's Site Plan Review process, the GPD would review the Project concerning access and other safety measures. The Project does not propose, and would not create a need for, new or physically altered police protection facilities to maintain acceptable service ratios and response times. Therefore, the Project would not result in adverse physical impacts associated with such facilities. Given the Project's nature and scope, impacts to police protection facilities would be less than significant, and no mitigation is required.

MITIGATION MEASURES

No mitigation is required.

Impact 4.12-3: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, 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 schools?

Level of Significance: Less Than Significant Impact

The Project proposes 265 DUs, including studio, one, and two bedroom apartments. **Table 4.12-1: LAUSD Student Generation Factors**, identifies the student generation factor per DU used by LAUSD.[3] The student generation rates account for a mix of single-family and multi-family units between 0 bedrooms to more than 5 bedrooms.

Based on 265 DUs and LAUSD's student generation factor of 0.437 students per new DU, the Project is forecast to generate approximately 116 new students to the LAUSD.[4] The Project's forecast student population growth would incrementally increase the demand for school facilities and services. As indicated in **Table 4.12-1**, sufficient capacity for this student population growth is available at the existing schools. Further, the Project would be subject to payment of school impact fees in accordance with SB 50. Pursuant to Government Code §65995(3)(h), "payment of statutory fees is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use or development of real property…" According to LAUSD's 2020 Developer Fee

[3] Los Angeles Unified School District. (2020). 2020 Developer Fee Justification Study, Table 3: LA Unified Student Generation Factors. Roseville, CA: Schoolworks, Inc.

[4] Los Angeles Unified School District. (2020). 2020 Developer Fee Justification Study, Table 3: LA Unified Student Generation Factors. Roseville, CA: Schoolworks, Inc.

Justification Study, the fee for residential construction is $4.08 per square foot and for parking structures is $0.44 per square foot.

Table 4.12-2: LAUSD Student Generation Factors

Grade	Students per Household	Proposed Project
Transitional Kindergarten - 6	0.2269	60
7 – 8	0.0611	16
9 – 12	0.1296	34
Special Day Class	0.0194	5
Total	0.4370	116 (rounded)

Source: Los Angeles Unified School District. (2020). 2020 Developer Fee Justification Study, Table 3: LA Unified Student Generation Factors.

The Project does not propose, and would not create a need for, new or physically altered school facilities to maintain acceptable service ratios and standards. Therefore, the Project would not result in adverse physical impacts associated with such facilities. Impacts would be less than significant impact concerning schools, and no mitigation is required.

MITIGATION MEASURES

No mitigation is required.

Impact 4.12-4: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, 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 parks?

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?

Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Level of Significance: Less Than Significant Impact

The Project's forecast population growth could incrementally increase the use of existing recreational facilities. However, this incremental increase would not be such that substantial physical deterioration of an existing recreational facility would occur or be accelerated. The Project proposes onsite active and passive open space uses. According to the GTODSP, the Project must provide a minimum of 8,500 SF of common open space (outside of setback areas) and may provide additional private open space (such as balconies for certain dwelling units) for residents and their guests use and enjoyment.

The Project's common open space and amenities consist of a series of courtyards and open areas, both active and passive, distributed in three levels for use by residents and their guests. The proposed open spaces and amenities would include, at a minimum:

- Dog park: 1,789 SF
- Swimming pool and upper-level courtyard(s): 8,349 SF
- Fitness areas: 2,648 SF
- Club house: 1,136 SF
- Co-working space: 1,057 SF

Active and passive open space and amenities would total 14,979 SF, which exceeds the 8,500 SF minimum noted in the proposed GTODSP. In addition, private balconies would provide an additional 8,730 SF of open space.

Master Plan Figure 4-3: Proposed Bicycle Facilities in Gardena, identifies a proposed Class II Bike Lane along Crenshaw Boulevard adjacent to the Project site. The Master Plan's proposed Crenshaw Boulevard Class II Bike Lane would extend approximately 2.3 miles, from El Segundo Boulevard to Redondo Beach Boulevard. Class II Bike Lanes are striped and signed on-street travel lanes exclusively for bicycles. As noted above, this facility is ranked No. 13 in priority based on ten factors, including gap closure, safety, and cost. Therefore, it is unknown when construction would occur. Additionally, the City has determined that no additional right-of-way dedication would be required to implement the Plan.[5] Moreover, while it would be geometrically feasible to add the Class II bike lane in Crenshaw Blvd without any additional ROW, the City considers adding a lane impractical given there are multiple concrete medians that would need to be removed to accommodate a bike lane, and it would likely cause traffic delay, safety, and parking issues and that half of the street is owned by the City of Hawthorne. Construction and operation of the Crenshaw Boulevard Class II Bike Lane would be subject to environmental review pursuant to CEQA to determine whether adverse physical effects on the environment would occur. Given it is unknown when this bike lane would be constructed, and since its construction and operation would be subject to review under CEQA, the Project would not result in an adverse physical effect on the environment concerning this bike lane. A less than significant impact would occur, and no mitigation is required.

MITIGATION MEASURES

No mitigation is required.

Impact 4.12-5: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, 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 facilities?

Level of Significance: Less Than Significant Impact

The Project's forecast population growth would incrementally increase the demand for library services, and specifically at the Masao W. Satow Library located closest to the Project site, approximately 1.0 mile to the south. However, the County Library system has developed a Strategic Plan that identifies goals and objectives including financial management and fundraising strategies to maintain and enhance library facilities to meet future demands. Strategic initiatives associated with the Strategic Plan include Tell the Library Story; Affirm the Library as a Center for Learning; Expand and Support the Digital Library;

[5] Kwak, Kevin, City of Gardena City Engineer, Personal Communication, December 15, 2020.

Transform the Role of the Library as Place; Support and Cultivate the Community's Creativity; Develop the Library as a Center for Community Engagement; and Develop Staff Prepared for the Future. Given that there are seven libraries within an approximately 2.0-mile radius of the Project site, the Project would not stimulate the need for new facilities as adequate facilities are available.

The Project does not propose, and would not create a need for, new or physically altered library facilities to maintain acceptable service ratios and standards. Therefore, the Project would not result in adverse physical impacts associated with such facilities. Given the Project's nature and scope, impacts to libraries would be less than significant, and no mitigation is required.

MITIGATION MEASURES

No mitigation is required.

4.12.5 CUMULATIVE IMPACTS

For purposes of the public services and recreation impact analysis, cumulative impacts are considered for cumulative development within Gardena, according to the related projects; see **Table 3-1: List of Cumulative Projects**.

As concluded above, all Project impacts to public services and recreation are considered less than significant, following compliance with the established regulatory framework. The proposed Project, combined with cumulative development projects would result in incremental increases in public service and recreation demands as the number of people, buildings, roads, and utilities would increase. However, each cumulative project would be required to pay construction and development fees and Quimby Act fees, and comply with regulatory requirements that would be used to provide additional or modify existing public service and recreation facilities. The Project would not result in a significant cumulative impact concerning public services and recreation.

4.12.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts to public services and recreation have been identified.

4.12.7 REFERENCES

City of Gardena. (2006). *Gardena General Plan 2006: Community Safety Element, Public Safety Plan*. Retrieved from https://www.cityofgardena.org/wp-content/uploads/2016/04/generalplan8.pdf.

City of Gardena. (2020). *Gardena TOD Specific Plan*.

Jaikowski, Marion, Los Angeles County Fire Department, Personal Communication, November 5, 2020.

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Los Angeles Unified School District. (2020). *2020 Developer Fee Justification Study, Table 3: LA Unified Student Generation Factors*. Roseville, CA: Schoolworks, Inc.



4.13 TRANSPORTATION

4.13 TRANSPORTATION

The purpose of this section is to describe the existing regulatory and environmental conditions related to transportation, identify potential impacts that could result from Project implementation, and as necessary, recommend mitigation to avoid or reduce the significance of impacts.

Information in this section is based primarily on transportation and traffic data provided in **Appendix 9.11: Transportation Data**. Additional resource information was obtained from available public resources, including among others, the Garden General Plan 2006 (GGP).

Kimley-Horn conducted a third-party review of the Project's transportation analyses on behalf of the City; see **Appendix 9.11**. The third-party review concluded the analyses meet the applicable provisions of CEQA and the State CEQA Guidelines.

4.13.1 AFFECTED ENVIRONMENT

PROJECT AREA TRANSPORTATION SYSTEM

Roadway Facilities

The key roadways providing access to the Project site are described below. Overall, the major and arterial roadway network surrounding the Project site comprises of a comprehensive grid network between I-105, I-110, and I-405 and adjacent communities.

Crenshaw Boulevard is a six-lane arterial which connects Gardena to Torrance and the Palos Verdes peninsula to the south, and Inglewood and Los Angeles to the north. It connects the Project site to both I-405 and I-105. In the immediate vicinity of the Project site, no on-street parking is allowed on either side of the roadway. South of the Project site, starting from approximately 500 feet south of the Crenshaw Boulevard/El Segundo Boulevard intersection, parking is allowed in the curbside lane except during the peak period of the direction of travel (i.e., northbound in the AM peak period and southbound in the PM peak period). The posted speed limit is 40 miles per hour (mph) with the exception of southbound Crenshaw Boulevard south of 132nd Street where the posted speed limit is 35 mph.

Crenshaw Boulevard is designated as a Disaster Route in the Los Angeles County Operational Area. Per the Los Angeles County Department of Public Works, "Disaster Routes are freeway, highway or arterial routes pre-identified for use during times of crisis. These routes are utilized to bring in emergency personnel, equipment, and supplies to impacted areas in order to save lives, protect property and minimize impact to the environment. During a disaster, these routes have priority for clearing, repairing and restoration over all other roads."[1]

El Segundo Boulevard is a six-lane arterial which connects Gardena to Hawthorne and El Segundo to the west and Compton, the Harbor Gateway portion of Los Angeles, and the unincorporated community of Willowbrook to the east. It connects the Project site to I-405 and I-110. The posted speed limit is 40 mph. El Segundo Boulevard is designated as a truck route within Gardena.

[1] Note: Disaster Routes are NOT Evacuation Routes. Although an emergency may warrant a road be used as both a disaster and evacuation route, they are completely different. An evacuation route is used to move the affected population out of an impacted area.

West 135th Street east of Crenshaw Boulevard is a four-lane major collector through Gardena, the Harbor Gateway portion of Los Angeles, and Compton. It runs parallel to El Segundo Boulevard and Rosecrans Avenue but does not provide direct access to I-110. The posted speed limit is 40 mph. West of Crenshaw Boulevard, West 135th Street is a two-lane road providing access to neighborhoods in Hawthorne and Hawthorne's Sphere of Influence and connects to Prairie Avenue. The posted speed limit is 25 mph.

Transit Facilities

The Project site is located within a quarter mile of nine bus stops and is served by transit service by LA Metro, Torrance Transit, and the City of Gardena's Transit Service, GTrans. Access to light rail is also available at the Green Line Station, located less than one mile north of the Project site at Crenshaw Boulevard/I-105. The following bus routes provide service within walking distance of the Project site:

- **Route 5 (GTrans)** connects to Metro buses on El Segundo Boulevard and to Metro Rail at the Imperial and Aviation Stations.
- **Route 2 (Torrance Transit)** runs along Crenshaw Boulevard between Pacific Coast Highway in Torrance and I-105.
- **Route 10 (Torrance Transit)** connects to the Del Amo Fashion Center in Torrance and Harbor Freeway Transit Station via Crenshaw Boulevard and El Segundo Boulevard.
- **Route 126 (Metro)** connects to Manhattan Beach – Hawthorne Metro Rail Station via El Camino College
- **Route 210 (Metro)** connects to Hollywood/Vine Station – South Bay Galleria via Crenshaw Boulevard
- **Route 710 (Metro)** connects to Wilshire Center – South Bay Galleria via Crenshaw Boulevard

Pedestrian Facilities

There are sidewalks along the Project frontage as well as the surrounding area. Marked crosswalks, curb ramps, and pedestrian signals are provided on all legs of the nearest intersection of Crenshaw Boulevard and El Segundo Boulevard, which provides direct access to transit stops and surrounding land uses. However, curb ramps are not Americans with Disabilities Act (ADA) complaint on at least two corners of the Crenshaw Boulevard and El Segundo Boulevard intersection. The sidewalk is discontinuous along the east side of Crenshaw Boulevard for the short segment just south of the Project site to 131st Street.

Bicycle Facilities

Separated or protected bicycle facilities are not currently provided along Crenshaw Boulevard near the Project site. El Segundo Boulevard, west of Crenshaw Boulevard, is designated as a bike route (Class III). An existing bike path (Class I) is provided along the Laguna Dominguez Trail east of the Project site on the east side of Dominguez Channel. The Laguna Dominguez Trail extends almost three miles between the cities of Lawndale and Hawthorne. It provides direct bicycle access between the Project site and the Green Line Station. Pedestrian access from the Project site to the Laguna Dominguez Trail is provided via continuous paved sidewalks along the east side of Crenshaw Boulevard and south side El Segundo Boulevard, approximately 500 feet between the Project site and the southern point of entry. Pedestrians and cyclists traveling northbound may cross the east leg of the Crenshaw Boulevard at El Segundo

Boulevard intersection at the existing marked crosswalk, then traverse east for approximately 200 feet to the trail entrance to head north. The trail's north end terminates on the south side of West 120th Street, approximately one block from the Crenshaw Green Line Station. A continuous path of paved sidewalks and marked crosswalks are provided between the trail and the Green Line Station platform.

4.13.2 REGULATORY FRAMEWORK

FEDERAL

Americans with Disabilities Act

The ADA of 1990 prohibits discrimination toward people with disabilities and guarantees that they have equal opportunities as the rest of society to become employed, purchase goods and services, and participate in government programs and services. The ADA includes requirements pertaining to transportation infrastructure. The Department of Justice's regulations for Titles II and III of the ADA, known as the 2010 ADA Standards for Accessible Designs, set minimum requirements for newly designed and constructed or altered State and local government facilities, public accommodations, and commercial facilities to be readily accessible to and usable by individuals with disabilities. These standards apply to accessible walking routes, curb ramps, and other facilities.

STATE

Sustainable Communities Strategies: Senate Bill 375 – Land Use Planning

Senate Bill (SB) 375 provides a planning process to coordinate land use planning and regional transportation plans (RTP) and funding priorities in order to help California meet the greenhouse gas (GHG) reduction goals established in Assembly Bill (AB) 32. SB 375 requires that RTPs developed by metropolitan planning organizations (MPO) (e.g., Southern California Association of Governments [SCAG]) incorporate a "sustainable communities strategy" (SCS) that would achieve GHG emission reduction targets set by the California Air Resources Board (CARB). SB 375 also includes provisions for streamlined CEQA review for some infill projects, such as Transit-Oriented Developments (TODs).

Senate Bill 743

The Steinberg Act (SB 743) (also known as the Environmental Act) was enacted in 2013 to shift the focus of transportation analysis from driver delay to reducing GHG emissions, creating multimodal networks, and promoting mixed land uses. SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide alternative level of service metrics for transportation impact evaluations. In December 2018, the updated State CEQA Guidelines were approved, shifting traffic analysis from delay and operations to vehicle miles traveled (VMT) when evaluating transportation impacts under CEQA.

Measurements of transportation impacts may include VMT, VMT per capita, automobile trip generation rates, or automobile trips generated. According to SB 743, projects should aim to reduce VMT and mitigate potential VMT impacts through the implementation of transportation demand management (TDM) strategies. Agencies were to have fully implemented the new CEQA mandates for transportation by July 1, 2020.

REGIONAL

Regional Transportation Plan/Sustainable Communities Strategy

The SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), Connect SoCal, was adopted on September 3, 2020. The RTP/SCS aims to create a long-range vision plan that balances future mobility and housing needs with economic, environmental and public health goals. Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The Connect SoCal Program EIR (SCH #2019011061) addresses the cumulative impact of future development and associated infrastructure improvements for the SCAG region, which includes Los Angeles County and the City of Gardena. The RTP/SCS is available on SCAG's website at: https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx.

South Bay Bicycle Master Plan

The intent of the South Bay Bicycle Master Plan (Master Plan) is to guide the development and maintenance of a comprehensive bicycle network and set of programs and policies throughout the cities of El Segundo, Gardena, Hermosa Beach, Lawndale, Manhattan Beach, Redondo Beach, and Torrance for the next 20 years. The Master Plan has a unique focus on cross-city consistency and connectivity that is often lacking in singular city bike plans. Upon plan adoption, each participating city would be eligible for grant funding sources. Master Plan Figure 4-3: *Proposed Bicycle Facilities in Gardena*, depicts Gardena's existing and proposed bike lanes and identifies a proposed Class II Bike Lane along Crenshaw Boulevard adjacent to the Project site. Class II Bike Lanes are striped and signed on-street travel lanes exclusively for bicycles. Master Plan Appendix C identifies bicycle facility standards and indicates that for a Class II Bike Lane, the minimum recommended bicycle facility standard width is 6 feet (5 feet plus 1 foot buffer). The Master Plan recommended vehicular lane width is 9.5 feet and parking lane width is 7.5 feet. The proposed Crenshaw Boulevard Class II Bike Lane would extend approximately 2.3 miles from El Segundo Boulevard to Redondo Beach Boulevard. Master Plan Table 4-15: *Gardena Prioritized Bicycle Projects*, indicates the proposed Crenshaw Boulevard Class II Bike Lane ranks No. 13 based on ten factors, including gap closure, safety, and cost. Therefore, it is unknown when construction would occur. Additionally, the City has determined that no additional right-of-way (ROW) dedication would be required to implement the Plan. Moreover, while it would be geometrically feasible to add the Class II bike lane in Crenshaw Boulevard without any additional ROW, the City considers adding a lane impractical given there are multiple concrete medians that would need to be removed to accommodate a bike lane, and it would likely cause traffic delay, safety, and parking issues and that half of the street is owned by the City of Hawthorne.

LOCAL

City of Gardena General Plan

The City of Gardena's General Plan's Community Development Element provides a Circulation Plan with the following goals and policies to enhance the development and maintenance of a transportation system:

- **CI Goal 1:** Promote a safe and efficient circulation system that benefits residents and businesses and integrates with the greater Los Angeles/South Bay transportation system.

- **Policy CI 1.1:** Prioritize long-term sustainability for the City of Gardena, in alignment with regional and state goals, by promoting infill development, reduced reliance on single-occupancy vehicle trips, and improved multi-modal transportation networks, with the goal of reducing air pollution and greenhouse gas emissions, thereby improving the health and quality of life for residents.

- **CI Goal 3:** Develop Complete Streets to promote alternative modes of transportation that are safe and efficient for commuters, and available to persons of all income levels and disabilities.
  - **Policy CI 3.1:** Work with Gardena Municipal Bus Lines and MTA to increase the use of public transit, establish or modify routes, and improve connectivity to regional services.
  - **Policy CI 3.3:** Maintain and expand sidewalk installation and repair programs, particularly in areas where sidewalks link residential neighborhoods to local schools, parks, and shopping areas.
  - **Policy CI 3.4:** Maintain a citywide bicycle route and maintenance plan that promotes efficient and safe bikeways integrated with the MTA's regional bicycle system.

4.13.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning transportation. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, the Project may create a significant environmental impact if it would:

- Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities (see Impact 4.13-1);
- Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b) (see Impact 4.13-2);
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) (see Impact 4.13-3);
- Result in inadequate emergency access (see Impact 4.13-4).

4.13.4 IMPACTS AND MITIGATION MEASURES

Impact 4.13-1: Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Level of Significance: Less Than Significant Impact

Please refer to **Table 4.9-1** of **Section 4.9: Land Use and Planning**, which evaluates the Project's consistency with the GGP. The analysis finds that the Project is consistent with the applicable goal and policies of the Community Development Element, Circulation Plan. The Project's Circulation Plan would be consistent with the GGP elements pertaining to the circulation system, including transit, bicycle and pedestrian facilities, resulting in a less than significant impact.

Impact 4.13-2: Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Level of Significance: Less Than Significant Impact

For informational purposes, an LOS analysis was conducted for the Project. To review this analysis please see the *Gardena TOD Specific Plan Local Transportation Assessment* (Fehr and Peers, 2020) in **Appendix 9.11**. The below VMT analysis is derived from the Technical Memorandum: *CEQA Transportation Analysis for 12850 Crenshaw Boulevard Project* prepared by Fehr and Peers (2020, **Appendix 9.11**).

Baseline VMT

The SCAG 2016 RTP/SCS trip-based model was used to estimate the baseline VMT for the City of Gardena. The current SCAG model has 2012 as the base year and 2040 as the forecast year. At the time of release of the NOP and preparation of the VMT analysis, the updated SCAG trip models had not yet been released to the public.

This baseline VMT methodology includes vehicle trips within the SCAG model to generate the following metrics:

1. Home-based VMT per Capita: Home-based vehicle trips are traced back to the residence of the trip-maker (non-home-based trips are excluded) and then divided by the residential population within the geographic area. This metric is used to estimate VMT for residential land uses.
2. Home-based Work VMT per Employee: Vehicle trips between home and work are counted, and then divided by the number of employees within the geographic area. This metric is used to estimate VMT for office, retail, and other commercial land uses.

The City's baseline VMT for each metric is shown in **Table 4.13-1: Baseline VMT for City of Gardena**.

Table 4.13-1: Baseline VMT for City of Gardena

VMT Metrics		Baseline VMT Year 2020
Home-Based VMT	Baseline Home-Based VMT per Capita	11.00
Home-Based Work VMT	Baseline Home-Based Work VMT per Employee	16.22
Source: Fehr and Peers. (2020). CEQA Transportation Analysis for 12850 Crenshaw Boulevard Project. Table 1.		

VMT Impact Thresholds

Following guidance from the OPR, Gardena identified a 15 percent reduction from the baseline regional average VMT as the impact threshold for land use development projects in the City. If a project would generate VMT higher than the threshold, then it would be expected to have a VMT impact, and if a project would generate VMT lower than the threshold, then it would not be expected to have a VMT impact. The regional baseline VMT and City's VMT impact thresholds are summarized in **Table 4.13-2: Baseline Regional VMT and City of Gardena VMT Impact Thresholds.**

Table 4.13-2: Baseline Regional VMT and City of Gardena VMT Impact Thresholds

VMT Metrics	Year 2020	
	Baseline VMT	VMT Impact Threshold*
Baseline Regional Home-Based VMT per Capita	14.35	12.20
* The VMT Impact Threshold for is 15% below the respective Baseline VMT.		
Source: Fehr and Peers. (2020). CEQA Transportation Analysis for 12850 Crenshaw Boulevard Project. Table 2.		

VMT Screening

The first step of a VMT analysis is to determine what type of analysis, if any, is needed. The City of Gardena identified three screening criteria to assess if a VMT analysis would be required for the Project as recommended by OPR's *Technical Advisory*. The three screening criteria are detailed below and applied to determine if the Project has the potential to result in a VMT impact.

Screening Criteria 1: Project Type

Land use projects that generate less than 110 daily trips and local-serving retail projects, defined as commercial projects with local-serving retail uses less than 50,000 SF, are presumed to have less than significant VMT impacts absent substantial evidence to the contrary. Therefore, these projects are screened out from completing a VMT analysis based on project size. Residential projects that are 100 percent affordable are also screened out.

Based on the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition) trip rate for multi-family mid-rise projects, or 5.44 trips per unit, the Project's proposed 265 residential units is expected to generate more than 110 daily trips and is not 100 percent affordable housing. Therefore, the Project is not screened out from VMT analysis under this screening criteria.

Screening Criteria 2: Low VMT Area Screening

Residential projects located within a low VMT generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. Based on the VMT impact threshold as identified by the City, low VMT for residential projects is defined as an area that generates VMT on a per capita basis that is 15 percent or more below the baseline VMT. In the City of Gardena, a low VMT area for residential projects generates no more than 12.20 VMT per capita (see **Table 4.13-2**). The traffic analysis zones (TAZ) contained in the SCAG model can be used to identify the low VMT areas in the City.

The Project is located in a TAZ estimated to generate 11.56 VMT per capita, which is 19.5 percent below the SCAG regional baseline VMT. Therefore, the Project is in an area with low residential VMT, which means the Project is presumed to have a less than significant VMT impact and can be screened out from further VMT analysis.

In addition, OPR's Technical Advisory suggests that a project in a low VMT area is presumed to have a less than significant VMT impact if the project incorporates similar features as other development in the vicinity, such as similar density, similar mix of uses, and similar transit access. The TAZ contains primarily residential land uses to the southeast of the Project site, with more than 1,100 in population. The Project brings higher density housing than other housing developments in the vicinity, which are mainly single-family homes. The higher density housing generates lower VMT than the adjacent residential uses. The

location of the Project also provides better access to transit on Crenshaw Boulevard and El Segundo Boulevard than the rest of the residential uses in the TAZ.

Screening Criteria 3: Transit Proximity Screening

Projects located in proximity to high quality transit may also be exempt from VMT analysis because they are presumed to have a less than significant impact absent substantial evidence to the contrary. Transit Priority Areas, or TPAs, are defined in the OPR Technical Advisory as a half mile radius around an existing or planned major transit stop or an existing stop along a high-quality transit corridor (HQTC). A HQTC is defined as a corridor with fixed route bus service frequency of no longer than 15 minutes during peak commute hours. For this analysis, the morning and afternoon peak commute hours are defined as 6:00 to 9:00 AM and 3:00 to 6:00 PM, respectively.

The Project site is less than half a mile from several bus stops near the intersection of Crenshaw Boulevard and El Segundo Boulevard, which have headways of less than 15 minutes during peak commute hours, including Metro Routes 210 and 710.

The presumption that a project in a TPA would have a less than significant impact absent substantial evidence to the contrary may not be appropriate if the project:

1. Has a Floor Area Ratio (FAR) of less than 0.75 (for office, retail, hotel, and industrial projects) or fewer than 20 units per acre (for residential projects);
2. Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
3. Is inconsistent with the applicable SCS (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
4. Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

The Project includes a density of more than 20 units per acre, does not provide more parking than required, is consistent with the SCS, and does not replace affordable residential units. It is anticipated that SCAG will release a new model following the adoption of the 2020-2045 RTP/SCS. The VMT results for the Project are not expected to change given that the residential uses in Gardena are expected to remain below the regional average. Therefore, the Project is presumed to have a less than significant VMT impact and can be screened out from further VMT analysis.

Conclusions

Based on Gardena's SB 743 Implementation Transportation Analysis Guidelines, a project can be screened from VMT analysis and presumed to have a less than significant transportation impact under CEQA if the project meets any of the City's VMT screening criteria.

As summarized in **Table 4.13-3: VMT Screening Options for Land Use Projects**, the Project meets two of the City's screening criteria:

1. The Project is screened from VMT analysis because it is in a low VMT area, which is any TAZ that generates VMT per capita that is greater than 15 percent below the baseline VMT. Based on the

SCAG Model, the Project site is located in a TAZ that is 19.5 percent below the SCAG regional average. Therefore, the Project meets the low VMT screening criteria.

2. The Project is also screened from VMT analysis because it is in a high-quality transit area. The Project site is less than a half mile from bus stops near the intersection of Crenshaw Boulevard and El Segundo Boulevard which have headways of less than 15 minutes during peak commute hours. It is consistent with the RTP/SCS and provides 267 parking spaces, which does not exceed the parking required by the City. Per the Project's Specific Plan, the parking ratio is one space per unit, which is less than the City's standard for multi-family residential units. The Project would also provide bicycle parking and Transportation Demand Management (TDM) strategies to reduce single-occupant auto travel and encourage alternate means of transportation. Project TDM strategies that would be provided include unbundled parking, pre-leasing for area employees who work within a one-half mile radius, transit information kiosks, on-site residential bicycle parking, and ride-sharing pick-up/drop-off loading areas.

Table 4.13-3: VMT Screening Options for Land Use Projects

Screening Category	Screening Criteria	Project Screened Out?
Project type screening	Presumed less than significant impact for 100 percent affordable projects, local serving retail projects (defined as less than 50 ksf per OPR's Technical Advisory) and projects that generate less than 110 daily trips.	No
Low VMT area screening	Presumed less than significant VMT impact for projects located in low VMT generating TAZs. These TAZs generate total daily VMT per capita or per employee that is 15 percent less than the baseline level for the region.	**Yes**
Transit proximity screening	Presumed less than significant VMT impact for projects located in high-quality transit areas.	**Yes**
Source: Fehr and Peers. (2020). CEQA Transportation Analysis for 12850 Crenshaw Boulevard Project. Table 3.		

Based on the City of Gardena's transportation guidelines and impact thresholds, the Project can be screened out from a full VMT analysis and is presumed to result in a less than significant transportation impact.

Impact 4.13-3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Level of Significance: Less Than Significant Impact

Restricted vehicular access (i.e., right-turn in/out) is currently provided at the Project site from six curb cuts along northbound Crenshaw Boulevard. The Project would consolidate the six curb cuts and provide a single point of access from northbound Crenshaw Boulevard to the Project parking garage approximately midway along the structure. Curb cuts would also be provided for fire lane access north and south of the Project structure. The reduction on curb cuts along Crenshaw Boulevard is proposed to reduce potential conflict points between vehicles and pedestrians.

No southbound access into the Project site is provided because of a raised central median dividing northbound and southbound Crenshaw Boulevard. This median would remain in place upon completion of the Project. Consistent with existing conditions, vehicular access to the Project site from southbound Crenshaw Boulevard would be made from a median opening with a left turn where a U-turn is permitted. The nearest location is adjacent to the cul-de-sac at W. 134th Street, approximately 0.3 mile south of the Project site.

As part of the Project, parking would be provided in a 2.5-level parking garage within the building structure. The parking garage would permit two-way travel between the various levels with adequate circulation. Therefore, the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections).

The Project would not include the use of any incompatible vehicles or equipment on the site, such as heavy equipment. As previously discussed, several transit routes provide service within walking distance of the Project site. The proposed singular driveway would not conflict with on-street transit maneuverability or access to nearby bus stops. Less than significant impacts are anticipated, and no mitigation is required.

Impact 4.13-4: Would the project result in inadequate emergency access?

Level of Significance: Less Than Significant Impact With Mitigation Incorporated

CONSTRUCTION

Construction of the Project would require the temporary closure of one lane of traffic on the northbound side of Crenshaw Boulevard for the duration of construction (20 months estimated to be October 2021 through June 2023) and the closure of the sidewalk for 22 months (estimated to be October 2021 through September 2023). Increased traffic congestion and access disruptions caused by closures during construction could affect emergency access and response times resulting in a temporarily significant impact. Existing access and parking for the adjacent properties would be maintained. A Construction Transportation Plan would be prepared in accordance with MM TRAN-1. MM TRAN-2 would require emergency vehicle access to the construction worksite and adjacent land uses and would require that construction activities be coordinated with City law enforcement and fire department officials prior to implementation. With mitigation, a less than significant would occur.

OPERATIONS

Primary vehicular access to the Project site would be provided via right-in/right-out driveway located midway along the Project structure to/from Crenshaw Boulevard. Per the Los Angeles County Fire Department (LACFD), a fire access lane is required along both the north and south property lines with direct access to Crenshaw Boulevard. The LACFD accepted fire lanes would be 26 feet wide and fire lane signage would be placed at the fire lane entrances along Crenshaw Boulevard. Painted red curbs would delineate the limits of the fire lanes. Signage for the fire department with direction to units would be placed on the western building façade. Two stair towers, one at the north end of and one at the south end of the structure, would provide roof access. A 5-foot 8-inch wide concrete firefighter walkway would border the Project structure to the east.

Pedestrian access to the Project site would be provided on the ground floor with primary pedestrian access located at the building lobby located on the northern portion of the site. Additional restricted pedestrian access would also be provided to residential units on the southern end of the site, and via the parking garage. On-site pedestrian circulation would consist of a network of pathway connections between residential units, common areas, and the parking garage. A minimum 20-foot wide free and clear manual gate with a sub-keyed Knox lock and "No Parking Fire Lane" sign on each side would be placed at the terminus of each fire lane at the Projects' eastern property line. These gates would provide access to the existing channel access road located along the eastern side of the property.

Following compliance with LACFD access requirements, adequate emergency access to the Project site would be provided. Impacts would be less than significant with mitigation incorporated.

MITIGATION MEASURES

MM TRAN-1 **Construction Transportation Plan**: The contractor shall prepare a detailed Construction Transportation Plan (CTP) for the purpose of minimizing the impact of construction and construction traffic on adjoining and nearby roadways in close consultation with the City. The City shall review and approve the CTP before the contractor commences any construction activities. This plan shall address, in detail, the activities to be carried out in each construction phase, with the requirement of maintaining traffic flow during peak travel periods. Such activities include, but are not limited to, the routing and scheduling of materials deliveries, materials staging and storage areas, construction employee arrival and departure schedules, employee parking locations, and temporary road closures, if any. The CTP shall provide traffic controls pursuant to the California Manual on Uniform Traffic Control Devices sections on temporary traffic controls (Caltrans 2012) and shall include a traffic control plan that includes, at a minimum, the following elements:

- Temporary signage to alert drivers and pedestrians to the construction zone.
- Flag persons or other methods of traffic control.
- Traffic speed limitations in the construction zone.
- Temporary road closures and provisions for alternative access during the closure.
- Detour provisions for temporary road closures—alternating one-way traffic would be considered as an alternative to temporary closures where practicable and where it would result in better traffic flow than would a detour.
- Identified routes for construction traffic.
- Provisions for safe pedestrian and bicycle passage or convenient detour.
- Provisions to minimize access disruption to residents, businesses, customers, delivery vehicles, and buses to the extent practicable—where road closures are required during construction, limit to the hours that are least disruptive to access for the adjacent land uses.
- Provisions for 24-hour access by emergency vehicles.

- Safe vehicular and pedestrian access to local businesses and residences during construction. The plan shall provide for scheduled transit access where construction would otherwise impede such access. Where an existing bus stop is within the work zone, the design-builder shall provide a temporary bus stop at a safe and convenient location away from where construction is occurring in close coordination with the transit operator. Adequate measures shall be taken to separate students and parents walking to and from the temporary bus stop from the construction zone.
- Advance notification to the local school district of construction activities and rigorously maintained traffic control at all school bus loading zones, to provide for the safety of schoolchildren. Review existing or planned Safe Routes to Schools with school districts and emergency responders to incorporate roadway modifications that maintain existing traffic patterns and fulfill response route and access needs during Project construction operations.
- Identification and assessment of the potential safety risks of Project construction to children, especially in areas where the Project is located near homes, schools, daycare centers, and parks.
- Promotion of child safety within and near the Project area. For example, crossing guards could be provided in areas where construction activities are located near schools, daycare centers, and parks.
- CTPs would consider and account for the potential for overlapping construction projects.

MM TRAN-2 **Emergency Vehicle Access:** Emergency vehicle access shall be maintained at all times to the construction worksite and adjacent businesses. Emergency vehicle access would be maintained at all times to and from fire stations, hospitals, and medical facilities near the construction site and along the haul routes. Construction activities, road closures, and lane closures would be coordinated with local law enforcement and fire department officials prior to implementation. The implementation of these measures would provide emergency vehicle access to the construction worksite and adjacent businesses and require that construction activities be coordinated with City law enforcement and fire department officials prior to implementation.

4.13.5 CUMULATIVE IMPACTS

For baseline conditions, the Project is screened out from further VMT analysis based on its location in a low VMT area and proximity to high quality transit service. For cumulative conditions, a project that is below the VMT impact thresholds and does not have a VMT impact under baseline conditions would also not have a cumulative impact as long as it is aligned with long-term State environmental goals, such as reducing GHG emissions, and relevant plans, such as the SCAG RTP/SCS. The Project supports long-term environmental goals as an in-fill residential project that provides housing near commercial and employment areas.[2] The Project is also aligned with the SCAG RTP/SCS because the Project is located

[2] The SCAG Tier 1 TAZ 21223000 includes a growth of 450 households between 2012 and 2040. The size of the Project is consistent with the SCAG RTP and is accommodated within the forecasted growth.

within a TPA and provides housing development in a TAZ with downward trending VMT per capita, which is consistent with the goals of the RTP/SCS.

4.13.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning transportation have been identified.

4.13.7 REFERENCES

Alta Planning + Design. (2011). *The South Bay Bicycle Master Plan, Draft Final Plan – August 2011*. Retrieved from https://bchd.org/docs/healthy-communities/South_Bay_BMP_Draft_Final_Plan.pdf.

City of Gardena. (2020). *Gardena General Plan 2006*. Circulation Plan Update.

Fehr and Peers. (2020). *Gardena TOD Specific Plan (12850 Crenshaw Boulevard) Local Transportation Assessment*. San Diego, CA.

Fehr and Peers. (2020). *Technical Memorandum: CEQA Transportation Analysis for 12850 Crenshaw Boulevard Project*. San Diego, CA.

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4.14 TRIBAL CULTURAL RESOURCES

4.14 TRIBAL CULTURAL RESOURCES

The purpose of this section is to describe the existing regulatory and environmental conditions related to tribal cultural resources, identify potential impacts that could result from Project implementation, and as necessary, recommend mitigation to avoid or reduce the significance of impacts.

Information in this section is based primarily on cultural and tribal cultural resources data provided in **Appendix 9.4: Cultural Resources Data** and **Appendix 9.12: Tribal Cultural Resource Data and Tribal Consultation Correspondence**. Additional resource information was obtained from available public resources, including among others, the Gardena General Plan 2006 (GGP). Additionally, the Native American Heritage Commission (NAHC) letter in response to the Project's Notice of Preparation (NOP), which is provided in **Appendix 9.1: Notice of Preparation and Comment Letters,** provides guidance on Assembly Bill (AB) 52 and Senate Bill (SB) 18 compliance.

Kimley-Horn conducted a third-party review of the Project's tribal cultural resources analysis on behalf of the City; see **Appendix 9.12**. The third-party review concluded the analysis meets the applicable provisions of CEQA and the State CEQA Guidelines.

Tribal cultural resources, as defined in Public Resources Code (PRC) §21074, include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (CRHR) or included in a local register of historical resources, or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant. A cultural landscape that meets these criteria is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. Historical resources, unique archaeological resources, or non-unique archaeological resources may also be tribal cultural resources if they meet these criteria.

4.14.1 AFFECTED ENVIRONMENT

ETHNOGRAPHIC SETTING

See also *Tribal Cultural Resources Assessment for the 12850 and 12900 Crenshaw Boulevard Project, Gardena, California* (SWCA 2020 [**Appendix 9.12**]) for the Cultural Resources Setting, and as summarized in this EIR section.

The Project area is in an area historically occupied by the Gabrielino (SWCA 2020). Surrounding native groups included the Chumash and Tataviam/Alliklik to the north, the Serrano to the east, and the Luiseño/Juaneño to the south. There is well-documented interaction between the Gabrielino and many of their neighbors in the form of intermarriage and trade.

The name "Gabrielino" (sometimes spelled Gabrieleno or Gabrieleño) denotes those people who were administered by the Spanish from Mission San Gabriel. This group is now considered a regional dialect of the Gabrielino language, along with the Santa Catalina Island and San Nicolas Island dialects. In the post-European contact period, Mission San Gabriel included natives of the greater Los Angeles area, as well as members of surrounding groups such as Kitanemuk, Serrano, and Cahuilla. There is little evidence that the people we call Gabrielino had a broad term for their group; rather, they identified themselves as an inhabitant of a specific community with locational suffixes (e.g., a resident of *Yaanga* was called a *Yabit*,

much the same way that a resident of New York is called a New Yorker. Native words suggested as labels for the broader group of Native Americans in the Los Angeles region include *Tongva* (or *Tong-v*) and *Kizh* (*Kij* or *Kichereno*). The term Gabrielino is used in the remainder of this report to designate native people of the Los Angeles Basin and their descendants.

The Gabrielino subsistence economy was centered on gathering and hunting. The surrounding environment was rich and varied, and the tribe exploited mountains, foothills, valleys, deserts, riparian, estuarine, and open and rocky coastal eco-niches. Like that of most native Californians, acorns were the staple food (an established industry by the time of the Early Intermediate period). Inhabitants supplemented acorns with the roots, leaves, seeds, and fruits of a variety of flora (e.g., islay, cactus, yucca, sages, and agave). Freshwater and saltwater fish, shellfish, birds, reptiles, and insects, as well as large and small mammals, were also consumed (SWCA 2020).

The Gabrielino used a variety of tools and implements to gather and collect food resources. These included the bow and arrow, traps, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. Groups residing near the ocean used ocean-going plank canoes and tule balsa canoes for fishing, travel, and trade between the mainland and the Channel Islands. Gabrielino people processed food with a variety of tools, including hammerstones and anvils, mortars and pestles, manos and metates, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Food was consumed from a variety of vessels. Catalina Island steatite was used to make ollas and cooking vessels (SWCA 2020).

At the time of Spanish contact, the basis of Gabrielino religious life was the Chinigchinich cult, centered on the last of a series of heroic mythological figures. Chinigchinich gave instruction on laws and institutions, and also taught the people how to dance, the primary religious act for this society. He later withdrew into heaven, where he rewarded the faithful and punished those who disobeyed his laws. The Chinigchinich religion seems to have been relatively new when the Spanish arrived. It was spreading south into the southern Takic groups even as Christian missions were being built and may represent a mixture of native and Christian belief and practices (SWCA 2020).

Deceased Gabrielino were either buried or cremated, with inhumation more common on the Channel Islands and the neighboring mainland coast, and cremation predominating on the remainder of the coast and in the interior. Remains were buried in distinct burial areas, either associated with villages or without apparent village association. Cremation ashes have been found in archaeological contexts buried within stone bowls and in-shell dishes, as well as scattered among broken ground stone implements. Archaeological data such as these correspond with ethnographic descriptions of an elaborate mourning ceremony that included a variety of offerings, including seeds, stone grinding tools, otter skins, baskets, wood tools, shell beads, bone and shell ornaments, and projectile points and knives. Offerings varied with the sex and status of the deceased (SWCA 2020).

Native American Communities

The Project site is within the traditional territory of the Gabrielino. In general, it has proven very difficult or impossible to establish definitively the precise location of Native American villages occupied in the Ethnohistoric period. Native American place names referred to at the time of Spanish contact did not necessarily represent a continually occupied settlement within a discrete location. Instead, in at least some cases, the communities were represented by several smaller camps scattered throughout an approximate geography, shaped by natural features subject to change over generations. Many of the

villages had long since been abandoned by the time ethnographers, anthropologists, and historians attempted to document any of their locations, at which point the former village sites were affected by urban and agricultural development, and Native American lifeways had been irrevocably changed. Alternative names and spellings for communities, and conflicting reports on their meaning or locational reference, further confound efforts at relocation. McCawley quotes Kroeber (1925:616 as cited in SWCA 2020) in his remarks on the subject, writing that "the opportunity to prepare a true map of village locations 'passed away 50 years ago'". Thus, even with archaeological evidence, it can be difficult to conclusively establish whether any given assemblage represents the remains of the former village site.

Although the precise location of any given village is subject to much speculation, it is clear the greater Los Angeles area once contained many Gabrielino villages, including several concentrated along the banks of major waterways and near the coast. The closest Gabrielino placename to the Project area was known as Amupubit. Amupubit is listed in Mission San Gabriel baptism records, which King (2011, as cited in SWCA 2020) and others (SWCA 2020) place along the former inland lake and wetlands area, later known as the Dominguez Slough. The site is estimated to have been located approximately 3.5 miles southeast of the Project site. Further southwest and closer to the San Pedro Bay were a series of other former Gabrielino communities, including Swaanga on the east side of San Pedro Bay. The area generally represented by the Ballona Wetlands, Ballona Creek, and Centinela Creek, north of the Project area around Marina del Rey, was also known to have been populated with several Gabrielino settlements that are referenced in ethnographic records, especially the village of Waachnga (alternately spelled or referred to as Guaspet, Guasna, Guashna, Guachpet, and Guashpet).

NATIVE AMERICAN HERITAGE COMMISSION SACRED LANDS FILE

The NAHC Sacred Lands File (SLF) search conducted March 2020 indicated negative results; see Appendix B of the *Tribal Cultural Resources Assessment for the 12850 and 12900 Crenshaw Boulevard Project, Gardena, California*, located in **Appendix 9.12: Tribal Cultural Resource Data and Tribal Consultation Correspondence**.

4.14.2 REGULATORY FRAMEWORK

FEDERAL

National Historic Preservation Act of 1966

Enacted in 1966 and amended in 2000, the National Historic Preservation Act (NHPA) declared a national policy of historic preservation and instituted a multifaceted program, administered by the Secretary of the Interior, to encourage the achievement of preservation goals at the federal, state, and local levels. The NHPA authorized the expansion and maintenance of the National Register of Historic Places (NRHP), established the position of State Historic Preservation Officer and provided for the designation of State Review Boards, set up a mechanism to certify local governments to carry out the purposes of the NHPA, assisted Native American tribes to preserve their cultural heritage and created the Advisory Council on Historic Preservation.

STATE

California Environmental Quality Act

Concerning historical and archaeological resources, the California Environmental Quality Act (CEQA) includes explicit standards for determining when a resource is "historically significant" or "unique," as well as when an impact to such a resource is significant. State CEQA Guidelines §15064.5, Determining the Significance of Impacts to Archaeological and Historical Resources, describes the steps public agencies must take to consider their actions' effects on both "historical resources" and "unique archaeological resources." First, it must be determined whether such resources are present. Secondly, it must be determined if the project would cause a "substantial adverse change" in the significance of these resources. Finally, the State CEQA Guidelines include requirements for how to treat identified resources. The City reviews all development applications for conformance with CEQA.

Assembly Bill 52

On July 1, 2015, California AB 52 of 2014 was enacted and expanded CEQA by defining a new resource category, "tribal cultural resources." AB 52 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" (PRC §21084.2).

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be released. AB 52 requires that lead agencies "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if: (1) the California Native American tribe requested to the Lead Agency, in writing, to be informed by the Lead Agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the Lead Agency. Consultation may include discussing the type of environmental review necessary, the significance of tribal cultural resources, the significance of the project's impacts on the tribal cultural resources, and alternatives and mitigation measures recommended by the tribe.

The parties must consult in good faith, and consultation is deemed concluded when either the parties agree on measures to mitigate or avoid a significant effect on a tribal cultural resource (if such a significant effect exists) or when a party concludes that mutual agreement cannot be reached.

Traditional Tribal Cultural Places Act (Senate Bill 18)

Senate Bill (SB) 18 (California Government Code §65352.3) requires local governments to consult with Native American tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to the adoption and amendment of general plans and specific plans. The consultation process requires (1) that local governments send the State Native American Heritage Commission (NAHC) information on a proposed project and request contact information for local Native American tribes; (2) that local governments then send information on the project to the tribes that the NAHC has identified and notify them of the opportunity to consult; (3) that the tribes have 90 days to respond on whether they want to consult or

not, and (4) that consultation begins if requested by a tribe and there is no statutory limit on the duration of the consultation. If issues arise and consensus on mitigation cannot be reached, SB 18 allows a finding to be made that the suggested mitigation is infeasible.

California Government Code Sections 6254(r) and 6254.10

Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to "Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission." Section 6254.10 specifically exempts from disclosure requests for "records that relate to archaeological site information and reports, maintained by, or in the possession of the Department of Parks and Recreation, the SHRC, the State Lands Commission, the NAHC, another state agency, or a local agency, including the records that the agency obtains through a consultation process between a Native American tribe and a state or local agency."

California Health and Safety Code Section 7050.5

California Health and Safety Code (CHS) §7050.5 requires that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or site disturbance or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined that the remains are not subject to the provision of California Government Code §27491 or any other related provisions of law concerning investigation of the circumstances, manner, and cause of death. If the coroner determines that the remains are that of a Native American or has reason to believe that they are those of a Native American, he or she shall contact the NAHC by telephone within 24 hours.

California Public Resources Code Section 5097.98

Public Resources Code §5097.98 stipulates that whenever the NAHC receives notification concerning discovery of Native American human remains from a county coroner pursuant to CHS §7050.5, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the landowner's permission, or his or her authorized representative, inspect the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with the appropriate dignity, the human remains and any associated grave goods. The descendants shall complete their inspection and make their recommendation within 48 hours of being granted access to the site. The recommendation may include the scientific removal and non-destructive analysis of human remains and items associated with Native American burials. The NAHC would designate the Most Likely Descendant (MLD) for any future human remains found in the project area.

LOCAL

City of Gardena General Plan

The City of Gardena's General Plan's Community Resource Element provides a Conservation Plan with the following goal and policy for the treatment of historic and cultural resources:

- **CN Goal 5:** Protect the City's cultural resources.
    - **Policy CN 5.3**: Protect and preserve cultural resources of the Gabrielino Native American Tribe found or uncovered during construction.

4.14.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning tribal cultural resources. Criteria under CEQA states that if a project causes a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k) (see Impact 4.14-1), or
- 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 §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe (see Impact 4.14-1).

According to PRC §21084.2, 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. While what constitutes a "substantial adverse change" to a tribal cultural resource is not defined in the section, guidance on what constitutes a substantial adverse change under CEQA can be drawn from State CEQA Guidelines §15064.5(b). Although applicable specifically to historical resources (as defined in §15064.5(a)), an analogy can be drawn when assessing if there has been a substantial adverse change to a tribal cultural resource. State CEQA Guidelines §15064.5(b)(1) defines a substantial adverse change as the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings, resulting in material impairment of the historical resource. According to State CEQA Guidelines §15064.5(b)(2), the significance of a historical resource is materially impaired when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to PRC §5020.1(k) or its identification in an historical resources survey meeting the requirements of PRC §5024.1(g), unless the public agency reviewing the effects of the Project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

In drawing an analogy, a substantial adverse change to a tribal cultural resource could be considered to be the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings, resulting in material impairment of the tribal cultural resource.

Similarly, material impairment could include:

- Demolition or material alteration in an adverse manner those characteristics of a tribal cultural resource that justify its eligibility for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC §5020.1(k); or
- Demolition of material alteration in an adverse manner those characteristics of a tribal cultural resource that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

PRC §21084.3 provides guidance on addressing impacts to tribal cultural resources and states that:

- Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.
- If the lead agency determines that a project may cause a substantial adverse change to a tribal cultural resource, and measures are not otherwise identified in the consultation process provided in § 21080.3.2, the following are examples of mitigation measures that, if feasible, may be considered to avoid or minimize the significant adverse impacts:
    - Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
        - 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: (a) protecting the cultural character and integrity of the resource; (b) protecting the traditional use of the resource; and (c) protecting the confidentiality of the resource.
    - 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.
    - Protecting the resource.

State CEQA Guidelines §15370 provides additional guidance on the types of mitigation that may be considered, and includes: avoiding impacts altogether; minimizing impacts; rectifying impacts through repair, rehabilitation, or restoration; reducing impacts through preservation; and compensating for impacts by providing substitute resources.

PRC §21082.3(b) indicates that if a project may have a significant impact on a tribal cultural resource, the agency's environmental document shall discuss whether the proposed project has a significant impact on an identified tribal cultural resource and whether feasible alternatives or mitigation measures avoid or substantially less the impact on the identified tribal cultural resource.

PRC §21080.3.2 indicates that as part of the consultation pursuant to §21080.3.1, California Native American tribes may propose mitigation measures, including, but not limited to, those recommended in §21084.3, capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource. Also, the lead agency may incorporate changes or additions to a project even if not legally required to do so.

4.14.4 IMPACTS AND MITIGATION MEASURES

Impact 4.14-1: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or 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 the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Level of Significance: Less Than Significant Impact With Mitigation Incorporated

DISCUSSION/ANALYSIS

No tribal cultural resources were identified in a California Historical Resources Information System (CHRIS) records search of a 0.5-mile radius of the Project site. Additionally, the SLF records search did not identify any sacred lands or sites. The closest known site on-file at the CHRIS that could be considered tribal cultural resources is Site P-19-000088. The site is a former prehistoric settlement located approximately 3.0 miles to the southeast, near the former boundary of an inland lake and wetland known as Dominguez Slough. Ethnographic reports describe a former Gabrielino village site known as *Amupubit* in the same approximate location as the site. The next closest Gabrielino placenames that included significant settlements are located approximately 7.0 to 8.0 miles to the north, south, and east.

The Project site is not located near any major stream courses or known sources of freshwater, except the Dominguez Flood Control Channel (Dominguez Channel), which is located immediately east of the Project site. The Dominguez Channel is an approximately 16.0-mile perennial river located in the Dominguez Watershed's center. However, near the Project site, this drainage is a concrete-lined channel.[1] There are no landmarks or other landscape features apparent that might have given the Project area significance to prehistoric foragers. Broadly, the area is set within alluvial sediments, the uppermost stratum of which accumulated as fan deposits formed during the late Pleistocene and early Holocene, between approximately 12,000 to 6000 B.C., just before the first evidence for human presence in the Los Angeles Basin. The Project site was subject to plow agriculture for at least 50 years before being developed as a commercial property with a paved lot. Geotechnical boring at the Project site identified 2.0 and 3.0 feet of artificial fill overlying alluvial sediments with varying strata of mixed composition. Together, this information suggests any former tribal cultural resources that were once present on the surface or near surface would have likely been destroyed or otherwise compromised. This significantly reduces the sensitivity for tribal cultural resources. It is possible for tribal cultural resources to be preserved as more deeply buried archaeological sites, preserved beneath surface disturbances or even intermixed with artificial fill and Historic-period debris. However, the age of the deeply buried sediments allows for

[1] Although the Dominguez Channel is located east of the Project site, this northerly segment of the channel was not constructed along the former water course. This segment of the Dominguez Channel was constructed between 1938 and 1947 as a concrete lined channel, oriented north-south to follow the street grid and property boundaries.

preservation of material from only the earliest Prehistoric period, which are extremely rare within the Los Angeles Basin. Furthermore, the Project design is only likely to encounter this depth within the area for the internal parking ramp and parking, and three elevator shafts. Removal and recompaction of the existing artificial fill to approximately three feet below grade is assumed over the entire Project site, except for internal ramp and parking, and elevator shaft construction, where construction is anticipated to require the following excavation:

- The internal ramp and parking are assumed in this EIR to require excavation to approximately 8.0 feet below the current grade in an area that measures approximately 112 by 42 feet.
- Three elevator shafts are anticipated to require excavation to approximately 5.0 feet below current grade, each shaft would be approximately 6 by 6 feet.

Therefore, to the extent that the proposed ground disturbance extends into undisturbed alluvial soils buried beneath previously disturbed sediments, there may be some potential for preservation, but it is considered very unlikely for any resource to be present.

Given the overall lack of any indication of the Project area as a location of likely habitation or resource procurement, and the poor preservation conditions, there is a low potential for encountering tribal cultural resources within the Project area. Notwithstanding and as discussed below, the Kizh Nation provided tribal archive information to the City to identify high cultural sensitivity of the Project location and why they have concerns for subsurface ground disturbance activities that may impact tribal cultural resources.

Pursuant to AB 52 requirements, on April 14, 2020, the City of Gardena notified the designated contact of, or a tribal representative of, California Native American Tribes that are traditionally and culturally affiliated with the Project's geographic area and that have requested notification of projects being considered by the City, pursuant to PRC §21080.3.1. Letters were sent via certified mail and email to the following:

- Mr. Sam Dunlap of the Gabrieleno Tongva Tribe
- Mr. Andrew Salas, Chairperson of the Gabrieleno Band of Mission Indians - Kizh Nation

The letters included a description of the Project, a map depicting the Project location, and the City's contact information. Recipients were requested to respond within 30 days should they wish to consult under AB 52.

On April 23, 2020, the City received one request for consultation from the Gabrieleno Band of Mission Indians-Kizh Nation (Kizh Nation). On April 23, 2020, the City replied to the representative via email initiating formal government-to-government consultation with the Kizh Nation. The City initiated consultation with the Kizh Nation on June 25, 2020. Tribal representatives expressed concerns should subsurface activities be associated with the Project. the Kizh Nation provided their knowledge of the Project site vicinity, including information about the natural environment and the area's general history, and known villages and trade routes in the larger area. During the consultation call and in subsequent email communication, the Kizh Nation indicated that the Project site has a high sensitivity for the presence of unknown, subsurface archaeological resources; also see **Section 4.3: Cultural Resources**, for a discussion of the potential for encountering subsurface archaeological resources during ground disturbance. The Kizh Nation provided tribal archive information to the City to identify high cultural

sensitivity of the Project location and why they have concerns for subsurface ground disturbance activities that may impact tribal cultural resources, which are included in **Appendix 9.4** to this EIR.

Per the Kizh Nation (B. Salas, Personal Communication, June 25, 2020), the Project location is within the Village of Suangna. All of their mainland villages (sans their island villages) "…overlapped each other to help facilitate the movement of tribal cultural resources throughout the landscape and also to our sister tribes outside of our traditional ancestral territory. Village use areas were usually shared between village areas and were commonly used by two or more adjoining villages depending on the type, quantity, quality, and availability of natural resources in the area. Therefore, human activity can be pronounced within the shared use areas due to the combined use by multiple villages and tribal cultural resources may be present in the soil layers from the thousands of years of human activity within that landscape." Based on the above, according to the Kizh Nation, there is the potential for as-yet unidentified archaeological resources to be present in the area. The Kizh Nation representatives did not identify any known tribal cultural resources (as defined in PRC §21074) at the Project site. In subsequent correspondence June 25, 2020, the Kizh Nation provided mitigation recommendations. On August 20, 2020, the City accepted the proposed mitigation measures and concluded the consultation.

The Kizh Nation identified measures to mitigate potential impacts to as-yet undiscovered tribal cultural resources. The mitigation measures include requirements for retaining a Native American Monitor/Consultant (MM TCR-1), procedures in the event of an unanticipated discovery of tribal cultural and archaeological resources (MM TCR-2), procedures for handling unique archaeological resources (MM TCR-3), procedures in the event of an unanticipated discovery of human remains and associated funerary objects (MM TCR-4), resource assessment and continuation of work protocol requirements (MM TCR-5), Kizh-Gabrieleno procedures for burials and funerary remains (MM TCR-6), resource treatment measures (MM TCR-7), and professional standards (MM TCR-8). Following compliance with MMs TCR-1 through TCR-8, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. With mitigation, impacts would be less than significant.

Senate Bill 18 Consultation

On April 14, 2020, the City notified the designated contact of, or a tribal representative of, California Native American Tribes that are on the Tribal Consultation List maintained by the California NAHC. In compliance with SB 18 requirements, and as Lead Agency, the City extended an invitation to consult on the Project. This consultation was intended to assist with identifying and/or preserving and/or mitigating potential Project impacts to Native American cultural places. Letters were sent via certified mail and email to the following:

- Mr. Sam Dunlap of the Gabrieleno Tongva Tribe
- Mr. Andrew Salas, Chairperson of the Gabrieleno Band of Mission Indians - Kizh Nation
- Mr. Anthony Morales, Chairperson of the Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Ms. Sandonne Goad, Chairperson of the Gabrielino /Tongva Nation
- Mr. Robert Dorame, Chairperson of the Gabrielino Tongva Indians of California Tribal Council
- Mr. Charles Alvarez of the Gabrielino-Tongva Tribe.

The letters included a description of the Project, a map depicting the Project location, and the City's contact information. Recipients were requested to respond within 90 days should they wish to consult under SB 18. No responses were received regarding SB 18 consultation. As previously noted, consultation was conducted with the Kizh Nation as a part of AB 52 consultation.

MITIGATION MEASURES

MM TCR-1 **Retain a Native American Monitor/Consultant:** Prior to ground-disturbing construction activities, the Project Applicant shall retain and compensate for the services of a Tribal Monitor/Consultant who is ancestrally affiliated with the Project area, approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government, and listed under the Native American Heritage Commission's (NAHC) Tribal Contact list for the Project area. Applicant shall obtain this list from the NAHC. A Native American Monitor shall be retained by the Lead Agency or Project owner to be on-site to monitor all project-related, ground-disturbing construction activities (i.e., boring, grading, excavation, potholing, trenching, etc.). A monitor associated with one of the NAHC recognized Tribal governments, which have commented on the Project shall provide the Native American Monitor. The Monitor/Consultant shall only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The Tribal Monitor/Consultant shall complete daily monitoring logs that provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the Project site grading and excavation activities are completed, or when the Tribal Representatives and Monitor/Consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.

MM TCR-2 **Unanticipated Discovery of Tribal Cultural and Archaeological Resources:** Upon discovery of any tribal cultural or archaeological resource, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All tribal cultural and archaeological resources unearthed by Project construction activities shall be evaluated by a qualified archaeologist and Tribal Monitor/Consultant; see MM TCR-8: Professional Standards below. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe requests preservation in place or recovery for educational purposes. Work may continue on other parts of the Project while evaluation and, if necessary, additional protective mitigation takes place (State CEQA Guidelines §15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with State CEQA Guidelines §15064.5(f) for historical resources.

MM TCR-3 **Public Resources Code §21083.2(b)** for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. All tribal cultural resources shall be returned to the Tribe. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to the Tribe or a local school or historical society in the area for educational purposes.

MM TCR-4 **Unanticipated Discovery of Human Remains and Associated Funerary Objects:** Native American human remains are defined in PRC §5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC §5097.98, are also to be treated according to this statute. Pursuant to Health and Safety Code §7050.5, any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the remains' nature. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC and PRC §5097.98 shall be followed.

MM TCR-5 **Resource Assessment and Continuation of Work Protocol:** Upon discovery of human remains, the Tribal and/or Archaeological Monitor/Consultant shall immediately divert work at a minimum of 150 feet from the discovery and place an exclusion zone around the discovery location. The Monitor/Consultant(s) shall then notify the Tribe, the qualified Archaeologist, and the construction manager who shall call the coroner. Work shall continue to be diverted, while the coroner determines whether the remains are human and subsequently Native American. The discovery shall be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner shall notify the NAHC as mandated by state law who shall then appoint a Most Likely Descendent (MLD).

MM TCR-6 **Kizh-Gabrieleno Procedures for burials and funerary remains:** If the Gabrieleno Band of Mission Indians – Kizh Nation is designated MLD, the Koo-nas-gna (sacred burial place) Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

MM TCR-7 **Treatment Measures:** If human remains/ceremonial objects are discovered, prior to continuation of ground disturbing activities, the landowner shall arrange a designated site location within the Project site footprint for the respectful reburial of the human remains/ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard shall be posted outside of working hours. The Tribe shall make every effort to recommend diverting the Project and keeping the remains in situ and protected. If the Project cannot be diverted, it may be determined that burials shall be removed. The Tribe shall work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations shall either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

Each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects, and objects of cultural patrimony shall be removed to a secure on-site container, if possible. These items shall be retained and reburied within six months of recovery. The site of reburial/ repatriation shall be on the Project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

MM TCR-8 **Professional Standards:** Archaeological and Native American monitoring and excavation during construction shall be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.

4.14.5 CUMULATIVE IMPACTS

For purposes of the tribal cultural resource impact analysis, cumulative impacts are considered for cumulative development within Gardena and Hawthorne, according to the related projects; see **Table 3-1: List of Cumulative Projects**.

As concluded above, the potential exists for undiscovered tribal cultural resources to be adversely impacted during Project construction. With implementation of MMs TCR 1 through 8, the Project would

not cause a substantial adverse change in the significance of these resources; a less than significant impact with mitigation incorporated would occur in this regard.

Future cumulative development projects could encounter tribal cultural resources during ground disturbing activities. Thus, the potential exists for cumulative development to result in the adverse modification or destruction of tribal cultural resources. Potential tribal cultural resource impacts associated with the individual developments would be specific to each site. As with this Project, all cumulative development in the area would undergo environmental and design review on a project-by-project basis pursuant to CEQA, AB 52, and SB 18, to evaluate the potential for impacts to tribal cultural resources. All cumulative development would be subject to compliance with the existing federal, state, and local regulatory framework concerning the protection of tribal cultural resources on a project-by-project basis, including consultation with tribes to identify whether a site may contain tribal cultural resources and if so, what mitigation measures may be required. Additionally, implementation of site-specific mitigation measures would reduce potential project impacts to as-yet unidentified tribal cultural resources to less than significant levels.

Similarly, all future development with the potential to impact tribal cultural resources would be required to demonstrate compliance with applicable federal and state regulatory requirements, including General Plan goals and policies of the affected jurisdiction, intended to reduce and/or avoid potential adverse environmental effects. As such, cumulative impacts to tribal cultural resources would be mitigated on a project-by-project level, and in accordance with the established regulatory framework, through the established regulatory review process.

Therefore, the combined cumulative impacts to tribal cultural resources associated with the Project's incremental effects and those of the cumulative projects would be less than significant following compliance with the established regulatory framework and with mitigation incorporated.

4.14.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts to tribal cultural resources have been identified.

4.14.7 REFERENCES

City of Gardena. (2006). *Gardena General Plan 2006*. Retrieved from https://www.cityofgardena.org/wp-content/uploads/2016/04/generalplan7.pdf.

Salas, B. (2020). Personal communication, June 25, 2020.

SWCA. (2020). *Tribal Cultural Resources Assessment for the 12850 and 12900 Crenshaw Boulevard Project, Gardena, California*. Pasadena, CA.



4.15 UTILITIES AND SERVICE SYSTEMS

4.15 UTILITIES AND SERVICE SYSTEMS

The purpose of this section is to describe the existing regulatory and environmental conditions related to utilities and service systems, identify potential impacts that could result from Project implementation, and as necessary, recommend mitigation to avoid or reduce the significance of impacts.

Information in this section is based on utilities and service systems data provided in **Appendix 9.13**: **Utilities and Service System Data**. Information in this section is also based on available public resources, including among others, the City of Gardena (City) General Plan 2006 (GGP) and annual reports and average usage information from utility providers whose service area includes the Project site.

Kimley-Horn conducted a third-party review of the Project's utilities and service systems analysis on behalf of the City; see **Appendix 9.13**. The third-party review concluded the analysis meets the applicable provisions of CEQA and the State CEQA Guidelines.

4.15.1 AFFECTED ENVIRONMENT

REGIONAL SETTING

Stormwater and Drainage

See **Section 4.8: Hydrology and Water Quality**, for existing conditions concerning stormwater and drainage facilities.

Wastewater

The Project site is within the jurisdictional boundaries of the Sanitation Districts of Los Angeles County Sanitation District No. 5 (LACSD). Wastewater generated at the Project site discharges to local sewer lines for conveyance to a LACSD trunk sewer. City as-built plans show an 8-inch vitrified clay pipe (VCP) is near the Project site, approximately 34 feet east of the Crenshaw Boulevard centerline. This existing sewer pipe has a peak flow rate of 24,500 gallons per day (gpd), which equates to approximately 17 percent of its total capacity. [1]

Wastewater generated at the Project site is conveyed to and treated at the Joint Water Pollution Control Plant (JWPCP) in Carson, approximately 8.0 miles southeast of the Project site. The JWPCP currently provides primary and secondary treatment for a design capacity of 400 million gallons of wastewater per day, and serves over 4.8 million residents, businesses, and industries. [2] In 2018, the JWPCP discharged approximately 267 million gallons per day (mgd), or 298,812 acre-feet per year (afy). The JWPCP has a design capacity of 400 mgd and currently processes an average flow of 261.1 mgd. [3]

Water

Golden State Water Company (GSWC) supplies water to the Project site. The Project site is within the Southwest System. The Southwest System serves the cities of Gardena and Lawndale, as well as portions

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1 Fuscoe Engineering. 2021. *Gardena TOD Specific Plan Infrastructure Assessment for Water and Sewer*, Attachment B.

2 LACSD. ND. *Joint Water Pollution Control Plant (JWPCP)*. https://www.lacsd.org/services/wastewatersewage/facilities_information/wwfacilities/wwtreatmentplant/jwpcp/default.asp (accessed May 2020).

3 Raza, Adrianna, Los Angeles County Sanitation Districts, personal communication, September 10, 2020.

of the cities of Carson, Compton, El Segundo, Redondo Beach, Hawthorne, and Inglewood and unincorporated Los Angeles County. Water service to the Project site is provided via an existing 8-inch cast iron line, and domestic and fire water lateral.

GSWC's *Final Draft 2015 Urban Water Management Plan - Southwest* (UWMP) Tables 7-2, 7-3, and 7-4 identify that water supplies would meet the service area's water demands for normal, single-dry, and multiple dry-year conditions through 2040. The Southwest System is supplied by two active, GSWC-owned wells in the Central Subbasin of the Coastal Plain of Los Angeles Groundwater Basin (Central Basin), and 12 active GSWC-owned wells in the West Coast Subbasin of the Coastal Plain of Los Angeles Groundwater Basin (West Coast Basin). GSWC would meet water demand through purchasing water from Central Basin Municipal Water District and West Basin Municipal Water District. UWMP water demand forecasts are based on adopted general plans. Water supply and demand for normal, single-dry, and multiple dry-year conditions for the GSWC Southwest System is shown on **Table 4.15-1: Projected Water Supply and Demand (AFY)**. As shown on **Table 4.15-1**, GSWC would have sufficient supply to meet demand through 2040.

Table 4.15-1: Projected Water Supply and Demand (AFY)

Year	Supply	Demand
2020	33,072	33,072
2025	33,492	33,492
2030	33,915	33,915
2035	34,345	34,345
2040	34,779	34,779

Source: Golden State Water Company. 2016. 2015 Urban Water Management Plan – Southwest; Tables 7-2, 7-3, and 7-4.

Electrical Power, Natural Gas, and Telecommunications

Electrical power to the area is provided by Southern California Edison (SCE) and natural gas is provided by the Southern California Gas Company (SoCalGas). Various companies provide telecommunications. SCE, SoCalGas, and local telecommunications companies operate and maintain transmission and distribution infrastructure in the Project area, inclusive of the Project site.

The site is currently served by overhead power lines on the east side of the Crenshaw Boulevard owned and maintained by SCE. These overhead power lines would be undergrounded, or subterranean, as part of the Project.

Although the site is not currently served by natural gas, there is existing infrastructure in Crenshaw Boulevard owned and maintained by SoCalGas, including a 20-inch transmission line on the west side of the street and a 4-inch distribution line on the east side of the street.

Solid Waste

Waste Resources of Gardena (Waste Resources) provides solid waste and recycling services for the City's residential, commercial, and industrial customers. Waste Resources uses the Chiquita Canyon Sanitary Landfill for non-recyclable municipal solid waste by way of its transfer station Waste Resources Recovery,

at 357 West Compton Boulevard, in the community of West Rancho Dominguez. Construction and demolition debris are sent either directly to a recycling partner or to California Waste Services for sorting and recycling.

In operation since 1972, the Chiquita Canyon Sanitary Landfill is a 639-acre landfill located in Castaic, California. This facility accepts only non-hazardous solid waste for disposal. Solid waste received at this facility consists of municipal solid waste, residential and commercial waste, including yard waste, green waste (for composting or for recycling), clean fill soil and construction/demolition debris.[4]

4.15.2 REGULATORY FRAMEWORK

WATER SUPPLY

STATE

California Urban Water Management Act

The California Urban Water Management Planning Act (California Water Code [CWC] Division 6, Part 2.6, §§10610-10656) addresses several State policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires water suppliers to prepare an Urban Water Management Plan ("UWMP") every five years to identify short-term and long-term water demand management measures to meet growing water demands during normal, dry, and multiple-dry years. Specifically, municipal water suppliers that serve more than 3,000 customers or provide more than 3,000 AFY of water must adopt an UWMP. GSWC is operating based on their 2015 UWMP, which was adopted in July 2016.

Sustainable Groundwater Management Act

Three bills collectively known as the Sustainable Groundwater Management Act (SGMA) were passed in 2014: Assembly Bill (AB) 1739 (Dickinson), SB 1168 (Pavley), and SB 1319 (Pavley).[5] These bills provided a framework for sustainable, groundwater management which is defined as "management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results."

SGMA requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. The latest basin prioritization project, SGMA 2019 Basin Prioritization, was completed in December 2019. SGMA 2019 Basin Prioritization identified 94 basins/sub-basins as high or medium priority. The Project site is in a very low priority basin.[6]

SGMA also empowers local agencies to form Groundwater Sustainability Agencies (GSAs) to manage basins sustainably and requires those GSAs to adopt Groundwater Sustainability Plans (GSPs) for crucial groundwater basins in California. The Southwest System where the Project site is located is supplied by

[4] Waste Connections, Inc. 2019. *About Chiquita Canyon*. https://chiquitacanyon.com/about/about.html (accessed November 2020).

[5] State Water Resources Control Board. 2020. Sustainable Groundwater Management Act Development. Retrieved from https://www.waterboards.ca.gov/water_issues/programs/sgma/development.html (accessed November 2020).

[6] California Department of Water Resources. 2020. Basin Prioritization Dashboard. Retrieved from https://gis.water.ca.gov/app/bp-dashboard/final/ (accessed November 2020).

two active, GSWC-owned wells in the Central Basin, and 12 active, GSWC-owned wells in the West Coast Basin. GSWC monitors well capacity, status, and water quality. Under the SGMA, the Central Basin and West Coast Basin are exempted from the requirement to form a GSA, since they are adjudicated basins. See also **Section 4.8: Hydrology and Water Quality**.

Porter-Cologne Water Quality Control Act

In California, the State Water Resources Control Board (SWRCB) is responsible for ensuring the highest reasonable quality of waters of the State, while allocating those waters to achieve the optimum balance of beneficial uses. The 1969 Porter-Cologne Water Quality Control Act, codified in the CWC, authorizes the SWRCB to implement programs to control polluted discharges into State waters. This law essentially implements the requirements of the Clean Water Act (CWA). Pursuant to this law, the local Regional Water Quality Control Board (RWQCB) is required to establish the wastewater concentrations of a number of specific hazardous substances in treated wastewater discharge. The Los Angeles RWQCB regulates wastewater discharges and water quality in the southern/coastal portions of Los Angeles County, including the Project site.

On May 2, 2006, the SWRCB adopted Statewide General Waste Discharge Requirements (WDRs) and a Monitoring and Reporting Program (MRP) for sanitary sewer systems. The regulations were in response to growing public concern about the water quality impacts of sanitary sewer overflows, particularly those that cause beach closures, adversely affect other bodies of water, or pose serious health and safety or nuisance problems. The MRP underwent revision in 2013; a summary of revisions incorporated into the final revised MRP is provided at:
https://www.waterboards.ca.gov/water_issues/programs/sso/docs/fs_wqo20130058.pdf.

LOCAL

Gardena General Plan 2006

The GGP Community Development Element provides a Conservation Plan with the following goal and policies for the enhancement and maintenance of water supply. The General Plan consistency analysis is provided in **Table 4.9-1** of **Section 4.9, Land Use and Planning**.

CN Goal 2: Conserve and protect groundwater supply and water resources.

- **Policy CN 2.2:** Comply with the water conservation measures set forth by the California Department of Water Resources.
- **Policy CN 2.6:** Encourage and support the proper disposal of hazardous waste and waste oil. Monitor businesses that generate hazardous waste materials to ensure compliance with approved disposal procedures.

Gardena Municipal Code (GMC)

GMC Chapter 8.70 provides an overview of the City's regulations concerning stormwater and runoff pollution control. The purpose of this chapter is to protect the public health, welfare and safety and to reduce the quantity of pollutants being discharged to the waters of the U.S. through:

A. The elimination of non-stormwater discharges to the municipal stormwater system;

B. The elimination of the discharge of pollutants into the municipal storm drain system;

C. The reduction of pollutants in stormwater discharges to the maximum extent practicable;

D. The protection and enhancement of the quality of the waters of the United States in a manner consistent with the provisions of the Clean Water Act.[7]

SOLID WASTE

STATE

Assembly Bill 939 – California Integrated Waste Management Act of 1989

The State Legislature passed the California Integrated Waste Management Act of 1989 (AB 939) to improve solid waste disposal management with respect to (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. AB 939 mandates jurisdictions to meet a diversion goal of 50 percent by 2000 and thereafter.

AB 939 requires that all counties and cities develop a comprehensive solid waste management program that includes a Source Reduction and Recycling Element (SRRE) to address waste characterization, source reduction, recycling, composting, solid waste facility capacity, education and public information, funding, special waste (asbestos, sewage sludge, etc.), and household hazardous waste. It also requires counties to develop a Siting Element that addresses the need for landfill/transformation facilities for 15-year intervals; and it also mandates, all cities and counties to prepare and submit Annual Reports that summarize the jurisdictions' progress in reducing solid waste. Oversight of these activities was set up under the aegis of the California Integrated Waste Management Board (CIWMB). The duties and responsibilities of CIWMB were transferred to CalRecycle as of January 1, 2010.

Assembly Bill 1327

California Solid Waste Reuse and Recycling Access Act of 1991 (AB 1327), passed on October 11, 1991, required "CalRecycle" to develop a model ordinance for adoption of recyclable materials in development projects by March 1, 1993. Local agencies were then required to adopt the model, or an ordinance of their own, governing adequate areas for collection and loading of recyclable materials in development projects by September 1, 1993. If, by that date, a local agency had not adopted its own ordinance, the model ordinance adopted by the CalRecycle took effect and shall be enforced by the local agency. Subsection F of GMC §18.20.110: Containers/bins details the requirements for container enclosures.

Senate Bill 1374 – Construction and Demolition Waste Materials Diversion Requirements

SB 1374 was signed into law in 2002 and requires the range of diversion rates of construction and demolition (C&D) waste material from 50 to 75 percent at the local level. CALGreen mandates locally permitted new residential and non-residential building construction, demolition and certain additions and alteration projects to recycle and/or salvage for reuse a minimum 65 percent of the nonhazardous C&D debris generated during the project (CALGreen §§4.408, 5.408, 301.1.1 and 301.3).[8] The Gardena City Council adopted Ordinance No. 1797 to comply with State law. SB 1374 called for preparation of a model C&D diversion ordinance by March 1, 2004, and a model ordinance was adopted by CalRecycle on March

[7] City of Gardena. 2020. Gardena Municipal Code, Section 8.7.020 Purpose and Intent. Retrieved from https://www.codepublishing.com/CA/Gardena/#!/html/Gardena08/Gardena0870.html (accessed November 2020).

[8] CalRecycle. 2020. Construction and Demolition (C&D) Diversion Informational Guide. Retrieved from https://www.calrecycle.ca.gov/lgcentral/library/canddmodel (accessed November 2020).

16, 2004. SB 1374 also required that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting C&D wastes.

Assembly Bill 341 – California's 75 Percent Initiative

AB 341, which took effect on July 1, 2012, was designed to help meet California's recycling goal of 75 percent by the year 2020. AB 341 made "…a legislative declaration that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020…" AB 431 requires a business, defined to include a commercial or public entity that generates more than 4 cubic yards (CY) of commercial solid waste per week or a multifamily residential dwelling of 5 units or more to arrange for recycling services. Such business/residential development must: 1) source separate recyclable materials from the solid waste they are discarding, and either self-haul or arrange for separate collection of the recyclables; and 2) subscribe to a service that includes mixed waste processing that yields diversion results comparable to source separation.

California Green Building Standards (CALGreen Code)

The 2019 California Green Building Standards (CALGreen) Code sets standards for new buildings and development project with the objective of minimizing the state's carbon output (California Building Standards Commission, 2019). The 2019 CALGreen Code has new and revised provisions that require new buildings to reduce water consumption, increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. Local jurisdictions also retain the administrative authority to exceed the CALGreen standards. The 2019 CALGreen Code went into effect statewide on January 1, 2020.

LOCAL

Gardena General Plan 2006

The GGP Community Resources Element provides a Conservation Plan with the following goals and policies for the treatment of solid waste:

- **CN Goal 3**: Reduce the amount of solid waste produced in Gardena.
    - **Policy CN 3.1:** Comply with the requirements set forth in the City's Source Reduction and Recycling Element.

Gardena Municipal Code

GMC Chapter 8.20 provides an overview of the City's solid waste and recyclable collection and disposal requirements. Subsection G: Requirement for Collection of C&D Wastes of §8.20.060: Solid Waste Disposal and Diversion states that " All construction and demolition waste as defined by this chapter that result from construction work shall be collected by a solid waste collection enterprise duly authorized by the city of Gardena. No C&D wastes can be carted by a nonauthorized firm or individual unless the materials carted are recyclable solid waste as defined by this chapter, and collected without fee, or sold or donated by the owner/occupant. One hundred percent of organic waste must be diverted. One hundred percent of asphalt, concrete, dirt and rock must be diverted."

ELECTRICAL

STATE

California Electrical Code

The California Electrical Code is codified in Title 24, CCR, Part 3. The Electrical Code contains regulations including, but not limited to, electrical materials, electrical wiring, overcurrent protection, grounding, and installation.

LOCAL

Gardena General Plan 2006

The GGP Community Resources Element provides a Conservation Plan with the following goals and policies for the treatment of energy resources:

- **CN Goal 4:** Conserve energy resources through the use of technology and conservation methods.
  - **Policy CN 4.1**: Encourage innovative building designs that conserve and minimize energy consumption.
  - **Policy CN 4.2**: Require compliance with Title 24 regulations to conserve energy.

Gardena Municipal Code

Chapter 15.04: General Building Provisions, of the GMC, adopts the California Electrical Code in its entirety.

4.15.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G: Environmental Checklist Form, includes questions concerning utilities. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, the Project may create a significant environmental impact if it would:

- Require or result in the relocation or construction of the following new or expanded facilities, the construction or relocation of which could cause significant environmental effects:
  - Water facilities (see Impact 4.15-1);
  - Wastewater facilities (see Impact 4.15-2);
  - Stormwater facilities (see Impact 4.15-3);
  - Electric power, natural gas, and telecommunications facilities (see Impact 4.15-4);
- Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years (see Impact 4.15-1);
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments (see Impact 4.15-2);

- 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 (see Impact 4.15-5);
- Fails to comply with federal, State, and local management and reduction statutes and regulations related to solid waste (see Impact 4.15-5)

4.15.4 IMPACTS AND MITIGATION MEASURES

Impact 4.15-1: Would the project require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects?

Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Level of Significance: Less Than Significant Impact

CONSTRUCTION AND OPERATIONS

Water Conveyance Facilities. GSWC supplies water to the Project site via an existing 8-inch cast-iron main, and domestic and fire water lateral. The Project would connect a domestic water line, a fire line, and irrigation line to the existing main. Additionally, there is an existing fire hydrant on the east side of Crenshaw Boulevard adjacent to the northwestern portion of the Project site, which would remain. The Project proposes a new fire hydrant at the southern area of the Project site, as required by the Los Angeles County Fire Department. The environmental effects associated with the proposed water facility improvements are analyzed throughout this EIR. Although the Project would require relocation or construction of new water facilities, these improvements would be limited to connections to existing facilities near the Project site, thus, their construction or relocation would not cause significant environmental effects. Therefore, a less than significant impact would occur in this regard, following compliance with the established regulatory framework.

Water Supply. The existing water demand associated with the Project site, which is based on a commercial land use, is approximately 1,277 gpd. The Project proposes a multi-family residential development. Based on the proposed land use, the Project's estimated water demand would be approximately 50,506 gpd, or approximately 49,229 gpd over existing conditions demand; see **Appendix 9.13**. The Project would include all state mandated water-saving features, including water-efficient faucets, shower heads, and toilets.

GSWC Final Draft 2015 Urban Water Management Plan - Southwest (UWMP) Tables 7-2, 7-3, and 7-4 indicate water supplies would meet the service area's water demands for normal, single-dry, and multiple dry-year conditions through 2040. The UWMP water demand forecasts are based on adopted general plans, which assumed General Commercial for the Project site. Although the Project's estimated water demand would increase by approximately 49,229 gpd (55.14 afy) over existing conditions demand, GSWC has sufficient capacity to accommodate the Project. GSWC's 2015 UWMP forecasts water demands would increase from 33,266 afy in 2020 to 34,975 afy in 2040 for both normal and dry years, representing an increase in demand of 1,709 afy. The proposed increase in demand from the Project of 49,229 gpd (55 afy)

represents approximately three percent of the total increase in demand from 2020 to 2040 in the UWMP. The UWMP also projects adequate supplies to meet all future demands.[9]

Further, GSWC has analyzed the Project to determine if sufficient water supplies are available to serve the Project from existing entitlements and resources. GSWC has confirmed water service would be available to the Project site from GSWC's Southwest System, and service could be provided from their existing water facilities within Crenshaw Boulevard.[10] Thus, GSWC would have adequate water supplies from existing entitlements. Project impacts concerning water demand would be less than significant, and no mitigation is required. Further, GSWC provides conservation programs along with incentives to conserve water in the City. Although the GSWC service area population is expected to increase, the overall baseline potable demand in afy is expected to decrease due to further water use efficiency and recycled water programs. Thus, there would be sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, a less than significant impact would occur, and no mitigation is required.

MITIGATION MEASURES

No mitigation is required.

Impact 4.15-2: Would the project require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects?

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?

Level of Significance: Less Than Significant Impact

CONSTRUCTION AND OPERATIONS

Wastewater Generation and Conveyance. The Project's projected wastewater generation is approximately 50,400 gpd, representing a net increase in wastewater generation at the Project Site of approximately 49,123 gpd (**Appendix 9.13**). City as-built plans show an 8-inch VCP approximately 34 feet east of the centerline of Crenshaw Boulevard. Wastewater flow originating from the Project site would discharge to the 8-inch local sewer line (which is not maintained by LACSD) for conveyance to LACSD's Moneta Extension Trunk Sewer Section 1, located in Crenshaw Boulevard at 135th Street. LACSD's 10-inch diameter trunk sewer has a capacity of 0.5 million gpd and conveyed a peak flow of 0.1 mgd (when last measured in 2016).[11]

Under proposed conditions, the Project site would be served by the same City of Gardena infrastructure (8-inch VCP) as under existing conditions. Flows are anticipated to increase under Project buildout by 49,123 gpd. A site-specific Sewer Study was conducted for the Project and approved by the City on 10/22/20. Additionally, LACSD has provided a will-serve letter for the Project site; both can be found in **Appendix 9.13**. Analysis in the Infrastructure Assessment for Water and Sewer found that the peak flow

9 GSWC. 2016. *2015 Urban Water Management Plan - Southwest*.
10 Zhao, Joseph, Golden State Water Company, personal communication, October 1, 2019.
11 Raza, Adrianna, Los Angeles County Sanitation Districts, personal communication, September 10, 2020.

condition of the sewer main is 0.51, where the allowable range is 0.5-0.75 (with 0.5 at the bottom of the range). Therefore, it is not anticipated that any City or County sewer lines would need to be upsized as a result of the Project. For any new connections, laterals, or trenching that is required as a part of Project construction, all pertinent local, regional, and state-level regulations would be followed to preclude environmental impacts. Impacts to wastewater would be less than significant. See the Project *Infrastructure Assessment for Water and Sewer* in **Appendix 9.13** for analysis information.

Wastewater Treatment. The wastewater generated by the Project would be treated at LACSD's Joint Water Pollution Control Plant located in Carson. The Plant has a capacity of 400 mgd and the existing average daily flow for the system is approximately 260 mgd. The Project would generate 50,400 gpd of wastewater, an increase of 49,123 gpd.[12] The HSC empowers the LACSD to charge a fee for the privilege of connecting to the LACSD's Sewage System for increasing the strength or quantity of wastewater discharged from connected facilities. The fee payment would be required before a permit to connect to the sewer is issued. The environmental effects associated with the proposed wastewater treatment improvements are analyzed throughout this EIR. Although the Project would require relocation or construction of new wastewater facilities, these improvements would be limited to connections to existing facilities near the Project site; construction or relocation would not cause significant environmental effects. Therefore, with compliance with the established regulatory framework, impacts would be less than significant.

MITIGATION MEASURES

No mitigation is required.

Impact 4.15-3: Would the project require or result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects?

Level of Significance: Less Than Significant Impact

CONSTRUCTION AND OPERATIONS

Stormwater Generation and Conveyance. The Project would maintain the existing site condition's impervious surface with the exception of proposed landscaped areas and a dog run. The Project would be graded to collect stormwater onsite and route the water by means of various best management practices (BMP) and into the street flow line of Crenshaw Boulevard.

The Project proposes onsite drainage improvements. No offsite drainage improvements are proposed. The environmental effects associated with the proposed stormwater drainage facilities are analyzed throughout this EIR. Although the Project would require relocation or construction of new stormwater drainage facilities, these improvements would be limited to connections to existing facilities near the Project site, thus, their construction or relocation would not cause significant environmental effects. Therefore, impacts would be less than significant with compliance with the established regulatory framework.

[12] Fuscoe Engineering. 2021. *Gardena TOD Specific Plan Infrastructure Assessment for Water and Sewer*.

MITIGATION MEASURES

No mitigation is required.

Impact 4.15-4: Would the project require or result in the relocation or construction of new or expanded electric power, natural gas, and telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Level of Significance: Less Than Significant Impact

CONSTRUCTION AND OPERATIONS

SCE provides electrical power and SoCalGas provides natural gas. Various companies provide telecommunications. SCE, SoCalGas, and local telecommunications companies operate and maintain transmission and distribution infrastructure in the Project area, which currently serves the Project site. As noted above, the site is currently served by overhead power lines on the east side of the Crenshaw Boulevard owned and maintained by SCE. These lines would be placed underground within the Project site as part of the Project to provide permanent electrical power.

Although the site is not currently served by natural gas, there is existing infrastructure in Crenshaw Boulevard owned and maintained by SoCalGas, including a 20-inch transmission line on the west side of the street and a 4-inch distribution line on the east side of the street. It is anticipated that the Project would be served by the 4-inch line on the far side of Crenshaw Boulevard. Project construction would not use natural gas.

The estimated proposed electricity demand during Project operations is provided in **Table 4.15-2: Estimated Proposed** Electricity Demand below. The Project's estimated demand for electricity is 1,771,720 kWh per year, or approximately 4,854 kWh per day.

Table 4.15-2: Estimated Proposed Electricity Demand

Land Use	Units	Total Avg. (kWh/year)[1,2]
High Rise Apartment	265 units	1,219,840
Digital Billboard		551,880
Total Electricity Demand		1,771,720

Notes
[1] CalEEmod was used to calculate the electricity demand based on land use.
[2] Kilowatt hours (kWh)
Energy demands are modeled based on a general land use assumption and unit count only, and do not consider site-specific amenities, appliances, or efficiency measures.

The estimated proposed natural gas demand during Project operations is provided in **Table 4.15-3: Estimated Proposed Natural Gas Demand** below. The Project's estimated demand for natural gas is 3,012,600 kBTU per year, or approximately 8,253 kBTU per day.

Table 4.15-3: Estimated Proposed Natural Gas Demand

Land Use	Units	Total Average Demand (kBTU/year)[1]
High Rise Apartment	265 units	3,012,600

Notes
[1] CalEEmod was used to calculate the natural gas demand based on land use.
Energy demands are modeled based on a general land use assumption and unit count only, and do not consider site-specific amenities, appliances, or efficiency measures.

The Project proposes to connect to existing electrical, natural gas, and telecommunications infrastructure, and no offsite improvements are proposed. The environmental effects associated with the proposed electrical, natural gas, and telecommunications infrastructure are analyzed throughout this EIR. Although the Project would require relocation or construction of new electrical, natural gas, and telecommunications infrastructure, these improvements would be limited to connections to existing facilities near the Project site; their construction or relocation would not cause significant environmental effects. Therefore, impacts would be less than significant with compliance with the established regulatory framework.

MITIGATION MEASURES

No mitigation is required.

Impact 4.15-5: 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?

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

Level of Significance: Less Than significant Impact

CONSTRUCTION AND OPERATIONS

As noted above, solid waste pickup for the site would be handled by Waste Resources of Gardena. The trash pickup location would be coordinated with Waste Resources. The Project proposes to remove all existing onsite structures and surface parking lot and develop a high-quality transit-oriented development (TOD) consisting of up to 265 DUs. State law requires a 65 percent diversion rate for C&D projects. The Gardena City Council adopted Ordinance No. 1797 to comply with state law. Each C&D project for which a Building/Demolition Permit is applied for and approved must achieve the waste diversion performance standard or show a good faith effort to achieve that standard. Thus, the Project would be subject to compliance with Ordinance No. 1797, which would achieve compliance with state law.

Project implementation would increase solid waste disposal demands over existing conditions. Chiquita Canyon Sanitary Landfill is located at 29201 Henry Mayo Drive, Castaic, and its maximum permitted throughput is 6,000 tons per day. The facility's remaining capacity is approximately 8.6 million CY and maximum capacity is approximately 63.9 million CY, respectively. The Project would be served by a landfill with sufficient remaining permitted capacity to accommodate the Project's solid waste disposal needs.

Therefore, the Project's solid waste disposal needs could be accommodated at one or a combination of the disposal facilities discussed above. Operational activities would be subject to compliance with all applicable federal, state, and local statutes and regulations for solid waste, including those identified under CALGreen and AB 939. In 2018, all projects subject to the City's diversion program met or exceeded the 65 percent requirement. The Project would result in less than significant impacts concerning solid waste, and no mitigation is required.

MITIGATION MEASURES

No mitigation is required.

4.15.5 CUMULATIVE IMPACTS

The context for assessing cumulative environmental impacts associated with utilities is primarily the service area associated with each of the water, wastewater, solid waste disposal, telecommunications, and energy facilities that serve the Project site. As previously mentioned, analysis regarding electrical and natural gas facilities is included in **Section 4.4: Energy.** The cumulative impacts analysis evaluates whether the provision of utility services for the growth projected to occur in the future, along with the currently Project, would exceed the capacity of existing or planned utility infrastructure, requiring the construction of new infrastructure that could cause significant environmental impacts not already addressed as part of the Project or otherwise anticipated in conjunction with each agency's growth plans.

WASTEWATER

Other cumulative projects with the LACSD's service area could result in a cumulative increase in demand for wastewater service facilities. The City keeps records of all proposed developments in the City and the immediately adjacent area. Of the 22 projects currently in development or planning within the City or immediately adjacent areas, two are within one mile of the Project site. Both Projects are located in the City of Hawthorne. The first project is a 62,000 square foot industrial warehouse located on Cerise to the northwest of the Project site, and the second is a mixed-use project consisting of 238 dwelling units and 3,100 square feet of restaurant space located on Crenshaw immediately north of the Project site (Hawthorne Green Line Mixed Use Specific Plan). Flows from both of these sites connect to the El Segundo trunk line located north of the Project site. Neither of these sites drain through the 8-inch line located in Crenshaw Boulevard that serves as the connection point for the Project into City and regional sewer systems. Therefore, no cumulative impacts to the sewer infrastructure serving the Project site are anticipated.

All new facilities proposed or necessitated by cumulative projects would be subject to applicable CEQA review, and projects would be required to comply with the other applicable laws and regulations protecting environmental resources. Adherence to the above laws and regulations would ensure that neither the Project nor other cumulative projects would result in demand for wastewater treatment services that exceeds the existing entitlements and resources for wastewater services and impacts would be less than significant.

WATER

The Project would involve an increase in demand for water supplies. Past, present, and reasonably foreseeable future projects also could result in water supply impacts, and incrementally increase the long-

term demand for water service, similar to the Project. However, under the provisions of SB 610, all past, present, and future projects in the surrounding area would be required to prepare a comprehensive WSA if they meet the statutory requirements. The WSAs for the projects that would require a WSA, in conformance with the 2015 UWMP, would evaluate the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed, on a project-by-project basis. Any new water facilities would undergo separate environmental review and require compliance with all applicable County and City water supply ordinances, laws, and regulations. Each applicant also must fund the costs of the water-related infrastructure needed to serve a particular site. Therefore, cumulative impacts associated with adequate water service and supplies would be less than significant.

SOLID WASTE

Although the Project and cumulative projects would result in an increase in the amount of solid waste sent to landfills, compliance with state and local waste diversion requirements would contribute to the longevity of existing and proposed landfills that would serve the projects and ensure that cumulative impacts to solid waste are less than significant. As stated above, AB 341 sets a goal of 75 percent of solid waste generated statewide to be source reduced, recycled, or composted by 2020. This would require all cumulative projects to meet a 75 percent diversion rate by 2020. Therefore, through compliance with the applicable regulations, the related projects would significantly reduce the amount of solid waste that would be generated and distributed to landfills. Cumulative impacts associated with adequate solid waste capacity in landfills would be less than significant.

TELECOMMUNICATIONS

The Project and cumulative projects would result in an increase in the construction of additional telecommunications equipment, all of which is readily available. The equipment would be installed on each site and would not affect surrounding sites. Similar to the Project, the cumulative projects would be required to coordinate their respective projects, sites, and requirements with the service provider to ensure that connectivity is not disturbed and that proper conduits are installed relative to their respective projects. Cumulative impacts associated with adequate telecommunications capacity would be less than significant.

4.15.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts to utilities and service systems have been identified.

4.15.7 REFERENCES

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5.0 OTHER CEQA CONSIDERATIONS

5.0 OTHER CEQA CONSIDERATIONS

5.1 ANY SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE MITIGATED

State CEQA Guidelines §15126.2(c) requires that the EIR describe any significant impacts, including those that can be mitigated but not reduced to less than significant levels. The Project's environmental effects are addressed in **Sections 4.1** through **4.15** of this EIR. Project implementation would result in potentially significant impacts for the following topical issues: cultural resources, paleontological resources, tribal cultural resources, transportation, hazards and hazardous materials and noise. Implementation of project design features (PDFs), standard conditions and requirements (SCs), and mitigation measures (MMs) provided in **Sections 4.1** through **4.15** would reduce these impacts to levels considered less than significant, except concerning construction-related noise impacts, as discussed below.

NOISE

Construction activities would result in a substantial temporary increase in ambient noise levels to various nearby noise-sensitive receptors (i.e., R-1 through R-3). Mitigation Measure (MM) NOI-1, which involves the placement of a temporary and impermeable sound barrier, is proposed to reduce noise levels. However, given that construction activities would occur over an extended period (i.e., approximately 27 months), the temporary construction-related noise would remain significant despite mitigation. There would be periodic, temporary, unavoidable significant noise impacts that would cease upon completion of construction activities.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD BE INVOLVED IN THE PROPOSED PROJECT SHOULD IT BE IMPLEMENTED

According to State CEQA Guidelines §15126(c), an EIR is required to address any significant irreversible environmental changes that would occur should a proposed project be implemented. As stated in State CEQA Guidelines §15126.2(d):

> *"…..uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."*

The Project would use limited, slowly renewable and non-renewable resources. This use would occur during Project construction and operations. Project construction activities would require a commitment of resources that would include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and persons to and from individual construction sites. Construction would

require the consumption of resources that are not renewable or which may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: lumber and other forest products; aggregate materials used in concrete and asphalt; metals; and water. Fossil fuels such as gasoline and oil would also be consumed to power construction vehicles and equipment.

The resources that would be committed during future Project operations would be similar to those used by residential operations, including electricity, water, fossil fuels for vehicle and delivery trips, and natural gas.

The Project site is developed and would require demolition activities to accommodate the proposed development. The demolition activities would be subject to compliance with the established regulatory requirements to ensure that any asbestos-containing materials, lead-based paints, agricultural chemicals, and volatile organic compounds are not released into the environment. Compliance with the established regulatory framework and recommended mitigation would protect against a significant and irreversible environmental change resulting from the accidental release of hazardous materials.

In summary, Project implementation would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these resource quantities for future generations or for other uses during the Project's life. However, use of such resources would be on a relatively small scale in a regional context. Although irreversible environmental changes would result from Project implementation, such changes would not be considered significant.

5.3 GROWTH-INDUCING IMPACTS

State CEQA Guidelines §15126.2(e) requires that EIRs include a discussion of ways in which a project could induce growth. The State CEQA Guidelines identify a project as "growth-inducing" if it fosters economic or population growth or if it encourages the construction of additional housing either directly or indirectly in the surrounding environment. New employees from commercial or industrial development and new population from residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area. Therefore, the Project would have a growth-inducing impact if it would:

- Directly or indirectly foster economic or population growth, or the construction of additional housing;
- Remove obstacles to population growth;
- Require the construction of new or expanded facilities that could cause significant environmental effects; or
- Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

A project's potential to induce growth does not automatically result in growth. Growth can happen through capital investment in new economic opportunities by the private or public sectors. Under CEQA, the potential for growth inducement is not considered necessarily detrimental nor necessarily beneficial, and neither is it automatically considered to be of little significance to the environment.

Directly or Indirectly Foster Economic or Population Growth, or the Construction of Additional Housing

The Project site is developed with an approximately 24,990-SF warehouse used to store both vintage cars and auto parts and surface parking lot. The Project would remove all onsite uses to develop a multi-family residential building with up to 265 dwelling units (DUs). When implemented, the Project would increase population in the City. The Project's residential component would result in a population increase of approximately 562 persons associated with the new apartments and would increase the City's existing population of approximately 60,937[1] persons by approximately one percent; see **Section 4.11: Population and Housing**. Therefore, the Project would induce direct population growth through the construction of additional housing. The Project is a residential development, which would have minimal employees that may include management and maintenance staff during operation. It is unlikely that the minimal number of potential employees would indirectly induce the need for the construction of additional housing. Additionally, the Project does not propose to extend roads or other infrastructure, thus, would not indirectly induce population growth in the City. Although the Project would directly increase population and housing in the City, this growth is consistent with local and regional growth projections. It is the City's goal (GGP Land Use Goal 1) to "preserve and protect existing single-family and low/medium-density residential neighborhoods while promoting the development of additional high-quality housing types in the City." The Project would be in furtherance of this goal by providing additional housing types in the City. The Project's nominal population growth is not considered substantial in a City-wide context. Therefore, the Project would not induce substantial unplanned direct population growth in the City through new homes or commercial uses.

Remove Obstacles to Population Growth or Require the Construction of New or Expanded Facilities that Could Cause Significant Environmental Effects

The Project would not remove obstacles to population growth through the construction or extension of major infrastructure facilities. The Project site is developed and in an urban area bordered by existing industrial, commercial, and residential uses and a roadway. Therefore, the area is already served by existing utilities and service systems (i.e., water, wastewater, solid waste, natural gas, and electricity), which would provide services to the Project. While minor modifications to the existing utilities are required, major infrastructure already exists in the area. The utility improvements that are being implemented are distribution lines that would serve the proposed onsite land use. The Project does not propose improvements that would extend services to areas that currently are not served or provide additional capacity in these infrastructure improvements, thereby facilitating new offsite development. There are no properties adjacent to the Project site that would benefit by having the utilities extended.

Encourage and Facilitate Other Activities That Could Significantly Affect the Environment, Either Individually or Cumulatively

Project implementation is anticipated to have a beneficial economic effect. The introduction of new housing and residents to this Project site could encourage the creation of new businesses and services.

[1] California Department of Finance. (2020). E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark.

Section 4.1 through **Section 4.15** of this EIR address the project-specific and potential cumulate impacts associated with the Project.

5.4 MANDATORY FINDINGS OF SIGNIFICANCE

CEQA requires preparation of an EIR when certain specified impacts may result from construction or implementation of a project. An EIR has been prepared for the Project, which fully addresses all of the Mandatory Findings of Significance, as described below.

DEGRADATION OF THE ENVIRONMENT

Section 15065(a)(1) of the CEQA Guidelines requires a finding of significance if a project "has the potential to substantially degrade the quality of the environment." In practice, this is the same standard as a significant effect on the environment, which is defined in §15382 of the CEQA Guidelines as "a substantial or potentially adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance." This EIR in its entirety addresses and discloses all known potential environmental effects associated with the development of the Project including direct, indirect, and cumulative impacts. A summary of all potential environmental impacts, level of significance and mitigation measures is provided in the **Executive Summary**.

IMPACTS ON HABITAT OR SPECIES

Section 15065(a)(1) of the CEQA Guidelines states that "A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur: (1) The project has 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 an endangered, rare or threatened species; or eliminate important examples of the major periods of California history or prehistory." The Initial Study (**Appendix 9.1**) prepared for the Project found that the Project would have less than significant impact to no impact to biological resources. Therefore, biological resources are not evaluated in this EIR.

Section 4.3: Cultural Resources analyzed the potential historic and prehistoric cultural resource impacts that could occur due to the implementation of the Project and found no recorded historic or prehistoric resources in the Project site. Analysis found that the existing onsite structure is not a historically significant resource pursuant to State CEQA Guidelines §15064.5. Further, mitigation proposed within the section, **Section 4.5: Geology, Soils, and Paleontological Resources,** and **Section 4.14: Tribal Cultural Resources** identifies the retention of a professional archaeologist, Native American tribal representative, and paleontologist. MM CUL-1 in **Section 4.3** identifies step to be taken in the event of an inadvertent discovery of an archaeological resource The mitigation presented in these sections further lowered the significance of the potential impacts to less than significant levels. Therefore, the Project would not eliminate important examples of the major periods of California history or prehistory.

SHORT-TERM VS. LONG-TERM GOALS

Section 15065(a)(2) of the CEQA Guidelines states that "A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur: the project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals." **Section 5.2: Significant Irreversible Environmental Changes**, of this document addresses the short-term and irretrievable commitment of natural resources to ensure that the consumption is justified on a long-term basis. As summarized under Section 5.2, Project implementation would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these resource quantities for future generations or for other uses during the Project's life. However, use of such resources would be on a relatively small scale in a regional context. Although irreversible environmental changes would result from Project implementation, such changes would not be considered significant. In addition, the **Executive Summary**, identifies all significant and unavoidable impacts that could occur that would result in a short-term impact on the environment. There would be periodic, temporary, unavoidable significant noise impacts that would cease upon completion of construction activities. Lastly, **Section 5.3: Growth-Inducing Impacts of the Proposed Action**, identifies any long-term environmental impacts associated with economic and population growth that are associated with the Project. The Project would directly, but not indirectly, influence population growth in the City. Nor would the Project would remove obstacles to population growth through the construction or extension of major infrastructure facilities.

CUMULATIVELY CONSIDERABLE IMPACTS

Section 15065(a)(3) of the CEQA Guidelines states that "A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur: the project has potential environmental effects that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." Cumulative impacts are addressed in **Section 4.1** through **Section 4.15** of this EIR.

SUBSTANTIAL ADVERSE EFFECTS ON HUMAN BEINGS

As required by §15065(a)(4) of the State CEQA Guidelines, "A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur: the environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly." Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This standard relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could directly or indirectly affect human beings would be possible in all of the CEQA issue areas previously listed, those that could directly affect human beings include aesthetics, air quality, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, land use and planning, public services and utilities, transportation/traffic, water resources,

wildfire hazards, and climate change, all of which are addressed in the appropriate sections of this EIR and in the Initial Study; see Table of Contents for specific section numbers. The following topic area was determined to be significant and unavoidable with respect to adverse effects on human beings:

CONSTRUCTION NOISE

The Project's contribution to construction noise would be significant and unavoidable despite implementation of MM NOI-1.



6.0 ALTERNATIVES TO THE PROPOSED PROJECT

6.0 ALTERNATIVES TO THE PROPOSED PROJECT

Under the California Environmental Quality Act (CEQA), the identification and analysis of alternatives to a project is a fundamental part of the environmental review process. Public Resources Code (PRC) §21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is ... to identify alternatives to the project."

Direction regarding the definition project alternatives is further provided in State CEQA Guidelines §15126.6(a), as follows:

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.*

The State CEQA Guidelines emphasize that the selection of project alternatives be based primarily on the ability to reduce impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."[1] The State CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed.[2]

In selecting project alternatives for analysis, potential alternatives must pass a test of feasibility. State CEQA Guidelines § 15126.6(f)(1) states that:

> *Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site...*

Beyond these factors, State CEQA Guidelines require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. "If the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."[3] In addition, State CEQA Guidelines § 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible and discuss the reasons for their rejection.

The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. The range of potential alternatives to the proposed project shall also include those that could feasibly accomplish most of the basic objectives of the project and could

[1] State CEQA Guidelines §15126.6(b).

[2] State CEQA Guidelines §15126.6(f).

[3] State CEQA Guidelines §15126.6(e)(2).

avoid or substantially lessen one or more of the significant effects. An alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative need not be considered.

6.1 PROJECT SUMMARY

The Gardena Transit-Oriented Development Specific Plan ("GTODSP") Project ("Project") would be developed in the City of Gardena ("City"), approximately 8.8 miles southwest of downtown Los Angeles. The Project site is comprised of four lots on one 1.33-acre parcel (APN # 4060-004-039) on Crenshaw Boulevard south of West El Segundo Boulevard, at 12850 - 12900 Crenshaw Boulevard. The Project proposes to establish a maximum allowable development within the GTODSP area of up to 265 dwelling units (DU). A full Project description is provided in **Section 2.0: Project Description**.

6.2 PROJECT OBJECTIVES

The proposed Project objectives presented below are, as outlined, in **Section 2.5: Goals and Objectives**.

1. Diversify Gardena's existing multi-family housing options to serve the City's growing and evolving technology and creative sectors and aid in recruiting talent for these companies.
2. Balance job growth in the expanding technology and creative sector with new high-quality housing opportunities, enabling local employees to live close to where they work.
3. Cluster urban development near the Crenshaw Station, technology firms, and other large employment centers, providing City residents with the opportunity to live, work, and shop with less reliance on automobiles.
4. Establish multi-family development that meets high design standards and pursues environmental sustainability.
5. Allow for digital signage for off-site advertising, community programming and City/Applicant revenue sharing opportunities as a public benefit.
6. Redevelop a blighted, non-conforming site, increase tax revenues to the City, and create a catalyst for future development in the northern portion of Gardena.

6.3 PROJECT IMPACTS

6.3.1 PROJECT SIGNIFICANT AND UNAVOIDABLE IMPACTS

Per State CEQA Guidelines, only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed Project. As discussed throughout **Section 4.0: Environmental Analysis**, there would be a significant and unavoidable Project impact related to construction noise. There would be no other significant and unavoidable Project impact.

6.3.2 IMPACTS THAT CAN BE MITIGATED BELOW A LEVEL OF SIGNIFICANCE

Impacts associated with the following topics would be significant without implementation of mitigation measures, but would be reduced to a less-than-significant level if the mitigation measures identified in the EIR are implemented:

- Cultural Resources – cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines § 15065.5; disturb human remains
- Hazards and Hazardous Materials – create a significant hazard through reasonably foreseeable upset and accident conditions involving the release of hazardous materials
- Transportation – inadequate emergency access and construction traffic
- Tribal Cultural Resources – change in the significance of a tribal cultural resources

6.4 PROJECT ALTERNATIVES

The analysis presented below compares the potential environmental impacts associated with the following alternatives to impacts from the proposed Project:

- "No Project/No Construction" Alternative;
- "No Project/Existing Land Use Designation" Alternative;
- "No Digital Sign" Alternative; and
- "Reduced Density" Alternative.

Throughout the following analysis, the alternatives' impacts are analyzed for each environmental issue area, as examined in **Sections 4.1: Aesthetics** through **4.15: Utilities and Service Systems**. In this manner, each Alternative can be compared to the Project on an issue-by-issue basis. **Table 6-3: Comparison of Alternatives**, which is included at the end of this Section, provides an overview of the alternatives analyzed and a comparison of each Alternative's impacts in relation to the Project. This Section also identifies alternatives that were considered by the lead agency but were rejected as infeasible. **Section 6.6: Environmentally Superior Alternative**, references the "environmentally superior" Alternative, as required by the State CEQA Guidelines.

6.4.1 "NO PROJECT" ALTERNATIVE

Under State CEQA Guidelines § 15126.6(e), the specific Alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed Project with the impacts of not approving the proposed Project. The "no project" analysis is required to discuss the existing conditions (at the time the Notice of Preparation is published), as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

The discussion of the no project alternative usually proceeds along one of two lines. If the project is not a land use or regulatory plan, for example a development project on identifiable property, the "no project" alternative is the circumstance under which the project does not proceed. Here, the discussion would compare the environmental effects of the property remaining in its existing state against environmental

effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this "no project" consequence should be discussed. In certain instances, the no project alternative means "no build" wherein the existing environmental setting is maintained. However, where failure to proceed with the project would not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.

Therefore, two "no project" alternatives are analyzed below: the circumstance under which the Project does not proceed and the Project site remains in its existing state; and the circumstance under which the Project does not proceed, but the Project site is developed, based on current plans (i.e., Gardena General Plan (GGP) and Gardena Municipal Code Zoning Ordinance (GMC)) and consistent with available infrastructure and community services (what would reasonably be expected to occur in the foreseeable future, if the Project were not approved).

6.4.2 "NO PROJECT/NO CONSTRUCTION" ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The Project site is within a fully urbanized area comprised primarily residential, commercial, and industrial land uses, and roadways. Vegetation is primarily small patches of ornamental and ruderal (disturbed vegetation, weeds).

Exhibits 2-2 depicts the 1.33-acre Project site, which consists of an approximately 24,990-square-foot (SF), circa 1958, warehouse used to store both vintage cars and auto parts. **Table 2-1: Onsite and Surrounding Land Uses and Zoning**, summarizes the land uses that are present within the Project site and surrounding area.

The GGP designates the Project site as General Commercial, which provides for a wide range of larger-scale commercial uses to serve both the needs of the City and the region. The Zoning Map classifies the Project site as General Commercial Zone (C-3), which is consistent with the GGP. The C-3 Zone is intended for general commercial uses; see GMC Chapter 18.32, General Commercial Zone (C-3). GMC §18.32.00 identifies the C-3 Zone's permitted uses. Therefore, there is a light-industrial use on the Project site, which is a legal non-conforming use.

The No Project/No Construction Alternative would retain the Project site in its current condition. With this Alternative, the Project site's existing improvements would remain. None of the proposed Project improvements would be implemented. The following discussion evaluates the potential environmental impacts associated with the No Project/No Construction Alternative, as compared to impacts from the proposed Project.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Aesthetics

Under this Alternative, the site's visual character/quality would not be altered, as the proposed multi-family residential structure and digital sign would not be developed, and the existing land use would not be displaced. The existing landscape, including the blighted building and associated onsite parking, would not be removed or replaced with the proposed multi-family residential structure and digital sign. The Project site is a blighted property that is under significant deterioration and disrepair. The existing building

is dilapidated, and the property is inadequately maintained and devoid of all landscaping. Therefore, the property is an eyesore in the neighborhood. Additionally, the property does not conform to current development standards. The existing urbanized area comprised primarily of commercial, industrial, and residential land uses, and roadways would remain; therefore, these existing uses, along with the Project site's existing uses, would continue to be sources of light or glare and the existing onsite vertical features including buildings and structural massing would remain. Removal of the existing vertical features and sources of light and glare, and replacement with the multi-family residential structure and digital sign that would occur with the Project, would not occur under this Alternative. The Project's generation of light trespass and glare, which was concluded to be a less than significant impact, would not occur with this Alternative.

The No Project/No Construction Alternative would be neither environmentally superior nor inferior to the proposed Project regarding aesthetics/light and glare, because while the site's existing light and glare would not increase under this Alternative, the existing deteriorated and dilapidated structure would remain, continuing to be an eyesore in the neighborhood and not conforming to current development standards.

Air Quality

Short-term air quality impacts from demolition, grading, and construction activities associated with the proposed Project would not occur with the No Project/No Construction Alternative because the proposed Project development would not be constructed. The Project's construction-related emissions, which would be less than significant, would be avoided.

Project implementation would not exceed significance thresholds related to operational emissions. Similar to the proposed Project, with continuation of existing uses, there would be no emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation or result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment. As with the proposed Project, impacts would be less than significant under this Alternative.

The No Project/No Construction Alternative would be environmentally superior to the proposed Project regarding air quality impacts, because although the Project would not exceed short- or long-term thresholds, the existing conditions would generate less criteria pollutants than the proposed Project.

Cultural Resources

The Project would result in no impact to historical resources and less than significant impacts to as yet undiscovered archaeological resources, with mitigation incorporated. Under this Alternative, these potential Project impacts would be avoided, as no ground disturbing activities would occur. This Alternative would also avoid the Project's potential for disturbing human remains, which is concluded to be less than significant through compliance with the established regulatory framework and with mitigation incorporated.

The No Project/No Construction Alternative would be environmentally superior to the proposed Project regarding cultural resources. There would be no potential for impacting resources, since no ground disturbing activities would occur.

Energy

The Project's energy usage during construction associated with water usage, diesel fuel consumption, and gasoline consumption would not occur with this Alternative because the Project's construction activities would not occur. Project construction impacts, which would be less than significant, would not occur under this Alternative.

Project operations would consume electricity, natural gas, gasoline, and diesel fuel; however, would not substantially affect existing energy or fuel supplies or resources. The Project would be subject to compliance with applicable energy standards and new capacity would not be required. Under this Alternative, no change in operational electricity, natural gas, gasoline, or diesel fuel consumption would occur, as would occur with the proposed Project, and existing energy consumption and energy waste would remain at current levels.

The No Project/No Construction Alternative would be environmentally superior to the proposed Project regarding energy impacts because less long-term energy consumption would occur under this Alternative.

Paleontological Resources

Since no multi-family residential structure would be constructed, the No Project/No Construction Alternative would avoid the Project's potential for unique paleontological resources to be impacted from ground disturbing activities, which is concluded to be less than significant with mitigation incorporated for the proposed Project.

The No Project/No Construction Alternative would be environmentally superior to the proposed Project regarding paleontological resources. There would be no potential for impacting resources, since no ground disturbing activities would occur.

Greenhouse Gas Emissions

Short-term GHG emissions from demolition, grading, and construction activities associated with the proposed Project would not occur with the No Project/No Construction Alternative, because no land uses would be removed and the Project's proposed development would not be constructed. The Project's construction-related GHG emissions, which would be less than significant, would be avoided.

Project-related GHG emissions would increase compared to existing conditions through an increase in direct emissions, such as Project energy usage, water use, and waste disposal. The analysis found that Project GHG emissions would be 2,397 $MTCO_2e$/year, while the existing conditions would be 88 $MTCO_2e$/year less, at 2,309 $MTCO_2e$/year.

Although the No Project/No Construction Alternative would have no GHG emissions related to construction, per the SCAQMD recommended methodology, construction-related GHG emissions are amortized over a project's 30-year lifetime in order to include these emissions as part of a project's annualized lifetime total emissions. As discussed above, the Project-related GHG emissions would increase compared to existing conditions, even with the emissions reductions associated with the EV charging stations.

The Project's construction emissions and increase in operational GHG emissions would not occur under the No Project/No Construction Alternative. Therefore, the No Project/No Construction Alternative would just barely be environmentally superior to the proposed Project regarding GHG emissions.

Hazards and Hazardous Materials

The Project's construction-related impacts involving potential increased safety risk to workers due to the transport, handling, and disposal of hazardous materials and waste, and potential accidental release of hazardous materials or waste due to ground-disturbing activities, which were considered to be less than significant with mitigation incorporated, would be avoided with this Alternative, since no construction activities would occur. Similarly, the Project's potential construction-related impacts involving demolition of buildings or structures with asbestos or lead-based paint, which were considered to be less than significant with mitigation incorporated, would be avoided with this Alternative.

The No Project/No Construction Alternative would be environmentally superior to the proposed Project regarding hazards and hazardous materials, since no construction or ground disturbing activities would occur, and no buildings or structures would be demolished.

Hydrology and Water Quality

The No Project/No Construction Alternative would not result in short-term water quality impacts, since no construction activities would occur. The Project's less than significant short-term water quality impacts would be avoided with this Alternative.

Project implementation would decrease the existing peak flow rates due to increased infiltration through proposed underground infiltration basins and BMPs, and would not violate any water quality standards or waste discharge requirements. Surface drainage generally flows to the south through the Dominguez Watershed before out letting to the Port of Los Angeles. The No Project/No Construction Alternative's long-term hydrology and water quality impacts would be greater than the proposed Project, since the decrease the existing peak flow rates that would occur with the proposed Project would not occur under this Alternative.

The Project's potential construction-related impacts to groundwater would be less than significant, because excavation would be limited to a depth of approximately 8.0 feet below ground surface or less and it is not expected that groundwater would be encountered. Project implementation would decrease potential impacts to groundwater resources, as compared to existing conditions, through a decrease in impervious surfaces and increase in infiltration of stormwater runoff. Project impacts concerning demand for groundwater supplies would be less than significant. Under the No Project/No Construction Alternative, groundwater supplies would continue to be expended at a higher rate than the Project due to the larger amount of impervious surfaces and existing rate of infiltration, which would not benefit from the BMPs proposed by the Project.

The No Project/No Construction Alternative would be environmentally inferior to the proposed Project regarding hydrology and water quality, since no increase in infiltration of stormwater runoff or decrease in impervious surfaces would occur.

Land Use and Planning

To accommodate the proposed multi-family residential structure, the Project would remove the approximately 24,990-SF warehouse used to store both vintage cars and auto parts. The proposed GTOD Specific Plan would replace the Project site's existing C-3 zoning. However, the Project would not conflict with the General Commercial designation or C-3 zoning, and was determined to result in a less than significant impact. The No Project/No Construction Alternative would retain the Project site in its current

condition - none of the existing land uses would be removed and no the multi-family residential structure would be constructed. To implement the Project, the Applicant would require several discretionary permits/approvals, including a General Plan Amendment and Zone Change, among others; see **Section 2.6: Agreements, Permits, and Approvals**). The No Project/No Construction Alternative would not require any discretionary permits/approvals. However, there is a light-industrial use on the Project site, which is a legal non-conforming use that would remain.

The No Project/No Construction Alternative would be environmentally inferior to the proposed Project regarding land use. Although no discretionary permits/approvals would be required for this Alternative, it would allow an existing non-conforming use to remain on the Project site.

Noise

The Project's construction-related noise impacts would be significant and unavoidable despite implementation of mitigation requiring a temporary noise barrier. The Project's construction-related vibration impacts would be less than significant. Under the No Project/No Construction Alternative, no new land uses would be constructed. Therefore, this Alternative would avoid the Project's construction-related noise and vibration impacts.

Table 4.10-1: Existing Ambient Noise Levels identifies the existing ambient noise levels (L_{eq}). Because there would be no new development under this Alternative, no new operational noise would be generated. However, under the No Project/No Construction Alternative, existing noise levels, which are estimated to be less than the proposed Project's, would continue.

Project implementation would result in less than significant impacts from operational and off-site traffic noise sources. Although off-site roadway traffic noise impacts would increase, the estimated noise increases are considered negligible and the Project's off-site traffic noise impacts associated with the Project would be less than significant.

As shown in **Table 4.10-10: Composite Noise Impacts**, the composite noise level, which accounts for onsite Project-related noise sources such as mechanical equipment, parking facility, and outdoor uses, would be below the 50.0 dBA significance thresholds.

The No Project/No Construction Alternative would be environmentally superior to the proposed Project regarding noise. Although the Project's increase in off-site roadway traffic noise impacts related to the proposed Project would be negligible, and the Project's long term operational impacts resulting from the proposed Project would be less than those resulting from the No Project/No Construction Alternative, the Project's construction-related noise impacts would be significant and unavoidable and would be avoided Under the No Project/No Construction Alternative.

Population and Housing

Under the No Project/No Construction Alternative, the Project site would remain in its present condition and the proposed residential Project would not be developed. As with the proposed Project, this Alternative would not induce substantial unplanned population growth or displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. The No Project/No Construction Alternative would not generate any new jobs, involve the development of additional housing, or cause increases in the City's resident population.

The Project would construct 265 DUs. As shown in **Table 4.11-4**, the City's draft RHNA allocation is 5,721 units, thus, the Project would meet approximately 5 percent of the City's 6th cycle RHNA allocation and 10 percent of the above-moderate allocation. Under this Alternative, no DUs would be added, thus, the City would be required to find other candidate housing sites suitable for these DUs. Instead, this Alternative would retain the Project site's existing industrial development. The No Project/No Construction Alternative would be environmentally inferior to the proposed Project regarding housing and population impacts. This Alternative's would continue to be inconsistent with the underlying GGP designation and thus forecasted in planning documents, it would not be in furtherance of the City meeting its 6th Cycle RHNA allocation.

Public Services and Recreation

The Project's construction-related activities would temporarily increase the demand for fire, police, and medical services in and near the Project site due to the potential increased hazards associated with construction and demolition activities and use of materials. The No Project/No Construction Alternative would avoid these Project impacts, since no construction activities would occur. Additionally, the Project would displace non-residential land uses with a multi-family residential use, with resultant increases in population and demands for fire, police, medical, schools, and library services, as well as parks and recreational facilities. The No Project/No Construction Alternative would retain the existing land uses, with no increase in population or demand for these services and facilities.

The No Project/No Construction Alternative would be environmentally superior to the proposed Project regarding impacts to public services and recreational facilities, since increases in demands for police, fire, medical, schools, and library services and recreational facilities would not occur.

Transportation

Project construction would result in less than significant impacts concerning emergency access, with mitigation incorporated. This Alternative would not result in any construction activities; thus, emergency access would remain unchanged during construction.

The Project would improve hazards related to geometric design features over the No Project/No Construction Alternative. Under existing conditions, the site is accessed by six curb cuts. The Project would consolidate the multiple curb cuts, reducing the numerous motorist-motorist and motorist-pedestrian/cyclist conflict points that currently exist.

Project operations met two of the three screening criteria for VMT under the City VMT screening guidelines. The Project is a TOD use, with bicycle parking, reduced vehicular parking, nine bus stops within one quarter of a mile, and the Green Line Station located less than one mile north of the Project site. This Alternative would maintain the Project site's industrial development, which would not benefit from this surrounding infrastructure compared to the Project.

The No Project/Existing Land Use Designation Alternative would be environmentally inferior to the proposed Project regarding transportation impacts. Under this Alternative, the Project's TOD use would not occur; instead this Alternative involves maintaining the industrial land use.

Tribal Cultural Resources

The Project would result in less than significant potential impacts to as yet undiscovered tribal cultural resources, with mitigation incorporated. Under this Alternative, these potential Project impacts would be avoided, as no ground disturbing activities would occur.

The No Project/No Construction Alternative would be environmentally superior to the proposed Project regarding tribal cultural resources. There would be no potential for impacting tribal cultural resources, since no ground disturbing activities would occur.

Utilities and Service Systems

The No Project/No Construction Alternative would avoid the Project's temporary increased demand upon utilities and service systems during construction. Project operations would generate demands for more water, and increased wastewater and solid waste generation. The No Project/No Construction Alternative would retain the Project site in its current condition. With this Alternative, the site's existing land uses would remain.

The No Project/No Construction Alternative would be environmentally superior to the proposed Project regarding impacts to utilities and service systems, since increases in demands for utilities and service systems would not occur.

ABILITY TO MEET PROJECT OBJECTIVES

The No Project/No Construction Alternative would not meet any of the Project objectives, as identified above.

6.4.3 "NO PROJECT/EXISTING LAND USE DESIGNATION" ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The Project constitutes a development project on identifiable property. Thus, in this instance, the "no project" alternative is the circumstance under which the Project would not proceed, but the existing environmental conditions would not be preserved. The Project site is wholly within the City. The Project site is zoned C-3 (General Commercial). The maximum allowable Floor-Area-Ratio for the C-3 zone is 0.5.[4] The Project site is 1.33 acres (57,935 SF), thus, the maximum allowable development on the Project site is 28,967 SF of commercial uses. Therefore, this Alternative would demolish the existing 24,990 SF of industrial uses and in its place construct up to 28,967 SF of commercial uses.

The Project site is occupied by a building that could be redeveloped consistent with the underlying zoning. Thus, the "No Project/Existing Land Use Designation" Alternative discussed below assumes development of the Project site consistent with the GGP allowed density and intensity. **Table 6-1: Comparison of Development Between the Project and the No Project/Existing Land Use Designation Alternative**, presents the existing land use designation, along with maximum development capacities, according to GGP/GMC provisions, for the Project site. This Alternative assumes that the existing use would be demolished and replaced with a new commercial use up the maximum allowable development capacity.

[4] City of Gardena. 2013. Land Use Plan. Page LU-12. Retrieved from: https://www.cityofgardena.org/wp-content/uploads/2016/04/generalplan2.pdf

As indicated in **Table 6-1**, the No Project/Existing Land Use Designation Alternative would result in 28,967 SF of commercial development. Therefore, this Alternative would demolish the existing 24,990 SF of industrial uses and in its place construct up to 28,967 SF of commercial uses. It is assumed that the remainder of the Project site would be developed with associated surface parking.

Table 6-1: Comparison of Development Between the Project and the No Project/ Existing Land Use Designation Alternative

Description	Multi-Family Residential (DU)[1]	Commercial (SF)[1]
Existing Conditions (CEQA Baseline)	0	24,990
Proposed Project	265	0
Difference between Project and Existing Conditions	*+265*	*-24,990*
No Project/Existing Land Use Designation Alternative	0	28,967
Difference between Project and No Project/Existing Land Use Designation Alternative	*-265*	*+28,967*

Notes:
1. DU = dwelling units; and SF = square feet.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Aesthetics

Under this Alternative, the Project's TOD use would not be constructed. This Alternative assumes redevelopment of the existing blighted industrial use; the existing 24,990 SF industrial use and associated surface parking would be removed and replaced with a new commercial land use and ancillary improvements. With this Alternative, the degree of visual alteration would be less than with the Project because this Alternative involves proportionately less development of substantially less height (35 feet,[5] compared to 100 feet under the Project). Additionally, this Alternative would conform to current development standards.

The existing urbanized area comprised primarily of commercial, industrial, and residential land uses, and roadways would remain unchanged. The proposed commercial use would be a source of light or glare similar to the existing condition. The replacement of existing vertical features and sources of light and glare with the proposed Project, namely, an eight-story TOD with digital sign, would not occur under this Alternative. The Project's increase in light and glare, which was concluded to be a less than significant impact, would not occur with this Alternative, since no eight-story light sources or display would be constructed. The Project's impacts involving light and glare were concluded to be less than significant. New light sources would be introduced with this Alternative, however, to a lesser degree than with the Project, since this Alternative involves commercial land uses, with nominal change in floor area from existing conditions.

The No Project/Existing Land Use Designation Alternative would be environmentally superior to the proposed Project regarding aesthetics/light and glare, as new light/glare would be introduced to a lesser degree than with the Project and it would conform to current development standards.

[5] As noted in Gardena Municipal Code Section 18.32.050(c)

Air Quality

Short-term air quality impacts from demolition, grading, and construction activities associated with the proposed Project would not occur with the No Project/Existing Land Use Designation Alternative. However, under this Alternative, short-term emissions would occur from construction-related activities associated with Project site redevelopment. The Project's construction-related emissions would be less than significant. This Alternative's construction-related air quality impacts would be less than with the proposed Project, given that this Alternative would construct up to only 28,967 SF of commercial uses, which is significantly less floor area than proposed under the Project.

Project implementation would result in less than significant operational air quality impacts. As shown in **Table 4.2-6**, Project emissions would result in incrementally greater emissions than existing conditions. With the No Project/Existing Land Use Designation Alternative, emissions would likely be less than the Project during operations.

The No Project/Existing Land Use Designation Alternative would be environmentally superior to the proposed Project regarding air quality impacts, as less air quality impacts would occur during construction and operations.

Cultural Resources

The Project would result in no impact to historical resources and less than significant impacts to as yet undiscovered archaeological resources, with mitigation incorporated. These potential Project impacts would occur also with this Alternative, as site redevelopment would result in similar ground disturbing activities. The Project's potential to disturb as yet undiscovered human remains, which is concluded to be less than significant through compliance with the established regulatory framework and with mitigation incorporated, would be similar with this Alternative.

The No Project/Existing Land Use Designation Alternative would be neither environmentally superior nor inferior to the proposed Project regarding cultural resources. Given similar development footprint within the Project site and ground disturbing activities, there would be a similar potential to impact as yet undiscovered resources.

Energy

The energy usage during construction associated with water usage for dust control, diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption from on-road worker commute and vendor trips would be less with the No Project/Existing Land Use Designation Alternative, since less construction activities would occur.

Project implementation would result in less than significant impacts concerning energy. Total electricity, natural gas, diesel, and gasoline used during Project operations would total less than 0.01% of the County's usage; see **Section 4.4**. Under this Alternative, substantially less electricity usage would occur, as no digital sign would be built and proportionately less development would occur. Natural gas, diesel, and gasoline usage would also be less compared to the Project, as this Alternative would result in fewer vehicle trips (see Transportation analysis below).

The No Project/Existing Land Use Designation Alternative would be environmentally superior to the proposed Project regarding energy impacts, as energy usage would occur during construction and operations.

Paleontological Resources

The Project would result in less than significant potential impacts to paleontological resources, with mitigation incorporated. These potential Project impacts would occur also with the No Project/Existing Land Use Designation Alternative, as site redevelopment would result in similar ground disturbing activities.

The No Project/Existing Land Use Designation Alternative would be neither environmentally superior nor inferior to the proposed Project regarding paleontological resources, given it would involve a similar development footprint within the Project site and ground disturbing activities.

Greenhouse Gas Emissions

Project-related GHG emissions would increase compared to existing conditions. Since the commercial land use associated with the No Project/Existing Land Use Designation Alternative is unknown, it is unknown if this Alternative would also increase existing GHG emissions. This Alternative would however increase GHG emissions from construction activities due to site redevelopment, although, to a lesser degree than the Project given less floor area would be constructed.

The No Project/Existing Land Use Designation Alternative would be neither environmentally superior nor inferior to the proposed Project regarding GHG emissions, since construction GHG emissions would be emitted under both alternatives. However, as previously noted, the commercial land use type associated with this Alternative is unknown; therefore, it's unknown if there would be a decrease or increase from new commercial use operations, whereas emissions would increase with the proposed Project.

Hazards and Hazardous Materials

The Project's potential construction-related impacts involving increased safety risk to workers due to the transport, handling, and disposal of hazardous materials and waste, which were considered to be less than significant with mitigation incorporated, would be similar with this Alternative, as construction activities would still occur. Similarly, the Project's potential construction-related impacts involving demolition of buildings or structures with asbestos or lead-based paint, which were considered to be less than significant with mitigation incorporated, would be similar with this Alternative.

Project operations would result in less than significant impacts concerning a significant hazard to the public, with mitigation incorporated. This Alternative may require similar mitigation concerning the Project site's historic use, as this Alternative would replace an industrial use with a commercial use. A similar number of persons could be adversely affected by accidental upset or accident conditions concerning hazardous materials, because both Alternatives would increase the number of persons to the Project site.

The No Project/No Construction Alternative would be neither environmentally superior nor inferior to the proposed Project regarding hazards and hazardous materials, because an increased number of people could be adversely affected by accidental upset or accident conditions concerning hazardous materials under this Alternative, as compared to existing conditions.

Hydrology and Water Quality

The No Project/Existing Land Use Designation Alternative would result in short-term impacts to water quality similar to the proposed Project, as the existing use would be demolished and the Project site

redeveloped. The less than significant short-term water quality impacts that would occur with the Project would occur also with this Alternative.

Project implementation would reduce the rate and amount of stormwater runoff, improve runoff quality, and decrease impervious surfaces on the Project site. Under this Alternative, it is presently unknown if stormwater runoff rate or quality would improve or remain at existing conditions. However, it is assumed that, through compliance with the established regulatory framework and best management practices, this Alternative would result in similar beneficial effects to hydrology and water quality.

The No Project/Existing Land Use Designation Alternative would be neither environmentally superior nor inferior to the proposed Project regarding hydrology and water quality, since construction and operations impacts would be similar.

Land Use and Planning

As indicated in **Table 6-1**, this Alternative involves replacing the existing 24,990 SF industrial use with an approximately 29,000 SF commercial use, resulting in a net increase of approximately 3,967 SF of commercial floor area. This Alternative would not add any DUs. Displacement of the existing use and construction of a new commercial use and associated surface parking are discussed below.

The Project was concluded to be consistent with the GGP plans and goals adopted for the purpose of avoiding or mitigating an environmental effect; see **Table 4.9-1: Gardena General Plan 2006 Consistency**. Development proposed under this Alternative would be required to demonstrate consistency with the relevant plans and policies.

The land use consistency issues associated with the Project's proposed residential uses and off-site uses were concluded to be less than significant. No GGP or GMC amendments would occur with the Alternative. The No Project/Existing Land Use Designation Alternative impacts would be similarly less than significant because the additional industrial land uses would generally be a continuation of an existing industrial use. However, potential impacts would be evaluated through the established City development review processes, and would be subject to compliance with the established regulatory framework, including the GGP and GMC standards.

The No Project/Existing Land Use Designation Alternative would be environmentally superior to the proposed Project regarding land use consistency. The proposed Project would be consistent with applicable policies and would not result in conflicts with mitigation incorporated. However, this Alternative would propose land uses consistent with underlying GGP land use designation and zoning, and would not require any General Plan or Zoning amendments.

Noise

Although construction noise is not considered a significant impact, due to the length of construction, the height of the building, and the proximity to the nearest noise receptor, Project construction noise has been identified as a significant unavoidable impact, despite mitigation incorporated. The Project's construction-related vibration impacts would be less than significant. Construction-related short-term noise impacts from stationary and mobile sources and vibration impacts would also occur with the No Project/Existing Land Use Designation Alternative, although to a lesser degree than with the Project due to less overall development and a shorter construction phase. This Alternative's construction-related noise impacts would be less than with the proposed Project, since proportionately less construction would

occur. The maximum allowable development on the Project site under this Alternative is 28,967 SF of commercial uses, which is less floor area than the residential development proposed for this Project. Therefore, this Alternative's construction impacts would be less than the proposed Project.

Project implementation would result in less than significant impacts from mobile noise sources. This Alternative would also be anticipated to result in less than significant impacts from mobile noise sources. However, given the type of commercial land use development under this Alternative is unknown, impacts that could occur as this Alternative are considered equivalent to that of the Project.

The No Project/Existing Land Use Designation Alternative would be environmentally superior to the proposed Project regarding noise and vibration. The Project's significant unavoidable impact concerning construction noise would most likely be lessened or avoided under this Alternative. Operational impacts are considered equivalent when compared to the Project, as the commercial land use development under this Alternative is unknown.

Population and Housing

The Project would increase population through development of 265 DUs, replacing the existing industrial use. Under this Alternative, this population increase would not occur, rather this Alternative would redevelop the existing industrial use, resulting in additional industrial space. Therefore, this Alternative would not induce population growth in the area. Because this Alternative assumes development consistent with the GGP, as presented in **Table 6-1**, it would not exceed the growth forecasts from the relevant planning documents. Therefore, as with the Project, this Alternative would result in less than significant impacts involving population growth.

The Project would construct 265 DUs. As shown in **Table 4.11-4**, the City's draft RHNA allocation is 5,721 units, thus, the Project would be in furtherance of meeting the City's 6th cycle RHNA allocation and 10 percent of the above-moderate allocation. Under this Alternative, no DUs would be added, thus, the City would be required to find other candidate housing sites suitable for these DUs. Instead, this Alternative would redevelop the Project site with additional industrial development.

The No Project/Existing Land Use Designation Alternative would be environmentally inferior to the proposed Project regarding population and housing. Although this Alternative's development would be consistent with the underlying GGP designation and thus forecasting in planning documents, it would not be in furtherance of the City meeting its 6th cycle RHNA allocation.

Public Services and Recreation

Construction-related activities associated with the Project could temporarily increase the demand for fire, police, and medical services in and near the Project site due to the potential increased hazards associated with construction and demolition activities and use of materials. The No Project/Existing Land Use Designation Alternative would result in similar impacts as the Project, although to a lesser degree, given less construction activities would occur.

The Project would construct 265 DUs with a proportionate increase in population and demand for fire, police, medical, schools, and library services, as well as parks and recreational facilities. The No Project/Existing Land Use Designation Alternative would retain the existing land use designation and zoning, with no increase in population or corresponding demands for public services and recreational

facilities. Rather, under this Alternative, additional commercial development would occur with proportionately less increase in demand for public services and recreational facilities.

The No Project/Existing Land Use Designation Alternative would be environmentally superior to the proposed Project regarding impacts to public services and recreational facilities. Under this Alternative, no increase in population with corresponding demands for public services and recreational facilities would occur, with only slight demands associated with industrial uses.

Transportation

Project construction would result in less than significant impacts concerning emergency access, with mitigation incorporated. This Alternative would result in less construction activities, thus, would have less potential to impact emergency access during construction.

Project operations met two of the three screening criteria for VMT under the City VMT screening guidelines. The Project is a TOD use, with bicycle parking, reduced vehicular parking, nine bus stops within one quarter of a mile, and the Green Line Station located less than one mile north of the Project site. This Alternative would redevelop the Project site with new commercial development, which would benefit from this surrounding infrastructure to a lesser degree than the Project.

The No Project/Existing Land Use Designation Alternative would be environmentally inferior to the proposed Project regarding transportation impacts. Under this Alternative, the Project's TOD use would not necessarily occur; instead this Alternative involves increasing commercial land uses.

Tribal Resources

The Project would result in no impact to historical resources and less than significant impacts to as yet undiscovered tribal cultural resources, with mitigation incorporated. These potential Project impacts would occur also with this Alternative, as site redevelopment would result in similar ground disturbing activities.

The No Project/Existing Land Use Designation Alternative would be neither environmentally superior nor inferior to the proposed Project regarding tribal cultural resources. Given similar development within the Project site and ground disturbing activities, there would be a similar potential to impact as yet undiscovered resources.

Utilities and Service Systems

The No Project/Existing Land Use Designation Alternative would generate temporary increased demands upon utilities and service systems during construction. Construction utility demand would be proportionately less compared to the Project, given proportionately less construction activities would occur.

Project operations would increase demand for water and wastewater use, solid waste generation, and electricity and natural gas consumption. Under the No Project/Existing Land Use Designation Alternative, the site's existing land uses would be replaced with a new commercial use consistent with the underlying zoning. This would result in an additional approximately 3,967 SF of commercial uses on the Project site, thus, a proportionate increase demand for water and wastewater use, solid waste generation, and electricity and natural gas consumption relative to existing conditions. However, compared to the Project, this increase would be substantially less given this Alternative's size and scale.

The No Project/Existing Land Use Designation Alternative would be environmentally superior to the proposed Project regarding impacts to utilities and service systems given less increased demands for utilities and service systems would occur.

ABILITY TO MEET PROJECT OBJECTIVES

The No Project/Existing Land Use Designation Alternative would not meet any of the Project objectives, as identified above.

6.4.4 "No Digital Sign" ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The No Digital Sign Alternative would be identical to the Project, except that it would exclude the approximately 2,500 SF digital sign on the building's north face. All other Project components would remain unchanged. All Project impacts would remain unchanged, except concerning aesthetics, energy, and greenhouse gas emissions, as discussed below.

Aesthetics

With this Alternative, the degree of visual alteration during construction would be the same as the Project, because this Alternative involves the same construction activities.

During operations, this Alternative would result in less light and glare, as the Project given the Project's digital sign would not occur under this Alternative. All other Project operational impacts would remain the same.

The No Digital Sign Alternative would be environmentally superior to the proposed Project regarding aesthetics/light and glare, as the digital sign's light/glare would not occur under this Alternative.

Energy

With this Alternative, the energy usage during construction would be the same as the Project, because this Alternative involves the same construction activities.

During operations, this Alternative would result in less energy usage, as the Project given the Project's digital sign would not occur under this Alternative. All other Project operational impacts would remain the same.

The No Digital Sign Alternative would be environmentally superior to the proposed Project regarding energy, as the digital sign's energy usage would not occur under this Alternative.

Greenhouse Gas Emissions

With this Alternative, the greenhouse gas emissions during construction would be the same as the Project, because this Alternative involves the same construction activities.

During operations, this Alternative would result in less greenhouse gas emissions, as the Project given the Project's digital sign would not occur under this Alternative. Thus, the greenhouse gas emissions attributable to electricity would be less under this Alternative. All other Project operational impacts would remain the same.

The No Digital Sign Alternative would be environmentally superior to the proposed Project regarding greenhouse gas emissions, as the digital sign's electricity usage would not occur under this Alternative.

Land Use and Planning

As discussed above, this Alternative would include construction of the up to 265 dwelling units; however, the digital Sign would not be incorporated into the Project design. Because the digital Sign would not be included, no GMC amendments concerning the digital sign would be required with the Alternative. Therefore, this Alternative is environmentally superior to the proposed Project regarding land use and planning.

ABILITY TO MEET PROJECT OBJECTIVES

The No Digital Sign Alternative would accomplish all the Project's objectives described in **Section 6.2**, except that it would not allow for digital signage, which communicates community programming and shares revenue with the City. Per State CEQA Guidelines 15126.6(c), an Alternative must demonstrate it meets the Project's "basic" objectives. This Alternative successfully meets almost all of the Project's basic objectives.

6.4.5 "REDUCED DENSITY" ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The "Reduced Density" Alternative assumes development of the Project site similar to the proposed Project, however, it proposes a reduced density compared to the Project on the same Project site. The DUs would be reduced to 168 DUs and the building height would be reduced to six stories. This would eliminate one level of parking and approximately 22 feet from the height for a total height of approximately 78 feet. This Alternative would include partially-underground parking and an approximately 50 percent reduction in digital sign area, which would result in a reduction in monetary benefit to the City. **Table 6-2** compares development under the Project and the Reduced Density Alternative.

Table 6-2: Comparison Between Proposed Project and Reduced Density Alternative

Description	Single-Family Res. (DU)[1]	Density	Height of Building (Stories)	Vehicle Parking Spaces
Proposed Project	265	199 DU/AC	8	267
Reduced Density Alternative	168	126 DU/AC	6	173
Difference	*-97*	*-63 DU/AC*	*-2*	*-94*
% Difference	*-36%*	*-36%*	*-25%*	*-35%*
Note: DU = dwelling units; and AC = acre.				

IMPACT COMPARISON TO THE PROPOSED PROJECT

Aesthetics

Under this Alternative, the site's visual character/quality would be altered similar to the Project, since the existing use would be removed and replaced with a TOD use and other ancillary improvements. With this

Alternative, the degree of visual alteration during construction would be slightly less than with the Project, because this Alternative involves less construction activities.

This Alternative would be two stories less than the Project as shown in **Table 6-2**. This Alternative would construct 97 fewer DU, thus, aesthetic impacts from light and glare would be proportionately less under this Alternative compared to the Project. Additionally, the digital sign would be proportionately smaller under this Alternative. As with the Project, this Alternative would result in less than significant light and glare impacts.

The Reduced Density Alternative would be environmentally superior to the proposed Project regarding aesthetics/light and glare. This Alternative would construct fewer DUs and a smaller sign, thus, proportionately less light/glare would be generated.

Air Quality

Short-term air quality impacts from demolition, grading, and construction activities associated with the proposed Project also would occur with the Reduced Density Alternative, as demolition and construction would occur, although to a slightly lesser degree. The Project's construction-related emissions would be less than significant. This Alternative's construction-related air quality impacts would be slightly less than with the proposed Project, given that this Alternative involves a reduced density.

The Project's operational emissions would also occur with this Alternative. However, proportionately less operational emissions would occur compared to the Project, as there would be fewer DUs.

The Reduced Density Alternative would be environmentally superior to the proposed Project regarding air quality impacts. Less short-term construction emissions and long-term operational emissions would occur under the Reduced Density Alternative than the Project.

Cultural Resources

The Project would result in no impact to historical resources and less than significant impacts to as yet undiscovered archaeological resources, with mitigation incorporated. The Project's potential to disturb as yet undiscovered human remains was concluded to be less than significant through compliance with the established regulatory framework and with mitigation incorporated. These potential Project impacts would occur also with this Alternative, as the same Project site would be fully developed and similar ground-disturbing activities would occur.

The Reduced Density Alternative would be neither environmentally superior nor inferior to the proposed Project regarding cultural resources. Since the development footprint would remain the same, potential impacts to as yet undiscovered resources would be the same as the Project.

Energy

The energy usage during construction associated with water usage for dust control, diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption from on-road worker commute and vendor trips would be slightly less with the Reduced Density Alternative than with the Project, since less construction activities would occur.

Project implementation would result in less than significant impacts concerning energy usage. This Alternative would similarly result in less than significant impacts concerning energy usage. However,

proportionately less energy usage would occur under this Alternative than under the Project, given this Alternative would construct 97 fewer DUs.

The Reduced Density Alternative would be environmentally superior to the proposed Project regarding energy impacts, as less energy usage would occur under this Alternative compared to the Project.

Paleontological Resources

The Project would result in less than significant potential impacts to paleontological resources, with mitigation incorporated. These potential Project impacts would occur also with the Reduced Density Alternative, as site redevelopment would result in similar ground disturbing activities involving the same development footprint.

The Reduced Density Alternative would be environmentally equal to the proposed Project regarding paleontological resources, given this Alternative involves the same development footprint.

Greenhouse Gas Emissions

Project-related GHG emissions would be less than significant. Since this Alternative would construct fewer DU, incrementally less GHG emissions would occur with this Alternative during construction. These residential uses would continue to generate vehicle trips and corresponding GHG, but during operations, this Alternative would generate proportionately less GHG as fewer DU would be constructed.

The Reduced Density Alternative would be environmentally superior to the proposed Project regarding GHG emissions, since fewer DU would occur.

Hazards and Hazardous Materials

The Project's potential construction-related impacts involving increased safety risk to workers due to the transport, handling, and disposal of hazardous materials and waste, which were considered to be less than significant, would be slightly less with this Alternative, since less construction would occur. The Project's potential construction-related impacts involving demolition of buildings or structures with asbestos or lead-based paint, which were considered to be less than significant with mitigation incorporated, would be the same under this Alternative.

The Project's potential operational impacts from transport, handling, and disposal of hazardous materials and waste would similar with this Alternative, although slightly less due to fewer DU.

The Reduced Density Alternative would be environmentally superior to the proposed Project regarding hazards and hazardous materials since less construction activities would occur.

Hydrology and Water Quality

The Reduced Density Alternative would result in short-term impacts to water quality, similar to the proposed Project although to a slightly lesser degree, since less construction activities would occur. The less than significant short-term water quality impacts that would occur with the Project would occur also with this Alternative.

Project implementation would decrease the rate and amount of stormwater runoff, improve its quality, and reduce impervious surfaces. The Project's potential long-term hydrology and water quality impacts, which were concluded to be less than significant, would be the same under this Alternative.

The Reduced Density Alternative would be neither be environmentally superior nor inferior to the proposed Project regarding hydrology and water quality, since the same reductions to runoff, impervious surface, and improvements to water quality would occur.

Land Use and Planning

The Reduced Density Alternative assumes similar development as the Project; however, this Alternative would construct 97 fewer DU, as indicated in **Table 6-2**. Comparatively, this Alternative proposes approximately 36 percent less residential development.

The Project was concluded to be consistent with the GGP policies and plans and GMC standards. This Alternative would similarly be consistent with GGP policies and plans and GMC standards.

The land use consistency issues associated with the Project's proposed land uses and on- and off-site uses were concluded to be less than significant. The Reduced Density Alternative's impacts involving land use consistency would be similar to the Project, as land use type would occur.

The Reduced Density Alternative would be neither environmentally superior nor inferior to the proposed Project regarding land use and planning. The same use would occur on the Project site and be similarly consistent with the GGP policies and plans.

Noise

Construction noise associated with the Project would result in a significant unavoidable impact, despite mitigation incorporated. The Project's construction-related vibration impacts would be less than significant. Construction-related short-term noise impacts from stationary and mobile sources and vibration impacts would occur also with the Reduced Density Alternative, as new development would occur. This Alternative's construction-related noise impacts would be slightly less than the proposed Project, given this Alternative involves less dense development. However, it is likely that construction impacts under this Alternative would still be significant and unavoidable.

Project implementation would result in less than significant impacts from mobile noise sources. This Alternative would also be anticipated to result in less than significant impacts from mobile noise sources, however, proportionately less impacts would occur as this Alternative would generate fewer trips than the Project.

The Reduced Density Alternative would be environmentally superior to the proposed Project regarding noise impacts, given less construction and operational noise would occur compared to the Project, although the Project's significant unavoidable construction impacts would occur also under this Alternative.

Population and Housing

The Project would increase population through providing 265 DUs, replacing the existing industrial use. Under this Alternative, this population increase would be less, as 97 fewer DUs would be constructed. Therefore, this Alternative would result in less population growth in the area.

The Project would construct 265 DUs. As shown in **Table 4.11-4**, the City's draft RHNA allocation is 5,721 units, thus, the Project would be in furtherance of meeting the City's 6th cycle RHNA allocation and 10 percent of the above-moderate allocation. Under this Alternative, fewer DUs would be added, thus,

would also be in furtherance of meeting the City's 6th cycle RHNA allocation, although to a lesser degree than the Project.

The Reduced Density Alternative would be environmentally inferior to the proposed Project regarding population and housing, as less DUs would be constructed under this Alternative.

Public Services and Recreation

Project construction-related activities would increase the demands for fire, police protection, and medical services. Similar construction activities would occur under this Alternative, thus, there would be similar construction-related demand for these services.

The Project would construct 265 DUs with a proportionate increase in population and demands for fire, police, medical, schools, and library services, as well as parks and recreational facilities. The Reduced Density Alternative would result in 97 fewer DUs, resulting in proportionately less demand for these public services and recreational facilities, as the Project.

The No Project/Existing Land Use Designation Alternative would be environmentally superior to the proposed Project regarding impacts to public services and recreational facilities, as fewer DUs would be constructed, resulting in less demand for public services and recreational facilities.

Transportation

Project construction would result in less than significant impacts concerning emergency access, with mitigation incorporated. This Alternative would result in less construction activities, thus, would have less potential to impact emergency access during construction.

Project operations met two of the three screening criteria for VMT under the City VMT screening guidelines. The Project is a TOD use, with bicycle parking, reduced vehicular parking, nine bus stops within one quarter of a mile, and the Green Line Station located less than one mile north of the Project site. This Alternative would similarly be a TOD use and be screened from further VMT analysis under the same criteria as the Project.

The No Project/Existing Land Use Designation Alternative would be neither environmentally superior nor inferior to the proposed Project regarding transportation impacts. This Alternative would similarly be a TOD use and be screened from further VMT analysis.

Tribal Resources

The Project would result in less than significant impacts to as yet undiscovered tribal cultural resources, with mitigation incorporated. These potential Project impacts would occur also with this Alternative, as similar ground-disturbing activities would occur.

The Reduced Density Alternative would be neither environmentally superior nor inferior to the proposed Project regarding tribal cultural resources. Since the development footprint would remain the same, potential impacts to as yet undiscovered resources would be the same as the Project.

Utilities and Service Systems

The Reduced Density Alternative would generate temporary increased demands upon utilities and service systems during construction, to a slightly lesser degree than the Project, given fewer DU would be

constructed. During operations, this Alternative would result in proportionately less demand upon utilities and service systems, as the Project.

The Reduced Density Alternative would be environmentally superior to the proposed Project regarding impacts to utilities and service systems. With this Alternative, there would be less demand upon utilities and service systems during construction and operations.

ABILITY TO MEET PROJECT OBJECTIVES

The Reduced Density Alternative would fulfill all the Applicant's objectives. This Alternative would diversify Gardena's existing multi-family housing options, balance job-growth by providing high-quality housing near employment centers, and establish environmentally-sustainable multi-family development that meets high design standards. However, because this Alternative proposes 97 fewer DUs (36 percent less) than the Project, this Alternative would not accomplish these objectives, to the same degree as the Project. This Alternative would cluster urban development near employment centers and allow for a scaled-down digital signage, which communicates community programming and shares revenue with the City, but the revenue to the City would be reduced.

6.5 ALTERNATIVES CONSIDERED, BUT REJECTED

In accordance with State CEQA Guidelines § 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the State CEQA Guidelines, among the factors that may be used to eliminate alternatives from detailed consideration are the Alternative's failures to meet most of the basic project objectives, the Alternative's infeasibility, or the Alternative's inability to avoid significant environmental impacts.

In addition to the four alternatives analyzed above, an "Avoid Construction Noise Impact" Alternative was considered but rejected. The "Avoid Construction Noise Impact" Alternative would reduce the Project size and density to avoid the Project's significant unavoidable construction noise impact.

To avoid the Project's significant and unavoidable construction-related noise impact, analysts considered noise during construction phases and whether these noise levels could be reduced by reducing the development footprint under the Avoid Noise Impact Alternative. As shown in **Table 4.10-3**, the City's exterior noise limit for residential uses during daytime is 55 dBA. As shown in **Table 4.10-5**, Project construction noise levels would vary between 61.2 dBA (paving/landscaping) to 75.5 dBA (grading). The Project would include a temporary noise barrier to reduce construction noise by 10 dBA. However, despite this mitigation, given demolition and grading would occur under the Avoid Construction Noise Impact Alternative regardless of density, the separation needed to decrease this Alternative's noise to below the City's exterior noise limit for residential uses would render the site nearly undevelopable. Therefore, the Avoid Construction Noise Impact Alternative was rejected because, to avoid the Project's significant and unavoidable construction noise impact, the development would be of such small density and scale that it would render the site nearly undevelopable, thus, it would not be practical and would not accomplish the Project's objectives.

An "Alternative Site" Alternative was also considered but rejected given that the Applicant does not have interest in any alternative site within the City- and most notably, none that would be situated near public transit (i.e., near the Crenshaw Station), such as the Project site.

6.6 "ENVIRONMENTALLY SUPERIOR" ALTERNATIVE

According to State CEQA Guidelines § 15126.6(e)(2), "*No Project" Alternative*, "If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." **Table 6-3**: **Comparison of Alternatives**, summarizes the comparative analyses presented above (i.e., the Alternatives compared to the proposed Project). As indicated in **Table 6-3**, the environmentally superior Alternative is the No Project/No Construction Alternative. Among the other Alternatives, the Reduced Density Alternative is the environmentally superior Alternative. As shown in **Table 6-3**, it would be environmentally superior to the proposed Project for various resource areas analyzed, excluding population and housing, for which it would be environmentally inferior to the Project, and excluding cultural resources, hydrology and water quality, land use and planning, transportation, and tribal cultural resources, for which it would be neither environmentally superior nor inferior to the Project. However, this Alternative would not eliminate the only unavoidable significant impact of construction noise and would not achieve the objectives to the same level as the proposed Project.

Table 6-3: Comparison of Alternatives

Sections	Alternative 6.4.1: No Project/ No Construction	Alternative 6.4.2: No Project/ Existing Land Use Designation	Alternative 6.4.3: No Digital Sign	Alternative 6.4.4: Reduced Density
Aesthetics	=	⮟	⮟	⮟
Air Quality	⮟	⮟	=	⮟
Cultural Resources	⮟	=	=	=
Energy	⮟	⮟	⮟	⮟
Paleontological Resources	⮟	=	=	=
Greenhouse Gas Emissions	⮟	=	⮟	⮟
Hazards & Hazardous Materials	⮟	=	=	⮟
Hydrology & Water Quality	⮝	=	=	=
Land Use & Planning	⮝	⮟	⮟	=
Noise*	⮟	⮟	=	⮟**
Population & Housing	⮝	⮝	=	⮝
Public Services & Recreation	⮟	⮟	=	⮟
Transportation	⮝	⮝	=	=
Tribal Cultural Resources	⮟	=	=	=
Utilities & Service Systems	⮟	⮝	=	⮟

⮝ Indicates an impact that is greater than the proposed Project (environmentally inferior).
⮟ Indicates an impact that is less than the proposed Project (environmentally superior).
= Indicates an impact that is equal to the proposed Project (neither environmentally superior nor inferior).
* Indicates a significant unavoidable impact.
** Impact would still be significant.

Table 6-4: Alternatives Ability to Meet Project Objectives

Would the Alternative:	Alternative 6.1.1: No Project/No Construction	Alternative 6.1.2: No Project/ Existing Land Use Designation	Alternative 6.2: No Digital Sign	Alternative 6.3: Reduced Density
Diversify Gardena's existing multi-family housing options to serve the City's growing and evolving technology and creative sectors and aid in recruiting talent for these companies?	No	No	Yes	Yes – but to a lesser degree
Balance job growth in the expanding technology and creative sector with new high-quality housing opportunities, enabling local employees to live close to where they work?	No	No	Yes	Yes – but to a lesser degree
Cluster urban development near the Crenshaw Station, technology firms, and other large employment centers, providing City residents with the opportunity to live, work, and shop with less reliance on automobiles?	No	No	Yes	Yes – but to a lesser degree
Establish multi-family development that meets high design standards and pursues environmental sustainability?	No	No	Yes	Yes
Allow for digital signage for off-site advertising, community programming and City/Applicant revenue sharing opportunities as a public benefit?	No	No	No	Yes - but to a lesser degree
Redevelop a blighted, non-conforming site, increase tax revenues to the City, and create a catalyst for future development in the northern portion of Gardena?	No	No	Yes	Yes

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7.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

7.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA provides that an EIR shall focus on the significant effects on the environment, discussing the effects with emphasis in proportion to their severity and probability of occurrence. The environmental topics dismissed in an Initial Study (Environmental Checklist) as clearly not significant and unlikely to occur need not be discussed further in the EIR unless information inconsistent with the Environmental Checklist findings is subsequently received.

California Public Resources Code (PRC) §21100 (c) states that an EIR shall contain a statement briefly indicating the reasons that a project's various possible significant effects were determined not to be significant and were, therefore, not discussed in detail in the Draft EIR (PRC §21000 et. seq.). State CEQA Guidelines §15128 adds, "Such a statement may be contained in an attached copy of an Initial Study (Environmental Checklist)" (14 CCR 15000 et. seq.). The environmental topics included in the Initial Study (Environmental Checklist) prepared with the Notice of Preparation (NOP) included determination of potential impact significance. The Draft EIR further evaluates all of the Project's possible significant effects in accordance with the State CEQA Guidelines. Where the Initial Study determined that Project would have a "less than significant impact" or "no impact," these threshold issues have not been addressed in the EIR, except to be listed in this section. "The following identifies the threshold and a discussion of why the "less than significant impact" or "no impact" determination was reached. The Initial Study is included in **Appendix A** of this EIR.

7.1 AESTHETICS

7.1a Would the project have a substantial adverse effect on a scenic vista?

No Impact. Under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly-valued landscape for the public's benefit. No such conditions exist on or near the Project site. Additionally, the Gardena General Plan (GGP) does not specifically address scenic vistas. Therefore, the Project would not have an adverse effect on a scenic vista. No impact would occur.

7.1b 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 area surrounding the Project site is predominately developed, with no natural landforms or scenic features. There are no State- or County-designated scenic highways in the vicinity of the Project site.[1][2] Therefore, the Project would not damage scenic resources within a state scenic highway.

[1] California Department of Transportation. (2017). *California Scenic Highway.* Retrieved from https://www.arcgis.com/home/item.html?id=f0259b1ad0fe4093a5604c9b838a486a.

[2] City of Gardena. (2005). *Final Environmental Impact Report City of Gardena General Plan 2006*. Appendix A: NOP and Initial Study. Retrieved from https://www.cityofgardena.org/wp-content/uploads/2020/04/General-Plan-Update-2006-Final-EIR.pdf.

7.2 AGRICULTURE AND FORESTRY RESOURCES

7.2a 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?

7.2b Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

7.2c Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?

7.2d Would the project result in the loss of forest land or conversion of forest land to non-forest use?

7.2e 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. The Project site is developed with an approximately 24,990-SF auto parts warehouse building and parking lot. No properties in Gardena or Hawthorne are used for agriculture or contain forestry resources. Therefore, the Project would not result in the conversion or loss of farmland, forest land, or timberland. No Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance is mapped in Gardena or Hawthorne.[3] The Project site is not under a Williamson Act Contract.[4] The Project site is zoned C-3 Zone and no sites in either city have zoning for agricultural, forest land, or timberland uses.[5] Two parcels zoned Horticulture are 0.5 mile west of the Project; however, the Project would not result in the conversion of these parcels to a non-agricultural use directly or indirectly because the parcels are already used as an elementary school (Kornblum School). Therefore, the Project would not impact mapped farmland, Williamson Act contracts, or conflict with zoning that permits these uses. No impacts would occur.

7.3 BIOLOGICAL RESOURCES

7.3a 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 Game or U.S. Fish and Wildlife Service?

7.3b 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 Game or U.S. Fish and Wildlife Service?

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3 California Department of Conservation. (2016). *California Important Farmland Finder.* Retrieved from https://maps.conservation.ca.gov/dlrp/ciff/ (accessed November 2020).

4 California Department of Conservation. (2016). *Williamson Act/Land Conservation Act.* Retrieved from http://www.conservation.ca.gov/dlrp/lca (accessed November 2020).

5 City of Gardena. (January 2018). *Zoning Map*. Retrieved from https://www.cityofgardena.org/wp-content/uploads/2016/04/Zoning-D-2017.pdf (accessed November 2020).

7.3c 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 a fully developed property with no native biological resources on the site. The Project site is bordered by commercial and industrial uses to the north, commercial uses to the south, residential uses east of the Dominguez Flood Control Channel (Dominguez Channel) and Laguna Dominguez Trail (Dominguez Trail), and commercial and industrial uses to the west. No natural habitats are present on the abutting properties; only landscaping (i.e., ornamental vegetation) is present. Based on review of the existing and abutting site conditions, no candidate, sensitive, or special-status plant or wildlife species, riparian habitat or other sensitive natural community, or wetlands are present on or adjacent to the Project site. Therefore, the Project would not have an adverse effect on any candidate, sensitive, or special-status plant or wildlife species, riparian habitat or other sensitive natural community, or wetlands.

7.3d 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. Corridors are linear linkages between two or more habitat patches, which provide for wildlife movement and dispersal. As previously addressed, the Project site is fully developed and bordered by other urban land uses. There is no native habitat on the Project site or abutting areas. Vegetation is limited to landscaping (i.e., ornamental vegetation).

The Dominguez Channel is located immediately east of the Project site. There are no established wildlife movement corridors that traverse the Project site or within this segment of the Dominguez Channel, as described within the Los Angeles County General Plan.[6] This drainage is concrete-lined; thus, its habitat value in this urban area are low. Although the Dominguez Channel does not include habitat capable of supporting all requirements of a species, it could be used for wildlife movement. However, because Project construction activities would occur entirely on-site and would be restricted to daytime hours in accordance with the Gardena Municipal Code (GMC), the Project's potential construction-related impacts concerning interference with an established wildlife movement would be less than significant.

7.3e Would the project conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. GMC §13.60.080; *Permit*, requires a Trimming Permit, Tree Removal Permit, and/or a Tree Planting Permit for cutting, trimming, pruning, planting, removing, injuring, or interfering with any tree, shrub or plant upon any Street or Public Place of the City. The proposed Project would be developed on private property and no tree trimming or tree removal within any of the City's Streets or Public Places would occur as a result of Project construction. Therefore, the Project would not conflict with GMC §13.60.080.

[6] Environmental Sciences Associates. (2015). *Los Angeles County Flood Control District Enhanced Watershed Management Programs Draft Program Environmental Impact Report*. Retrieved from https://dpw.lacounty.gov/LACFCD/ewmppeir/docs/Entire%20Document.pdf (accessed November 2020).

7.3f Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project site is not located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the Project would not result in conflicts with such plans. No impact would occur.

7.4 GEOLOGY AND SOILS

7.4ai Would the project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving the 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.

No Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act requires the State Geologist to establish regulatory zones, known as "Alquist-Priolo (AP) Earthquake Fault Zones," around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet). The Project site is not located in an Alquist-Priolo Earthquake Fault Zone.[7] Additionally, no evidence exists of a known fault in or adjacent to the Project site. The Project would not expose people or structures to adverse effects involving rupture of a known earthquake fault. Therefore, no impact would occur.

7.4aii Would the project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving strong seismic ground shaking?

Less Than Significant Impact. The City is located between several active fault zones including the Newport-Inglewood-Rose Canyon Fault Zone, Puente Hills, and Palos Verdes Fault.[8] The zoned fault nearest the Project site is the Newport-Inglewood Fault zone, located 1.65 miles to the east. The Project site is in an area of high regional seismicity. Ground shaking originating from earthquakes along active faults in the region is expected to induce lower horizontal accelerations due to smaller anticipated earthquakes and/ or greater distances to other faults. The region has experienced shaking from several earthquakes recorded back to 1812. The nearest large historic earthquake is the 1941 Torrance-Gardena Earthquake, with an epicenter approximately 4.7 miles southeast of the Project site.[9] Historic earthquakes with magnitudes of greater than or equal to 6.0 and have been epicentered within approximately 32 miles of the Project site.

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7 California Department of Conservation. (2015). *Earthquake Zones Required Investigation Inglewood Quadrangle*. Retrieved from http://gmw.consrv.ca.gov/SHP/EZRIM/Maps/INGLEWOOD_EZRIM.pdf (accessed November 2020).

8 California Department of Conservation. (2015). *CGS Information Warehouse: Regulatory Maps*. Retrieved from http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps (accessed November 2020).

9 Southern California Earthquake Data Center. (2019). *Significant Earthquakes and Faults*. Retrieved from https://scedc.caltech.edu/significant/index.html (accessed November 2020).

The faults described above could cause moderate to intense ground shaking during the Project's lifetime. Additionally, the Project site has experienced earthquake-induced ground shaking in the past and can be expected to experience further shaking in the future. Therefore, Project implementation could expose people and structures to potential adverse effects involving strong seismic ground shaking. The intensity of ground shaking on the Project site would depend upon the earthquake's magnitude, distance to the epicenter, and geology of the area between the Project site and epicenter. Regulatory controls to address potential seismic hazards would be imposed on the Project through the permitting process.

Pursuant to GMC Chapter 15.04: *General Building Provisions*, the City has adopted the 2019 California Building Standards Code (CBSC), subject to certain amendments and changes, including those that address seismic resistance. CBSC design standards correspond to the level of seismic risk in a given location and are intended primarily to protect public safety and secondly to minimize property damage. The Project would be subject to compliance with all applicable regulations in the most recently published CBSC (as amended by GMC Chapter 15.04), which specifies design requirements to mitigate the effects of potential earthquake hazards. Moreover, the *Geotechnical Engineering Investigation Proposed Residential Complex* (Geotechnical Investigation) (Geotechnologies, Inc., Revised May 22, 2020), located in **Appendix 9.14: Geotechnical Data**, evaluated various geologic and seismic hazards based on site-specific parameters, including strong seismic ground shaking shrinkage, and subsidence. The *Geotechnical Investigation Conclusions and Recommendations* section makes recommendations concerning seismic design parameters, foundations, slabs, and general earthwork and grading, among other factors. The Geotechnical Investigation concludes Project construction is feasible from a geotechnical standpoint provided the Investigation's recommendations are followed and implemented during construction. A COA would be imposed on the Project requiring that the Applicant submit the Final Geotechnical Investigation for City review/approval and comply with its recommendations and any revisions deemed necessary by the City's Building Official. The Gardena Building Services Division would review construction plans to verify compliance with standard engineering practices, the GMC/CBSC, and the Geotechnical Investigation's recommendations. Following compliance with standard engineering practices, the established regulatory framework (i.e., GMC and CBSC), and the Geotechnical Investigation's recommendations, the Project's potential impacts concerning exposure of people or structures to potential adverse effects involving strong seismic ground shaking would be less than significant.

7.4aiii Would the project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburden pressure. When this occurs, the soil can completely lose its shear strength and enter a liquefied state. For liquefaction to occur, three criteria must be met: underlying loose, coarse-grained (sandy) soils, a groundwater depth of approximately 25 feet, and a potential for seismic shaking from nearby large-magnitude earthquakes. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

The Seismic Hazards Maps of the Inglewood Quadrangle by the State of California (CDMG, 1999) does not classify the Project site as part of the potentially "Liquefiable" area. This determination is based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial earthquake.

As part of the Geotechnical Investigation, a site-specific liquefaction analysis was performed following the *Recommended Procedures for Implementation of the California Geologic Survey Special Publication 117A, Guidelines for Analyzing and Mitigating Seismic Hazards in California*, and the EERI Monograph by Idriss and Boulanger. The liquefaction analysis indicated that the underlying soils would not be capable of liquefaction during the Maximum Considered Earthquake ground motion, as set forth by ASCE 7-16 Standards and the most recent California Building Code. Therefore, the Project's potential impacts concerning exposure of people or structures to potential adverse effects involving liquefaction would be less than significant. Further, as discussed in Response 7.4aii, the Gardena Building Services Division would review construction plans to verify compliance with standard engineering practices, the GMC/CBSC and the Geotechnical Investigation's recommendations. Following compliance with standard engineering practices, the established regulatory framework (i.e., GMC and CBSC), and the Geotechnical Investigation's recommendations, the Project's potential impacts involving adverse effects associated with seismic-related ground failure, including liquefaction, would be less than significant.

7.4aiv Would the project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving landslides?

No Impact. Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. According to the California Geological Survey's Earthquake Zones of Required Investigation Inglewood Quadrangle Map, the Project site does not lie in a landslide hazard zone.[10] Since the site is relatively flat and not within a landslide hazard zone, no potential for earthquake-induced land sliding would occur. Therefore, the Project would not directly or indirectly cause potential adverse effects involving landslides. No impact would occur.

7.5b Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The Project site is relatively flat, and its geology is composed of fill materials and native alluvial soils. Fill materials were encountered in all exploratory excavations, to depths ranging between 2.5 and 3.0 feet below the existing site grade. The fill consists of silty to clayey sand, sandy clay, and sandy silt, which are brown to dark brown in color, moist, medium dense and firm to stiff, fine to medium-grained, with variable amounts of gravel and construction debris fragments. The fill is underlain by native alluvial soils, consisting of sandy to clayey silts, sandy to silty clays, and silty to clayey sands and sands. The native alluvial soils range from light brown to dark brown and olive-brown to grayish dark brown in color, slightly moist to wet, medium dense to very dense, stiff to very stiff, and fine to medium-grained, with variable amounts of gravel.

Grading and earthwork activities during construction would expose soils to potential short-term erosion by wind and water. During construction, the Project would be subject to compliance with GMC §8.70.110.B.1: Development Construction, erosion and siltation control measures and the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, and all subsequent amendments) (Construction General Permit); see **Section 4.8: Hydrology and Water Quality**, which specifies that no Grading Permit shall be issued to construction projects that disturb 1.0 or more acres of soil without obtaining a *General Construction Activity Stormwater Permit* (GCASWP) from the State Water

[10] Ibid.

Resources Control Board. Following compliance with the established regulatory framework (i.e., the GMC and Construction General Permit), the Project's potential impacts concerning soil erosion and loss of topsoil would be less than significant.

7.4c 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?

7.4d 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. The Project site would not be subject to seismically-induced liquefaction or lateral spreading (see Response 7.5aiii) or landslides (see response 7.4aiv). The Geotechnical Investigation did not identify any potential for subsidence or collapse and concluded that the calculated settlements are expected to be within the tolerance of structures designed based on modern building codes. The Geotechnical Investigation also concluded onsite geologic materials are in the very low to low expansion range. The Expansion Index was found to be 10 and 28 for representative remolded bulk samples. The Geotechnical Investigation includes recommended reinforcing as detailed in the *Foundation Design and Slabs-On-Grade* sections. As discussed in response 7.4aii, the Geotechnical Investigation makes recommendations concerning design parameters, foundations, slabs, and general earthwork and grading, among other factors. The Gardena Building Services Division would review construction plans to verify compliance with standard engineering practices, the GMC/CBSC, and the Geotechnical Investigation's recommendations, including those concerning expansive soils. Following compliance with standard engineering practices, the established regulatory framework (i.e., GMC and CBSC), and the Geotechnical Investigation's recommendations, the Project would not create substantial direct or indirect risks to life or property concerning expansive soils. Therefore, impacts would be less than significant.

7.4e Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. Sewers would be available for disposal of Project-generated wastewater; see **Section 4.15: Utilities and Service Systems**. The Project would not utilize septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur.

7.5 HAZARDS AND HAZARDOUS MATERIALS

7.5c 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 in a fully urbanized area and it is not adjacent to any wildland. Therefore, the Project would not expose people or structures to a risk involving wildland fires. No impact would occur.

7.6 HYDROLOGY AND WATER QUALITY

7.6a In flood hazard, tsunami, or seiche zones, would the project result in the risk release of pollutants due to project inundation?

Less than Significant Impact. The Project site is in an area of minimal flood hazard.[11] Tsunamis are sea waves that are generated in response to large-magnitude earthquakes. When these waves reach shorelines, they sometimes produce coastal flooding. Seiches are the oscillation of large bodies of standing water, such as lakes, that can occur in response to ground shaking. The Project site is approximately eight miles east of the Pacific Ocean and there are no nearby bodies of standing water. Tsunamis and seiches do not pose hazards due to the Project site's inland location and lack of nearby bodies of standing water. The Project proposes a residential development that would involve the use of materials associated with routine property maintenance, such as janitorial supplies for cleaning purposes and/or herbicides and pesticides for landscaping. The Project site is not within a flood hazard, tsunami, or seiche zone; therefore, no risk of release of pollutants due to Project inundation would occur. Therefore, potential impacts associated with inundation by flood hazard, tsunami, or seiche would be less than significant.

7.6b Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact. The Southwest System is supplied by two active, Golden State Water Company (GSWC)-owned wells in the Central Basin, and 12 active, GSWC-owned wells in the West Coast Basin. GSWC monitors well capacity, status, and water quality.

In 2014, the California Sustainable Groundwater Management Act (SGMA) was passed, which provides authority for agencies to develop and implement Groundwater Sustainability Plans (GSPs) or alternative plans that demonstrate water basins are being managed sustainably.[12] Under the SGMA, the Central Basin and West Coast Basin are exempted from the requirement to form a Groundwater Sustainability Agency (GSA), since they are adjudicated basin.

The Central Basin adjudication limit (total of the allowed pumping allocations (APA) of each party) for groundwater extraction across the entire basin is 217,467 AFY. GSWC maintains an APA of 16,439 AFY. GSWC's APA is shared between all their systems that extract groundwater from the Central Basin. Three agencies, Los Angeles County Department of Public Works (LACDPW), Water Replenishment District of Southern California (WRDSC), and CBMWD, work with the water producers to ensure that the APA is available to the Central Basin's pumpers.

The West Coast Basin adjudication limit for groundwater extraction across the entire basin is 64,468 acre feet per year (AFY). The GSWC maintains legal rights to 7,502 AFY. Three agencies, Los Angeles County Department of Public Works (LACDPW), Water Replenishment District of Southern California (WRDSC), and West Basin Municipal Water District (WBMWD), collaborate with the groundwater producers such as

[11] Federal Emergency Management Agency. (April 2019). *FEMA Flood Map Service Center.* Retrieved from https://msc.fema.gov/portal/search?AddressQuery=1515%20W%20178th%20St%2C%20Gardena%2C%20CA%2090248#searchresultsanchor

[12] California SWRCB. (2020). *Groundwater Management Program*. Retrieved from https://www.waterboards.ca.gov/water_issues/programs/sgma/ (accessed November 2020).

GSWC to ensure that the allowed pumping allocations (APA) is available to be pumped from West Coast Basin wells.

GSWC currently operates 12 active wells in the Southwest System, 10 of which are in the West Coast Basin, and the remaining two are in the Central Basin. The Southwest System has a total normal year active well capacity of 10,865 gallons per minute (gpm) (17,525 AFY), of which 8,715 gpm (14,057 AFY) is in the West Coast Basin, and 2,150 gpm (3,468 AFY) is in the Central Basin.

Groundwater levels are managed within a safe basin operating range to protect the Los Angeles Basin's long-term sustainability and to protect against land subsidence. The Southwest System is supplied by two active, GSWC-owned wells in the Central Basin and 12 active, GSWC-owned wells in the West Coast Basin. The Central Basin's groundwater storage capacity is approximately 13.8 million AF. The storage capacity of the West Coast Basin's primary water producing aquifer, the Silverado aquifer, is estimated to be 6.5 million AF.

SGMA requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline. The latest basin prioritization project, SGMA 2019 Basin Prioritization, was completed in December 2019. SGMA 2019 Basin Prioritization identified 94 basins/sub-basins as medium or high priority. The Project site is in a very low priority basin.[13] Additionally, the Southwest System's water use in 2015 (most recent UWMP) was 87 gallons per capita per day (GPCD), well below the SBX7-7 2020 target of 121 GPCD. Further, the City would continue to comply with SBX7-7 requirements. Therefore, the Project would not conflict with or obstruct implementation of a sustainable groundwater management plan. Impacts would be less than significant.

7.7 LAND USE AND PLANNING

7.7a Would the project physically divide an established community?

No Impact. Examples of projects that could physically divide an established community include a new freeway or highway that traverse an established neighborhood. The Project proposes a TOD development consisting of up to 265 DUs. The Project replaces the existing industrial use and does not propose any new streets or other physical barriers, which could physically divide an established community. Given its nature and scope, the Project would not physically divide an established community. Therefore, no impact would occur.

[13] California Department of Water Resources. (2020). *SGMA Basin Prioritization Dashboard*. Retrieved from: https://gis.water.ca.gov/app/bp-dashboard/final/ (accessed November 2020).

7.8 MINERAL RESOURCES

7.8a Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

7.8b Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. The Surface Mining and Reclamation Act of 1975 (SMARA) requires classification of land into mineral resource zones (MRZs) according to the area's known or inferred mineral potential.[14] The Project site is located in Mineral Resource Zone-1 (MRZ-1). Areas designated MRZ-1 are noted to have adequate information that no significant[15] mineral deposits are present or it is judged that little likelihood exists for their presence.[16] Further, the GGP does not identify the Project site as a locally-important mineral resource recovery site. Therefore, the Project would have no impact on mineral resources.

7.9 NOISE

4.9a Would the project be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?

Less Than Significant Impact. See Impact 4.7-3. Hawthorne Airport is approximately 0.45 mile north of the Project site. Review of the Hawthorne Airport's Airport Influence Area Map indicates the Project site is outside of the Influence Area boundaries. Therefore, the Project would not expose people residing or working in the Project area to excessive airport- or airstrip-related noise levels. Impacts would be less than significant.

7.10 POPULATION AND HOUSING

7.10a Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project would not displace existing housing or require construction of replacement housing elsewhere, since no housing is located on the Project site. Therefore, no impact would occur.

7.11 WILDFIRE

7.11a Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. According to CalFire Fire Hazard Severity Zone Map for the City, the Project site is not in a State Responsibility Area. The Project site is in a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ)

[14] California Department of Conservation. (2018). *California Statutes and Regulations for the California Geological Survey.* Sacramento, CA: California Geological Survey.

[15] Note that use of the term "significant" in this context is used in the MRZ definitions of zones to describe economic value of mineral resources and does not refer to a level of impact under CEQA.

[16] California Department of Conservation. (2015). *CGS Information Warehouse: Regulatory Maps. Special Report 143, Plate 4-1.* Retrieved from http://maps.conservation.ca.gov/cgs/informationwarehouse/ (accessed November 2020).

within a local responsibility area.[17] Project design and site access would adhere to LACFD regulations and designs. Further, Project construction would not require the complete closure of any public or private streets during construction. Temporary construction activities would not impede use of the streets for emergencies or access for emergency response vehicles. Therefore, the Project would not result in inadequate emergency access. No impact would occur.

7.11b 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?

No Impact. As discussed above, the Project site is not within an area classified as VHFHSZ. Therefore, no impact would occur.

7.11c Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. As discussed above, the Project site is not within an area classified as VHFHSZ. The Project site is surrounded by development in an urbanized area of the City. The Project would tie into existing infrastructure that currently serves the Project site. Project implementation would not result in the construction, installation, or maintenance of new infrastructure that would exacerbate fire risk. No impact would occur.

7.11d 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. The Project site is not within an area classified as VHFHSZ. The Project site and surrounding vicinity are relatively flat. There are no known landslides near the site nor is the site in the path of any known or potential landslides. Therefore, the Project would expose people or structures to significant risks, as a result of runoff, post-fire slope instability, or drainage changes. No impact would occur.

[17] CalFire. (November 2007). *Los Angeles County FHSZ Map.* Retrieved from https://osfm.fire.ca.gov/media/7280/losangelescounty.pdf.

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8.0 LIST OF PREPARERS

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EXHIBIT B

FINAL

ENVIRONMENTAL IMPACT REPORT

SCH # 2020080305

GARDENA TRANSIT-ORIENTED DEVELOPMENT SPECIFIC PLAN PROJECT

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MARCH 2021

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1.0 INTRODUCTION

1.1. PUBLIC REVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

In accordance with State California Environmental Quality Act (CEQA) Guidelines §§ 15120 through 15132, the City of Gardena prepared a Draft EIR (DEIR) for the Gardena Transit-Oriented Development Specific Plan Project (SCH No. 2020080305). The DEIR was made available for review and comment to the public, responsible and trustee agencies, interested groups, and organizations for a 45-day period that occurred between January 15, 2021 and March 1, 2021. The DEIR was also made available directly to State agencies through the State Clearinghouse, Office of Planning and Research.

1.2. FINAL ENVIRONMENTAL IMPACT REPORT

Before approving a project, CEQA requires that the Lead Agency prepare and certify a Final Environmental Impact Report (FEIR). The contents of a FEIR are specified in State CEQA Guidelines § 15132, as follows:

(a) The draft EIR or a revision of the draft.

(b) Comments and recommendations received on the draft EIR either verbatim or in summary.

(c) A list of persons, organizations, and public agencies commenting on the draft EIR.

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

(e) Any other information added by the Lead Agency.

The FEIR allows the public and Lead Agency an opportunity to review DEIR revisions, the comments and responses, and other EIR components, such as the Mitigation Monitoring and Reporting Program (MMRP), before Project approval. The FEIR serves as the environmental document to support a decision on the proposed Project. This FEIR document consists of the following components:

- **Section 1.0: Introduction**,
- **Section 2.0: Comment Letters and Responses**,
- **Section 3.0: Errata to the DEIR**, and
- **Section 4.0: Mitigation Monitoring and Reporting Program**.

It is noted, none of the corrections/clarifications identified in this FEIR constitute "significant new information" pursuant to State CEQA Guidelines § 15088.5. The new information added merely clarifies/amplifies and makes insignificant modifications to the DEIR. The corrections/ clarifications do not involve changes in the Project or environmental setting, or significant new information. They do not result in a new impact or substantial increase in the severity of an environmental impact identified in the DEIR. No new or substantially different mitigation measures than those identified in the DEIR are required. Moreover, the new information does not affect the DEIR's overall conclusions. Therefore, recirculation of the DEIR is not warranted.

Pursuant to State CEQA Guidelines § 15090, prior to approving a project, the Lead Agency must certify that:

1. *The Final EIR has been completed in compliance with CEQA;*
2. *The Final EIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information in the Final EIR prior to approving the Project; and*
3. *The Final EIR reflects the Lead Agency's independent judgment and analysis.*

These certifications, or "Findings of Fact," are included in a separate *Findings* document. Both the FEIR and the Findings will be submitted to the Lead Agency for consideration of the proposed Project.

2.0 COMMENT LETTERS AND RESPONSES

2.1 LISTS OF PUBLIC AGENCIES, PERSONS, AND ORGANIZATIONS COMMENTING ON THE DEIR

In accordance with State CEQA Guidelines § 15132, the public agencies, and persons and organizations commenting on the DEIR are listed in **Table 2-1: List of Commenting Public Agencies and Persons and Organizations**. As indicated in **Table 2-1**, comments on the DEIR were received from three public agencies; however, no comments were received from persons or organizations.

TABLE 2-1: LIST OF COMMENTING PUBLIC AGENCIES AND PERSONS AND ORGANIZATIONS

No.	Date	Author	Author Title	Agency
Public Agencies				
1	02/25/21 (accessed)	Not applicable	Not applicable	State of California Governor's Office of Planning and Research State Clearinghouse and Planning Unit
2	02/09/21	Ronald M. Durbin	Chief, Forestry Division Prevention Services Bureau	County of Los Angeles Fire Department
3	02/25/21	Miya Edmonson	IGR/CEQA Branch Chief	State of California Department of Transportation, District 7
Persons and Organizations				
None				

2.2 COMMENT LETTERS AND RESPONSES

In compliance with State CEQA Guidelines § 15132, this Section includes all of the comments received on the DEIR, along with the City of Gardena's responses to significant environmental points raised by those comments. The comments are grouped according to author (i.e., Public Agencies, and Persons and Organizations). Each individual comment letter listed in **Table 2-1** is reproduced on the following pages. Each letter and the individual comments in each letter have been consecutively numbered for ease of reference. Following each comment letter, a response is provided for each comment raising substantive environmental issues. The responses are numbered and correlated to the bracketed and identified portions of each comment letter.

Responses may include text revisions to clarify or amplify information in the DEIR, as a result of environmental points issues in the comments, or as requested by the Lead Agency. A response to a comment requiring DEIR revisions presents the relevant DEIR text in a box, with deleted text indicated by ~~strike through~~ and added text indicated by <u>double underline</u>, as follows:

~~Deleted DEIR text~~	Added DEIR text

DEIR text revisions are also presented according to DEIR Section in **Section 3.0: Errata to the Draft EIR**.

Comment Letter 1

Gardena Transit-Oriented Development Specific Plan Project - Draft EIR

Summary

SCH Number	2020080305
Lead Agency	City of Gardena
Document Title	Gardena Transit-Oriented Development Specific Plan Project - Draft EIR
Document Type	EIR - Draft EIR
Received	1/14/2021
Present Land Use	The proposed Project would replace an approximately 24,900-square-foot existing auto parts warehouse and surface parking lot.
Document Description	The GTODSP Project proposes to create a Specific Plan allowing for the development of up to 265 dwelling units (DU) in a single building on a 1.33-acre site at a density of 200 DU/acre. The Project replaces an approximately 24,900-square-foot existing auto parts warehouse and surface parking lot. In addition to allowing multi-family housing, the Specific Plan would also allow short-term corporate housing within up to 10 percent of the dwellings at any given time. Access to/from the proposed building would be from a right-turn in/right-turn out at Crenshaw Boulevard. There would be 267 parking spaces within the parking garage. The proposed active and passive open space and amenities would total approximately 15,000 square feet. Additionally, an approximately 2,500-square-foot (60 feet high by 42 feet wide) digital display is proposed on the building's north side facing El Segundo Boulevard.
Contact Information	John F Signo City of Gardena Lead/Public Agency 1700 West 162nd Street Gardena , CA 90247 Phone : (310) 217-9530 jsigno@cityofgardena.org Din/Cal 4 Inc. Project Applicant

1-1

Location

Cities	Gardena
Counties	Los Angeles
Cross Streets	Crenshaw Blvd and West Segundo Boulevard
Zip	90249
Total Acres	1.33
Parcel #	4060-004-039
State Highways	105

Comment Letter 1

Notice of Completion

Review Period Start 1/15/2021

Review Period End 3/1/2021

Development Type Residential (Units 265, Acres 1.33)

Local Action General Plan Amendment | Specific Plan | Site Plan | Rezone

Project Issues Aesthetics | Agriculture and Forestry Resources | Air Quality | Biological Resources | Coastal Zone | Cultural Resources | Drainage/Absorption | Flood Plain/Flooding | Geology/Soils | Growth Inducement | Hazards & Hazardous Materials | Hydrology/Water Quality | Land Use/Planning | Mineral Resources | Noise | Population/Housing | Public Services | Recreation | Schools/Universities | Septic System | Sewer Capacity | Solid Waste | Transportation | Wildfire

Reviewing Agencies California Air Resources Board (ARB) | California Department of Conservation (DOC) | California Department of Fish and Wildlife, South Coast Region 5 (CDFW) | California Department of Forestry and Fire Protection (CAL FIRE) | California Department of Parks and Recreation | California Department of Transportation, District 7 (DOT) | California Department of Water Resources (DWR) | California Highway Patrol (CHP) | California Native American Heritage Commission (NAHC) | California Natural Resources Agency | California Regional Water Quality Control Board, Los Angeles Region 4 (RWQCB) | Office of Historic Preservation

Attachments

Environmental Document

- Gardena TOD SP_Summary_Form_for_Document_Submittal PDF 607 K
- GTOD Specific Plan DEIR_Public Review PDF 14244 K
- NOA GTODSP EIR_011121 PDF 380 K

NOC

- GTODSP DEIR NOC (E-Signed by Amanda) PDF 229 K

State Comments

- 2020080305_DOT Comment PDF 183 K

Disclaimer: The Governor's Office of Planning and Research (OPR) accepts no responsibility for the content or accessibility of these documents. To obtain an attachment in a different format, please contact the lead agency at the contact information listed above. You may also contact the OPR via email at state.clearinghouse@opr.ca.gov or via phone at (916) 445-0613. For more information, please visit OPR's Accessibility Site.

RESPONSE TO COMMENT LETTER NO. 1

State of California Governor's Office of Planning and Research, State Clearinghouse (SCH)
CEQAnet
Accessed February 25, 2021

1-1 This letter acknowledges that the State Clearinghouse submitted the DEIR to selected State agencies for review and that the DEIR review period closed on March 1, 2021. The comment states that the Lead Agency, City of Gardena, complied with the public review requirements for draft environmental documents pursuant to CEQA. As such, no further response is necessary.

Comment Letter 2

COUNTY OF LOS ANGELES
FIRE DEPARTMENT

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

"Proud Protectors of Life, Property, and the Environment"

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FIRE CHIEF
FORESTER & FIRE WARDEN

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HOLLY J. MITCHELL
SECOND DISTRICT

SHEILA KUEHL
THIRD DISTRICT

JANICE HAHN
FOURTH DISTRICT

KATHRYN BARGER
FIFTH DISTRICT

February 9, 2021

FEB 19

John Signo, Senior Planner
City of Gardena
Department of Community Development
1700 West 162nd Street
Gardena, CA 90247

Dear Mr. Signo:

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "GARDENA TRANSIT-ORIENTED DEVELOPMENT SPECIFIC PLAN" PROPOSES TO CREATE A SPECIFIC PLAN ALLOWING FOR THE DEVELOPMENT OF UP TO 265 SWELLING UNITS IN A SINGLE BUILDING ON A 1.33-ACRE SITE AT A DENSITY OF 200 DU/ACRE, THE PROPOSED BUILDING WOULD HAVE A MAXIMUM HEIGHT OF 90 FEET, INCLUDING 5.5 LEVELS OF RESIDENTIAL DEVELOPMENT OVER 2.5 LEVELS OF PARKING, LOCATED AT 12850-12900 CRENSHAW BOULEVARD, GARDENA, FFER 2021000488

2-1

The Notice of Availability of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

We have no comments.

2-2

For any questions regarding this response, please contact Kien Chin, Planning Analyst, at (323) 881-2404 or Kien.Chin@fire.lacounty.gov.

LAND DEVELOPMENT UNIT:

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

The proposed development has been submitted to the County of Los Angeles Fire Department's Fire Prevention, Engineering Section Building Plan Check Unit, Hawthorne Office for review and approval.

The corrections and comments provided to the applicant at this time have not changed. The applicant shall continue to work with Fire Prevention Engineering to satisfy all requirements issued by Fire Prevention Engineering Section Building Plan Check Review. (epicla.lacounty.gov, FEPC2020-0370). 2-3

The Fire Prevention Division, Land Development Unit has no additional comments regarding this project. The conditions that were addressed at the Fire Prevention, Engineering Section Building Plan Check Review have not changed at this time.

The County of Los Angeles Fire Department's Fire Prevention, Land development Unit appreciates the opportunity to comment on this project.

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department Land Development Unit's, Inspector Nancy Rodeheffer at (323) 890-4243.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

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

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade. 2-4

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

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

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

2-5

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

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

RMD:ac

RESPONSE TO COMMENT LETTER NO. 2
Ronald M. Durbin, Chief, Forestry Division, Prevention Services Bureau
County of Los Angeles Fire Department
February 9, 2021

2-1 This is an introductory comment briefly describing the Project and the County of Los Angeles Fire Department (LACFD) divisions that reviewed the environmental document. This comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary.

2-2 This comment states that the Planning Division has no comments on the DEIR and provides contact information for further communication. This comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary.

2-3 This comment provides the Land Development Unit's comments on the DEIR. The comment states that Project development must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants. As stated in DEIR **Section 4-12, Public Services and Recreation,** Page 4.12-4, the LACFD Fire Prevention Division has reviewed the Project and Site Plan and provided requirements regarding firefighter and fire truck access, water system, fire flow, fire hydrant type/location, building address numbers, etc., which would enhance the Project's fire protection. The comment notes that the corrections and comments provided to the Applicant have not changed. The Applicant is required to continue to work with Fire Prevention Engineering to satisfy all requirements issued by Fire Prevention Engineering Section Building Plan Check Review. It is noted, LACFD also reviewed the Project's NOP and provided Conditions of Approval of which the Project would be required to comply. The comment also provides contact information for further communication. This comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary.

2-4 This comment provides the Forestry Division's comments on the DEIR and details the Division's responsibilities within the LACFD. The comment summarizes the County's Oak Tree Ordinance and notes that field studies should be conducted if Oak trees are known to exist in the Project area and provides contact information for further communication. No oak trees are present on the Project site. As stated in DEIR **Section 7, Effects Found Not to Be Significant**, Page 7-3, the Project would not conflict with local policies or ordinances protecting biological resources, including tree preservation policies and ordinances. This comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary.

2-5 This comment states that the Health Hazardous Materials Division has no comments on the DEIR and provides contact information for further communication. This comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 266-3574
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

February 25, 2021

John F. Signo, AICP – Senior Planner
City of Gardena
1700 West 162nd Street
Gardena, California 90247

RE: Gardena Transit Oriented Development Specific Plan Project – Draft Environmental Impact Report (DEIR)
SCH# 2020080305
GTS# 07-LA-2020-03478
Vic. LA 105 PM R4.74

Dear John F. Signo,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Gardena Transit Oriented Development Specific Plan Project (GTODSP) proposes to create a Specific Plan allowing for the development of up to 265 dwelling units (DU) in a single building on a 1.33-acre site at a density of 200 DU/acre. The Project replaces an approximately 24,900-square-foot existing auto parts warehouse and surface parking lot. In addition to allowing multi-family housing, the Specific Plan would also allow short-term corporate housing within up to 10 percent of the dwellings at any given time. Access to/from the proposed building would be from a right-turn in/right-turn out at Crenshaw Boulevard. There would be 267 parking spaces within the parking garage. The proposed active and passive open space and amenities would total approximately 15,000 square feet. 3-1

Caltrans acknowledges and supports infill development that prioritizes nearby transit service, promotes active transportation, and provides a mixture of land uses that keep the goods and services people need in close proximity to where they work and live. Caltrans concurs with the GTODSP's design decisions that help achieve those objectives, such as:

- The removal of unnecessary curb cuts, reducing the number of potential conflict points between cars and people walking. 3-2
- The unbundling of motor vehicle parking spaces from the monthly cost of the project's residential rental units.
- The inclusion of at least one secure, long-term, bicycle storage space per residential unit.

After reviewing the DEIR, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities. If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2020-03478. 3-3

Sincerely,

Miya Edmonson

MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

RESPONSE TO COMMENT LETTER NO. 3

Miya Edmonson, IGR/CEQA Branch Chief
State of California Department of Transportation, District 7 - Office of Regional Planning
February 25, 2021

3-1 This comment introduces the California Department of Transportation (Caltrans) response and summarizes the Project. This comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary.

3-2 This comment states Caltrans concurs with the Project's design decisions, including the removal of unnecessary curbs, unbundling motor vehicle parking spaces from the cost of the Project's residential rental units, and inclusion of bicycle storage space per dwelling unit. This comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary.

3-3 This comment states that the Project is not expected to result in direst adverse impacts to existing State transportation facilities. The comment also provides contact information. This comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary.

3.0 ERRATA TO THE DRAFT EIR

The responses included in **Section 2.0: Comment Letters and Responses**, may include text revisions to clarify or amplify information in the DEIR, as initiated by the Lead Agency or due to environmental issues raised in the comment letters. Should a response to a comment require DEIR revisions, the relevant DEIR text is presented in a box, with deleted text indicated by ~~strike through~~ and added text indicated by double underlining, as shown in the following example:

~~Deleted DEIR text~~ Added DEIR text

The comments received (see **Section 2.0**) did not address the DEIR's adequacy or raise a significant environmental issue. Therefore, no revisions to the DEIR text were necessary.

4.0 PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

The California Environmental Quality Act (CEQA) requires that all public agencies establish monitoring and/or reporting procedures for mitigation adopted as conditions of approval in order to mitigate or avoid significant environmental impacts. This Mitigation Monitoring and Reporting Program (MMRP) has been developed to provide a vehicle by which to monitor mitigation measures (MMs) outlined in the Gardena Transit-Oriented Development Specific Plan Project ("Project") Environmental Impact Report (EIR). The Project MMRP has been prepared in conformance with Public Resources Code §21081.6 and City of Gardena ("City") monitoring requirements. Specifically, Public Resources Code §21081.6 states:

> (a) *When making findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:*
>
> *(1) The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.*
>
> *(2) The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.*

State CEQA Guidelines §15097 provides clarification of mitigation monitoring and reporting requirements and guidance to local lead agencies on implementing strategies. The reporting or monitoring program must be designed to ensure compliance during project implementation. The City of Gardena is the Lead Agency for the Project and is therefore responsible for ensuring MMRP implementation. The MMRP has been drafted to meet Public Resources Code §21081.6 requirements as a fully enforceable monitoring program.

The MMRP is comprised of the Mitigation Program and includes measures to implement and monitor the Mitigation Program. The MMRP defines the following for each MM:

- **Definition of Mitigation.** The Mitigation Measure contain the criteria for mitigation, either in the form of adherence to certain adopted regulations or identification of the steps to be taken in mitigation.

- **Responsible Party or Designated Representative.** Unless otherwise indicated, an applicant would be the responsible party for implementing the mitigation, and the City of Gardena or designated representative is responsible for monitoring the performance and implementation of the

mitigation measures. To guarantee that the mitigation will not be inadvertently overlooked, a supervising public official acting as the Designated Representative is the official who grants the permit or authorization called for in the performance. Where more than one official is identified, permits or authorization from all officials shall be required.

- **Time Frame.** In each case, a time frame is provided for performance of the mitigation or the review of evidence that mitigation has taken place. The performance points selected are designed to ensure that impact-related components of project implementation do not proceed without establishing that the mitigation is implemented or ensured. All activities are subject to the approval of all required permits from agencies with permitting authority over the specific activity.

The numbering system in the table corresponds with the IS/MND's numbering system. The MMRP table "Verification" column will be used by the parties responsible for documenting when the mitigation measure has been completed. The City of Gardena will complete ongoing documentation and mitigation compliance monitoring. The completed MMRP and supplemental documents will be kept on file at the City of Gardena Community Development Department.

GARDENA TRANSIT-ORIENTED DEVELOPMENT SPECIFIC PLAN PROJECT
MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
CULTURAL RESOURCES					
MM CUL-1: Inadvertent discovery of an Archaeological Resource. Before ground disturbing activities are initiated on the Project site, the construction personnel conducting the activities shall be notified of the potential for archaeological resources, and the protocols to be implemented in the event of a discovery. Ground disturbing work includes but is not limited to activities such as excavation, grading, digging, trenching, plowing, drilling, tunneling, stripping, and clearing where the ground disturbance exceeds 3.0 feet. In the event that an archaeological resource is observed during construction, all ground disturbing work in the immediate vicinity of the find should temporarily cease until a Qualified Archaeologist can evaluate the find as a historical resources pursuant to Public Resources Code (PRC) §5024.1 and California Code of Regulations Title 14, CEQA Guidelines §15064.5 of the CEQA Guidelines. A Qualified Archaeologist is one who meets the Secretary of the Interior Professional Qualification Standards in archeology. The Qualified Archaeologist or an archaeologist working under their direction would have the authority to stop or divert construction excavation elsewhere on the site while the find is being assessed. Upon discovery, the project proponent will notify the City of Gardena (the City). At the direction of the project proponent and in consultation with the City, the Qualified Archaeologist shall prepare plans for feasible mitigation of impacts to the find, pursuant to Section 15064.5 of the State CEQA Guidelines §15064.5.	Prior to any Ground Disturbance	Notification to Construction Personnel	General Contractor		
	During Construction, If an Archaeological Resource is Discovered	Archaeological Resource Evaluation	Qualified Archaeologist		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
GEOLOGY, SOILS, AND PALEONTOLGICAL RESOURCES					
MM GEO-1: Retain a Project Paleontologist and Prepare a Monitoring Plan: A Project Paleontologist shall prepare a Paleontological Resources Monitoring and Mitigation Plan (PRMMP). A Project Paleontologist is defined as one who meets the Society of Vertebrate Paleontology (SVP) standards for a Qualified Professional Paleontologist. The PRMMP shall conform to SVP standards and address the specifics of monitoring and procedures to follow in the event of a fossil discovery. The PRMMP shall include a repository agreement with an accredited paleontological repository, such as the Natural History Museum of Los Angeles County. The PRRMP shall also include a Worker's Environmental Awareness Program that shall describe the legal requirements for preserving fossil resources, procedures to follow in the event of a fossil discovery, and other relevant sections of the PRMMP. This training program shall be given to the crew before ground-disturbing work commences and shall include handouts to be given to new workers.	Prior to any Ground Disturbance	Prepare a Paleontological Resources Monitoring and Mitigation Plan	Community Development Director Paleontological Monitor		
MM GEO-2: Monitor for Paleontological Resources: Monitoring shall be conducted by a Paleontological Monitor, defined as one who meets the SVP standards for a Paleontological Resource Monitor. The Paleontological Monitor shall be under the supervision of the Project Paleontologist. As defined in the PRMMP, Paleontological monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments that occur in previously undisturbed sediment, which has been estimated as any portion of the Project site where excavation exceeds 0.9 m (3 .0 feet) in depth. The frequency of monitoring shall be based on consultation with or periodic inspection by the Project Paleontologist and shall depend on the rate of excavation and grading activities and the materials being excavated.	During Ground Disturbance	Paleontological Resources Monitoring	Paleontological Monitor		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
MM GEO-3: Evaluate and Treat Fossil Discoveries: In the event of a fossil discovery work shall cease in a 15-m (50-foot) radius of the find while the Project Paleontologist assesses the significance of the fossil and documents its discovery. Work outside this radius may continue. Should the fossil be determined significant, it shall be salvaged following the procedures and guidelines of the SVP and recommendations of the Project Paleontologist. Recovered fossils shall be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and reposited with the paleontological curation facility identified in the PRMMP. The Project Paleontologist shall prepare a report of the monitoring work and any findings after construction is completed.	During Construction, in the Event of a Fossil Discovery	Fossil Assessment	Project Paleontologist		
HAZARDOUS MATERIALS & WASTES					
MM HAZ-1: Prior to issuance of a Building Permit, the building plans shall include an impermeable vapor membrane (or equivalent). The building plans shall be submitted to the City for review and approval prior to commencement of construction activities. The impermeable vapor membrane shall not underlie non-slab areas, such as landscaping and the dog run area, because these spaces are not enclosed. The local Building Department would have oversight/sign-off responsibility for the vapor barrier.	Prior to Building Permit Issuance	Impermeable Vapor Membrane (or equivalent) Included in Building Plans	Community Development Director Building and Safety Department Chief Building Official		
MM HAZ-2: Prior to issuance of a demolition permit of the on-site structure, preparation of a construction management plan addressing procedures and requirements for responding to disturbance of undocumented contaminated soil shall be required. The construction management plan shall be submitted to the City for review and approval prior to commencement of construction activities.	Prior to Demolition Permit Issuance	Prepare a Construction Management Plan	Community Development Director		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
NOISE					
MM NOI-1: A temporary and impermeable sound barrier shall be constructed along the Project eastern property line prior to construction and shall remain during construction. The temporary sound barrier shall be a minimum of 8.0-feet high and shall have a minimum Sound Transmission Class rating of STC-25. The sound barrier must be designed to meet a minimum 10dB(A) attenuation.	Prior to and During Construction	Provide a Temporary and Impermeable Sound Barrier	Community Development Director		
TRANSPORTATION					
MM TRAN-1: Construction Transportation Plan: The contractor shall prepare a detailed Construction Transportation Plan (CTP) for the purpose of minimizing the impact of construction and construction traffic on adjoining and nearby roadways in close consultation with the City. The City shall review and approve the CTP before the contractor commences any construction activities. This plan shall address, in detail, the activities to be carried out in each construction phase, with the requirement of maintaining traffic flow during peak travel periods. Such activities include, but are not limited to, the routing and scheduling of materials deliveries, materials staging and storage areas, construction employee arrival and departure schedules, employee parking locations, and temporary road closures, if any. The CTP shall provide traffic controls pursuant to the California Manual on Uniform Traffic Control Devices sections on temporary traffic controls (Caltrans 2012) and shall include a traffic control plan that includes, at a minimum, the following elements: • Temporary signage to alert drivers and pedestrians to the construction zone. • Flag persons or other methods of traffic control. • Traffic speed limitations in the construction zone.	Prior to Construction	Prepare a Construction Transportation Plan	Community Development Director Public Works Director		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
• Temporary road closures and provisions for alternative access during the closure. • Detour provisions for temporary road closures—alternating one-way traffic would be considered as an alternative to temporary closures where practicable and where it would result in better traffic flow than would a detour. • Identified routes for construction traffic. • Provisions for safe pedestrian and bicycle passage or convenient detour. • Provisions to minimize access disruption to residents, businesses, customers, delivery vehicles, and buses to the extent practicable—where road closures are required during construction, limit to the hours that are least disruptive to access for the adjacent land uses. • Provisions for 24-hour access by emergency vehicles. • Safe vehicular and pedestrian access to local businesses and residences during construction. The plan shall provide for scheduled transit access where construction would otherwise impede such access. Where an existing bus stop is within the work zone, the design-builder shall provide a temporary bus stop at a safe and convenient location away from where construction is occurring in close coordination with the transit operator. Adequate measures shall be taken to separate students and parents walking to and from the temporary bus stop from the construction zone. • Advance notification to the local school district of construction activities and rigorously maintained traffic control at all school bus loading zones, to provide for the safety of schoolchildren. Review existing or planned Safe Routes to Schools with school districts and emergency responders to incorporate roadway modifications that					

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
maintain existing traffic patterns and fulfill response route and access needs during Project construction operations. • Identification and assessment of the potential safety risks of Project construction to children, especially in areas where the Project is located near homes, schools, daycare centers, and parks. • Promotion of child safety within and near the Project area. For example, crossing guards could be provided in areas where construction activities are located near schools, daycare centers, and parks. • CTPs would consider and account for the potential for overlapping construction projects.					
MM TRAN-2: Emergency Vehicle Access: Emergency vehicle access shall be maintained at all times to the construction worksite and adjacent businesses. Emergency vehicle access will be maintained at all times to and from fire stations, hospitals, and medical facilities near the construction site and along the haul routes. Construction activities, road closures, and lane closures will be coordinated with local law enforcement and fire department officials prior to implementation. The implementation of these measures would provide emergency vehicle access to the construction worksite and adjacent businesses and require that construction activities be coordinated with City law enforcement and fire department officials prior to implementation.	Prior to and During Construction	Include Specification in Construction Drawings; Coordinate Construction Activities, Road Closures, and Lane Closures	Community Development Director Los Angeles County Fire Department Fire Chief City of Gardena Police Department Chief of Police Public Works Director		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
TRIBAL CULTURAL RESOURCES					
MM TCR-1: Retain a Native American Monitor/Consultant: Prior to ground-disturbing construction activities, the Project Applicant shall retain and compensate for the services of a Tribal Monitor/Consultant who is ancestrally affiliated with the Project area, approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government, and listed under the Native American Heritage Commission's (NAHC) Tribal Contact list for the Project area. Applicant shall obtain this list from the NAHC. A Native American Monitor shall be retained by the Lead Agency or Project owner to be on-site to monitor all project-related, ground-disturbing construction activities (i.e., boring, grading, excavation, potholing, trenching, etc.). A monitor associated with one of the NAHC recognized Tribal governments, which have commented on the Project shall provide the Native American Monitor. The Monitor/Consultant shall only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The Tribal Monitor/Consultant shall complete daily monitoring logs that provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the Project site grading and excavation activities are completed, or when the Tribal Representatives and Monitor/Consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.	Prior to any Ground Disturbance During Construction Phases Involving Ground-Disturbing Activities	Contract a Tribal Monitor/Consultant Tribal Cultural Resources Monitoring & Complete Daily Monitoring Logs	Community Development Director Tribal Monitor/Consultant		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
MM TCR-2: Unanticipated Discovery of Tribal Cultural and Archaeological Resources: Upon discovery of any tribal cultural or archaeological resource, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All tribal cultural and archaeological resources unearthed by Project construction activities shall be evaluated by a qualified archaeologist and Tribal Monitor/Consultant; see MM TCR-8: Professional Standards below. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe requests preservation in place or recovery for educational purposes. Work may continue on other parts of the Project while evaluation and, if necessary, additional protective mitigation takes place (State CEQA Guidelines § 15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with State CEQA Guidelines § 15064.5(f) for historical resources.	During Construction, Upon Discovery of any Tribal Cultural or Archaeological Resource	Tribal Cultural/Archaeological Resource Assessment	Qualified Archaeologist/Tribal Monitor/Consultant		
MM TCR-3: Public Resources Code §21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. All tribal cultural resources shall be returned to the Tribe. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the	During Construction, If a Unique Tribal Cultural/Archaeological Resource is Discovered	Tribal Cultural/Archaeological Resource Assessment and Compliance with Public Resources Code §21083.2(b)	Qualified Archaeologist/Tribal Monitor/Consultant		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
archaeological material, they shall be offered to the Tribe or a local school or historical society in the area for educational purposes.					
MM TCR-4: Unanticipated Discovery of Human Remains and Associated Funerary Objects: Native American human remains are defined in PRC §5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC §5097.98, are also to be treated according to this statute. Pursuant to Health and Safety Code § 7050.5, any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the remains' nature. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC and PRC §5097.98 shall be followed.	During Construction, If Unanticipated Discovery of Human Remains and Associated Funerary Objects Occurs	Tribal Cultural/Archaeological Resource Assessment and Compliance with Public Resources Code §5097.98 and Health and Safety Code § 7050.5	Qualified Archaeologist/Tribal Monitor/Consultant		
MM TCR-5: Resource Assessment & Continuation of Work Protocol: Upon discovery of human remains, the Tribal and/or Archaeological Monitor/Consultant shall immediately divert work at a minimum of 150 feet from the discovery and place an exclusion zone around the discovery location**.** The Monitor/Consultant(s) shall then notify the Tribe, the qualified Archaeologist, and the construction manager who shall call the coroner. Work shall continue to be diverted, while the coroner determines whether the remains are human and subsequently Native American. The discovery shall be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner shall notify the NAHC as mandated by state law who shall then appoint a Most Likely Descendent (MLD).	During Construction, Upon Discovery of Human Remains	Tribal Cultural/Archaeological Resource Assessment, and Compliance with Public Resources Code §5097.98 and Health and Safety Code § 7050.5, and MM TCR-5 Requirements	Qualified Archaeologist/Tribal Monitor/Consultant		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
MM TCR-6: Kizh-Gabrieleno Procedures for burials and funerary remains: If the Gabrieleno Band of Mission Indians – Kizh Nation is designated MLD, the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.	During Construction, if an Unanticipated Discovery, and the Gabrieleno Band of Mission Indians – Kizh Nation is Designated Most Likely Descendant	Implement Koo-nas-gna Burial Policy	Tribal Monitor/Consultant		
MM TCR-7: Treatment Measures: If human remains/ceremonial objects are discovered, prior to continuation of ground disturbing activities, the landowner shall arrange a designated site location within the Project site footprint for the respectful reburial of the human remains/ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard shall be posted outside of working hours. The Tribe shall make every effort to recommend diverting the Project and keeping the remains in situ and protected. If the Project cannot be diverted, it may be determined that burials shall be removed. The Tribe shall work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery	During Ground Disturbing Activities, if Human Remains/ Ceremonial Objects are Discovered	Tribal Cultural/Archaeological Resource Assessment, and Compliance with Public Resources Code §5097.98 and Health and Safety Code § 7050.5, and MM TCR-7 Requirements	Qualified Archaeologist/Tribal Monitor/Consultant		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
purposes. Cremations shall either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains. Each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects, and objects of cultural patrimony shall be removed to a secure on-site container, if possible. These items shall be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the Project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.					
MM TCR-8: Professional Standards: Archaeological and Native American monitoring and excavation during construction shall be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.	During Construction	Compliance with Archaeological and Native American Monitoring and Excavation Professional Standards	Qualified Archaeologist/Tribal Monitor/Consultant		

RESOLUTION NO. 6508

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF GARDENA, CALIFORNIA AMENDING THE LAND USE PLAN OF THE CITY OF GARDENA GENERAL PLAN BY CHANGING THE LAND USE DESIGNATION OF THE 1.33 ACRE PROPERTY LOCATED AT 12850 – 12900 CRENSHAW BOULEVARD TO SPECIFIC PLAN AND MAKING MINOR TEXT CHANGES PRIMARILY RELATING TO SPECIFIC PLANS

(APN # 4060-004-039)

WHEREAS, on January 21, 2020, Din/Cal 4, Inc., filed an application for a General Plan Amendment to the Land Use Plan (the "General Plan Amendment"), Specific Plan, Zone Change, Zoning Code Amendment, Site Plan Review and lot merger to develop an apartment building with approximately 265 units on 1.33 acres located at 12850 – 12900 Crenshaw Boulevard (the "Property"); and

WHEREAS, it was subsequently determined that the development would also require a Development Agreement and that the lot merger should be a lot line adjustment; and

WHEREAS, the General Plan Amendment, Specific Plan, Zone Change, Zoning Code Amendment, Development Agreement, Site Plan Review, and Lot Line Adjustment are collectively referred to as the Project; and

WHEREAS, on April 6, 2021, the Planning Commission of the City of Gardena held a duly, noticed public hearing on the Project at which time it considered all evidence presented, both written and oral, after which it adopted PC Resolution No. 4-21, recommending that the City Council certify the Environmental Impact Report, adopt a Mitigation Monitoring and Reporting Program, make CEQA findings regarding mitigation measures and alternatives, adopt a statement of overriding considerations, and approve all the requested entitlements for the Project, with the exception of the Lot Line Adjustment which will be administratively approved at a later date; and

WHEREAS, on April 27, 2021, the City Council of the City of Gardena held a duly noticed hearing on the Project; and

WHEREAS, after the close of the public hearing and prior to adopting this Resolution, the City Council adopted Resolution No. 6507 certifying the EIR, adopting the Mitigation Monitoring and Reporting Program, making findings with regard to alternatives and mitigation measures; and adopting a statement of overriding considerations.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF GARDENA DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. The City Council of the City of Gardena does hereby find that the General Plan Amendment changing the land use designation of the Property to Specific Plan and amending the text of the Land Use Plan is in the public interest for the following reasons:

A. The General Plan Amendment will allow the development of a high-density, 265-unit, first-class apartment project in the north end of Gardena which will provide new and needed housing opportunities in the City. There have been very few apartment buildings developed over the past few decades and nothing of which provides the type of amenities being required under the Specific Plan.

B. The General Plan Amendment will allow development of an apartment complex which will satisfy approximately ten percent of the City's Regional Housing Needs Assessment (RHNA) allocation for above-moderate housing for the Sixth Cycle Housing Element.

C. The General Plan Amendment will allow a development which will provide needed housing to nearby employers in the City of Gardena as well as the City of Hawthorne and will encourage additional high-tech industries to locate in the area.

D. The General Plan Amendment will allow a development which will help revitalize a site that is blighted and does not meet current development standards, acting as a catalyst for other new development in the area.

E. The General Plan Amendment will allow development which will provide the following economic benefits to the City:

1. Increase the property taxes which the City will receive each year from the property by approximately $110,000.

2. Increase the amount of Utility User's Tax the City will receive each year by approximately $15,000.

3. A one-time residential impact fee payment of approximately $265,000.

4. An annual increase in the business license fees attributable to the operation of the apartment building by more than $2,500 each year.

5. One-time construction related fees in the amount of approximately $1,150,000 for business license taxes, permit, plan-check and inspection fees.

6. Creation of approximately 400 full- and part-time construction jobs. The payment to workers will lead to indirect economic benefits as these workers will spend money in the City.

7. General fund revenue in the approximate amount of $2,250,000 over 30 years from the digital display portion of the Project.

8. New residents with above-moderate income that will provide additional indirect economic benefits as they spend money in Gardena.

F. The General Plan Amendment implements Connect SoCal, the Regional Transportation Plan/Sustainable Communities Strategy for 2020-2045 by promoting a transit-oriented project that will encourage the use of alternative transportation methods from passenger vehicles and reduce the amount of vehicle miles travelled due to more efficient land use strategies.

G. Approval of the additional text changes to the Land Use Plan correspond to the adoption of changes to the Specific Plan land use category that have been made in the past several years, reflect an update to reference all of the Specific Plans which have been adopted by the City to date, provide other minor updates to the Plan, and make the document internally consistent.

H. Approval of the General Plan Amendment is consistent with other goals of the General Plan:

1. Land Use Plan Goal 1: Preserving and protecting existing single-family and low/medium density residential neighborhoods while promoting the development of additional high-quality housing types in the City;

2. Economic Development Plan Goal 3: Attract desirable businesses to locate in the City;

3. Community Design Plan Goal 1: Enhance the visual environmental and create a positive image of the City;

4. Community Design Plan Goal 2: Enhance the aesthetic quality of the residential neighborhoods in the City;

5. Circulation Plan Goal 1: Promote a safe and efficient circulation system that benefits residents and businesses and integrates with the greater Los Angeles/South Bay transportation system.

6. Circulation Plan Goal 3: Promote alternative modes of transportation that are safe and efficient for commuters, and available to persons of all income levels and disabilities;

7. Housing Element Goal 3.0: Minimize the impact of governmental constraints on housing construction and cost;

8. Housing Element Goal 4.0: Provide adequate residential sites through appropriate land use and zoning to accommodate the City's share of regional housing needs;

9. Conservation Plan Goal 2: Conserve and protect groundwater supply and water resources;

10. Conservation Plan Goal 4: Conserve energy resources through the use of technology and conservation methods;

11. Conservation Plan Goal 5: Protect the City's cultural resources;

12. Public Safety Plan Goal 1: Maintain a high level of fire and police protection for residents, businesses and visitors;

13. Public Safety Plan Goal 2: Protect the community from dangers associated with geologic instability, seismic hazards and other natural hazards;

14. Public Safety Plan Goal 4: Increase public awareness of crime and fire prevention, and emergency preparedness and procedures;

15. Noise Plan Goal 2: Incorporate noise considerations into land use planning decisions; and

16. Noise Plan Goal 3: Develop measures to control non-transportation noise impacts.

I. The General Plan Amendment allows the adoption of the Gardena Transit Oriented Development Specific Plan. Without this change, the development cannot be built.

J. As demonstrated by the EIR which was certified pursuant to Resolution No. 6507, the Project, including the General Plan Amendment, will not be detrimental to the public health, safety and general welfare. The only impact which was significant and unavoidable was construction noise, which is temporary in nature.

K. The General Plan Amendment will not adversely affect the orderly development of property or the preservation of property values. The General Plan Amendment allows a development which will replace a decades-old building that is in a state of disrepair and which will provide a catalyst to new development in the area.

SECTION 2. The City Council hereby approves the General Plan Amendment changing the General Plan Land Use Designation of the Property from Commercial to Specific Plan as shown on Exhibit A and amending the text of the Land Use Plan as shown on Exhibit B hereto.

SECTION 3. Severability. If any section, subsection, subdivision, paragraph, sentence, clause or phrase of this ordinance, or any part thereof is for any reason held to be unconstitutional, such decision shall not affect the validity of the remaining portion of this ordinance or any part thereof. The City Council hereby declares that it would have passed each section, subsection, subdivision, paragraph, sentence, clause or phrase thereof, irrespective of the fact that any one or more section, subsection, subdivision, paragraph, sentence, clause or phrase be declared unconstitutional.

SECTION 4. Certification. The City Clerk shall certify the passage of this resolution.

SECTION 5. Effective Date. This ordinance shall not become effective or be in force until thirty (30) days from and after the date of its adoption.

Passed, approved, and adopted this 27th day of April, 2021.

_____
TASHA CERDA, Mayor

ATTEST:

_____
MINA SEMENZA, City Clerk

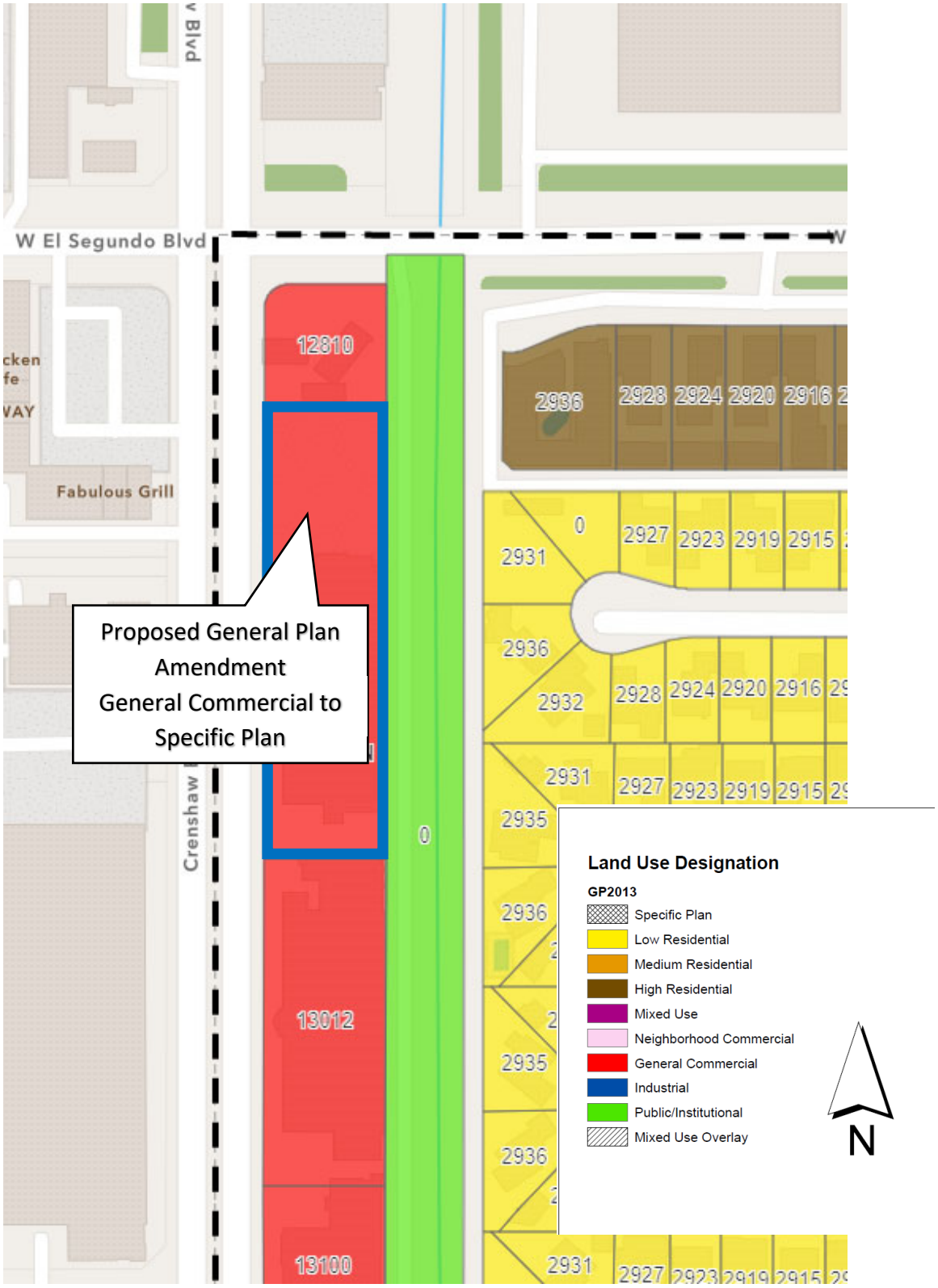
APPROVED AS TO FORM:

_____
LISA KRÁNITZ, Assistant City Attorney

Exhibit A – General Plan Land Use Change
Exhibit B – General Plan Land Use Text Change Excerpts

Exhibit A

Proposed General Plan Amendment #1-20



Adopted General Plan Amendment #1-20

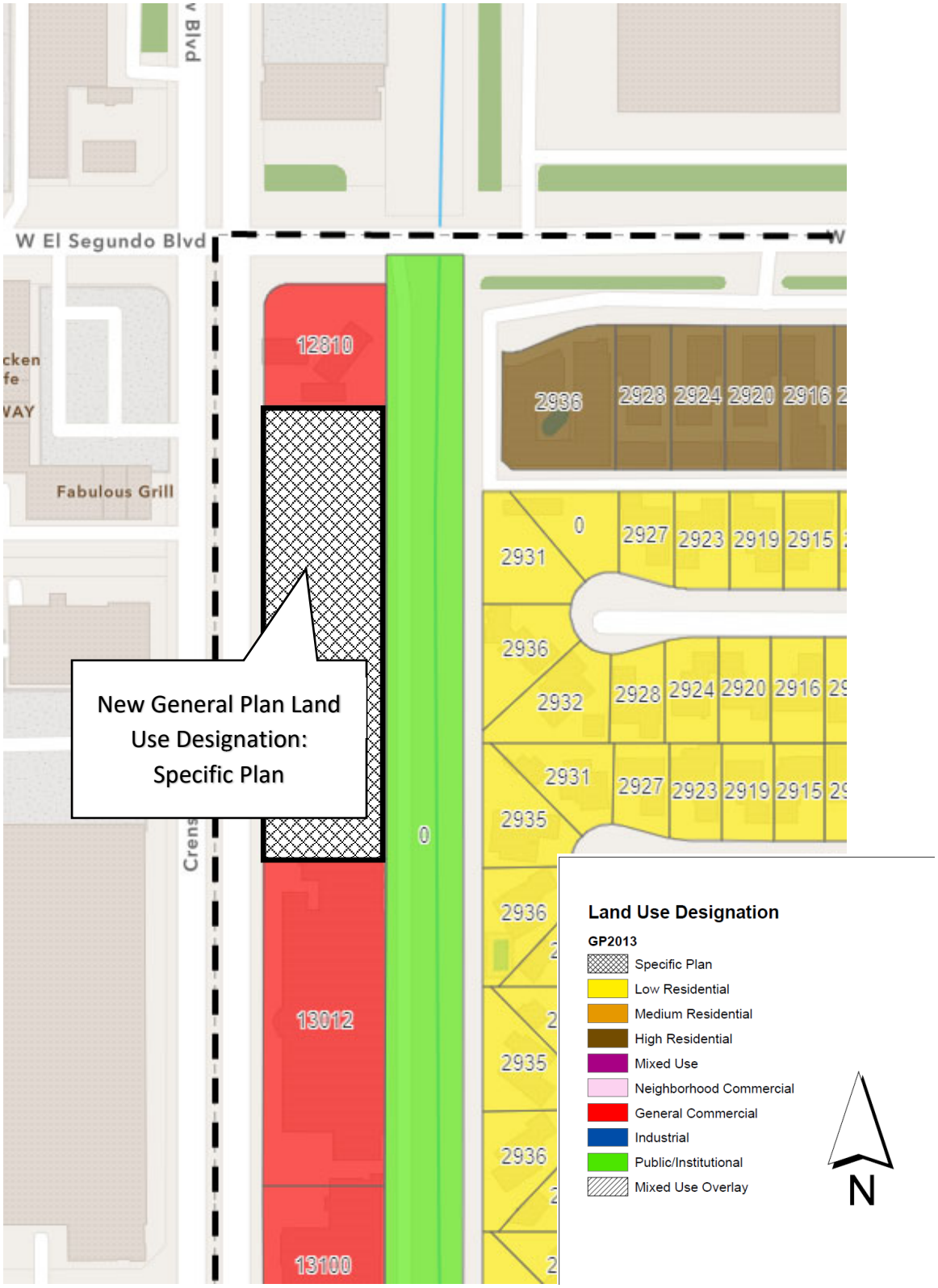


EXHIBIT B

EXCERPTED LAND USE PLAN CHANGES

Gardena Municipal Code (pp. LU-2 – LU-3)

As required by the State law, the Gardena Municipal Code serves as the primary tool for implementing the goals and policies of the Land Use Plan in the General Plan. Title 18 of the Municipal Code pertains to Zoning and it specifies the types of allowable uses, as well as development standards such as minimum lot size, building heights and setbacks, parking standards and others. The Land Use Plan defines the land use policies and the Zoning Ordinance provides the detailed and specific regulations/standards for all development projects within the City.

Since this Land Use Plan was originally adopted in 2006, the development standards within the Zoning Ordinance have been updated to address the new polices, particularly with respect to the Mixed-Use Overlay designation and to bring the Zoning Ordinance into compliance with the General Plan. Additionally the Zoning Ordinance and this Land Use Plan have been updated to address the housing programs that were set forth in the Housing Element of the General Plan which was approved in 2011 and in subsequent Housing Elements.

Specific Plans (p. LU-3)

Specific plans are either advisory or regulatory documents that provide more focused guidance and regulation for particular areas. Specific plans are a useful tool to implement planning and development goals within selected areas by adopting unique standards and requirements. Generally, specific plans include land use, circulation and infrastructure plans, development standards, design guidelines, as well as phasing, financing, and implementation plans.

Specific plans can provide for all residential uses, all commercial uses, or a mix of uses as determined appropriate. Specific plans are also useful in allowing the City to provide for site-specific high-density residential and mixed-use residential development which is required to meet the City's obligations under State housing law.

As of ~~February 2013~~ April 2021 there are ~~nine~~ twelve specific plans within the City of Gardena. The land use for ~~eight~~ eleven of these is for residential development; the ~~ninth~~ twelfth specific plan is for mixed use development. Each specific plan is summarized in the following Table LU-1.

All four corners at the intersections of Rosecrans Boulevard and Van Ness Boulevard, Rosecrans Boulevard and Western Boulevard and Rosecrans Boulevard and Vermont Avenue have been designated as Specific Plan Study Areas. (Figure LU-4 at the end of this Plan.) However, the use of specific plans is not limited to these areas and additional specific plans may be implemented where they are beneficial to the community or help the City meet its housing requirements.

Table LU-1 - Updated April 2021 (p. LU-5)

Gardena Specific Plans

Specific Plans	Adoption Year	Location	Land Use Plan Description
Emerald Square	1999	177th St. between Budlong Ave. and Vermont Ave.	159 single-family homes within a 21.5-acre gated community.
Redondo Village	1999	Redondo Beach Blvd. west of Van Ness Ave.	Two gated residential communities consisting of 65 detached condominium units within a 5-acre gated community.
Gardena Village	1999	North side of Artesia Blvd. between Denker St. and Western Ave.	59 detached condominium units within a 5.7-acre gated community.
Cottage Place	2003	Budlong Ave. between 144th St. and 146th St.	35 detached condominium units within a 2.9-acre gated community.
Normandie Estates/Normandie Courtyard	2004/ 2019	Southeast corner of Normandie Ave. and 168th St.	21 detached condominium units within a 1.5-acre gated community. In 2019, 9 more units added as Phase II within .71 additional acres.
Carnelian	2004	Vermont Ave. between 141st St. and 135th St.	101 single-family detached homes within an 11.4-acre gated community.
Artesia Corridor	2006	South side of Artesia Blvd. between Western Ave. and Normandie Ave.	375,000 square feet of General Commercial, 40,000 square feet of restaurant and up to 300 residential units on 44-acre area.
Normandie Place	2008	14532 – 14602 Normandie Ave.	12 single-family homes within a 38,280 square foot area.
Ascot Village	2011	1249 W. 139th St.	14 single-family homes within a 43,000 square foot area
Platinum Row	2015	14504 S. Normandie Ave.	96 townhome development within a 4.69 acre property
Western Avenue	2017	16958 Western Ave.	46 attached condominium units within a 2.31-acre property
Gardena Transit Oriented Development	2021	12850 – 12900 Crenshaw Blvd.	265 residential units within a 1.33 acre property

Non-Residential Designations (p. LU-11)

Gardena is a vibrant city that offers a variety of non-residential services for its residents and visitors. The non-residential land use designations include Neighborhood Commercial, General Commercial, Industrial, and Public uses. The commercial uses are located primarily along major streets to conveniently service the public. The industrial uses are located primarily in the northern and southern portions of the City, while the public uses are distributed throughout the City.

~~This~~ The 2006 General Plan introduced~~s~~ the Mixed-Use Overlay which allows for greater flexibility of development in selected areas designated for commercial and industrial areas of the City. This overlay ~~would~~ permits residential mixed-use development to occur in underutilized areas.

Specific Plans also allow for mixed-use development as well as residential development.

Residential Land Use (p. LU-20)

LU Goal 1	**Preserve and protect existing single-family and low/medium-density residential neighborhoods while promoting the development of additional high quality housing types in the City.**

LU 1.13: Allow for increased density through the use of Specific Plans where the City determines that there would be a benefit to the community, including meeting the City's housing obligaitons.

ORDINANCE NO. 1828

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF GARDENA, CALIFORNIA AMENDING SECTION 18.08.010 OF THE GARDENA MUNICIPAL CODE RELATING TO ESTABLISHED ZONES, AMENDING CHAPTER 18.58 OF THE GARDENA MUNICIPAL CODE RELATING TO DIGITAL BILLBOARDS, AMENDING THE ZONING MAP OF THE CITY OF GARDENA, APPROVING A SPECIFIC PLAN, INCLUDING THE SITE PLAN, AND APPROVING A DEVELOPMENT AGREEMENT WITH DIN/CAL 4, INC. RELATING TO THE DEVELOPMENT OF UP TO 265 DWELLING UNITS

(APN # 4060-004-039)

WHEREAS, on January 21, 2020, Din/Cal 4, Inc., filed an application for a General Plan Amendment to the Land Use Plan (the "General Plan Amendment"), Specific Plan, Zone Change, Zoning Code Amendment, Site Plan Review and lot merger to develop an apartment building with approximately 265 units on 1.33 acres located at 12850 – 12900 Crenshaw Boulevard (the "Property"); and

WHEREAS, it was subsequently determined that the development would also require a Development Agreement and that the lot merger should be a lot line adjustment; and

WHEREAS, the General Plan Amendment, Specific Plan, Zone Change, Zoning Code Amendment, Development Agreement, Site Plan Review, and Lot Line Adjustment are collectively referred to as the Project; and

WHEREAS, on April 6, 2021, the Planning Commission of the City of Gardena held a duly, noticed public hearing on the Project at which time it considered all evidence presented, both written and oral, after which it adopted PC Resolution No. 4-21, recommending that the City Council certify the Environmental Impact Report, adopt a Mitigation Monitoring and Reporting Program, make CEQA findings regarding mitigation measures and alternatives, adopt a statement of overriding considerations, and approve all the requested entitlements for the Project, with the exception of the Lot Line Adjustment which will be administratively approved at a later date; and

WHEREAS, on April 27, 2021, the City Council of the City of Gardena held a duly noticed hearing on the Project; and

WHEREAS, at the close of the public hearing and prior to adopting this Ordinance, the City Council adopted Resolution No. 6507 certifying the EIR, adopting the Mitigation

Monitoring and Reporting Program, making findings with regard to alternatives and mitigation measures, and adopting a statement of overriding considerations; and

WHEREAS, after the public hearing and prior to adopting this Ordinance the City Council adopted Resolution No. 6508 approving the General Plan Amendment; and

WHEREAS, the Site Plan is incorporated into the Specific Plan.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF GARDENA DOES HEREBY ORDAIN AS FOLLOWS:

SECTION 1. Findings. The City Council of the City of Gardena does hereby find as follows:

A. Approval of the Specific Plan, which includes the Site Plan, Zone Change and Zoning Code Amendment (collectively, "Zoning Changes") will provide a number of benefits to the City.

1. The Zoning Changes will allow the development of a high-density, 265-unit, first-class apartment project in the north end of Gardena which will provide new and needed housing opportunities in the City. There have been very few apartment buildings developed over the past few decades and nothing of this scale or which provides the type of amenities being required under the Specific Plan.

2. The Zoning Changes will allow an apartment development which will satisfy approximately ten percent of the City's Regional Housing Needs Assessment (RHNA) allocation for above-moderate housing for the Sixth Cycle Housing Element.

3. The development will provide needed housing to the nearby employers in the City of Gardena as well as the City of Hawthorne and will encourage additional high-tech industries to locate in the area.

4. The Zoning Changes will allow a development which will help revitalize a site that is blighted and does not meet current development standards, acting as a catalyst for other new development in the area

5. The Zoning Changes will allow development which will provide the following economic benefits to the City:

a. Increase the property taxes which the City will receive each year from the property by approximately $110,000.

b. Increase the amount of Utility User's Tax the City will receive each year by approximately $15,000

c. A one-time residential impact fee payment of approximately $265,000.

d. An annual increase in the business license fees attributable to the operation of the apartment building by more than $2,500 each year.

e. One-time construction related fees in the amount of approximately $1,150,000 for business license taxes, permit, plan-check and inspection fees.

f. Creation of approximately 400 full- and part-time construction jobs. The payment to workers will lead to indirect economic benefits as these workers will spend money in the City.

g. General fund revenue in the approximate amount of $2,250,000 over 30 years from the digital display portion of the Project.

h. New residents with above-moderate income that will provide additional indirect economic benefits as they spend money in Gardena.

6. The development implements Connect SoCal, the Regional Transportation Plan/Sustainable Communities Strategy Plan for 2020-2045 by promoting a transit-oriented project that will encourage the use of alternative transportation methods from passenger vehicles and reduce the amount of vehicle miles travelled due to more efficient land use strategies.

B. Approval of the Zoning Code Amendment, Specific Plan, which includes the Site Plan, and Zone Change is consistent with the General Plan.

1. Prior to adopting this Ordinance, the General Plan land use designation of this property was changed to Specific Plan so the Zone Change and adoption of the Specific Plan is consistent with the Land Use Plan.

2. The Zoning Changes implement a number of Goals and Policies of the Gardena General Plan including:

a. Land Use Plan Goal 1: Preserving and protecting existing single-family and low/medium density residential neighborhoods while promoting the development of additional high quality housing types in the City;

b. Economic Development Plan Goal 3: Attract desirable businesses to locate in the City;

c. Community Design Plan Goal 1: Enhance the visual environmental and create a positive image of the City;

d. Community Design Plan Goal 2: Enhance the aesthetic quality of the residential neighborhoods in the City;

e. Circulation Plan Goal 1: Promote a safe and efficient circulation system that benefits residents and businesses, and integrates with the greater Los Angeles/South Bay transportation system;

f. Circulation Plan Goal 3: Promote alternative modes of transportation that are safe and efficient for commuters, and available to persons of all income levels and disabilities;

g. Housing Element Goal 3.0: Minimize the impact of governmental constraints on housing construction and cost;

h. Housing Element Goal 4.0: Provide adequate residential sites through appropriate land use and zoning to accommodate the City's share of regional housing needs;

i. Conservation Plan Goal 2: Conserve and protect groundwater supply and water resources;

j. Conservation Plan Goal 4: Conserve energy resources through the use of technology and conservation methods;

k. Conservation Plan Goal 5: Protect the City's cultural resources;

l. Public Safety Plan Goal 1: Maintain a high level of fire and police protection for residents, businesses and visitors;

m. Public Safety Plan Goal 2: Protect the community from dangers associated with geologic instability, seismic hazards and other natural hazards;

n. Public Safety Plan Goal 4: Increase public awareness of crime and fire prevention, and emergency preparedness and procedures;

o. Noise Plan Goal 2: Incorporate noise considerations into land use planning decisions; and

p. Noise Plan Goal 3: Develop measures to control non-transportation noise impacts.

C. The Zoning Code Amendment establishes a new zone, the Gardena Transit Oriented Development Specific Plan. The Specific Plan establishes the permitted uses and development standards that apply to the Project. Creation of this zone is desirable

and necessary to implement the proposed Project. Without amending the Gardena Municipal Code, the current zoning would not permit this residential development.

D. Amendment of the Municipal Code to allow digital billboards will allow the creation of an entry point for the City, allow for community messaging, and provide a source of revenue to the City.

E. The Zoning Changes implement the public convenience, general welfare and good land use practice for the reasons set forth above.

F. The Development Agreement will implement the Specific Plan and will provide the City with certain benefits that would otherwise be unattainable through the other land use approvals. The Development Agreement provides that the developer will implement a hire and buy local policy which will assist local residents and businesses, as well as provide economic benefits to the City of Gardena through increase sales tax revenues. The Development Agreement also provides for a 30-year revenue sharing agreement from the Digital Billboard which is predicted to provide the City with a minimum of $75,000 per year which money can be spent for the benefit of the Gardena Community. Additionally, the City will be granted time on the Digital Billboard to advertise community events and highlight community businesses.

G. As demonstrated by the EIR which was certified pursuant to Resolution No. 6507, the Project will not be detrimental to the public health, safety and general welfare. The only impact which was significant and unavoidable was construction noise, which is temporary in nature.

H. The Zoning Changes will not adversely affect the orderly development of property or the preservation of property values. The development replaces a decades-old building that is in a state of disrepair. The development will hopefully provide a catalyst to new development in the area.

SECTION 2. The City Council hereby approves the Gardena Transit Oriented Development Specific Plan, a copy of which is attached hereto as Exhibit A, subject to the conditions of approval attached hereto as Exhibit B.

SECTION 3. The zoning map of the City of Gardena, California shall be amended to change the zoning of the four lots comprising the 1.33-acre parcel at (APN # 4060-004-039) at 12850 – 12900 Crenshaw Boulevard from General Commercial (C-3) to Gardena Transit Oriented Development Specific Plan (GTODSP), as shown hereto in Exhibit C.

SECTION 4. Section 18.08.010 of the Gardena Municipal Code is hereby amended to read as follows:

18.08.010 Zones established.
In order to carry out the purposes and provisions of this title, the city is divided into several zones, known as follows:

R-1 Single-family residential zone
R-2 Low-density multiple-family residential zone
R-3 Medium density multiple-family residential zone
R-4 High density multiple-family residential zone
M-U Mixed use overlay
C-R Commercial residential zone
P Parking zone
O Official zone
C-P Business and professional office zone
H-B Home business zone
C-2 Commercial zone
C-3 General commercial zone
C-4 Heavy commercial zone
M-1 Industrial zone
M-2 General industrial zone
-SP Specific plan zones as follows:
Artesia Corridor Specific Plan
Ascot Village Specific Plan
Carnelian Specific Plan
Cottage Place Specific Plan
Emerald Square Specific Plan
Gardena Transit Oriented Development Specific Plan
Gardena Village Specific Plan
Normandie Estates Specific Plan
Normandie Place Specific Plan
Redondo Village Specific Plan
Platinum Row Specific Plan
Western Avenue Specific Plan

SECTION 5. Section 18.58.018G of the Gardena Municipal Code relating to billboards is hereby amended to read as follows:

G. BILLBOARD POLICY

1. It is a fundamental policy of the City of Gardena to completely prohibit the construction, erection or use of any billboards, as defined herein, other than those that legally exist in the City, or for which a valid permit has been duly issued and has not expired, as of the date on which this provision is first adopted. No permit shall be issued for any billboard that violates this policy, and the City will take immediate abatement action against any billboard constructed or maintained in violation of this policy. The City Council affirmatively declares that it would have adopted this billboard policy even if it were the only provision in this Chapter. The City Council intends for this billboard policy to be severable and separately

enforceable even if other provision(s) of this Chapter may be declared, by a court of competent jurisdiction, to be unconstitutional, invalid or unenforceable. This provision does not prohibit agreements to relocate presently existing, legal billboards, as encouraged by California Business and Professions Code section 5412.

2. Notwithstanding Subsection A-1, digital billboards may be allowed in the City when approved as an allowed or conditionally allowed use in the specific zone in which it is to be located, subject to a Development Agreement which provides for a community benefit to the City.

SECTION 6. Section 18.58.020, Definitions, is hereby amended by adding the following definition to read as follows:

"Digital Billboard" means a billboard, utilizing digital message technology, capable of changing the content on the sign electronically, such that the alphabetic, pictographic, or symbolic informational content of which can be changed or altered on a fixed display surface composed of electronically illuminated or electronically actuated or motivated elements that can be changed or altered electronically. A digital billboard may be internally or externally illuminated. This includes billboards with displays that must be preprogrammed to display only certain types of information (i.e., time, date, temperature) and billboards whose informational content can be changed or altered by means of computer-driven electronic impulses. This includes, without limitation, billboards also known as LED billboards and includes dynamic animated digital displays.

SECTION 7. Section 18.58.050A of the Gardena Municipal Code relating to billboards is hereby amended to read as follows:

18.58.050 Prohibited signs.

The following signs shall not be permitted, constructed, erected or allowed to remain on display in the City:

A. Billboards, as defined herein; this does not apply to digital billboards.

SECTION 8. Section 18.58.055 is hereby added to the Gardena Municipal Code to read as follows:

18.58.055 Digital billboards.

Digital billboards shall be subject to the following provisions:

A. No digital billboard shall be permitted and no Development Agreement for a digital billboard shall be entered into without there being an aesthetic analysis, including a photo simulation of the proposed digital billboard, a photometric study, and a shade and shadow study, if applicable.

B. If the City Council approves a Development Agreement for a digital billboard, no sign permit shall be required.

C. The digital billboard will be required to comply with the standards set forth in the applicable zone.

SECTION 9. The Development Agreement attached hereto as Exhibit D, is hereby approved.

SECTION 10. Severability. If any section, subsection, subdivision, paragraph, sentence, clause or phrase of this ordinance, or any part thereof is for any reason held to be unconstitutional, such decision shall not affect the validity of the remaining portion of this ordinance or any part thereof. The City Council hereby declares that it would have passed each section, subsection, subdivision, paragraph, sentence, clause or phrase thereof, irrespective of the fact that any one or more section, subsection, subdivision, paragraph, sentence, clause or phrase be declared unconstitutional.

SECTION 11. Certification. The City Clerk shall certify the passage of this ordinance and shall cause the same to be entered in the book of original ordinances of said City; shall make a minute passage and adoption thereof in the records of the meeting at which time the same is passed and adopted; and shall, within fifteen (15) days after the passage and adoption thereof, cause the same to be published as required by law, in a publication of general circulation.

SECTION 12. Effective Date. This Ordinance shall not become effective or be in force until thirty (30) days from and after the date of its adoption.

Passed, approved, and adopted this 11th day of May, 2021.

_____
TASHA CERDA, Mayor

ATTEST:

_____
MINA SEMENZA, City Clerk

APPROVED AS TO FORM:



LISA E. KRANITZ, Assistant City Attorney

Exhibit A – Gardena Transit Oriented Development Specific Plan
Exhibit B – Conditions of Approval
Exhibit C – Zoning Map
Exhibit D – Development Agreement

EXHIBIT A

CITY OF GARDENA

GARDENA TOD SPECIFIC PLAN

APRIL 2021

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CHAPTER 1. SUMMARY STATEMENT

The Gardena TOD Specific Plan (GTODSP, Specific Plan, or Plan) facilitates a transition of underutilized commercial and industrial uses into a compact transit-oriented district where residents live near, and walk or bicycle to, their offices, shopping, and recreation. The Specific Plan allows the development of up to 265 residential units with related residential amenities and ancillary uses. The proposed project is designed to be compatible with adjacent and anticipated land uses and the surrounding built environment. The Specific Plan regulates buildout of the project site in a manner that is consistent with applicable State law.

CHAPTER 2. INTRODUCTION

I. AUTHORITY

The GTODSP provides for the orderly and efficient development and revitalization of the plan area consistent with the City of Gardena General Plan policies and objectives. The GTODSP is a regulatory document prepared pursuant to the provisions of California Government Code sections 65450 through 65457, which grant local government agencies the authority to prepare specific plans for the systematic implementation of their general plan for all or part of the area covered by the General Plan.

Government Code Sections 65450 through 65454 establish the authority to adopt a Specific Plan, identify the required contents of a Specific Plan, and mandate consistency with the General Plan.

Per Government Code Section 65451, a Specific Plan must include text and a diagram or diagrams which specify all of the following in detail:

- The distribution, location, and extent of the uses of land, including open space within the area covered by the plan.
- The proposed distribution, location, extent, and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy and other essential facilities proposed to be located within the land area covered by the plan and needed to support the land uses described in the plan.
- Standards and criteria by which development will proceed, and standards for the conservation, development, and utilization of natural resources, where applicable.
- A program of implementation measures including regulations, programs, public works projects and financing measures necessary to carry out the above items.
- A discussion of the relationship of the Specific Plan to the General Plan.

As a regulatory document, the Specific Plan implements the General Plan as the new zoning for the Specific Plan area. All future development plans and entitlements within the Specific Plan boundaries must be consistent with the applicable standards set forth in this document as described in Chapter 8 (Implementation); the Gardena Municipal Code (Municipal Code or Code), where not modified by the Specific Plan; and the General Plan.

II. PURPOSE AND INTENT

Successful transit-oriented development districts locate urban residential uses near transit and concentrate these uses in compact areas. The GTODSP further integrates high quality housing options into northwest Gardena. The Plan provides newly constructed multi-family housing options specifically to support local companies in the technology and creative industries.

III. SITE LOCATION

The project site is located at 12850–12900 Crenshaw Boulevard in the City of Gardena (City). The location of the project site within the City boundaries is illustrated in Figure 1. An aerial photograph of the project site vicinity is provided in Figure 2.

Figure 1. *Regional and Project Vicinity Map*

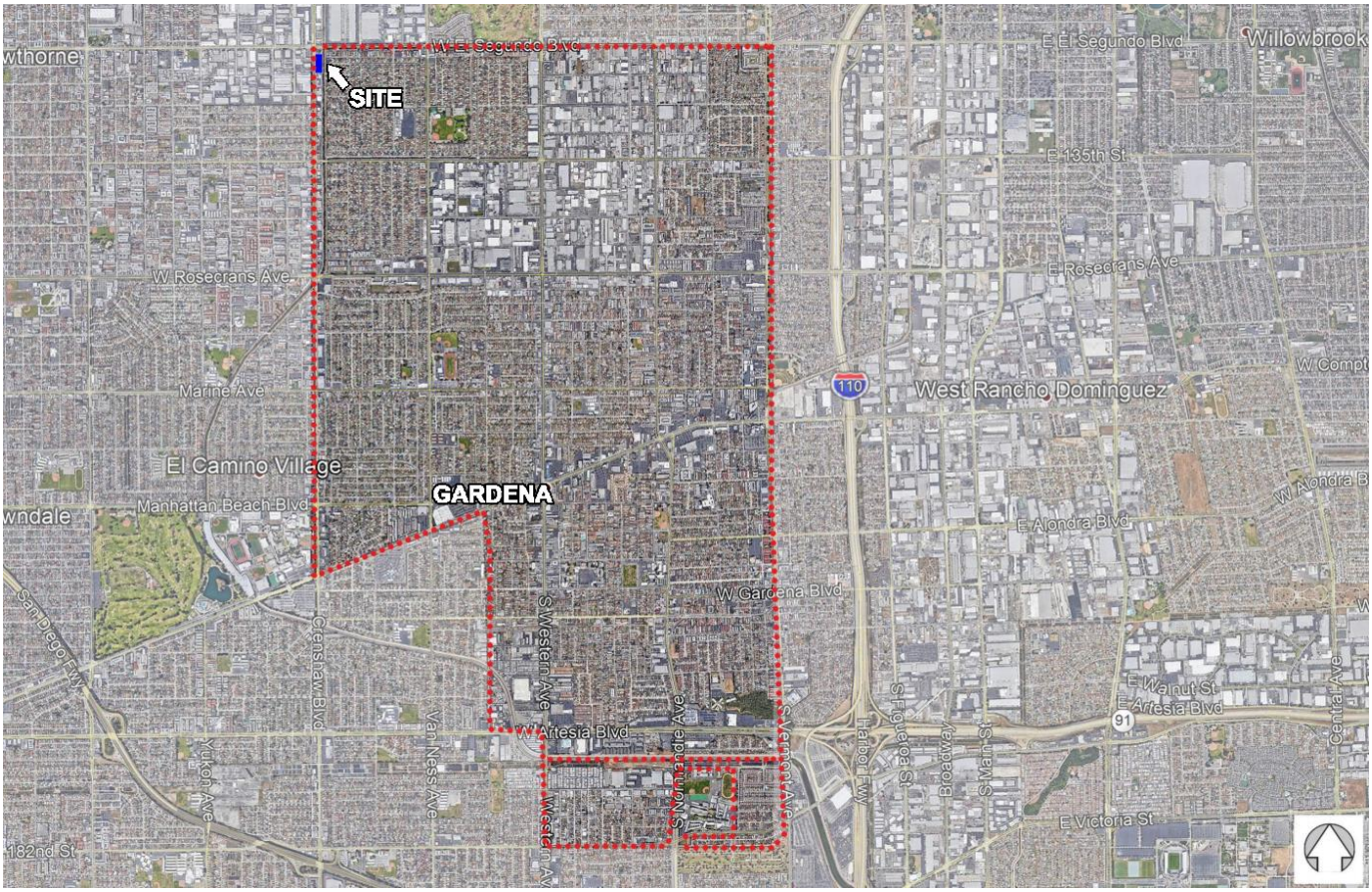
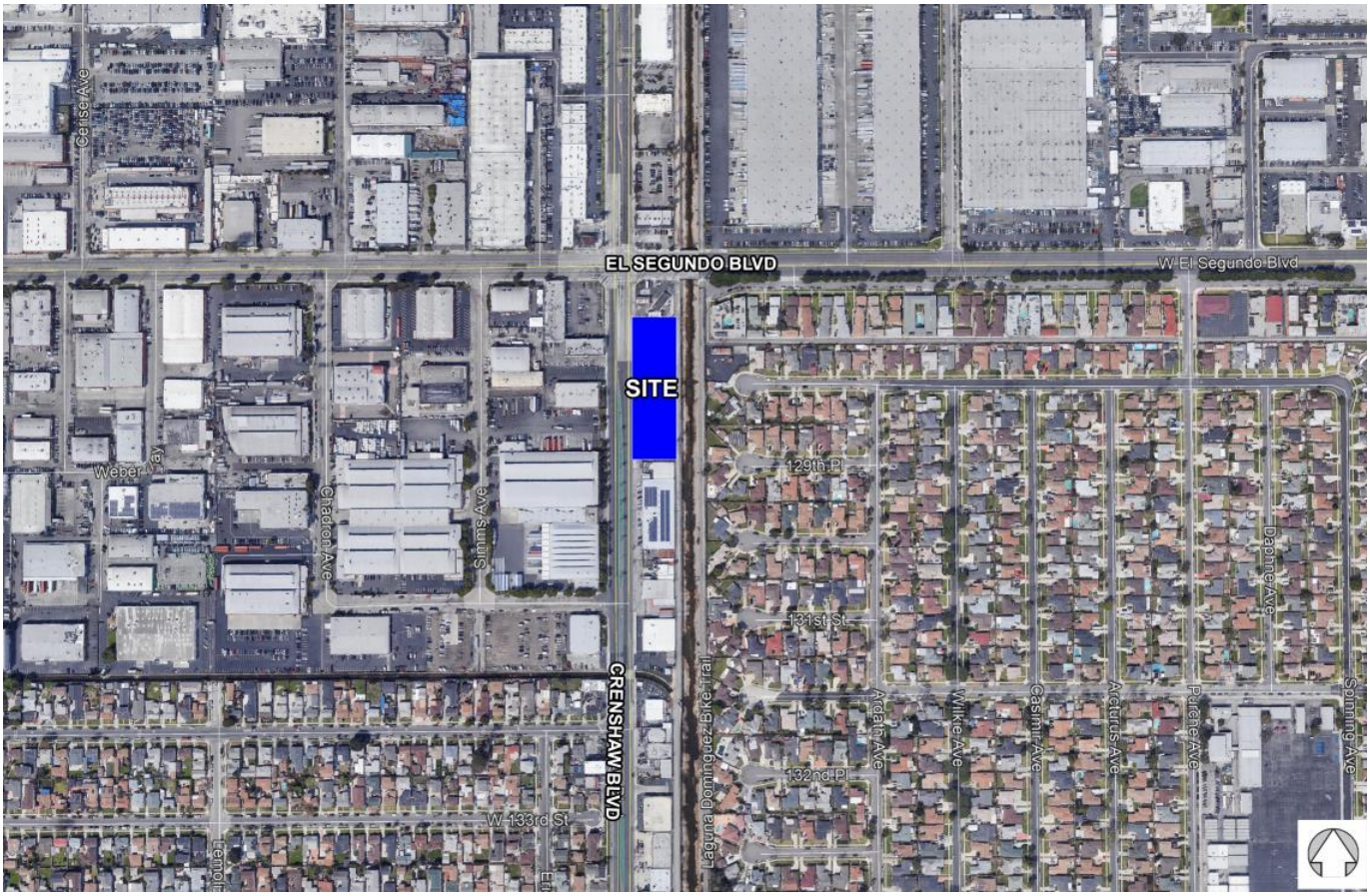


Figure 2. *Project Aerial*



Regional Setting

The City of Gardena is located in the South Bay area of Los Angeles County, approximately 12 miles south of downtown Los Angeles, approximately 7 miles southeast of the Los Angeles International Airport, and approximately 10 miles north of the Los Angeles Ports in San Pedro. The location of the project site in its regional setting is illustrated in Figure 1. A number of freeways provide regional access to and from Gardena, including the San Diego Freeway (I-405), the Artesia Freeway (SR-91), the Harbor Freeway (I-110), and the Century Freeway (I-105). Since its incorporation in 1930, the City has grown from a 3-square-mile community known for its farm products to a 5.9-square-mile, highly developed City with a population of over 60,000.

Local Setting

The 1.33-acre GTODSP area (Plan area) is located in the northwestern corner of the City of Gardena on the east side of Crenshaw Boulevard between W El Segundo Boulevard to the north and W 135th Street to the south. Crenshaw Boulevard abuts the Plan area immediately to the west, the Dominguez Flood Control Channel abuts the Plan area immediately to the east, an existing separated bicycle route runs along the Laguna Dominguez Trail to the east of the Flood

Control Channel, a gasoline station abuts the plan area immediately to the north, and light industrial uses abut the Plan area immediately to the south.

The Plan area is part of a larger engineering, commercial, and employment center that generally stretches north to south from I-105 to Rosecrans Avenue and east to west from Van Ness Avenue to Prairie Avenue. The larger surrounding area includes a variety of land uses and transportation infrastructure and facilities, including the Metro Green Line Crenshaw Station and I-105. The Plan area is generally surrounded by general commercial, logistical, and research and development land uses. Adjacent uses to the east, across the Dominguez Channel, primarily consist of single-family homes, with some multi-family uses across the Channel at the north end. North of the Plan area across W El Segundo Boulevard is a new 230-unit transient oriented development (TOD) project, approved by the City of Hawthorne pursuant to the Green Line Mixed Use Specific Plan, under construction as of the time of the adoption of this Specific Plan.

Crenshaw Boulevard, a north-south street forming the western boundary of the GTODSP area, delivers direct access to the Specific Plan area from Interstate 105 (I-105), which is 0.62 miles north of the Plan area. I-105 provides access to I-405 to the west and I-110 to the east. The intersection of Crenshaw Boulevard and I-105 is the location of the Metro Green Line Crenshaw Station. Local access to the plan area is also provided from El Segundo Boulevard, traveling east-west just north of the Specific Plan area.

The Plan area is within walking distance of the Crenshaw Station, enabling direct non-vehicular access and transportation to downtown Los Angeles and throughout Los Angeles County. The Plan area is also directly adjacent to Metro's 710 Route, which runs from Koreatown to Redondo Beach along Crenshaw Boulevard and which Metro has targeted for higher-frequency service as part of its NextGen Bus Plan, as well as other local bus lines. The GTODSP area is also within walking distance of a variety of retail opportunities and local eateries, many of which are in a large commercial center immediately south of the Crenshaw Station and I-105. The Plan area's proximity to the Crenshaw Station and commercial centers make it suitable for the type of transit-oriented development envisioned by this Specific Plan. The GTODSP's transit-rich setting offers future residents' access to regional destinations, including beaches to the west and downtown Los Angeles to the north, without the need for an automobile. However, direct access to three major freeways also allows convenient automobile access for those who choose to drive.

IV. PROJECT HISTORY AND BACKGROUND

The South Bay is evolving from a historically underutilized, heavy-industrial area to a hub of innovation and creativity, home to technology firms and industries. The presence of internationally prominent technology and creative companies and the GTODSP area's proximity

to the Crenshaw Station and other transportation infrastructure are anticipated to attract other technology firms considering expansion or relocation. However, innovative technology firms and their employees place a premium on quality-of-life and livability factors. These factors include access to high-quality housing; social, cultural, and environmental amenities; access to shops and restaurants; and lower-stress commutes.

The GTODSP will support the expanding regional technology industry with newly constructed, high-quality, multi-family housing options. The current jobs-housing regional imbalance negatively impacts the local economy, the regional transportation network, the environment, and the personal lives of employees and their families. The GTODSP is consistent with recent legislative efforts (such as Senate Bill 375) that aim to reduce greenhouse gas emissions by encouraging development proximate to transit and employment centers which ultimately shortens trip lengths and reduces vehicle miles traveled (VMT).

V. PROJECT DESCRIPTION

The project includes the demolition of an existing single-story building for the construction and development of an eight-story residential building with up to 265 dwelling units. The building includes a maximum of eight stories with a maximum height of up to 100 feet, as measured from the finished floor (i.e., the level of the finished floor on the ground level) to the highest point on the roof. The building will include five and one-half levels of residential floors over two and one-half levels of parking (the third level being half-residential and half-parking). The project will provide on-site vehicular parking at one space per unit (unbundled) and secured bicycle parking spaces for residents. The Project is located on an approximately 58,144 square foot parcel that includes up to a maximum of 247,112 square feet of total floor area with a floor area ratio (FAR) of up to 4.25:1.

The project's building design will incorporate an architectural style and scale that is compatible with the intended use. Architectural details may draw upon new local technology buildings or other nearby features that contribute to the aesthetic ambience of the immediate area. The project will provide consistency in architectural style throughout the project and will promote a unique style of design achieved through the creative use of massing, roof forms, materials, and facades. Additional architectural guidelines are included in Chapter 6, Section I. of this Specific Plan.

The project is a transit-oriented development that will locate urban residential uses near public transit. The project site is located within walking distance of the Crenshaw Station, numerous local and regional bus lines, and neighborhood-serving commercial uses, providing residents with

an urban experience, activating the streetscape and pedestrian realm, reducing dependence on the personal automobile. The project will also help to address the regional jobs-housing imbalance, support the local economy by creating newly constructed, high-quality, multi-family housing options in northwest Gardena near significant employment centers in the technology and creative industries.

The project site is currently located in the C-3 (General Commercial) zoning district. The C-3 zoning district does not permit residential uses and permits a maximum FAR of 0.5:1 and a maximum building height of two and one-half stories. By comparison, as noted, the GTODSP zoning permits residential density of up to 200 dwelling units per acre, maximum FAR of up to 4.25:1, and building heights of up to eight stories and 100 feet.

VI. ENVIRONMENTAL ASSESSMENT

An Environmental Impact Report (EIR) has been prepared and certified in accordance with the provisions of the California Environmental Quality Act (CEQA) to address the potential environmental effects of the GTODSP. In conjunction with the EIR, the project will implement mitigation measures to reduce potential impacts resulting from project implementation to a less-than-significant level [(SCH#2020080305)]. All mitigation identified in the EIR are incorporated in this Specific Plan by reference.

VII. RELATED APPLICATIONS AND DOCUMENTS

In addition to approval of this Specific Plan (SP #1-20), the following entitlements were also approved or will be approved by the City and are required to develop the project:

General Plan Amendment (GPA #1-20)

A general plan amendment to (i) change the land use designation on the General Plan Land Use Map from “General Commercial” to “Gardena TOD Specific Plan” and (ii) amend the Land Use Element text and Land Use Element Table LU-3 to allow the mix of uses and densities specified in this Specific Plan.

Zone Change/Zone Text Amendment (ZC #1-20/ZCA #3-20)

A corresponding zoning map amendment to replace the existing General Commercial (C3) zoning with the Gardena TOD Specific Plan zone and to amend the text of the Gardena Municipal Code to add this new zone. Changes are also being made to the zoning provisions of the Gardena Municipal Code relating to billboards in order to allow a dynamic, digital billboard in the Specific Plan area.

Development Agreement (DA #1-20)

A development agreement between the City and developer that guarantees the right to build the development as set forth in this Specific Plan for a period of 10 years and provides a community benefit to the City in the form of revenue from the billboard.

Lot Line Adjustment (LLA #1-20)

A lot line adjustment to combine the GTODSP site's four legal lots into a single development site.

Site Plan Review (SPR #1-20)

Review of the physical design of the development.

CHAPTER 3. CONTEXT AND EXISTING CONDITIONS

I. PROJECT SITE AND LAND USES

The GTODSP area consists of a single tax parcel and four legal lots totaling approximately 1.3 acres in size, situated between Crenshaw Boulevard and the Dominguez Flood Control Channel. Existing land uses in the GTODSP area include a dilapidated, one-story, approximately 24,000 square-foot light industrial building operating as an auto-parts warehouse at the time the Specific Plan was initiated, and a paved parking area to the north of the building.

A photo of the existing parcel is provided in Figure 3.

Figure 3. *Existing Uses*



II. TOPOGRAPHY

The topography of the site slopes from the northeast corner to the southwest corner, with an elevation difference of approximately 3’ across the site. An existing unpaved maintenance roadway owned by the Los Angeles County Flood Control District lies along the Dominguez Channel to the east of the site. It slopes in a southeasterly direction toward the channel.

A topographical survey of the GTODSP area is provided in Figure 4.

Figure 4. *Topographical Survey*

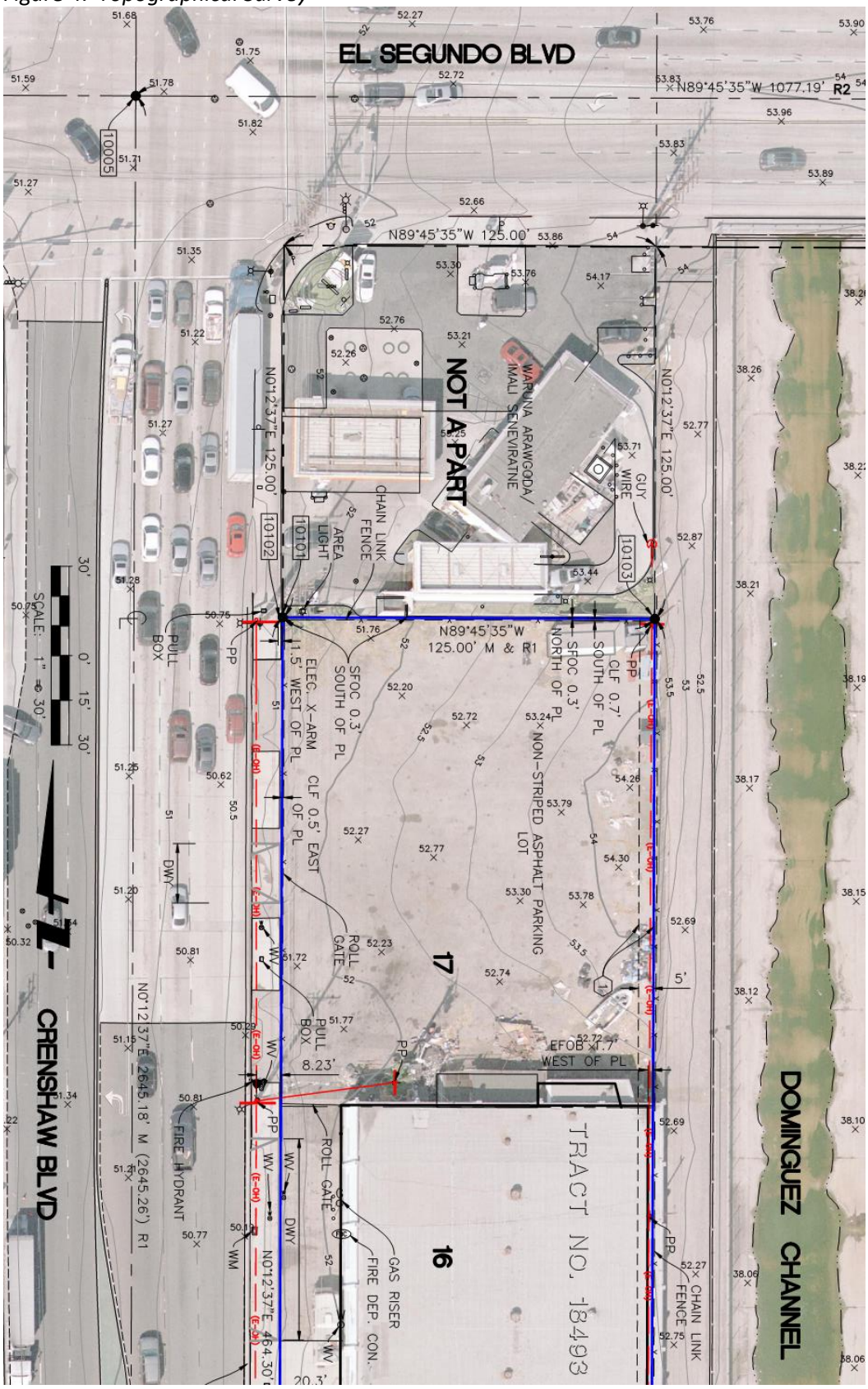
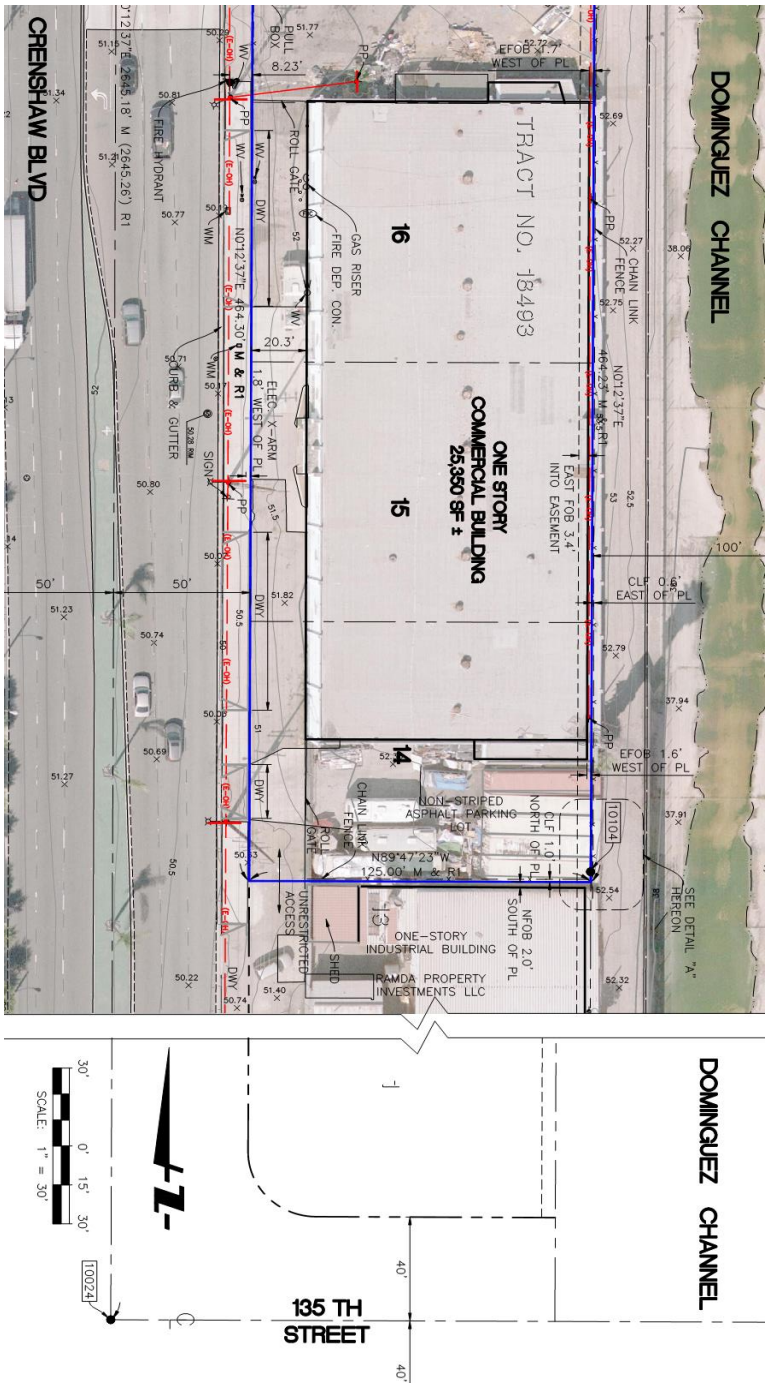


Figure 4. *Topographical Survey (Cont'd)*



III. GEOLOGY AND SOILS

A geotechnical study of the GTODSP area was prepared by Geotechnologies Inc. on January 30, 2020. Existing geology and soils conditions are taken from the geotechnical study.

Based on review of available geologic maps, the site is not located within an Alquist-Priolo Earthquake Fault Zone. The site is located approximately 1.2 miles south and 1.6 miles west of sections of the Inglewood fault zone. In addition, the site is not located in a liquefaction zone.

The site is underlain by artificial fill and alluvium. The fill encountered on the site ranged in depth from 2½ to 3 feet from existing grade. The fill is in turn underlain by native alluvial soils.

Groundwater was encountered at depths ranging from 26½ to 28 feet below the existing grade. Based on available groundwater data, the historically highest groundwater level for the site was approximately 25 feet below the ground surface.

The primary geologic hazard at the site is moderate to strong ground motion (acceleration) caused by an earthquake on any of the local or regional faults. The potential for other earthquake-induced hazards was also evaluated including surface rupture, liquefaction, dynamic settlement, inundation and landsliding.

IV. HYDROLOGY

A hydrology study of the GTODSP area was prepared by Fuscoe Engineering on April 24, 2020.

The site drains in a southwesterly direction and discharges via sheet-flow to Crenshaw Boulevard. From there, the drainage is directed south towards an existing public catch basin in Crenshaw Boulevard near W 131st Street. The drainage is ultimately conveyed to the Dominguez Channel, a Los Angeles County Flood Control District (LACFCD) Channel, located easterly of the site.

The grading pattern for the proposed development will largely be consistent with that of the existing condition and surface flow westerly towards Crenshaw Boulevard. The site is currently approximately 95 percent impervious. The proposed project will increase the pervious area of the site by approximately five percent.

V. GENERAL PLAN AND ZONING DESIGNATIONS

The City of Gardena's General Plan Land Use Plan currently designates the project site for General Commercial land uses, with a maximum floor area ratio (FAR) of 0.5. The General Commercial land use designation provides for a wide range of larger scale commercial uses to serve both the needs of the City and the region. It is intended for commercial uses such as regional retail, automobile dealerships, supermarkets, junior department stores, financial centers, professional offices, restaurants, and other commercial uses oriented to the traveling public. Its corresponding zoning includes General Commercial (C3), the current zoning district of the Plan area.

Adjoining properties to the north and south are also designated and zoned General Commercial. Property to the west of the plan area is located in the City of Hawthorne and is zoned for general commercial and industrial uses, while the Dominguez Flood Control Channel to the east is designated for Public/Institutional land uses (i.e., public, quasi-public and official uses and public or community facilities).

As described in Chapter 7, Section I, below, the General Plan, General Plan Land Use Map, Zoning Ordinance and Zoning Map have been amended by resolution and ordinance concurrent with adoption of this Specific Plan to ensure complete consistency.

VI. CIRCULATION

Three major freeways provide regional access to the project site: I-105 to the north, I-405 to the west, and I-110 to the east.

Circulation along I-105 connects to the project via Crenshaw Boulevard, which runs along the western boundary of the GTODSP area. Local access to the plan area is also provided from El Segundo Boulevard, traveling east-west just north of the Specific Plan area.

Crenshaw Boulevard provides local access to the site. Crenshaw Boulevard is a major divided arterial, with a total of six lanes west of the site.

A sidewalk along the east side of Crenshaw Boulevard provides pedestrian access to the site.

VII. UTILITIES AND SERVICES

Ensuring the GTODSP area is served by adequate infrastructure is critical to the successful implementation of the Plan and future development of the area.

Stormwater and Drainage

Stormwater from the GTODSP area is generally conveyed to the Dominguez Channel through curb and gutter along Crenshaw Boulevard. The GTODSP area is currently built out and covered with a combination of structures, surface parking, and other impervious surfaces.

Sewer

The City of Gardena is responsible for maintaining the existing sewer lines that provide wastewater collection, conveyance, and management surrounding the property. City of Gardena as-built plans show an 8-inch vitrified clay pipe (VCP) approximately 34 feet east of the centerline of Crenshaw Blvd. The existing sewer pipe has a peak flow rate of 24,000 GPD which equates to

being 17 percent full.

Water

Water and fire services are provided to the property by an 8-inch cast iron line owned and maintained by the Golden State Water Company. There are currently existing domestic and fire water laterals serving the site. There is an existing fire hydrant adjacent to the northwestern portion of the Plan area.

Electrical Power

The site is currently served by overhead power lines on the east side of the Crenshaw Boulevard owned and maintained by SoCal Edison.

Natural Gas

It does not appear that the site is currently served by natural gas. There is currently existing infrastructure in the street owned and maintained by SoCalGas. There is a 20-inch transmission line on the west side of the street and a 4-inch distribution line on the east side of the street.

Solid Waste

Waste Resources of Gardena provides solid waste pickup services for the City.

Fire Protection Services

The Los Angeles County Fire Department provides fire protection services and emergency medical service to the City. The closest facility to the project site, located 0.5 miles to the north and a two-minute driving distance, is Fire Station 162 at 12151 Crenshaw Boulevard in Hawthorne, California. The next-closest facility to the project site, located 1.2 miles to the southeast and a 3-minute driving distance, is Fire Station 159 at 2030 W 135th Street. The provision of water for fire suppression is available from existing water lines via adjacent hydrants.

Police Protection Services

The Gardena Police Department (Gardena PD) provides police protection services to the City. The Specific Plan area is approximately 3.4 miles from the police station located at 1718 W 162nd Street. The Gardena PD divides the City into three districts, each with its own District Policing Team. The project site is located within District 1.

Library Services

The Los Angeles County Library provides library services to the City. There are two libraries within

City limits. The closest library facility to the project site, located 1.1 miles to the south and a two-minute driving distance, is the Masao W. Satow Library at 14433 South Crenshaw Boulevard.

Schools

The Los Angeles Unified School District provides educational services and facilities for students from kindergarten through twelfth grade. The project site is within the service district of LAUSD and is served by three schools: Purche Avenue Elementary School, Peary Middle School, and Gardena Senior High School. The enrollment at all three of these schools has been dropping over the years. Animo Legacy Charter Middle School is also in the vicinity located approximately 1.3 miles to the northeast.

CHAPTER 4. SPECIFIC PLAN CONCEPTS

I. PROJECT GOALS AND OBJECTIVES

The overall purpose of the GTODSP is to be a catalyst to transform northwest Gardena into a vibrant, transit-oriented neighborhood. Implementation of the GTODSP would provide newly-constructed, high-quality multi-family housing and help facilitate a more complete community by bringing new residents to the neighborhood, reducing the regional jobs-housing imbalance, improving the streetscape, activating the pedestrian realm, and helping transition an automobile-oriented corridor to transit-oriented development. The GTODSP permits urban residential land uses and establishes building and site design, transportation, infrastructure, and streetscape strategies to achieve this vision. The project is guided by the following major objectives:

1. Diversify the City of Gardena's existing multi-family housing options to serve the region's growing and evolving technology and creative sectors and aid in recruiting talent for local companies.

2. Support the expanding technology and creative sector with newly constructed, high-quality multi-family housing opportunities, enabling local employees to live close to where they work.

3. Cluster urban development near the Crenshaw Station, technology firms, and other large employment centers, providing City residents with the opportunity to live, work, and shop with less reliance on automobiles.

4. Establish multi-family development that meets high standards of design and pursues environmental sustainability.

5. Provide digital, animated and moving signage for both off-site advertising as well as community programming and City revenue sharing public benefit purposes.

6. Redevelop a blighted, non-conforming site, increase tax revenues to the City, and create a catalyst for future development in the northern portion of Gardena.

II. SITE PLAN / RENDERINGS

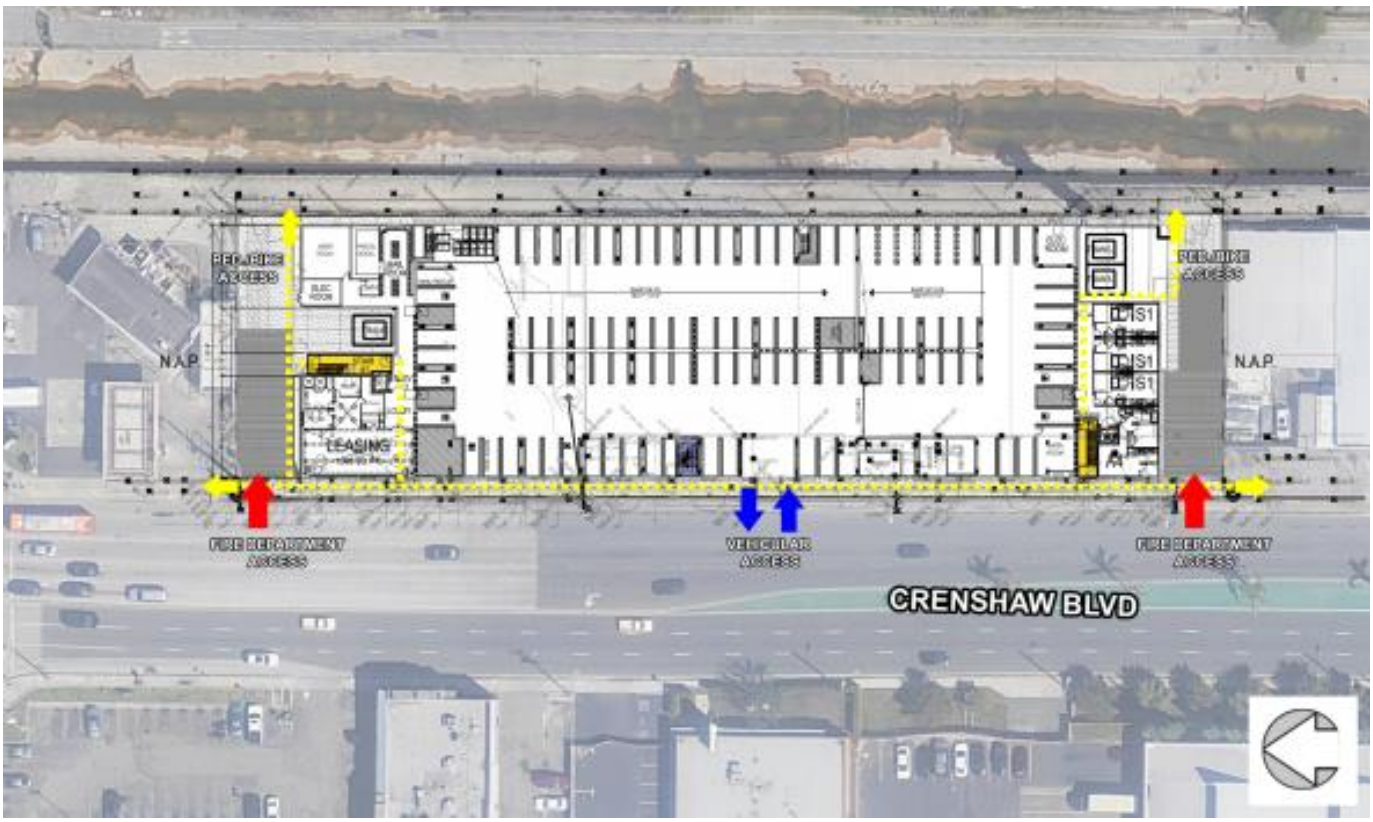
The GTODSP generally provides for development of up to 265 residential units with related amenities and ancillary uses. A full copy of the Site Plan, including the renderings, is attached as

Exhibit A. Development within the GTODSP area must be substantially consistent with this Exhibit.

III. TRANSPORTATION/CIRCULATION PLAN

The circulation plan for the GTODSP is provided in Figure 5.

Figure 5. *Circulation Plan*



On-Site Circulation and Access

The project replaces an operating auto-parts warehouse and surface lots that contain perpendicular parking areas and six curb cuts that interrupt the sidewalk. The proposed project replaces the existing light industrial land use with a new residential building with multi-modal amenities located near several transit service routes. The proposed vehicle access point will improve the frontage along Crenshaw Boulevard and will significantly reduce the number of curb cuts and potential conflict points between vehicles and pedestrians.

Vehicular access will be provided along the northbound side of Crenshaw Boulevard at one

driveway located approximately at the center of the project site. An existing raised median along Crenshaw Boulevard limits access to northbound right-turn entry/right-turn exit site access only. Per the Los Angeles County Fire Department, a 26-foot wide fire access lane is required along both the north and south property lines with direct access to Crenshaw Boulevard. On-site parking will be provided in an enclosed garage consisting of two-and-a-half vertical floors, starting at the ground level. The parking garage is designed to permit two-way travel between the various levels with adequate circulation.

Pedestrian Access

Pedestrian access to the project site will be provided on the ground floor with primary pedestrian access located at the building lobby located on the northern portion of the site. Additional restricted pedestrian access will also be provided to residential units on the southern end of the site, and via the parking garage. On-site pedestrian circulation will consist of a network of pathway connections between residential units, common areas, and the parking garage. Existing sidewalks are provided along the project frontage and within a continuous and complete pedestrian network in the surrounding area. Marked crosswalks are provided on all legs of the nearest intersection of Crenshaw Boulevard and El Segundo Boulevard, which provide direct access to transit stops and surrounding land uses.

Transit Access

The project site is well-served by transit service via Metro and the City of Gardena's transit service, GTrans. The Crenshaw Station is located 0.6 miles north of the project site, providing access to light rail. The project site is also located within a quarter-mile of nine bus stops. The following bus routes provide service within the immediate vicinity of the project site:

Route 5 (GTrans): connects to Metro buses on El Segundo Boulevard and to Metro Rail at the Imperial and Aviation Stations. Popular destinations on this bus route include Centennial High School, Hawthorne High School, Hawthorne Memorial Center, Hawthorne Sports Center, MLK Community Hospital and Magic Johnson Park.

Route 126 (Metro): connects to Manhattan Beach – Hawthorne Metro Rail Station via El Camino College.

Route 210 (Metro): connects to Hollywood/Vine Station – South Bay Galleria via Crenshaw Boulevard.

Route 710 (Metro): connects to Wilshire Center – South Bay Galleria via Crenshaw Boulevard.

Bicycle Access

Secured bicycle storage will be provided in the enclosed garage. There is an existing separated bicycle route along the Laguna Dominguez Trail behind the project site on the east side of the Dominguez Flood Control Channel. The Laguna Dominguez Trail spans nearly three miles between Lawndale and Hawthorne and can be accessed from El Segundo Boulevard, approximately 200 feet from the project site. The bicycle route provides direct access to the Crenshaw Station.

Transportation Demand Management

This section describes transportation demand management (TDM) strategies that will be implemented in the GTODSP area to advance the Plan's vision for multi-modal transportation. The project will integrate TDM measures to reduce single-occupant automobile travel and take advantage of the GTODSP's proximity to large employment centers, transit services, and bicycle and pedestrian facilities. The following applicable TDM strategies shall be provided by the developer of the GTODSP property.

Unbundled Parking. There shall be a charge for parking spaces. The property owner shall unbundle automobile parking charges from the rents or other fees charged for leasing residential units in the GTODSP area.

Pre-Leasing for Area Employees. Residential units within the GTODSP area shall be marketed exclusively for a thirty-day period to residents who are employees working within a one-half mile radius of the development, before the units are offered for rent to the general public. The developer shall submit a pre-leasing marketing plan to the Community Development Director for review and approval prior to issuance of a temporary certificate of occupancy. The developer must then demonstrate compliance with the approved thirty-day exclusive marketing plan prior to issuance of a final certificate of occupancy.

Transit Information. To ensure that residential tenants are aware of transit options and TDM programs available to them, an information board or kiosk shall be posted in a central location in the building.

On-site Residential Bicycle Parking. One bicycle parking space shall be provided for every residential unit (located in secured facilities accessible only by residents). There will also be unsecured bicycle parking spaces for guests, provided at-grade on a first-come, first-serve basis. All bicycle parking shall be located in a safe, convenient location, encouraging the use of bicycle transportation by residents and guests.

Ride-Sharing Pick-Up/Drop-Off. A designated loading area within the GTODSP shall be signed and distinguished (e.g., with paving and/or paint) so that it may be utilized as a pick-up and drop-off zone for ride-sharing services.

One-time Free Monthly Pass. During the initial 24-month period that units become available for rent, new residents who commence a 12-month lease shall be offered a one-time free monthly Metro pass.

IV. GRADING PLAN

The grading plan for the GTODSP area is provided in Figure 6.

Figure 6. *Grading Plan*

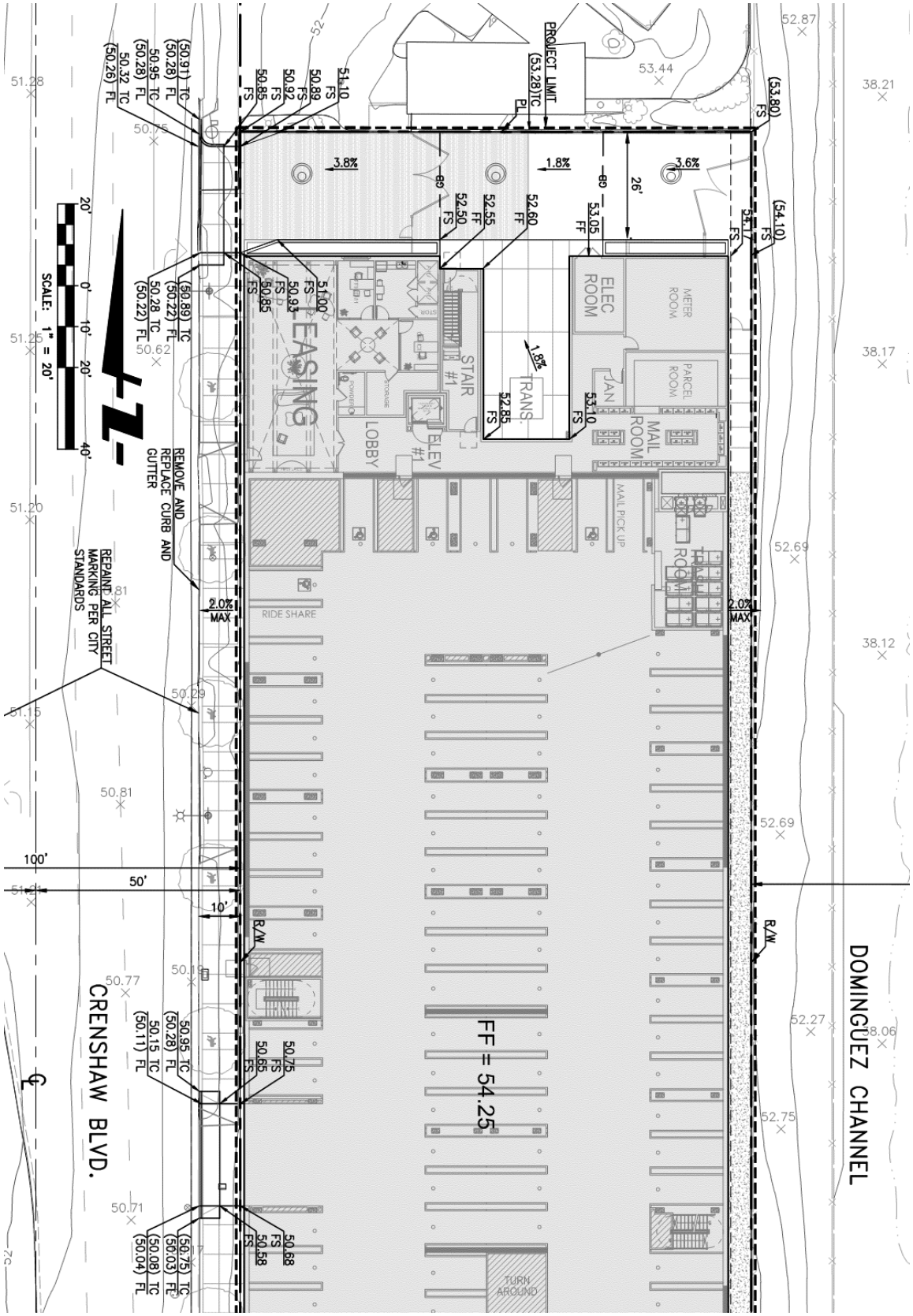
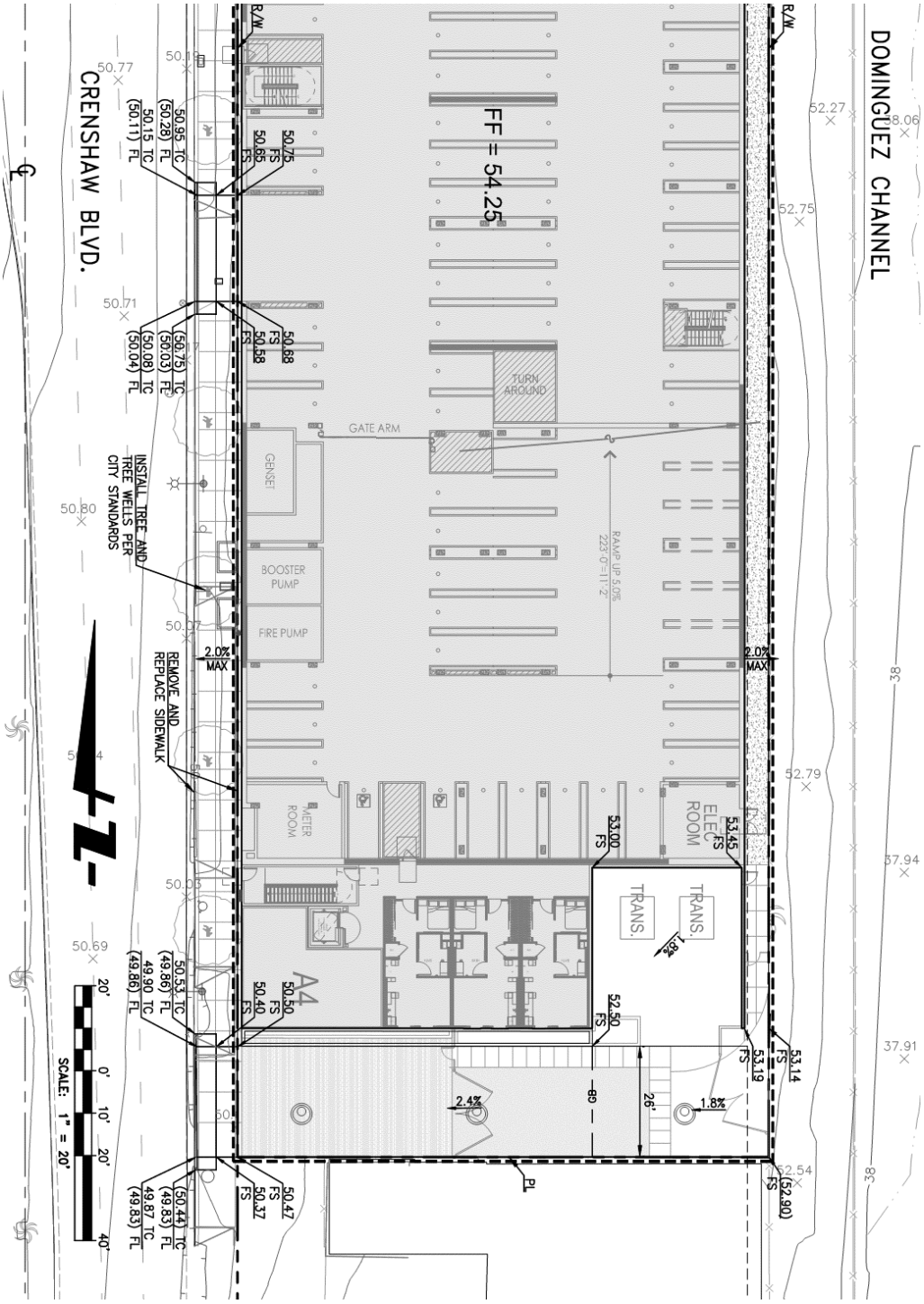


Figure 6. *Grading Plan (Cont'd)*



The site will be graded to mimic the existing grading and drainage patterns. The overall site grading and drainage pattern will be westerly towards Crenshaw Boulevard. Onsite area drains and catch basin will collect all onsite runoff prior to discharging through the curb into the existing gutter.

V. PUBLIC FACILITIES / UTILITIES PLAN

Existing utility infrastructure capacity for this area has been confirmed through regional area capacity studies and load-based assessment using proposed development parameters.

Stormwater and Drainage

As noted above, the GTODSP area is currently approximately 95 percent impervious. The construction of the proposed project will increase the site's permeability by approximately five percent. The project will not substantially change either the amount or rate of stormwater runoff flows currently generated in the Specific Plan area. In compliance with existing regulations, the GTODSP developers will provide all necessary drainage improvements and implement best management practices (BMPs) in compliance with National Pollutant Discharge Elimination System (NPDES) requirements, through a combination of infiltration, biofiltration, and possibly some capture-and-reuse.

The drainage improvements are subject to the City's standard development review and permit process, including plan checks and inspections.

The proposed project shall be graded to collect stormwater onsite and route the water by means of various BMP solutions and into the street flow line of Crenshaw Boulevard. The project shall utilize overflow drainage features if an influx of stormwater overtaxes the system.

Based on City code, the project will be required to treat the volume of water as determined by the Los Angeles County 85th Percentile 24-hour event precipitation isohyetal map.

Sewer

As noted above, City of Gardena as-built plans show an 8-inch vitrified clay pipe (VCP) approximately 34 feet east of the centerline of Crenshaw Blvd. The existing sewer pipe has a peak flow rate of 24,000 GPD which equates to being 17 percent full. The project is expected to keep the pipe flowing at less than the recommended guideline of 50 percent.

The project will connect to the existing sewer main through a series of laterals varying in size from four to eight inches.

Water

As noted above, there is an existing fire hydrant on the east side of Crenshaw Boulevard adjacent to the northwestern portion of the site. A new fire hydrant will be added at the south end of the property as required by the Los Angeles County Fire Department.

Development of the GTODSP will include all state mandated water-saving features, including water-efficient faucets, shower heads, and toilets.

The project will connect a domestic water line, a fire line, and irrigation line to the existing main.

Electrical Power

As noted above, the site is currently served by overhead power lines on the east side of the Crenshaw Boulevard owned and maintained by SoCal Edison. These lines will be placed underground within the project site as part of the project to provide permanent electrical power.

Natural Gas

As noted above, although the site is not currently served by natural gas, there is existing infrastructure in the street owned and maintained by SoCalGas, including a 20-inch transmission line on the west side of the street and a 4-inch distribution line on the east side of the street. It is anticipated that the project will be served by the 4-inch line on the far side of Crenshaw Boulevard.

Solid Waste

As noted above, solid waste pickup for the site will be handled by Waste Resources of Gardena. The trash pickup location will be coordinated with Waste Resources.

Public Services

The project site and surrounding area is developed and afforded all municipal services. Police protection services for Gardena are provided by the Gardena PD. Fire protection and emergency medical response services for Gardena are provided by the Los Angeles County Fire Department (LACFD). The LACFD operates two fire stations within the City of Gardena and several other fire stations in the vicinity of the project site. The LACFD Fire Station that will serve the Gardena TOD Specific Plan is Fire Station 162, located approximately 0.5 miles away at 12151 Crenshaw Boulevard in the City of Hawthorne. Because of the strategic location of the station, response times for emergency calls are generally within the four-minute goal established by the LACFD.

The provision of water for fire suppression is available from an existing 8-inch water line located in Crenshaw Boulevard. A two-hour fire flow test for the 6-inch hydrant located nearest the Project Site (Hydrant 163) determined that, at the required residual pressure of 20 pounds per square inch, a fire flow of 7,124 gallons per minute (gpm) was provided for the duration of the test, satisfying LACFD's minimum fire flow requirements of 3,000 gpm. Therefore, there would be adequate water service to satisfy the project's fire protection demand.

Educational services are provided to Gardena by the Los Angeles Unified School District (LAUSD). The project site is within the service district of LAUSD and is served by three schools: Purche Avenue Elementary School, Peary Middle School, and Gardena Senior High School. The enrollment at all three of these schools has been dropping over the years. Animo Legacy Charter Middle School is also in the vicinity located approximately 1.3 miles to the northeast.

VI. RECREATION AND OPEN SPACE PLAN

The recreation and open space plan for the GTODSP area is provided in Figure 7.

Figure 7. *Recreation and Open Space Plan*



The project will provide a minimum of 8,500 square feet of common open space and may provide additional private open space (such as balconies for certain dwelling units) for resident use and enjoyment.

The project's common open space and amenities consist of a series of courtyards and open areas, both active and passive, distributed in three levels for use by residents and their guests. The proposed open spaces and amenities shall include, at a minimum:

- Dog park;
- Swimming pool and upper-level courtyard(s);
- Fitness room;
- Club house; and
- Co-working space.

VII. PHASING PROGRAM

The proposed project within the GTODSP area is envisioned to be built in one phase. Phased occupancy of the proposed project is permitted. A Temporary Certificate of Occupancy may be issued pending clearance of certain final project conditions of approval, subject to approval by the Community Development Director.

VIII. LANDSCAPE PLAN

The landscape plan for the GTODSP area is provided in Figures 8A – 8H.

Figure 8A. *Landscape Plan – Ground Level*



Figure 8B.

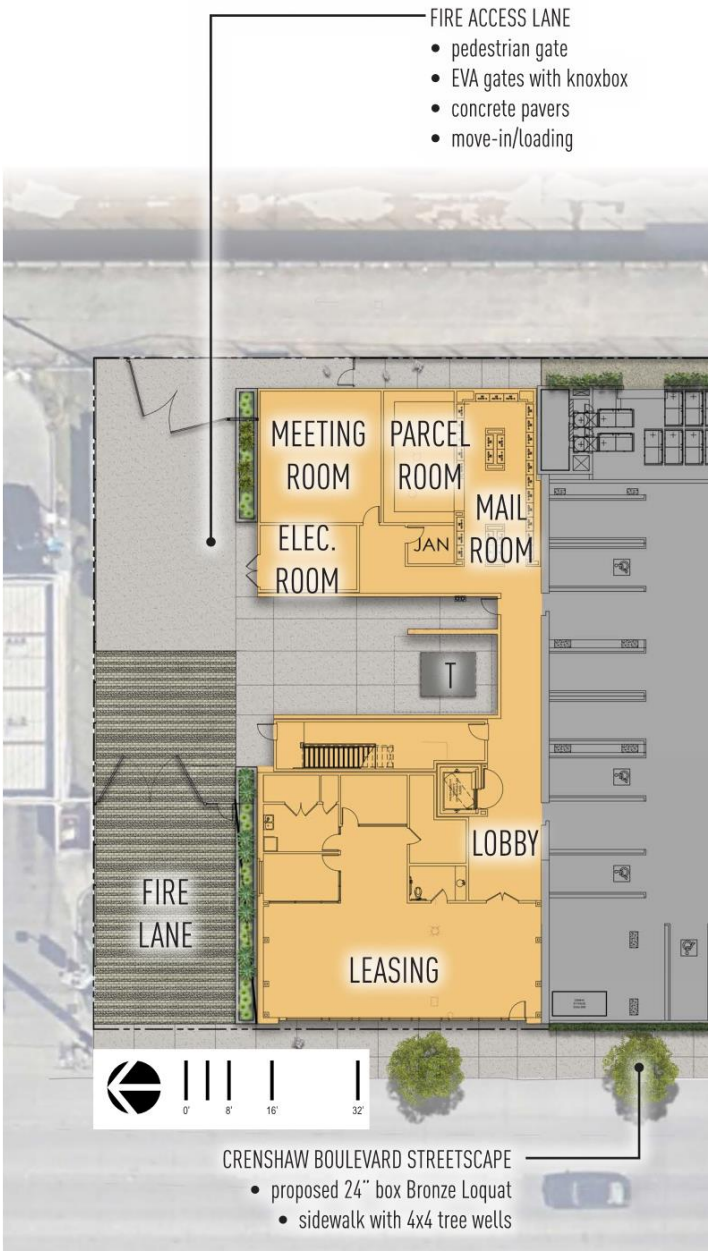


Figure 8C.

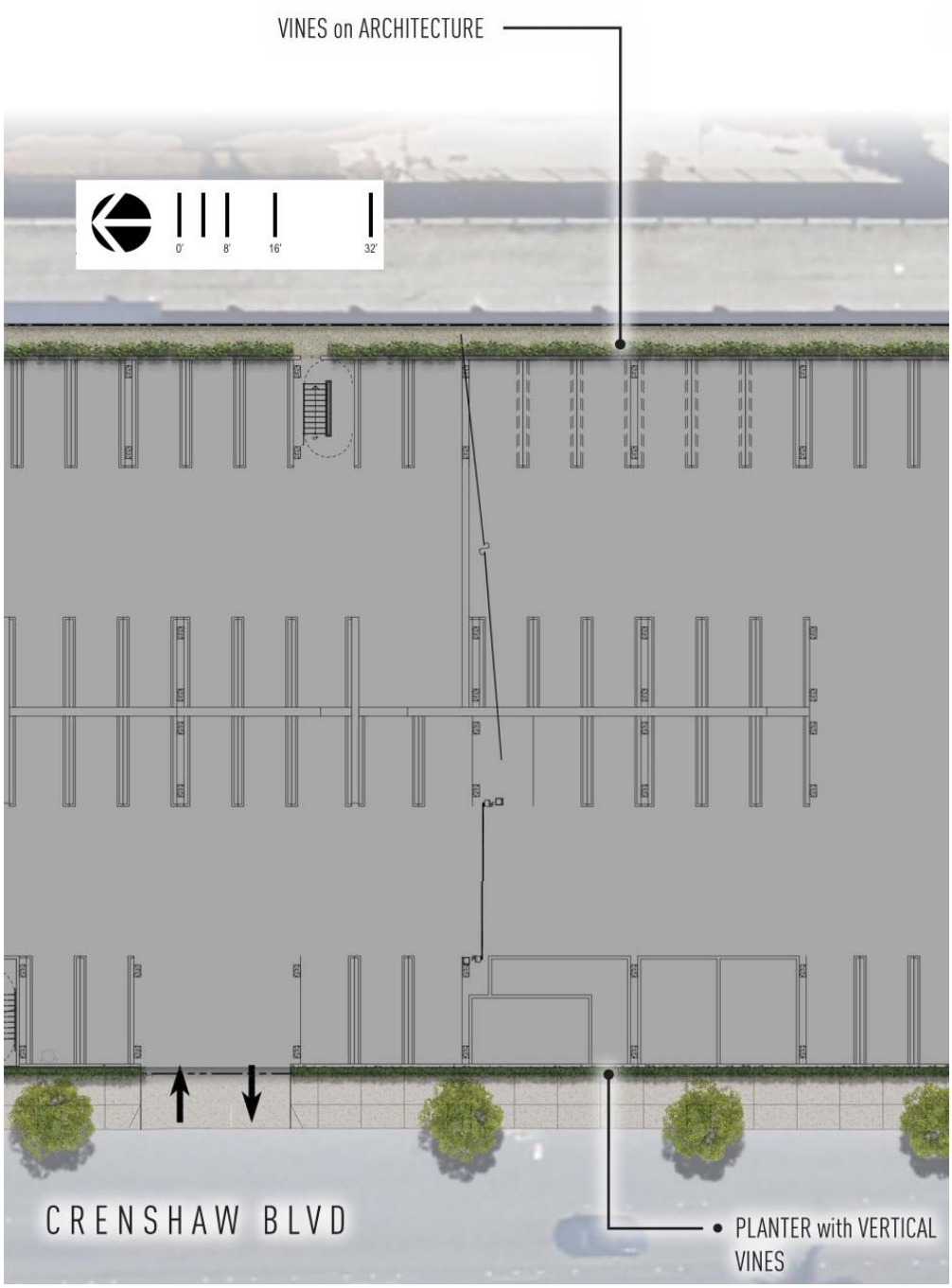

VINES on ARCHITECTURE
0'
8'
16'
32'
CRENSHAW BLVD
PLANTER with VERTICAL VINES

Figure 8D.

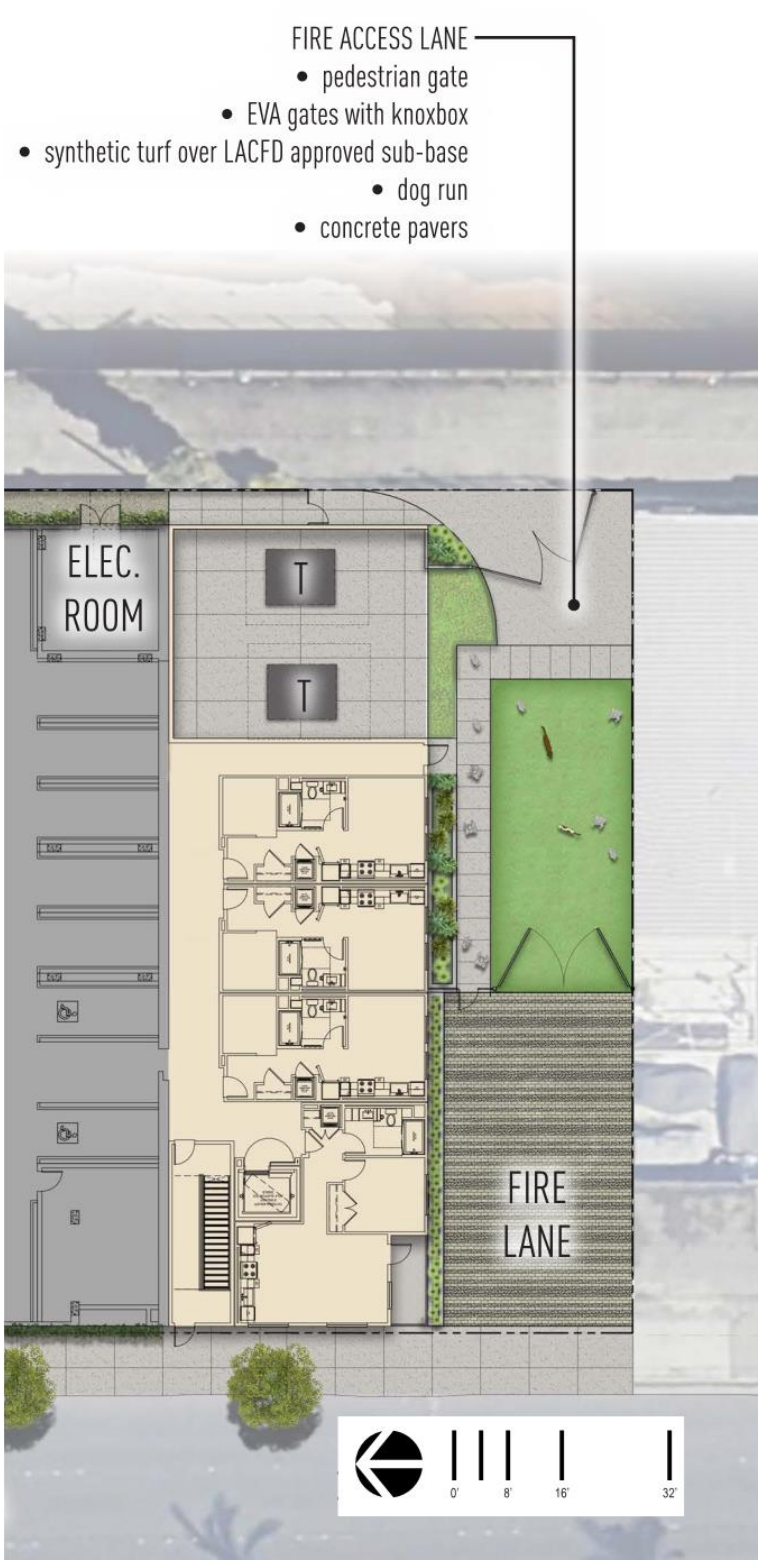


Figure 8E. *Landscape Plan – Elevated Courtyards*


FIRE LANE
FITNESS
CLUB ROOM
THE SOCIAL
• see Sheet L3
DOMINGUEZ CHANNEL
THE BACKYARD
• see Sheet L3
LEVEL 3
LEVEL 4
CRENSHAW BLVD
THE GATHERING
• see Sheet L3
GROUND LEVEL
• see Sheet L2
FIRE LANE

Figure 8F.


FIRE LOUNGE
• lounge seating
• fire pit
• pottery
• bbq
• gathering table
FITNESS LAWN
PRIVATE PATIOS TYP.
FITNESS
CLUB ROOM
FIREPLACE / TV
REF
THE SOCIAL LEVEL 3
LIMITS of UNIT ABOVE
ENTERTAINMENT
• tv
• decorative tile
• lounge seating
• pendant lights
• pool table
POOL DECK
• 12' x 22' pool
• lounge seating
• daybeds
• pottery
SPA LOUNGE
• 8' x 12' spa
• specimen tree
• daybeds
• pottery
LIVING ROOM
• sofas
• pottery
• decorative curtains

Figure 8G.

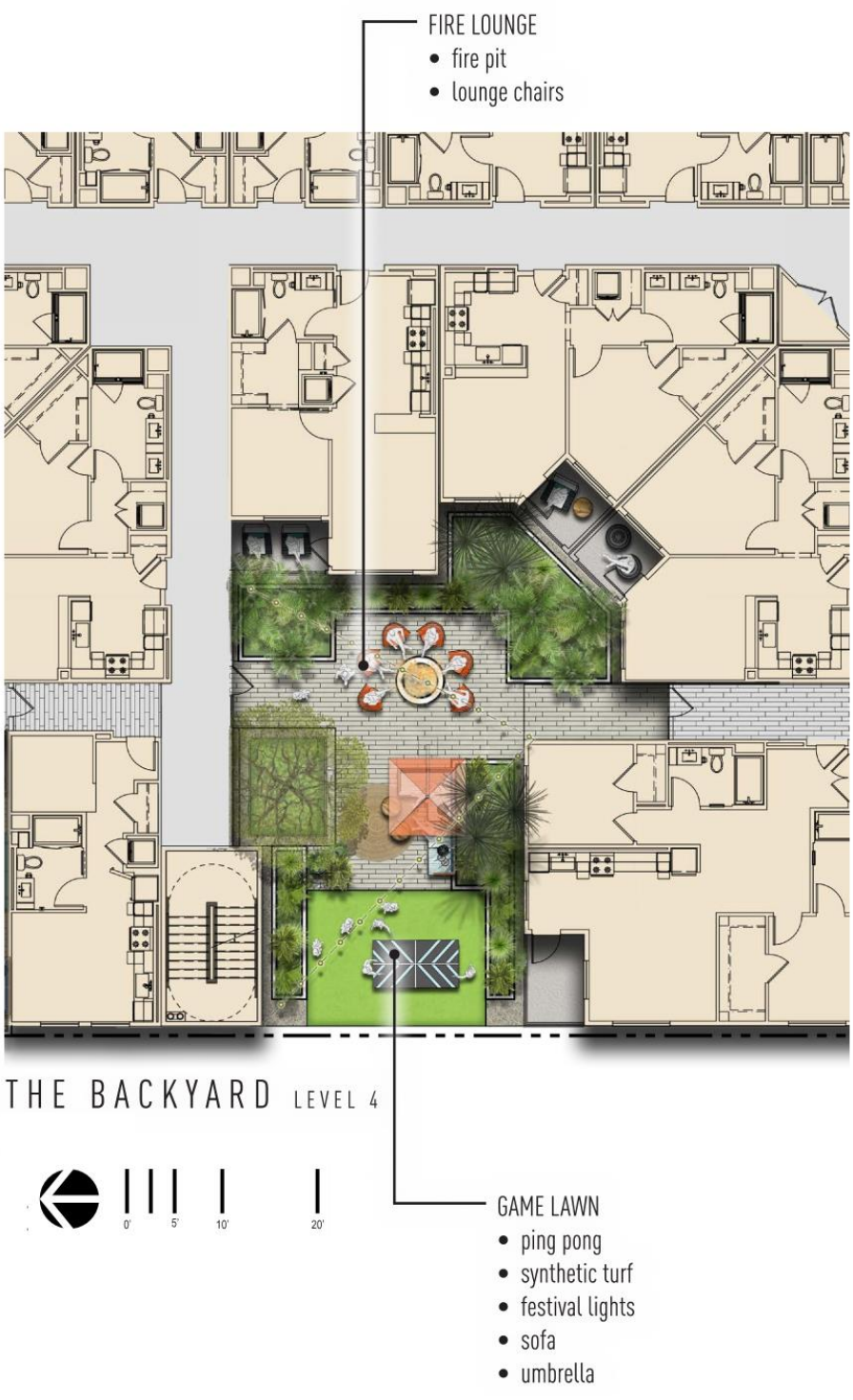

FIRE LOUNGE
• fire pit
• lounge chairs
THE BACKYARD LEVEL 4
0' 5' 10' 20'
GAME LAWN
• ping pong
• synthetic turf
• festival lights
• sofa
• umbrella

Figure 8H.



The landscaping for the project will provide a distinct visual impression and community identity, soften the urban experience, and provide a high level of aesthetic standards complemented by the quality of the building materials, all of which will assure an attractive environment enhancing the quality of life for its residents.

Streetscape

The Crenshaw Boulevard streetscape will provide street trees along the frontage at approximately 30 feet on center. The street trees will provide a valuable vertical element, shade the street and sidewalk, and create a pedestrian scale screen between the ground level and the upper floors of the building. The streetscape design also provides enhanced paving and space for short-term bicycle parking in the fire lane areas to further the visual appeal.

Amenity Courtyards

Each of the three courtyards are visible from the street and inject energy and activity to the street scene below. The courtyards provide residents with amenities including fire pits, lounge seating, areas for communal gatherings, barbecues, game lawns, and raised planters with mature trees. The north courtyard includes a pool and spa and a direct connection to the fitness room and club house.

Plant Materials

The landscape plan includes a layered landscape program with the proposed plants throughout the project regionally adapted with a focus on minimizing water use. This project will be consistent with the State and City of Gardena water efficient landscape ordinances.

The total landscaped area is approximately 2,000 square feet (or approximately 3.4 percent of the total project site area).

The plant design utilizes water-wise landscaping principles, including a low percentage of water-thirsty plants, smart irrigation controllers, drip irrigation, and bark mulch to slow evapotranspiration and weed germination.

CHAPTER 5. DEVELOPMENT REGULATIONS AND REQUIREMENTS

I. DEVELOPMENT STANDARDS

Permitted Uses

A project in the Plan area shall only be occupied by land uses identified in this Specific Plan and shall be subject to the applicable City approval process identified in Chapter 8 (Implementation).

The following uses are permitted by right in the GTODSP area:

- Multi-family housing;
- Short-term corporate housing (i.e., leases of 30 days or less) within up to 10 percent of the dwelling units at any given time. The intent of this provision is to allow an entity such as a corporate housing provider or large local employer to master lease up to 10 percent of the Project units and then sublease those to corporate tenants for periods less than 30 days;
- Residential amenities and ancillary uses, such as home occupations, and any use customarily incidental to a permitted use;
- A single approximately 42' x 60' digital billboard (animated and moving sign) on the north elevation not to exceed 2,500 square feet for off-site advertising, community programming and City revenue sharing purposes; and
- Any other use not specifically listed here determined by the Community Development Director to be similar to a permitted use.

Any use not listed as a permitted use, and not found to be sufficiently similar to a permitted use by the Community Development Director, is prohibited.

Minimum Lot Area

The minimum lot area required for development of the project permitted by the GTODSP shall be 1.33 acres. Individual lots may be consolidated to meet the minimum lot area.

Density/Development Capacity

The density is 200 units per acre. However, the maximum development allowed for the project area is 265 dwelling units, with related amenities and ancillary uses.

Maximum Building Height

Buildings shall not exceed 8 stories and 100 feet in height as measured from the finished floor (i.e., the level of the finished floor on the ground level) to the highest point on the roof, including non-habitable projections (including, without limitation, architectural features, elevator shafts mechanical equipment, stairwells, canopies, or shade structures). The garage entrance is at the ground level, but a portion of the internal ramp and parking shall be located below-grade. The below-grade portions of the parking garage shall not count towards the permitted building height.

Floor Area Ratio

FAR shall not exceed a maximum of 4.25 as calculated over the entire project area, excluding parking areas.

Dwelling Unit Size

The minimum dwelling unit size shall be:

- 400 square feet for studio units.
- 550 square feet for one-bedroom units.
- 850 square feet for two-bedroom units, plus 150 square feet for each additional bedroom over two.

Setbacks

Front and Rear: None required. However, a 12-inch-deep ground-level planter located behind the city sidewalk that runs along the project frontage shall be provided.

Side: 10 feet (as measured from the property line).

Permitted Encroachments: Non-habitable architectural features (e.g., canopy or awning), planter boxes, outdoor seating for pedestrians and similar features may encroach within required setback areas by up to five (5) feet. Fire lanes and other drive aisles may be located in the required side yard setbacks.

II. RECREATION AND OPEN SPACE STANDARDS

Required Open Space

A minimum of 8,500 square feet of common open space must be provided within the plan area outside of setback areas. A minimum of 250 square feet of ground-level planter shall be required along the street frontage at the ground level. The project is not required to provide any additional open space (on a per-unit basis or otherwise). Open space includes courtyards and open areas, both active and passive, and indoor amenity areas (including a fitness room, club house, and co-working space for residents to work in the building), for use by residents and their guests.

Open Space Standards

Common open space shall be improved and reserved for the exclusive use of residents and their guests. Common open space shall be either active (e.g., swimming pool, recreation rooms, fitness rooms, club room, audio visual entertainment) or passive (e.g., lounges, accessible landscaping and outdoor seating areas, or similar improvements) and may be either enclosed (indoor or outdoor) or unobstructed from the ground to the sky.

Private open space may be provided for certain dwelling units, but is not subject to any minimum or per-unit standard. Private open space may be provided as a private balcony, patio, or landscape area adjoining and directly accessible to a residential dwelling unit, reserved for the exclusive use of residents of the dwelling unit and their guests.

III. PARKING AND LOADING

Vehicle Parking

Due to the Specific Plan area's proximity to multiple transit options, this Specific Plan imposes a minimum parking requirement of: one parking space for each unit. As part of the TDM strategies, there shall be a charge for parking spaces and the property owner shall unbundle automobile parking charges from the rents or other fees charged for leasing residential units in the GTODSP area. The property owner may not lease a compact space to a resident that has a car greater than 16 feet in length.

Up to 50% of the required parking spaces may be compact spaces.

The minimum parking stall dimensions for required parking spaces are:

- Compact spaces: nine feet wide (to center of double striped lines) and 16 feet long
- Standard spaces: nine feet wide (to center of double striped lines) and 18 feet long

Each aisle of parking shall consist of one row of compact spaces and one row of standard spaces separated by a two-way drive aisle of at least 24 feet in width. In no circumstance will two rows of compact-sized parking spaces be provided within a single parking aisle, except in the limited circumstances where a parking space in the row of standard-sized spaces is located adjacent to a wall or other obstruction, in which case it will be designated as a compact space.

Bicycle Parking

One bicycle parking space shall be provided for each residential unit (located in secured facilities accessible only by residents). All bicycle parking shall be located in safe, convenient locations, encouraging the use of bicycle transportation by residents and residential guests. Storage for residents will be provided on rack type systems within secured/lockable rooms located throughout the project. There will also be unsecured bicycle parking spaces for guests, provided at-grade on a first-come, first-serve basis.

Drive Aisle

The minimum width of the drive aisle in the parking garage shall be 24 feet.

Loading Spaces

The project is not required to construct any loading spaces. Any loading spaces that are constructed shall not be required to meet the minimum dimension requirements of Section 18.40.100 B. of the Gardena Municipal Code.

IV. NONCONFORMITIES

The GTODSP area currently comprises owner-occupied light industrial development. Following approval of this Specific Plan, the existing industrial uses shall be nonconforming to the provisions of the Specific Plan.

Nonconforming uses shall be subject to the provisions of Section 18.54.040 of the Gardena Municipal Code, which prevents nonconforming uses from being changed or expanded beyond what was established when the use became nonconforming. If a nonconforming use within the GTODSP area ceases to operate or exist for a period of one year, it will be considered abandoned or discontinued.

V. MAINTENANCE STANDARDS

The property owner shall be required to maintain the project site in an orderly manner during and following construction. The property owner shall perform all regular maintenance and necessary repairs to the exterior and interior of the project.

VI. STANDARDS FOR ACCESSORY STRUCTURES, ADDITIONS, WALLS, FENCES, OTHER CHANGES

Walls, fences, and gates may be used to identify separate areas and provide needed privacy and security. Where constructed, walls, fences, and gates should appear consistent in style and material, complementing the surrounding architectural styles. Landscaping elements should be planted and layered to provide screening. Vines and trellises are encouraged to help soften hard edges and screen walls from view.

All walls and fences in a front yard setback shall comply with the requirements of Gardena Municipal Code Section 18.42.070 A.2. All walls or fences in the side and rear yard setbacks shall not exceed ten feet in height and shall be constructed of solid decorative concrete masonry or open wrought iron. A ten-foot-high solid decorative concrete masonry wall is required along the southern property line to buffer from existing industrial uses, and may also be provided along the northern property line.

VII. SIGN PROGRAM

A master sign program shall be submitted to the Community Development Director for administrative approval. The master sign program shall include project focused identification signage throughout the building, and on the north elevation an approximately 42’ x 60’ digital, animated and moving sign not to exceed 2,500 square feet for off-site advertising, community programming and City revenue sharing purposes. The permitted signage hours of operation will be from 6 a.m. to 2 a.m., seven days a week.

The digital billboard shall be subject to the following standards:

- Location: The Digital Display shall be located or screened to minimize to the greatest reasonable extent possible direct light sources onto any exterior wall of a residential unit in the City of Gardena.

- Materials: The Digital Display shall not use highly reflective materials such as mirrored glass.

- Title 24: All light sources, including illuminated signage, shall comply with CALGreen (Part II of Title 24, California Code of Regulations).

- Dimming: The Digital Display shall be fully dimmable and shall be controlled by a programmable timer so that luminance levels may be adjusted according to the time of day and ambient light conditions.

- Brightness: The Digital Display shall have a nighttime brightness no greater than 400 candelas per square meter and a daytime brightness no greater than 7,000 candelas per square meter. The displays shall transition smoothly at a consistent rate from the permitted daytime brightness to the permitted nighttime brightness levels, beginning 45 minutes prior to sunset and concluding 20 minutes after sunset, and at all times when the ambient light is less than 100 footcandles.

- Ground Spillage: When measured at ground level from any location other than the property on which the Digital Display is located, the Digital Display shall not under any circumstance increase the total amount of measurable light more than 8 LUX above the ambient-light level that exists when the Digital Display is extinguished.

- Interior Spillage: When measured from any location within the building, the Digital Display shall not increase the total amount of measurable light more than 5 LUX above the ambient-light level that exists when the Digital Display is extinguished.

- Refresh Rate: The Digital Display will operate under unrestricted refresh rates and shall permit images, videos, animation, parts and/or illumination that flash, change, move, stream, scroll, blink or otherwise incorporate motion to change at an unrestricted rate.

- Hours of Operation: The Digital Display may be illuminated between the hours of 6:00 a.m. to 2:00 a.m.

- Animation and Motion: Flashing, strobing, racing effects, and animation that may resemble red or blinking intermittent light or other traffic control devices shall be prohibited.

- Screen Freezing: The Digital Display shall be equipped with a default system backup server system in the case of a malfunction of the primary server.

CHAPTER 6. DESIGN GUIDELINES

The following guidelines are specifically tailored to ensure the quality development envisioned for the GTODSP area.

I. ARCHITECTURE

Design Principles

The following design principles will ensure that development activity is integrated, sensitive to surrounding neighborhoods, provides positive imagery, and creates an inviting environment for residents and visitors, meeting the intent of the Specific Plan.

Design Principle 1: Provide for High Quality Development

The GTODSP area is envisioned as a catalyst for new development in the Crenshaw corridor, thus development should not be thought of as temporary. Building materials and landscaping should be chosen for their ability to be maintained in a cost-effective manner at the same high quality as when they were originally constructed and installed. Planning and building design should consider longevity and adaptability to future conditions and trends.

Design Principle 2: Provide Development that is Human Scale

Development should be inviting and scaled for its users, while acknowledging the importance of safety for both pedestrians and vehicles along with access and mobility through pedestrian connectivity, public transit, and bicycles. The project design should include human-scale character throughout. In addition, new architecture should be designed with elements which are scaled to the pedestrian, such as awnings, fenestration, and first-floor design elements. If the garage is located on the ground level with street frontage, screening or enhancements should be considered to maintain the integrity of the architecture.

Design Principle 3: Create Cohesive Thematic Elements

New development and redevelopment should provide thematic elements that create a cohesive environment. Elements can include: consistent and cohesive streetscape; strong relationships between the building, sidewalk, and other outdoor spaces; comprehensive signage and wayfinding; gateway elements; pedestrian connections; and close proximity to existing bicycle facilities.

Architectural Styles and Scale

Building design should incorporate an architectural style and scale that is compatible with the intended use. Architectural details may draw upon new local technology buildings or other nearby features that contribute to the aesthetic ambience of the immediate area. The GTODSP does not prescribe a particular architecture style for development, but recommends consistency in architectural style throughout the project, and promotes a unique style of design achieved through the creative use of massing, materials, roof forms, and facades.

Elevations shall provide an adequate level of design detail and diversity to reduce a monolithic appearance.

The project should provide thematic elements that create a cohesive environment, including consistent and cohesive streetscape; strong relationships between the building, sidewalk, and other outdoor spaces; and comprehensive signage.

The GTODSP's regulation of the building envelope will contribute to a coherent building design and promote architectural unity in the Specific Plan area.

The structure should be broken up by creating horizontal emphasis using trim, awnings, eaves, or other ornamentation and by using a combination of complementary colors.

Siding Materials

The project should include enhanced materials to complement the architectural design at pedestrian level and at other key elements of the building elevation. The selection of enhanced materials shall contribute to the visual quality of the streetscape.

Materials shall be high quality, durable, and not readily deteriorate if exposed to the elements.

Architectural features and materials shall wrap corners and provide the same level of detail as the primary façade.

Color

Colors should include a base color and accent colors. Generally, a minimum of two complementary colors should be used. Color schemes should be selected with a harmonious range of accent materials.

Architectural Features

Architectural features are encouraged to create visual interest.

II. LANDSCAPE AND STREETSCAPE

Landscaping for any development within the GTODSP area must be substantially consistent with the landscape plan concepts set forth in Chapter 4, Section VIII of this Specific Plan.

Buildings and major pedestrian entrances should be oriented toward centers of activity, such as the primary street frontage.

Use of distinctive paving treatments is encouraged to give visual cues to users and emphasize different areas within the streetscape and visitor spaces.

The property owner shall maintain all landscaped areas. All landscaping shall be well maintained.

Landscaping shall not interfere with pedestrian movement or impede the visibility of business and signage.

III. LIGHTING STANDARDS

Lighting should be used to illuminate open spaces and contribute to the safety and beauty of the project. Fixtures should complement the architectural style of the area. Overly glaring or flashing lights are discouraged.

IV. PERFORMANCE STANDARDS

Development within the GTODSP shall conform to the most recent CALGreen sustainability standards in effect at the time of building plan submission. Compliance with these standards results in a reduction of energy usage for any given building or complex.

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CHAPTER 7. GENERAL PLAN CONSISTENCY

I. APPLICABLE GOALS AND POLICIES

Relationship to the General Plan

The City of Gardena General Plan establishes the overall vision for growth and development in the community. The General Plan Land Use Element establishes clear and logical patterns of land use and standards for new development.

The GTODSP provides for the orderly and efficient development and revitalization of the Plan area consistent with the City of Gardena General Plan. The GTODSP is a regulatory document prepared pursuant to the provisions of California Government Code sections 65450 through 65457, which grant local government agencies the authority to prepare specific plans for the systematic implementation of their general plan for all or part of the area covered by the general plan.

State law requires that any specific plan be consistent with the City's General Plan. The Gardena General Plan – Community Development Element – Land Use Plan is amended concurrent with adoption of the GTODSP to ensure technical consistency between the two documents. The general plan amendment will change the land use designation on the General Plan Land Use Map from "Commercial" to "Specific Plan" and amend the Land Use Element text and Land Use Element Table LU-3 to allow the mix of uses and densities specified in this Specific Plan.

Relationship to the Zoning Ordinance

Title 18 of the Gardena Municipal Code is the Zoning Ordinance, which provides the regulatory tool to implement the land use goals, policies, and actions established by the General Plan. The Zoning Ordinance identifies specific zoning districts in the city and prescribes development standards and regulations that apply to each district.

The Gardena Zoning Code and Map is also amended by ordinance concurrent with adoption of the Specific Plan to ensure complete and technical consistency. A Gardena TOD Specific Plan zone replaces the site's existing General Commercial - C3 zoning. The contents of this Specific Plan will be adopted by ordinance and will replace the existing zoning standards.

Where the Zoning Ordinance's regulations, development standards, design guidelines, and/or administrative procedures are inconsistent with this Specific Plan, the Specific Plan regulations, standards, guidelines, and procedures shall supersede. However, any issue not specifically

addressed in the GTODSP shall be subject to the standards and regulations of the Zoning Ordinance.

Specific Plan Policies

The policies in this section were established specifically for the GTODSP and provide guidance for new development, mobility, and public improvements in the Plan area. These policies apply throughout the GTODSP area and supplement the General Plan policies outlined in the consistency analysis below. Development proposals must be consistent with the policies of both the General Plan and this GTODSP.

Policy 1: Housing. Provide for the development of enhanced technology and creative sector housing that supports the employees of the area's expanding high-tech firms and industries.

Policy 2: Quality Development. Achieve quality development that can serve as a model for future development in Gardena, including the use of quality, durable materials, on-site residential amenities, pedestrian and streetscape amenities, and attention to architectural detail.

Policy 3: Transit-Oriented Development. Accommodate the development of land uses that include quality, multi-family housing that support and benefit from the presence of light-rail transit.

Policy 4: Development Density. Provide increased residential density near large employment centers and the Green Line Crenshaw station, while protecting and preserving the city's established single-family residential neighborhoods.

Policy 5: Sustainable Development. Achieve best practices for architectural design and land development that enhance the city's infrastructure, reduce consumption of non-renewable resources, and limit pollutants and greenhouse gas emissions.

Policy 6: Pedestrian Network Connections. Achieve safe and convenient pedestrian connections to the surrounding area—such as the local corporate headquarters and other employment centers—and the Green Line Crenshaw Station.

II. GENERAL PLAN CONSISTENCY ANALYSIS

The GTODSP is consistent with the following General Plan goals and policies:

Housing Element

GOAL 3.0: Minimize the impact of governmental constraints on housing construction and cost.

Policy 3.3: Encourage the use of special development zones and other mechanisms to allow more flexibility in housing developments.

Consistent with Goal 3.0, the GTODSP reduces the impact of governmental constraints on housing construction and cost. Consistent with Policy 3.3, the GTODSP implements special zoning and development standards to permit more flexibility in housing developments in northwest Gardena. The GTODSP offers an opportunity to create a vibrant, transit-oriented neighborhood. The GTODSP facilitates more diverse multi-family housing options to serve the City's growing and evolving technology industry, and supports the local economy with newly constructed, high-quality multi-family housing opportunities. By permitting denser development than would otherwise be permitted under existing zoning, the Specific Plan incentivizes construction of new multi- family housing with a variety of unit types.

GOAL 4.0: Provide adequate residential sites through appropriate land use and zoning to accommodate the City's share of regional housing needs.

Policy 4.1: Implement land use policies that allow for a range of residential densities.

Consistent with Goal 4.0, the GTODSP provides the appropriate land use and zoning for development of multi-family, transit-oriented residential development. Construction of up to 265 residential units in the vicinity of regional serving public transit infrastructure assists the City in meeting its share of the regional housing needs allocation. Currently, residential development in northwest Gardena primarily consists of single-family housing with multi-family housing along major arterials. The GTODSP permits a greater range of residential densities than is currently permitted in this area of the City, consistent with Policy 4.1.

Community Development Element - Land Use Plan

LU Goal 1: Preserve and protect existing single-family and low/medium-density residential neighborhoods while promoting the development of additional high-quality housing types in the City.

LU 1.1: Promote sound housing and attractive and safe residential neighborhoods.

LU 1.2: Protect existing sound residential neighborhoods from incompatible uses and development.

LU 1.4: Locate new medium- and high-density residential developments near neighborhood and community shopping centers with commensurate high levels of community services and facilities.

LU 1.5: Provide adequate residential amenities such as open space, recreation, off-street parking and pedestrian features in multifamily residential developments.

LU 1.6: Ensure residential densities are compatible with available public service and infrastructure systems.

LU 1.8: Minimize through-traffic on residential streets.

Consistent with Goal 1, the GTODSP implements new zoning and development standards to promote the development of additional high-quality housing types in the City. The GTODSP includes development standards and design guidelines to promote high quality housing and attractive and safe residential neighborhoods, consistent with Policy 1.1. The GTODSP facilitates the transition of the surrounding neighborhood into a more complete community, in that it will bring new residents to the neighborhood, support the local economy, improve the streetscape, activate the pedestrian realm, and help transition an automobile-oriented corridor to transit-oriented development.

Consistent with Policy 1.2, the GTODSP protects the existing single-family residential neighborhood to the east from incompatible uses and development, and is not within an existing residential neighborhood. The project design and access are oriented to Crenshaw Boulevard and away from the nearest residential neighborhood. In addition, the Dominguez Flood Control Channel and related improvements provide an additional physical separation of approximately 100 feet between the project and the nearest residential neighborhood.

Consistent with Policy 1.4, the Specific Plan clusters urban-density housing at an appropriate location near the Crenshaw Station, technology firms, and other large local employment centers. The Specific Plan also locates new housing within walking distance of a variety of retail opportunities and local eateries, many of which are in a large commercial center immediately south of the Crenshaw Station and I-105. These features of the project will increase convenience for residents and reduce future residents' automobile dependence.

Consistent with Policy 1.5, the project provides residential amenities including open space, recreation areas, and structured off-street parking. The project's open space and recreational facilities consist of a series of courtyards and open areas, both active and passive, distributed in three levels for use by residents and their guests. The open spaces include a dog park on the ground level, a 4,600-square foot pool courtyard on Level 3 adjacent to a fitness room and club house, and two additional courtyards on Level 4 with a combined area of approximately 4,000 square feet. On-site parking will be provided in an enclosed garage consisting of two-and-a-half vertical floors above grade (the garage entrance is at the ground level, but a portion of the

internal ramp and parking shall be located below-grade). The parking garage is designed to permit two-way travel between the various levels with adequate circulation.

Consistent with Policy 1.6, the GTODSP permits residential density compatible with available public service and infrastructure systems. As described in Chapter 3., Section VII., Utilities, and Chapter 4., Section V., Public Utilities / Facilities Plan, of this Specific Plan, the GTODSP includes measures to ensure that the plan area is served by adequate public services, infrastructure, and utilities.

Consistent with Policy 1.8, the project minimizes through-traffic on residential streets by orienting vehicular access towards Crenshaw Boulevard, a major divided arterial primarily developed with commercial and light industrial uses in the vicinity of the project site. The project does not disrupt any existing traffic patterns on residential streets.

Community Development Element – Economic Development Plan

ED Goal 3: Attract desirable businesses to locate in the City.

> ED 3.3: Maintain a multidisciplinary proactive approach to improve the City's image as a desirable business location.

Consistent with Goal 1, the GTODSP facilitates the development of high-quality housing in proximity to local technology and creative sector companies and other employment centers to further attract desirable businesses to locate in the City. Innovative technology firms and their employees place a premium on quality-of-life and livability factors, including access to high-quality housing options; social, cultural, and environmental amenities; access to shops and restaurants; and low-stress commutes. Implementation of the GTODSP will help alleviate the negative impacts of a lack of housing for local technology and creative sector employees. Consistent with Policy 3.3, the GTODSP adopts a multidisciplinary, proactive approach, supporting the expanding technology sector with newly constructed, high-quality multi-family housing opportunities.

Community Development Element – Community Design Plan

DS Goal 1: Enhance the visual environment and create a positive image of the City.

> DS 1.3: Promote a stronger design review process to ensure that public and private projects comply with best design practices and standards.
>
> DS 1.4: Provide a sense of arrival to Gardena through entry monument signs, landscaping features, architectural and motifs at key gateway locations.

Consistent with DS Goal 1, the project will enhance the visual environment by replacing an obsolete, automobile-oriented light industrial building and surface parking lot with a new transit-oriented multi-family development project. The project will incorporate high-quality design and landscaping consistent with the standards of the GTODSP to further enhance the visual environment. Developing new residential uses in proximity to growing local technology and creative sector industries will help create a positive image of the City. Consistent with Policy 1.4, the project would provide on-site landscaping features and a high-quality sign identifying the project, consistent with the sign standards identified in this Specific Plan, at a key gateway location in the City. These design features are a result of compliance with Policy 1.3.

DS Goal 2: Enhance the aesthetic quality of the residential neighborhoods in the City.

DS 2.1: Provide stronger design guidelines for residential development, including both new construction and additions to existing single-family units or multi-family dwellings.

DS 2.2: Ensure that new and remodeled dwelling units are designed with architectural styles, which are varied and are compatible in scale and character with existing buildings and the natural surroundings.

DS 2.3: Encourage a variety of architectural styles, massing, floor plans, color schemes, building materials, façade treatments, elevation and wall articulations.

DS 2.7: Require appropriate setbacks, massing, articulation and height limits to provide privacy and compatibility where multiple family housing is developed adjacent to single family housing.

DS 2.9: Integrate new residential developments with the surrounding built environment. IN addition, encourage a strong relationship between the dwelling and the street.

DS 2.10: Provide landscape treatments (trees, shrubs, groundcover, and grass areas) within multi-family development projects in order to create a “greener” environment for residents and those viewing from public areas.

DS 2.11: Incorporate quality residential amenities such as private and communal open spaces into multi-unit development projects in order to improve the quality of the project and to create more attractive and livable spaces for residents to enjoy.

DS 2.12: Provide well-designed and safe parking areas that maximize security, surveillance, and efficient access to building entrances.

DS 2.14: Require design standards be established to provide for attractive building design features, safe egress and ingress, sufficient parking, adequate pedestrian amenities, landscaping, and proper signage.

DS 2.15: Promote innovative development and design techniques, new material and construction methods to stimulate residential development that protects the environment.

Consistent with Goal 2, implementation of the GTODSP would enhance the aesthetic quality of the Specific Plan area. The GTODSP is intended to achieve quality and attractively designed development that can serve as a model for future multi-family, transit-oriented development in the City. Implementation of the Specific Plan will replace an obsolete light industrial building with a high-quality residential development that is intended to serve as a catalyst to transform northwest Gardena into a vibrant, transit-oriented neighborhood. Consistent with Policies 2.1, 2.2 and 2.3, Chapter 6 of the GTODSP includes design principles and guidelines for residential development to ensure that the project is designed with a varied, yet compatible architectural style. Consistent with Policy 2.14, these design standards will ensure that the project would be designed with attractive building design features, safe ingress and egress, sufficient parking, adequate pedestrian amenities, and landscaping. Approval of a master sign program as contemplated by this Specific Plan would provide for proper identification signage for the project.

Consistent with Policies 2.7 and 2.9, the project design and access are oriented towards Crenshaw Boulevard and away from the single-family housing located to the east of the project site. Furthermore, the project does not directly abut any residential neighborhood; the project abuts public facilities and open space. In addition, the Dominguez Flood Control Channel and related improvements provide an additional physical separation of approximately 100 feet between the project and the nearby single-family housing.

Consistent with Policy 2.10, the project will provide landscape treatments that will create a "greener" environment. The project will replace an existing light industrial building that has no landscaping and an expansive surface parking area with a multi-family residential building that incorporates street trees to shade the street and sidewalk and create a pedestrian-scale screen between the ground level and upper levels of the building. The upper level courtyards would all be landscaped and visible from the street, further enhancing the "green" environment for residents and those viewing from public areas.

Consistent with Policy 2.11, implementation of the GTODSP would incorporate quality residential amenities, including private and communal open spaces, into the proposed multi-family development project. The project's amenities include a dog park on the ground level, a 4,600-

square foot pool courtyard on Level 3 adjacent to a fitness room and club house, and two additional courtyards on Level 4 with a combined area of approximately 4,000 square feet. These amenities would improve the quality of the project and create more attractive and livable spaces for residents.

Consistent with Policy 2.12, parking for the project will be provided in an enclosed garage consisting of two-and-a-half vertical floors above grade (as noted, a portion of the internal ramp and parking shall be located below-grade). The parking garage will be accessible only to residents and will be secured by a key fob entry system. Residents will be able to enter the building directly from the parking garage.

Consistent with Policy 2.12, the GTODSP includes design guidelines to ensure the project is designed with a varied, yet compatible architectural style, attractive building design features, safe ingress and egress, sufficient parking, adequate pedestrian amenities and landscaping.

Consistent with Policy 2.15, the project will conform to the latest CALGreen sustainability standards.

Community Development Element – Circulation Plan

Cl Goal 1: Promote a safe and efficient circulation system that benefits residents and businesses and integrates with the greater Los Angeles/South Bay transportation system.

> Cl 1.1: Prioritize long-term sustainability for the City of Gardena, in alignment with regional and state goals, by promoting infill development, reduced reliance on single-occupancy vehicle trips, and improved multi-modal transportation networks, with the goal of reducing air pollution and greenhouse gas emissions, thereby improving the health and quality of life for residents.

Consistent with Goal 1, the GTODSP project promotes reduced reliance on single-occupancy vehicle trips and convenient access to the multi-modal transportation measure through its location and the TDM measures.

CI Goal 3: Develop Complete Streets to promote alternative modes of transportation that are safe and efficient for commuters, and available to persons of all income levels and disabilities.

> CI 3.1: Work with Gardena Municipal Bus Lines and MTA to increase the use of public transit, establish or modify routes, and improve connectivity to regional services.

CI 3.3: Maintain and expand sidewalk installation and repair programs, particularly in areas where sidewalks link residential neighborhoods to local schools, parks, and shopping areas.

CI 3.4: Maintain a citywide bicycle route and maintenance plan that promotes efficient and safe bikeways integrated with the MTA's regional bicycle system.

Consistent with Goal 3, the GTODSP facilitates a transit-oriented development where residents live near, and walk or bicycle to, their offices, shopping, and recreation. The project therefore promotes alternative modes of transportation for residents. The project also facilitates development of a Complete Street along Crenshaw Boulevard, by redeveloping an obsolete, automobile-oriented light industrial building and surface parking lot; reducing the number of curb cuts and potential conflict points between vehicles and pedestrians; and providing street trees that will shade the street and sidewalk and create a pedestrian scale at the street level.

Consistent with Policy 3.1, public transit use will be encouraged as the project site is located within a quarter mile of nine bus stops and less than one mile from the Crenshaw Boulevard Green Line station. The TDM measures will also encourage use of public transportation.

Consistent with Policy 3.3, the sidewalks, curbs, and gutters adjoining the project site will be reconstructed as part of the project.

Consistent with Policy 3.4, the project promotes bicycle usage through its close proximity to the Dominquez Trail, which is located behind the project site on the east side of the Dominguez Channel.

Community Resources Element—Conservation Plan

CN Goal 2: Conserve and protect groundwater supply and water resources.

CN 2.2: Comply with the water conservation measures set forth by the California Department of Water Resources.

CN 2.6: Encourage and support the proper disposal of hazardous waste and waste oil. Monitor businesses that generate hazardous waste materials to ensure compliance with approved disposal procedures.

Consistent with Goal 2 and its supporting policies, the project conserves and protect groundwater supply and water resources through compliance with all applicable regulations, including the water conservation measures set forth by the Department of Water Resources. The project will increase the permeable area of the project site by approximately five percentage points.

Consistent with Policy 2.6, the project must comply with all applicable regulations regarding the disposal of hazardous waste and waste oil during construction.

CN Goal 3: Reduce the amount of solid waste produced in Gardena.

> CN 3.1: Comply with the requirements set forth in the City's Source Reduction and Recycling Element.

Consistent with CN Goal 3 and Policy 3.1, the project will comply with all applicable requirements for waste diversion during construction and operation.

CN Goal 4: Conserve energy resources through the use of technology and conservation methods.

> CN 4.1: Encourage innovative building designs that conserve and minimize energy consumption.
>
> CN 4.2: Require compliance with Title 24 CALGreen regulations to conserve energy.

Consistent with Goal 4 and Policy 4.1, the GTODSP facilitates a multi-family development that meets high standards of environmental sustainability. Development proposals within the Specific Plan area must be designed to achieve best practices for architectural design and land development that enhance the city's infrastructure, reduce consumption of non-renewable resources, and limit pollutants and greenhouse gas emissions. Consistent with Policy 4.2, projects within the GTODSP will conform to the most recent CALGreen sustainability standards in effect at the time of building plan submission.

CN Goal 5: Protect the City's cultural resources.

> CN 5.3: Protect and preserve cultural resources of the Gabrielino Native American Tribes found or uncovered during construction.

Consistent with Goal 5 and its supporting policies, the project will incorporate measures to protect and preserve any cultural resources of the Gabrielino Native American Tribe, or any other Tribe, found or uncovered during construction.

Community Safety Element—Public Safety Plan

PS Goal 1: Maintain a high level of fire and police protection for residents, businesses and visitors.

> PS 1.6: Ensure that law enforcement, crime prevention, and fire safety concerns are considered in the review of planning and development proposals in the City.

Consistent with Policy 1.6, the City has considered law enforcement, crime prevention, and fire safety concerns in its review of the GTODSP. The building and parking structure will be accessible only to residents and secured by a key fob entry system. The project will comply with all applicable Fire Code and fire safety regulations.

PS Goal 2: Protect the community from dangers associated with geologic instability, seismic hazards and other natural hazards.

PS 2.3: Require compliance with seismic safety standards in the Unified Building Code.

PS 2.4: Require geotechnical studies for all new development projects located in an Alquist-Priolo Earthquake Fault Zone or areas subject to liquefaction.

Consistent with Policy 2.3, all projects within the GTODSP are required to comply with the seismic safety standards in the Unified Building Code. Consistent with Policy 2.4, a geotechnical study was prepared for the Specific Plan area.

PS Goal 4: Increase public awareness of crime and fire prevention, and emergency preparedness and procedures.

PS 4.3: Promote professional management of multi-family residential buildings.

Consistent with Policy 4.3, the proposed multi-family residential building within the Specific Plan area will be professionally managed and the property managers will develop standard emergency preparedness plans and procedures for the project.

Community Safety Element—Noise Plan

N Goal 2: Incorporate noise considerations into land use planning decisions.

N 2.4: Require mitigation of all significant noise impacts as a condition of project approval.

N 2.5: Require proposed projects to be reviewed for compatibility with nearby noise-sensitive land uses with the intent of reducing noise impacts.

N 2.6: Require new residential developments located in proximity to existing commercial/ industrial operations to control residential interior noise levels as a condition of approval and minimize exposure of residents in the site design.

N 2.9: Encourage the creative use of site and building design techniques as a means to minimize noise impacts.

Consistent with Goal 2, the City incorporated noise considerations into its review of the Specific Plan. Consistent with Policy 2.4 the EIR analyzed the project's potential for generating noise impacts on the surrounding environment both during construction and operation, and imposed mitigation measures as appropriate. Consistent with policies 2.5 and 2.6, the Project will conduct interior noise level studies and achieve interior noise level standards as required by the Building Code. In addition, consistent with Policy 2.9, the project will incorporate design features necessary to control residential interior noise levels and minimize exposure of residents to nearby commercial and industrial uses in accordance with the Building Code standards for interior noise levels.

N Goal 3: Develop measures to control non-transportation noise impacts.

> N 3.2: Require compliance with noise regulations. Review and update Gardena's policies and regulations affecting noise.
>
> N 3.3: Require compliance with construction hours to minimize the impacts of construction noise on adjacent land.

Consistent with Policy 3.2, the project complies with the City's noise ordinance. Consistent with Policy 3.3, the project complies with the City's regulations regarding permitted construction hours.

CHAPTER 8. IMPLEMENTATION

I. PHASING PLAN

The project proposed as part of the GTODSP is envisioned to be built in one phase. Phase occupancy of the proposed project is permitted.

II. PLAN REVIEW PROCESS

Development in the GTODSP will be implemented through City review of site plans, plot plans, building permits, and other permits that may be required by the City of Gardena. Any modification to the Site Plan attached as Exhibit A, including new construction or modifications to existing buildings, shall be reviewed by the Planning Commission for conformance with the General Plan, this Specific Plan, the Zoning Ordinance (if not superseded by this Specific Plan), and all other applicable documents. The Community Development Director may approve minor modifications to the approved Site Plan.

III. CEQA REVIEW

For any subsequent discretionary approvals requiring further CEQA review, the City as lead agency will rely on the certified EIR, together with any necessary errata, addenda or subsequent or supplemental EIR to the fullest extent permitted by CEQA.

IV. INFRASTRUCTURE IMPROVEMENTS/COORDINATION

The developer and/or property owner shall be responsible for making transportation and infrastructure utility improvements identified as part of the GTODSP and/or the EIR. All improvements shall be to the specifications of the City of Gardena Community Development Department, Public Works, or another applicable department.

V. FINANCING MEASURES

Implementation and financing of improvements of the GTODSP depend exclusively on private investment and development. The developer and/or property owner shall be responsible for financing the project, including all improvements and mitigation measures.

VI. ADMINISTRATION OF PLAN

Framework

Approval of the GTODSP indicates acceptance by the Gardena City Council of a specific framework for the development of the Plan area. That framework establishes specific standards and regulations, including permitted uses and development standards that constitute the zoning regulations for the Plan area and regulate development within the area.

Review Authority

This plan shall be administered by the Community Development Department and Planning Commission of the City of Gardena in accordance with the provisions of the Gardena Municipal Code, except to the extent superseded by the provisions of this Specific Plan.

Interpretation

In case of uncertainty or ambiguity to the meaning or intent of any provision of this Specific Plan, the Community Development Director has the authority to interpret the intent of the provision in question. The Director may, at his/her discretion, refer interpretations to the Planning Commission for consideration and action. Such a referral shall be accompanied by a written analysis of issues related to the interpretation. All interpretations made by the Community Development Director may be appealed to the Planning Commission in accordance with the appeal procedures set forth in Title 18 of the Gardena Municipal Code (2006). When used in this GTODSP, the words "shall" and "must" are always mandatory. The word "should," as used in the design guidelines section of this plan, is not mandatory but is strongly recommended.

The GTODSP is not intended to interfere with, abrogate, or annul any easement, covenant, or other agreement to which the City is a party.

Where the Zoning Ordinance's regulations, development standards, design guidelines, and/or administrative procedures are inconsistent with this Specific Plan, the Specific Plan regulations, standards, guidelines, and procedures shall supersede and control. However, any issue not specifically addressed in the GTODSP shall be subject to the standards and regulations of the Zoning Ordinance.

Severability

If any section, subsection, sentence, clause, or phrase of this Specific Plan, or future amendments or additions hereto, is for any reason held to be invalid or unconstitutional by the decision of any court, such decision shall not affect the validity of the remaining portions of the plan.

Substantial Conformance

Substantial Conformance allows for administrative approval and interpretation of minor modifications to the Specific Plan text, graphics, and/or project design that do not change the meaning or intent of the Specific Plan. Through this administrative review process the Community Development Director may find the project to be in substantial conformance with the Specific Plan and the Site Plan Review approval provided no significant modifications are proposed that require a Specific Plan amendment, as described in detail below.

Specific Plan Amendment

Amendments to this Specific Plan shall be processed for "significant" modifications in accordance with the applicable provisions of state law provided in California Government Code sections 65450 *et seq.* The procedures in Section 18.39.030 of the Gardena Municipal Code shall be followed for a proposed Specific Plan amendment. Each request for amendment shall specify the sections or portions of the Specific Plan that are affected by the amendment.

Any proposed "significant" modification which results in any of the following requires an amendment to the Specific Plan:

1. Any change in the permitted uses set forth in Chapter 5, Section I of this Specific Plan.
2. Any increase in the number of residential dwelling units in excess of 265.
3. An increase in building height.
4. A decrease in the minimum dwelling unit size by more than 20 percent.
5. A decrease in the minimum required amount of open space greater than 5 percent.
6. Any decrease in any ground floor side yard building setback.
7. A decrease in the amount of vehicular parking within the Specific Plan area by more than three spaces.
8. A decrease in the minimum required amount of bicycle parking within the Specific Plan area greater than 15 percent.
9. A substantial deviation, as determined by the Community Development Director, from the architecture approved in the Site Plan.
10. A substantial deviation from and/or reduction in the amenities listed in Chapter 4, Section VI. Above, as determined by the Community Development Director.

Other than the “significant” modifications listed above that require a Specific Plan Amendment, all other modifications to the project are considered “minor” and may be processed via administrative Substantial Conformance review and approval.

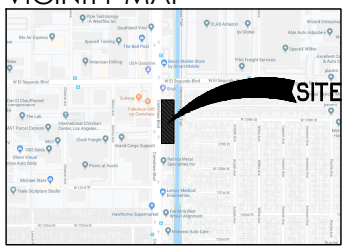
EXHIBIT A



DIN|CAL 4, INC,

SCHEMATIC DESIGN
OCTOBER 23, 2020.

VICINITY MAP



N.S.
NORTH

NARRATIVE

CONTEXT

THIS TRANSIT ORIENTED PROJECT REVITALIZES THE SOUTHEAST CORNER OF CRENSHAW AND EL SEGUNDO BOULEVARD IN THE CITY OF GARDENA. A CUTTING-EDGE, SUSTAINABLE RESIDENTIAL BUILDING REPLACES AN OWNER OCCUPIED AUTO-PARTS WAREHOUSE AND SURFACE LOTS. THE PROJECT PROVIDES A MUCH NEEDED CATALYST TO THE NORTHWEST GARDENA CRENSHAW CORRIDOR THAT INCORPORATES A HIGH QUALITY AMENITY BASE AND A PROMINENT GROUND FLOOR GRAND LOBBY AND LEASING CENTER TO PROVIDE PEDESTRIAN ACTIVATION.

OVERALL BUILDING CONCEPT

THE NEW RESIDENTIAL BUILDING CONSISTS OF 262 STUDIO, ONE- AND TWO- BEDROOM APARTMENT HOMES. THE BUILDING LAYOUT FEATURES A SERIES OF HIGHLY DEVELOPED OPEN AND ENCLOSED RECREATIONAL SPACES. THESE AMENITIES SPACES ARE SPREAD INTO THREE COURTYARDS THAT OPEN TOWARDS CRENSHAW BOULEVARD ON TWO LEVELS. THE FITNESS AND CLUBHOUSE, ALONG WITH COVERED LANAIS, SURROUND THE POOL AND SPA DECK ON THE THIRD LEVEL. TWO ADDITIONAL COURTYARDS ARE LOCATED ON THE FOURTH LEVEL DECK WITH MORE PASSIVE ACTIVITIES THAT PROVIDE WIDE WEST-FACING VIEWS.

FAÇADE MASSING AND ARTICULATION

THE USE OF METAL, CONCRETE AND GLASS IN THE CONCEIVED PLANES AND CURRENT ARTICULATION SPEAKS TO THE HYBRID TECH/INDUSTRIAL NATURE OF THE AREA. THIS CONTEMPORARY QUALITY IS SOFTENED WITH THE INTRODUCTION OF WOOD BOARD STYLE CLADDING AND PLANTING MATERIAL TO ENHANCE THE ARCHITECTURE.

THE CONCEPT OF JUXTAPOSED ARCHITECTURAL PLANES FROM THE CRENSHAW ELEVATION ARE RE-INTERPRETED FOR THE EAST FACADE FRONTING THE CHANNEL WITH THE USE OF COLORS. DIFFERENT WINDOW GROUPING IS AN ADDITIONAL MANNER IN WHICH THE OTHER THREE FACADES ARE ENHANCED. SCORE LINES ARE USED AS A TOOL TO BRING ORDER TO THE BUILDING COMPOSITION.

ARCHITECTURE STYLE AND CHARACTER

THE PROJECT IS ENVISIONED TO BE A SOPHISTICATED CONTEMPORARY ARCHITECTURE STYLE THAT ALSO MAINTAINS A WARM AND SOCIAL QUALITY.

Project Team

APPLICANT/OWNER:
DIN|CAL 4, INC
1010 S. Coast Highway 101
Suite 106
Encinitas, CA 92024
(858) 847-9311
Contact: Josh Vasbinder
Josh.Vasbinder@tdc-properties.com

DEVELOPMENT CONSULTANT:
BLACKWOOD REAL ESTATE
1000 Newport Center Drive
Newport Beach, CA 92660
(949) 510-8255
Contact: Gilad Ganish
gilad@blackwood.com

RESIDENTIAL ARCHITECT:
AO ARCHITECTS
144 N. Orange Street
Orange, CA 92866
(714) 639-9860
Contact: Ed Cadavona
ed@AOarchitects.com

LANDSCAPE ARCHITECT:
MJS
507 30TH STREET
Newport Beach, CA. 92663
(949) 675-9964
Contact: Dan Delle
dan@mjs-la.com

CIVIL ENGINEER:
FUSCOE ENGINEERING
600 Wilshire Blvd, Suite 1470
Los Angeles, CA 90017
(213) 988-8802
Contact: Keith Malloy, PE
KMalloy@fuscoe.com

STRUCTURAL ENGINEER:
SCA CONSULTING ENGINEERS
12511 Emily COurt
Sugar Land, TX 77478
(713) 779-7252
Contact: Martin Maingot
maingotm@scaengineers.com

GEO:
GEOTECHNOLOGIES, INC
439 Western Avenue
Glendale, CA 91201
(818) 240-9600
Contact: Stan Tang
stang@geoteq.com

COVER CS-1

PARKING SUMMARY

RESIDENTIAL PARKING REQUIRED

GARDENA MUNICIPAL CODE §18.40.040 REQUIRES 2 STALLS PER DEWELING UNIT	UNITS	REQUIRED PARKING RATIO	STALLS REQUIRED
STUDIO	92	1.0	92
1 BR	132	1.0	132
2 BR'S	38	1.0	38
TOTAL UNITS	262		
STALLS REQUIRED - RESIDENTIAL			262
TOTAL STALLS REQUIRED - RESIDENTIAL		RATIO: 1.00	**262**

LEASING & ADDITIONAL PARKING

	STALLS
LEASING STALLS (1,500 GFA)	3
MAIL PICK-UP STALL	1
SHARED RIDE STALL	1
TOTAL STALLS REQUIRED	**5**

EVCS PARKING REQUIRED

	QUANTITY	RATIO	STALLS REQUIRED
EVCS - RESIDENTIAL (ADDITIONAL STALLS)	262	0.1	27
EVCS - LEASING (ADDITIONAL STALLS)	3	0.1	1
TOTAL STALLS REQUIRED - EVCS			**28**

ACCESSIBLE PARKING REQUIRED (INCLUDED IN COUNT)

	QUANTITY	RATIO	STALLS REQUIRED
ADA - RESIDENTIAL	262	0.02	6
ADA - LEASING	3	0.02	1
TOTAL STALLS REQUIRED - EVCS			**7**

PARKING PROVIDED

LEVEL	UNITS PER LEVEL	ASSIGNED STALLS	ADA STALLS	EVCS STALLS*	TOTAL STALLS	
LEVEL 1	4	80	6		86	
LEVEL 2	6	107	1		108	
LEVEL 3	20	73	0		73	
TOTALS	30	**260**	**7**	0	**267**	**1.02**

NOTE:
EVCS STALLS ARE NOT INCLUDED IN PARKING COUNT ABOVE
STANDARD STALL DIMENSIONS: 9'X18' (9'X10' STANDARD & 10'X20' NEXT TO OBSTRUCTION)
COMPACT STALL DIMENSIONS: 9'X15' (8'X17' - MAX 25%)
DRIVE ISLE DIMENSIONS: 25' (26' WIDTH AT 90°)
INFORMATION BETWEEN PARENTHESES IS BASED ON GARDENA MUNICIPAL CODE §18.40.050

RESIDENTIAL BUILDING SUMMARY

UNITS	LEVEL 1	LEVEL 2	LEVEL 3	LEVEL 4	LEVEL 5	LEVEL 6	LEVEL 7	LEVEL 8	%	TOTAL
S1	3	3	6	8	8	8	8	8	19.8%	52
S2	-	1	3	6	6	6	6	6	13.0%	34
S3	-	-	1	1	1	1	1	1	2.3%	6
Studio	3	4	10	15	15	15	15	15	35%	92
A1	-	-	-	2	2	2	2	2	3.8%	10
A2	-	-	4	12	12	12	12	12	24.4%	64
A3	-	-	2	8	10	10	10	10	19.1%	50
A4	1	1	1	1	1	1	1	1	3.1%	8
1 BR'S	1	1	7	23	25	25	25	25	50%	132
B1	-	-	1	1	2	2	2	2	3.8%	10
B2	-	-	-	2	-	-	-	-	0.8%	2
B2-ALT	-	-	1	1	1	1	1	1	2.3%	6
B3	-	1	1	2	4	4	4	4	7.6%	20
2 BR'S	0	1	3	6	7	7	7	7	15%	38
TOTAL	**4**	**6**	**20**	**44**	**47**	**47**	**47**	**47**	**100%**	**262**

UNIT SUMMARY

UNIT TYPE	UNIT NET SQ. FT.	NUMBER OF UNITS	TOTAL NET SQ. FT.	PRIVATE OPEN SPACE SQ.FT.	TOTAL PRIVATE OPEN SPACE SQ.FT.	%	UNIT %
S1	493	52	25,636	0	0	19.8%	35%
S2	517	34	17,578	0	0	13.0%	
S3	614	6	3,684	0	0	2.3%	
A1	619	10	6,190	53	530	3.8%	50%
A2	652	64	41,728	53	3,392	24.4%	
A3	713	50	35,650	45	2,250	19.1%	
A4	718	8	5,744	50	400	3.1%	
B1	1,080	10	10,800	59	590	3.8%	15%
B2	1,076	2	2,152	56	112	0.8%	
B2-ALT	1,163	6	6,978	56	336	2.3%	
B3	1,278	20	25,560	56	1,120	7.6%	
TOTAL	**694**	**262**	**181,700**	**33**	**8,730**	**100%**	

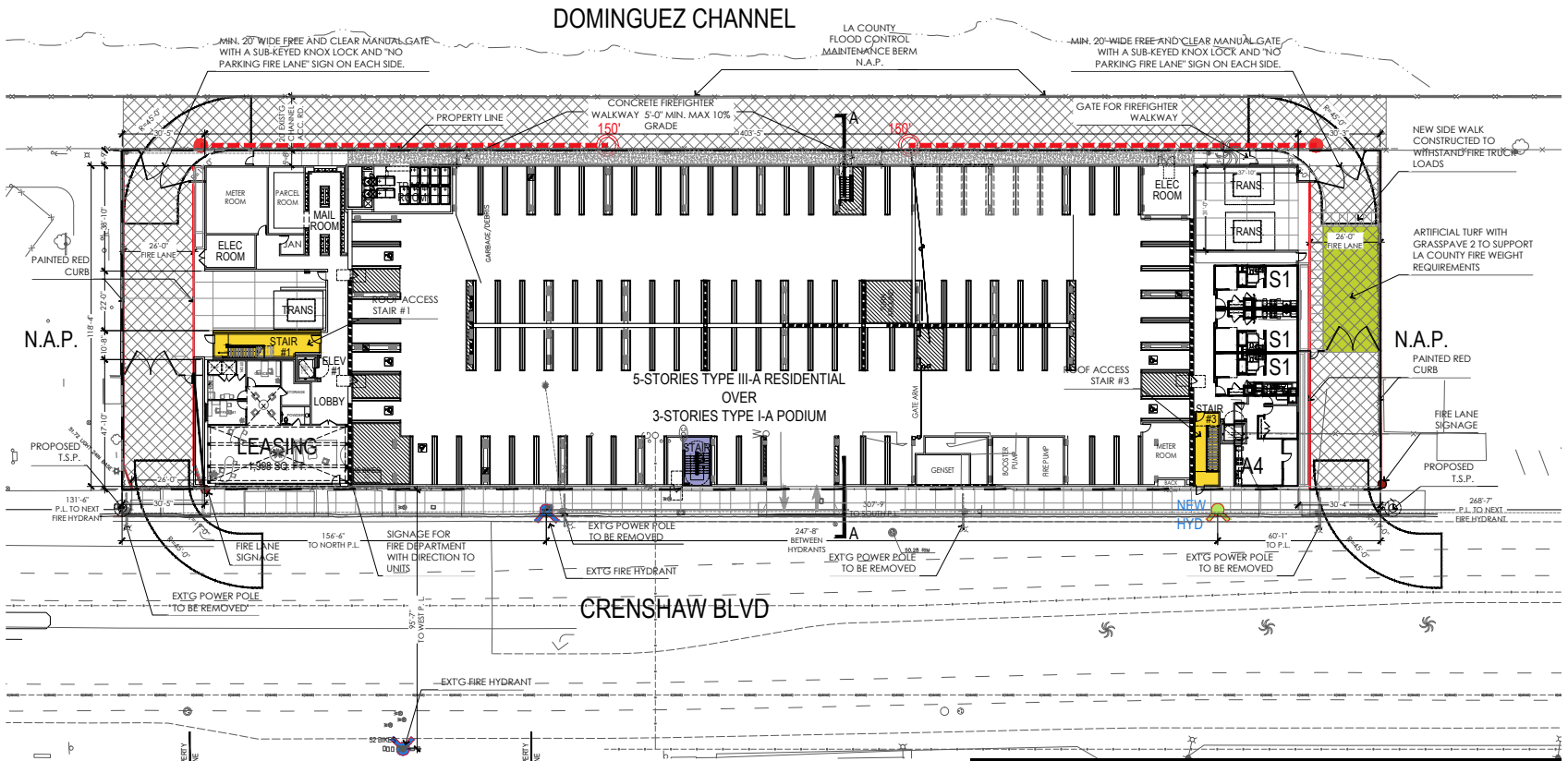
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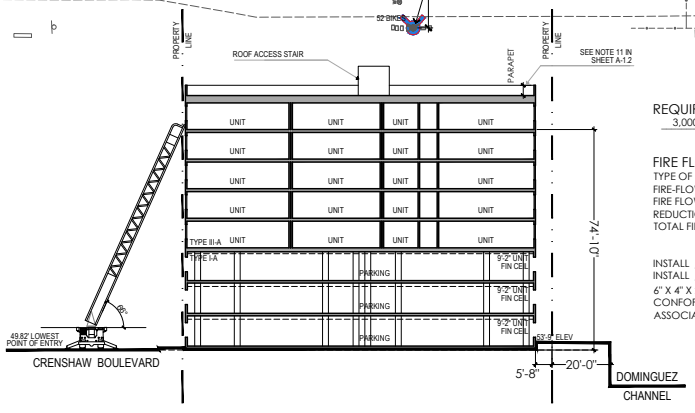
DATE: 10-23-2020
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GARDENA, CA

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SECTION - AA

REQUIRED FIRE FLOW
3,000 GPM @ 20 PSA FOR 3 HOURS

FIRE FLOW

TYPE OF CONSTRUCTION PER THE BUILDING CODE	TYPE III- A
FIRE-FLOW CALCULATION AREA AREA	203,395 SQ. FT.
FIRE FLOW BASED ON THE FIRE-FLOW CALCULATION AREA	6,000 GPM
REDUCTION FOR FIRE SPRINKLERS (MAXIMUM 50%)	3,000 GPM
TOTAL FIRE FLOW REQUIRED	3,000 GPM

INSTALL 1 PUBLIC
INSTALL 0 ON-SITE
6" X 4" X 2 ½" FIRE HYDRANTS
CONFOFORMING TO AMERICAN WATERWORKS ASSOCIATION STANDARD C503

BUILDING DATA

BUILDING TYPE	STORIES	CONSTRUCTION TYPE	SQUARE FOOTAGE	FIRE FLOW REQUIREMENT AT 20 PSI/DURATION
RESIDENTIAL BUILDING	3	I-A	39,727	
	5	III-A	203,395	
NATURALY VENTILATED PARKING STRUCTURE	2.5	I-A	95,291	

OCCUPANCY GROUP

RESIDENTIAL UNITS	R-2
PARKING STRUCTURE	S-2

BUILDING PLANS
GROUND LEVEL

A-1.1

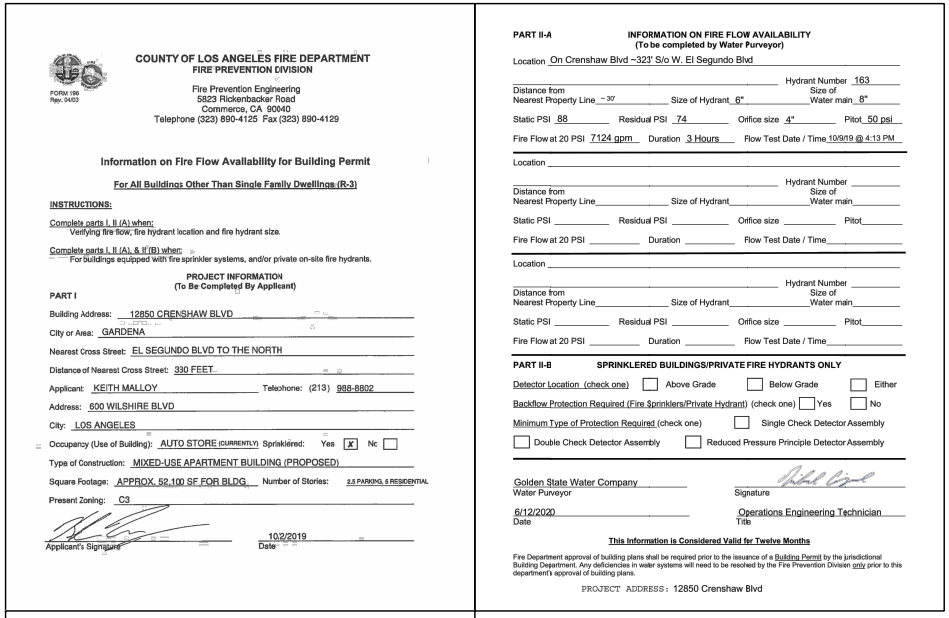
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COUNTY OF LOS ANGELES FIRE DEPARTMENT
FIRE PREVENTION DIVISION

Fire Prevention Engineering
5823 Rickenbacker Road
Commerce, CA 90040
Telephone (323) 890-4125 Fax (323) 890-4129

FORM 196
Rev. 04/03

Information on Fire Flow Availability for Building Permit

For All Buildings Other Than Single Family Dwellings (R-3)

INSTRUCTIONS:

Complete parts I, II (A) when:
Verifying fire flow, fire hydrant location and fire hydrant size.

Complete parts I, II (A), & II (B) when:
For buildings equipped with fire sprinkler systems, and/or private on-site fire hydrants.

PROJECT INFORMATION
(To Be Completed By Applicant)

PART I

Building Address: 12850 CRENSHAW BLVD
City or Area: GARDENA
Nearest Cross Street: EL SEGUNDO BLVD TO THE NORTH
Distance of Nearest Cross Street: 330 FEET
Applicant: KEITH MALLOY Telephone: (213) 988-8802
Address: 600 WILSHIRE BLVD
City: LOS ANGELES
Occupancy (Use of Building): AUTO STORE (CURRENTLY) Sprinklered: Yes [X] Nc [ ]
Type of Construction: MIXED-USE APARTMENT BUILDING (PROPOSED)
Square Footage: APPROX. 52,100 SF FOR BLDG. Number of Stories: 2.5 PARKING, 6 RESIDENTIAL
Present Zoning: C3

Applicant's Signature 10/2/2019 Date

PART II-A **INFORMATION ON FIRE FLOW AVAILABILITY**
(To be completed by Water Purveyor)

Location On Crenshaw Blvd ~323' S/o W. El Segundo Blvd
Hydrant Number 163
Distance from Nearest Property Line ~ 30 Size of Hydrant 6" Size of Water main 8"
Static PSI 88 Residual PSI 74 Office size 4" Pitot 50 psi
Fire Flow at 20 PSI 7124 gpm Duration 3 Hours Flow Test Date / Time 10/9/19 @ 4:13 PM

Location
Hydrant Number
Distance from Nearest Property Line Size of Hydrant Size of Water main
Static PSI Residual PSI Office size Pitot
Fire Flow at 20 PSI Duration Flow Test Date / Time

Location
Hydrant Number
Distance from Nearest Property Line Size of Hydrant Size of Water main
Static PSI Residual PSI Office size Pitot
Fire Flow at 20 PSI Duration Flow Test Date / Time

PART II-B **SPRINKLERED BUILDINGS/PRIVATE FIRE HYDRANTS ONLY**

Detector Location (check one) [ ] Above Grade [ ] Below Grade [ ] Either
Backflow Protection Required (Fire Sprinklers/Private Hydrant) (check one) [ ] Yes [ ] No
Minimum Type of Protection Required (check one) [ ] Single Check Detector Assembly
[ ] Double Check Detector Assembly [ ] Reduced Pressure Principle Detector Assembly

Golden State Water Company
Water Purveyor
Signature
6/12/2020
Date
Operations Engineering Technician
Title

This Information is Considered Valid for Twelve Months

Fire Department approval of building plans shall be required prior to the issuance of a Building Permit by the jurisdictional Building Department. Any deficiencies in water systems will need to be resolved by the Fire Prevention Division only prior to this department's approval of building plans.

PROJECT ADDRESS: 12850 Crenshaw Blvd

Golden State Water Company
A Subsidiary of American States Water Company

FIRE FLOW TEST APPLICATION FF-1

Golden State Water Company (GSWC) charges $300.00 for each fire flow test that is performed or witnessed by GSWC personnel. Discounts for multiple tests being requested are not available. The $300.00 fee is due in advance of GSWC performing or witnessing the fire flow test.

(This section is to be completed by the Applicant (One fire flow test request per Application Form)

Print Applicant or Contact First and Last Name: Include Company Name if Applicable

KEITH MALLOY, FUSCOE ENGINEERING INC.

Print Applicant or Contact Mailing Address: Street or PO Box

600 WILSHIRE BLVD, SUITE 1470

Print Applicant or Contact City, State, Zip

LOS ANGELES, CA 90017

Print Applicant or Contact Phone Number and E-mail Address

(213) 988-8802 KMALLOY@FUSCOE.COM, RSPAGNUOLO@FUSCOE.COM

Print Address/Location where Fire Flow Test is requested (Use back of page section for additional location information)

12850 CRENSHAW BLVD, GARDENA, CA 90249

Check the appropriate box below and provide the information needed to indicate how the test results are to be sent by GSWC. Please note that some local fire agencies require original signed forms, in which case the test results will be returned by mail.

[ ] Mailing Address:
[x] E-Mail: KMALLOY@FUSCOE.COM, RSPAGNUOLO@FUSCOE.COM
[ ] Fax No:

Signature 10/2/19 Date

Please make check or money order payable to Golden State Water Company
Return completed form, fee and include the Fire Department fire flow test form to:
Golden State Water Company (Check www.gswater.com for the office nearest you or call 1-800-999-4033)

(See the Reverse Side of this Page for More Information) Page 1

GENERAL NOTES:

1. ALL OVERHEAD POWER LINES FRONTING PROPERTY ALONG CRENSHAW BOULEVARD WILL BE PLACED UNDERGROUND PRIOR TO ANY COMBUSTIBLE CONSTRUCTION. ADDITIONALLY , NON-COMBUSTIBLE CONSTRUCTION ACTIVITIES SHALL BE ALLOWED TO COMMENCE PRIOR TO THE UNDER-GROUNDING OF SAID POWER LINES.

2. THE AREA OF FIRE FIGHTING OPERATIONS, AS DETERMINED BY THE FIRE CODE OFFICIAL, SHALL NOT BE LOCATED UNDERNEATH HIGH VOLTAGE TRANSMISSION LINES. FIRE CODE 503.2.9

3. ALL FIRE HYDRANTS SHALL MEASURE 6" X 4"" X 2-1/2"", BRASS OR BRONZE, CONFORMING TO AMERICAN WATER WORKS ASSOCIATION STANDARD C503, OR APPROVED EQUAL.

4. FIRE APPARATUS ACCESS ROADS AND STRUCTURES LOCATED NEAR HIGH-VOLTAGE TRANSMISSION LINES SHALL BE POSTED WITH APPROVED SIGNS STATING CAUTION OVERHEAD HIGH-VOLTAGE TRANSMISSION LINES AS REQUIRED BY FIRE CODE 503.3.1. SPECIFIC SIGN LOCATIONS SHALL BE DETERMINED BY THE FIRE INSPECTOR.

5. APPROVED BUILDING ADDRESS NUMBERS, BUILDING NUMBERS OR APPROVED BUILDING IDENTIFICATION SHALL BE PROVIDED AND MAINTAINED SO AS TO BE PLAINLY VISIBLE AND LEGIBLE FROM THE STREET FRONTING THE PROPERTY. THE NUMBERS SHALL CONTRAST WITH THEIR BACKGROUND, BE ARABIC NUMERALS OR ALPHABET LETTERS, AND BE A MINIMUM OF 4 INCHES HIGH WITH A MINIMUM STROKE WIDTH OF 0.5 INCH. FIRE CODE 505.1.

6. FIRE APPARATUS ACCESS ROADS SHALL BE IDENTIFIED WITH APPROVED SIGNS. TEMPORARY SIGNS SHALL BE INSTALLED AT EACH STREET INTERSECTION WHEN CONSTRUCTION OF NEW ROADWAYS ALLOWS PASSAGE BY VEHICLES. SIGNS SHALL BE OF AN APPROVED SIZE, WEATHER RESISTANT AND BE MAINTAINED UNTIL REPLACED BY PERMANENT SIGNS. FIRE CODE 505.2.

7. ALL REQUIRED PUBLIC FIRE HYDRANTS SHALL BE INSTALLED, TESTED AND ACCEPTED PRIOR TO BEGINNING COMBUSTIBLE CONSTRUCTION. FIRE CODE 501.4.

8. AN APPROVED KEY BOX, LISTED IN ACCORDANCE WITH UL 1037 SHALL BE PROVIDED AS REQUIRED BY FIRE CODE 506. THE LOCATION OF EACH KEY BOX SHALL BE DETERMINED BY THE FIRE INSPECTOR.

9. DEVELOPER WILL WORK WITH FIRE INSPECTOR TO DETERMINE THE SYSTEM AND LOCATIONS OF DIRECTIONAL UNIT NUMBERING IN ACCORDANCE WITH FIRE CODE 505.1 AND 505.3.

10. PRIOR TO APPROVAL OF THE PLANS TO BEGIN NON-COMBUSTIBLE CONSTRUCTION, DEVELOPER WILL PROVIDE A RECEIPT FROM WATER PURVEYOR THAT SHOWS ALL FUNDS HAVE BEEN PAID FOR INSTALLATION AND/OR UPGRADE OF THE REQUIRED PUBLIC FIRE HYDRANTS ALONG WITH A LETTER FROM THE WATER PURVEYOR OR INSTALLING CONTRACTOR THAT INDICATES THE APPROXIMATE DATE THE WORK WILL BE STARTED AND COMPLETED.

11. PARAPET HEIGHT SHALL NOT EXCEED 36" ALONG AT LEAST TWO SIDES OF THE BUILDING. ONE SIDE SHALL BE ALONG CRENSHAW BLVD. AND THE OTHER SHALL BE ALONG EITHER THE NORTH OR SOUTH SIDE OF THE BUILDING ADJACENT TO THE FIRE LANE. LA COUNTY FIRE DEPARTMENT TO MAKE FINAL DETERMINATION OF 36" PARAPET HEIGHT PLACED ALONG THE NORTH OR SOUTH SIDE OF THE BUILDING DURING BUILDING PLAN REVIEW.

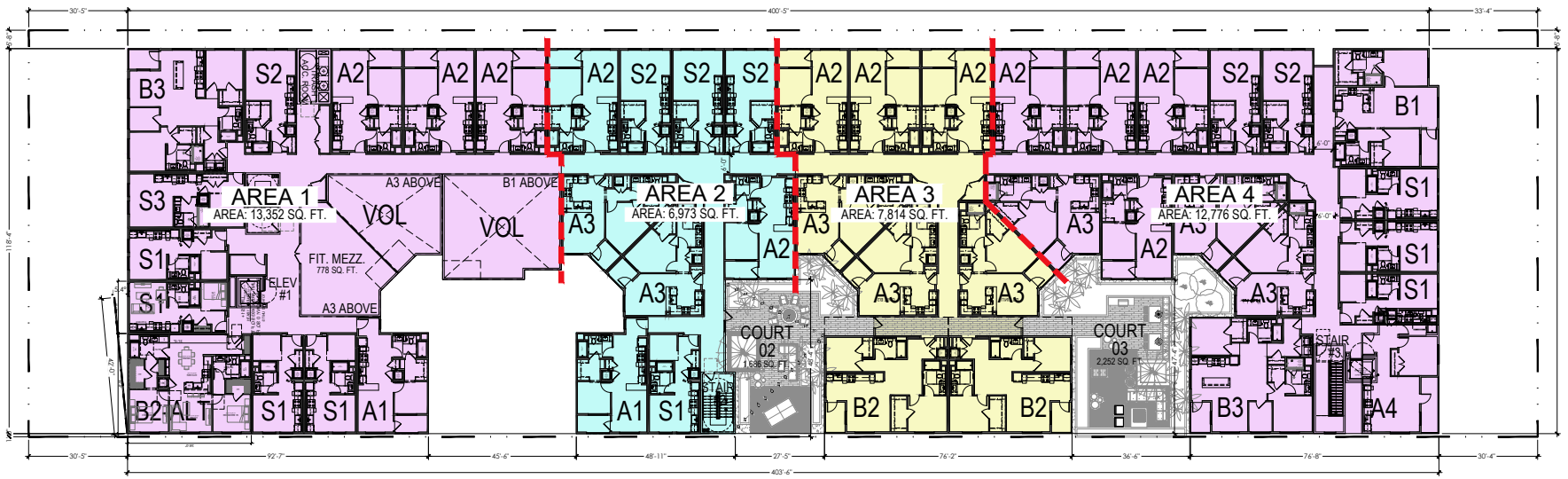
12. A MINIMUM FIRE LANE WIDTH OF 20' SHALL BE MAINTAINED ALONG THE NORTH AND SOUTH SIDES OF THE BUILDING WHILE UNDER CONSTRUCTION.

GENERAL NOTES A-1.2

DATE: 10-23-2020
JOB NO.: 2019-446

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LEGEND:

FIRE WALLS

NORTH

1/16"=1'-0" 0 8' 16' 32' 48'

AREA SEPARATION
FOURTH LEVEL

A-1.3

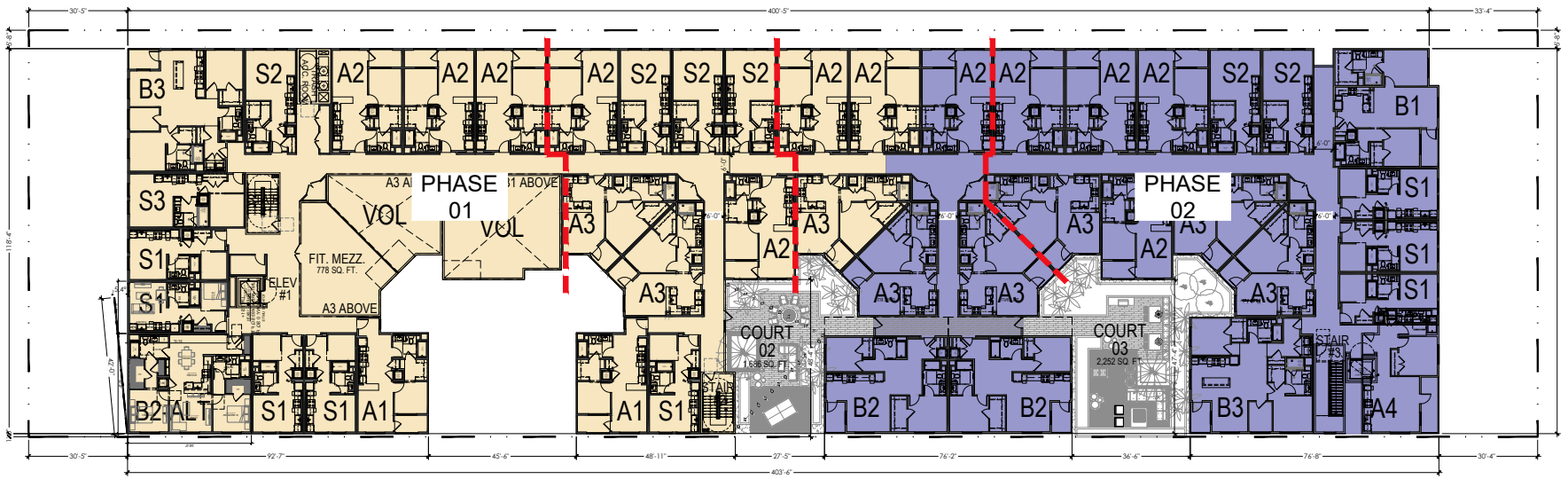
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LEGEND:

PHASE 01

PHASE 02

NORTH

1/16"=1'-0" 0 8' 16' 32' 48'

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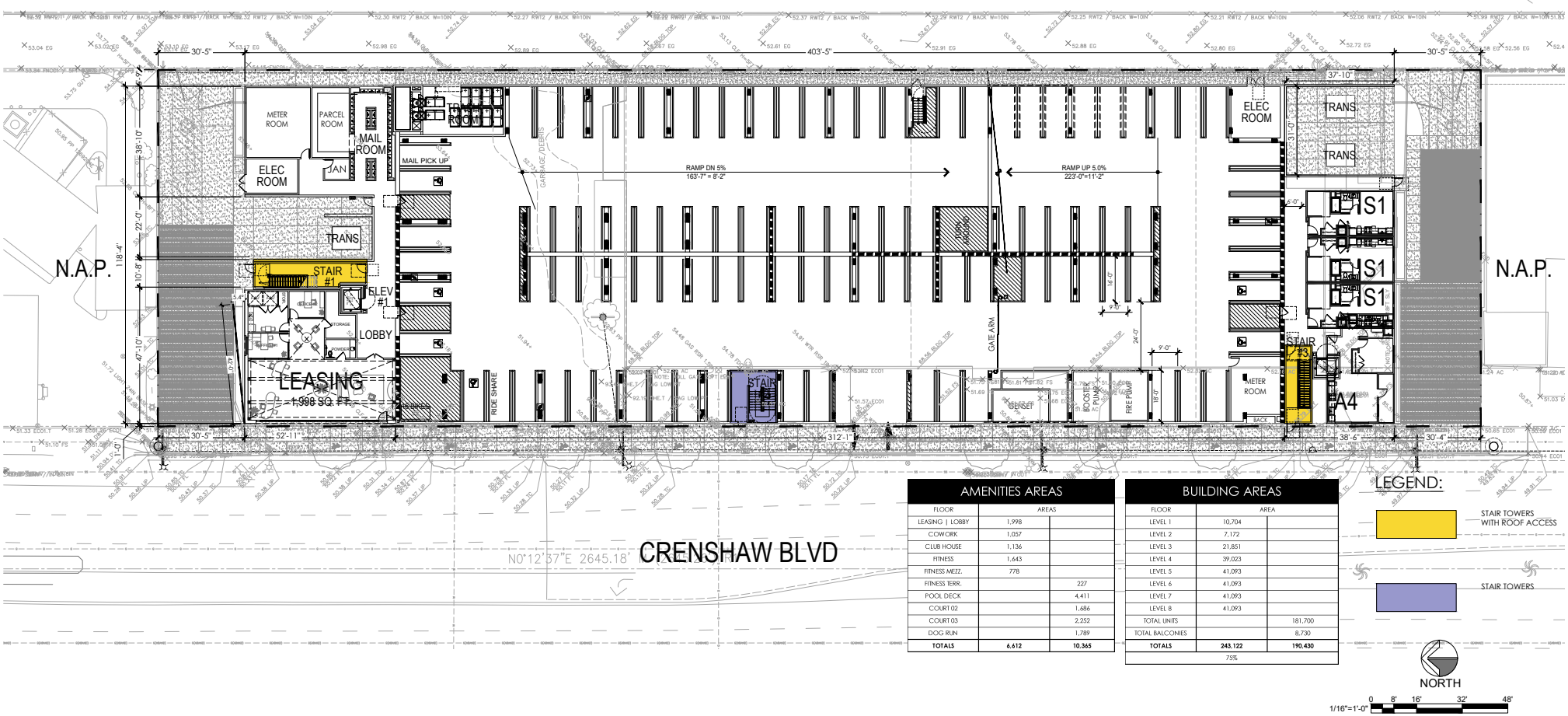
PHASING PLAN
FOURTH LEVEL

A-1.4

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AMENITIES AREAS		
FLOOR	AREAS	
LEASING | LOBBY	1,998	
COWORK	1,057	
CLUB HOUSE	1,136	
FITNESS	1,643	
FITNESS MEZZ.	778	
FITNESS TERR.		227
POOL DECK		4,411
COURT 02		1,686
COURT 03		2,252
DOG RUN		1,789
TOTALS	**6,612**	**10,365**

BUILDING AREAS		
FLOOR	AREA	
LEVEL 1	10,704	
LEVEL 2	7,172	
LEVEL 3	21,851	
LEVEL 4	39,023	
LEVEL 5	41,093	
LEVEL 6	41,093	
LEVEL 7	41,093	
LEVEL 8	41,093	
TOTAL UNITS		181,700
TOTAL BALCONIES		8,730
TOTALS	**243,122**	**190,430**
	75%	

LEGEND:

STAIR TOWERS WITH ROOF ACCESS

STAIR TOWERS

NORTH

1/16"=1'-0" 0 8' 16' 32' 48'

BUILDING PLANS
GROUND LEVEL

A-2.0

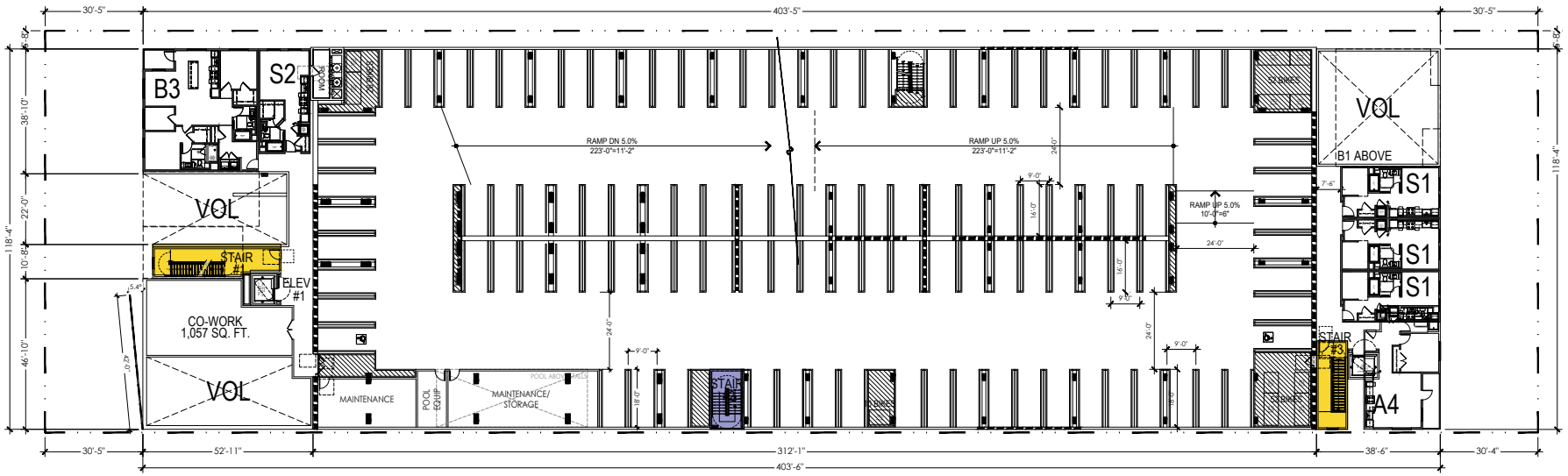
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Studio	3	4	10	15	15	15	15	15	35%	92
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B1	-	-	1	1	2	2	2	2	3.8%	10
B2	-	-	-	2	-	-	-	-	0.8%	2
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TOTAL	**4**	**6**	**20**	**44**	**47**	**47**	**47**	**47**	**100%**	**262**

AMENITIES AREAS

FLOOR	AREAS	
LEASING	LOBBY	1,998	
CO-WORK		1,057	
CLUB HOUSE		1,136	
FITNESS		1,643	
FITNESS MEZZ.		778	
FITNESS TERR.			227
POOL DECK			4,411
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LEVEL 5	41,093	
LEVEL 6	41,093	
LEVEL 7	41,093	
LEVEL 8	41,093	
TOTAL UNITS		181,700
TOTAL BALCONIES		8,730
TOTALS	**243,122**	**190,430**
	75%	

LEGEND:

STAIR TOWERS WITH ROOF ACCESS

STAIR TOWERS

NORTH

1/16"=1'-0" 0 8' 16' 32' 48'

BUILDING PLANS
SECOND LEVEL

A-2.1

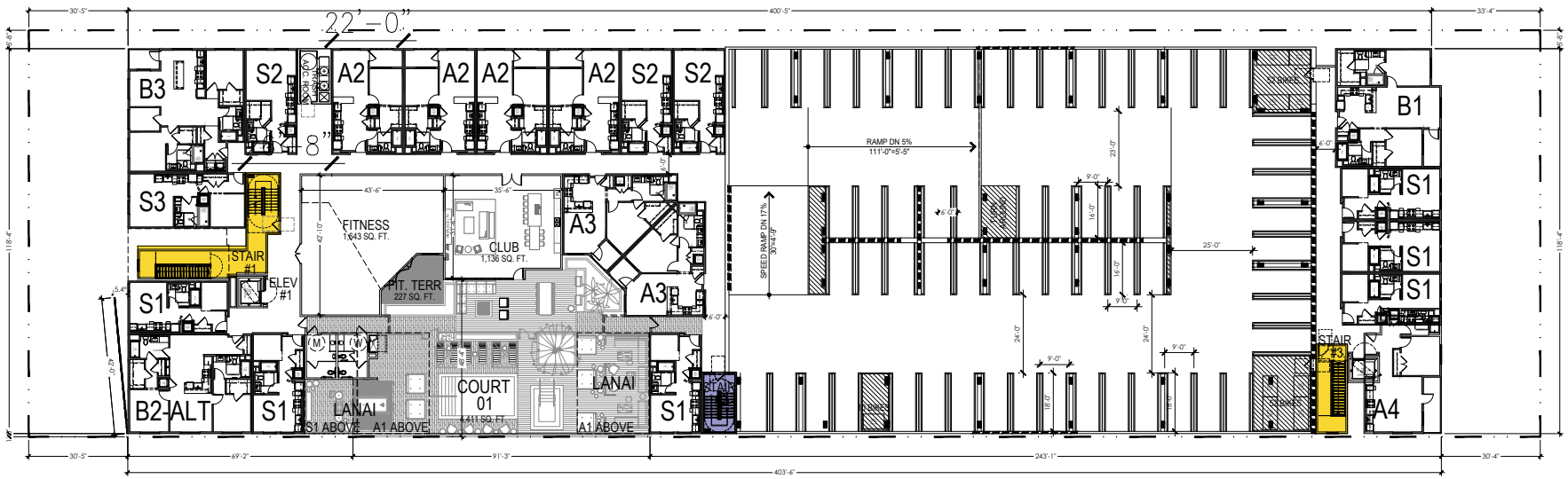
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Studio	3	4	10	15	15	15	15	15	35%	92
A1	-	-	-	2	2	2	2	2	3.8%	10
A2	-	-	4	12	12	12	12	12	24.4%	64
A3	-	-	2	8	10	10	10	10	19.1%	50
A4	1	1	1	1	1	1	1	1	3.1%	8
1 BR'S	1	1	7	23	25	25	25	25	50%	132
B1	-	-	1	1	2	2	2	2	3.8%	10
B2	-	-	-	2	-	-	-	-	0.8%	2
B2-ALT	-	-	1	1	1	1	1	1	2.3%	6
B3	-	1	1	2	4	4	4	4	7.6%	20
2 BR'S	0	1	3	6	7	7	7	7	15%	38
TOTAL	**4**	**6**	**20**	**44**	**47**	**47**	**47**	**47**	**100%**	**262**

AMENITIES AREAS

FLOOR	AREAS	
LEASING	LOBBY	1,998	
COWORK		1,057	
CLUB HOUSE		1,136	
FITNESS		1,643	
FITNESS MEZZ.		778	
FITNESS TERR.			227
POOL DECK			4,411
COURT 02			1,686
COURT 03			2,252
DOG RUN			1,789
TOTALS		**6,612**	**10,365**

BUILDING AREAS

FLOOR	AREA	
LEVEL 1	10,704	
LEVEL 2	7,172	
LEVEL 3	21,851	
LEVEL 4	39,023	
LEVEL 5	41,093	
LEVEL 6	41,093	
LEVEL 7	41,093	
LEVEL 8	41,093	
TOTAL UNITS		181,700
TOTAL BALCONIES		8,730
TOTALS	**243,122**	**190,430**
75%		

LEGEND:

STAIR TOWERS WITH ROOF ACCESS

STAIR TOWERS

NORTH

1/16"=1'-0" 0 8' 16' 32' 48'

BUILDING PLANS
THIRD LEVEL

A-2.2

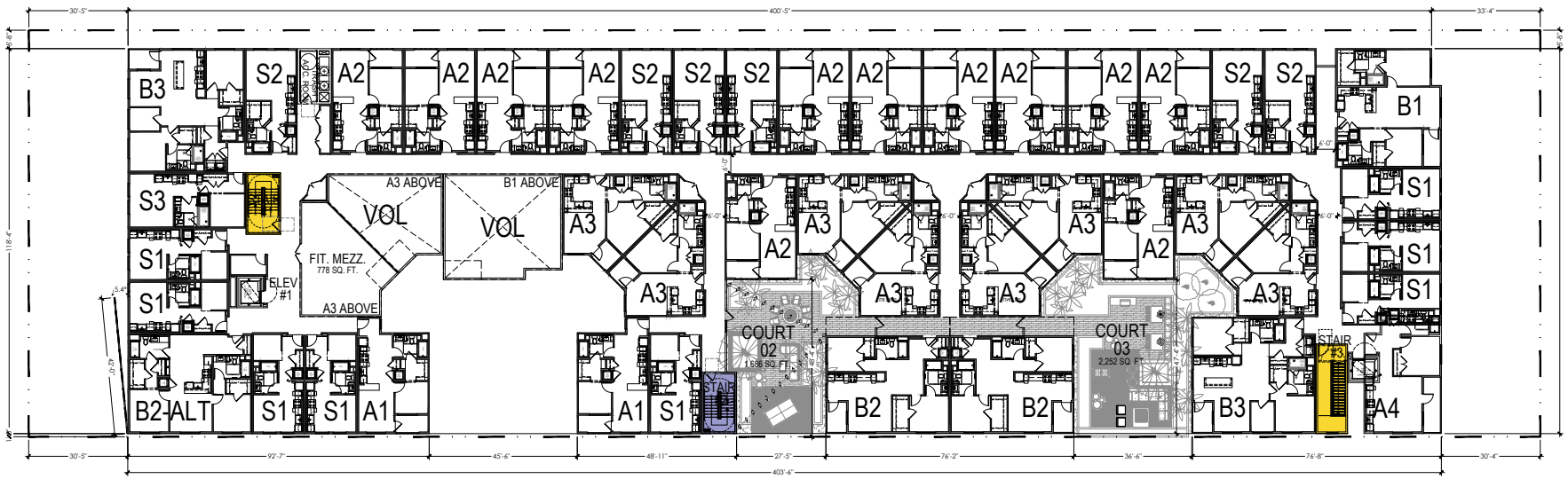
DATE: 10-23-2020
JOB NO.: 2019-446

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GARDENA, CA

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144 NORTH ORANGE ST., ORANGE, CA 92866
(714) 639-9860



RESIDENTIAL BUILDING SUMMARY

UNITS	LEVEL 1	LEVEL 2	LEVEL 3	LEVEL 4	LEVEL 5	LEVEL 6	LEVEL 7	LEVEL 8	%	TOTAL
S1	3	3	6	8	8	8	8	8	19.8%	52
S2	-	1	3	6	6	6	6	6	13.0%	34
S3	-	-	1	1	1	1	1	1	2.3%	6
Studio	3	4	10	15	15	15	15	15	35%	92
A1	-	-	-	2	2	2	2	2	3.8%	10
A2	-	-	4	12	12	12	12	12	24.4%	64
A3	-	-	2	8	10	10	10	10	19.1%	50
A4	1	1	1	1	1	1	1	1	3.1%	8
1 BR'S	1	1	7	23	25	25	25	25	50%	132
B1	-	-	1	1	2	2	2	2	3.8%	10
B2	-	-	-	2	-	-	-	-	0.8%	2
B2-ALT	-	-	1	1	1	1	1	1	2.3%	6
B3	-	1	1	2	4	4	4	4	7.6%	20
2 BR'S	0	1	3	6	7	7	7	7	15%	38
TOTAL	**4**	**6**	**20**	**44**	**47**	**47**	**47**	**47**	**100%**	**262**

AMENITIES AREAS

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BUILDING AREAS

FLOOR	AREA	
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LEVEL 3	21,851	
LEVEL 4	39,023	
LEVEL 5	41,093	
LEVEL 6	41,093	
LEVEL 7	41,093	
LEVEL 8	41,093	
TOTAL UNITS		181,700
TOTAL BALCONIES		8,730
TOTALS	**243,122**	**190,430**
75%		

LEGEND:

STAIR TOWERS WITH ROOF ACCESS

STAIR TOWERS

NORTH

1/16"=1'-0" 0 8' 16' 32' 48'

BUILDING PLANS
FOURTH LEVEL

A-2.3

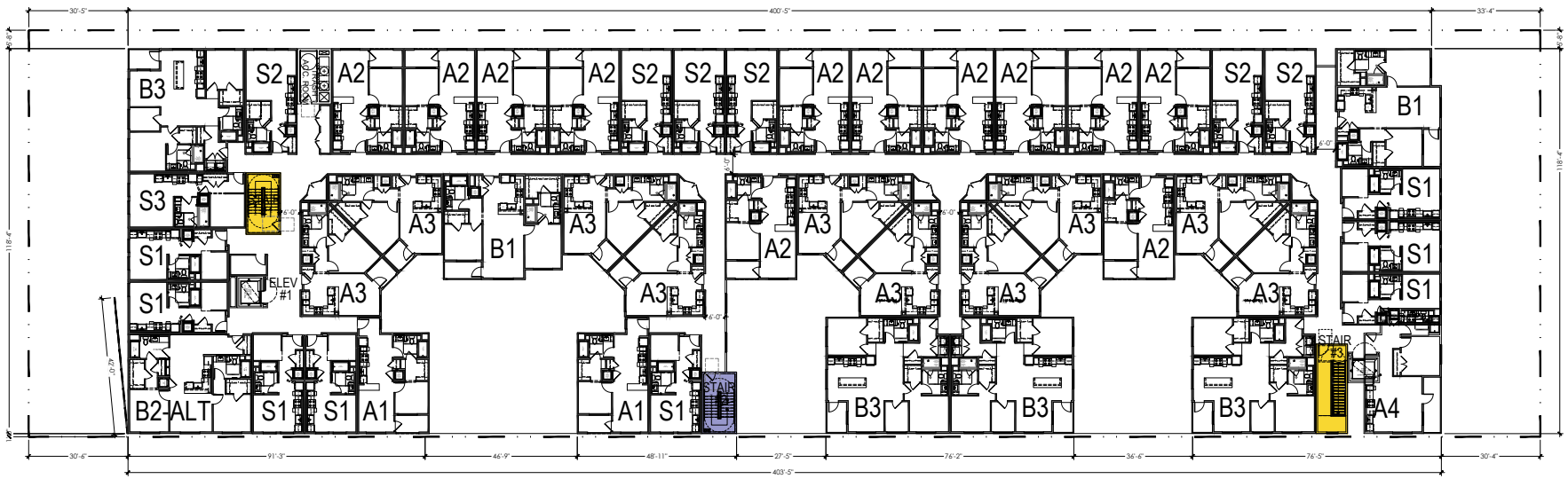
DATE: 10-23-2020
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RESIDENTIAL BUILDING SUMMARY

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S3	-	-	1	1	1	1	1	1	2.3%	6
Studio	3	4	10	15	15	15	15	15	35%	92
A1	-	-	-	2	2	2	2	2	3.8%	10
A2	-	-	4	12	12	12	12	12	24.4%	64
A3	-	-	2	8	10	10	10	10	19.1%	50
A4	1	1	1	1	1	1	1	1	3.1%	8
1 BR'S	1	1	7	23	25	25	25	25	50%	132
B1	-	-	1	1	2	2	2	2	3.8%	10
B2	-	-	-	2	-	-	-	-	0.8%	2
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LEVEL 8	41,093	
TOTAL UNITS		181,700
TOTAL BALCONIES		8,730
TOTALS	**243,122**	**190,430**
75%		

LEGEND:

STAIR TOWERS WITH ROOF ACCESS

STAIR TOWERS

NORTH

1/16"=1'-0" 0 8' 16' 32' 48'

BUILDING PLANS
FIFTH-EIGHTH LEVEL

A-2.4

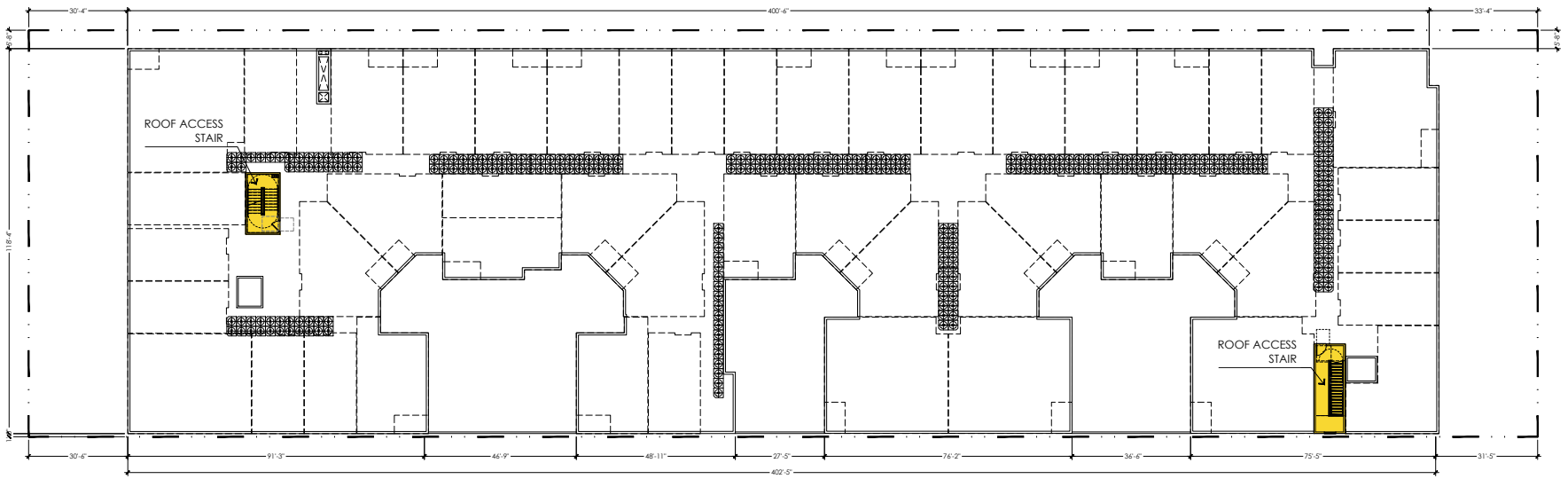
DATE: 10-23-2020
JOB NO.: 2019-446

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LEGEND:

STAIR TOWERS WITH ROOF ACCESS

NORTH

1/16"=1'-0" 0 8' 16' 32' 48'

BUILDING PLANS
ROOF LEVEL

A-2.5

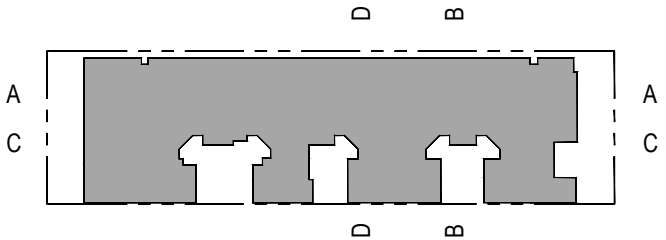
DATE: 10-23-2020
JOB NO.: 2019-446

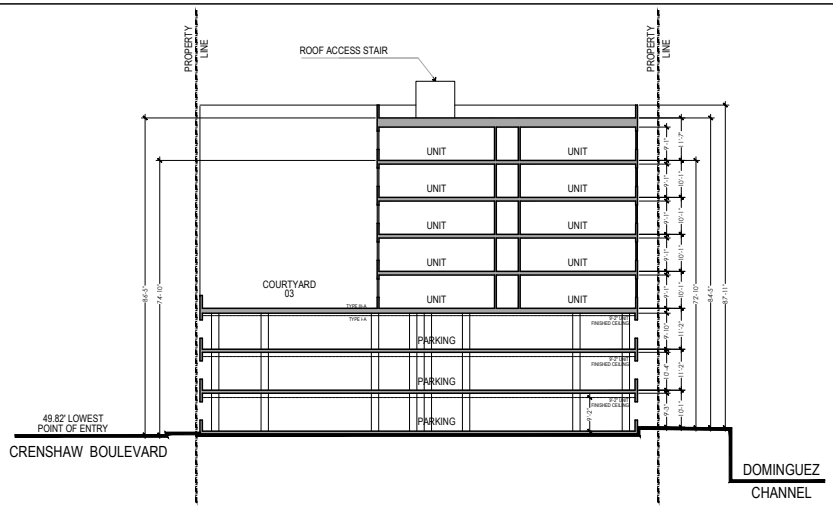
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GARDENA, CA

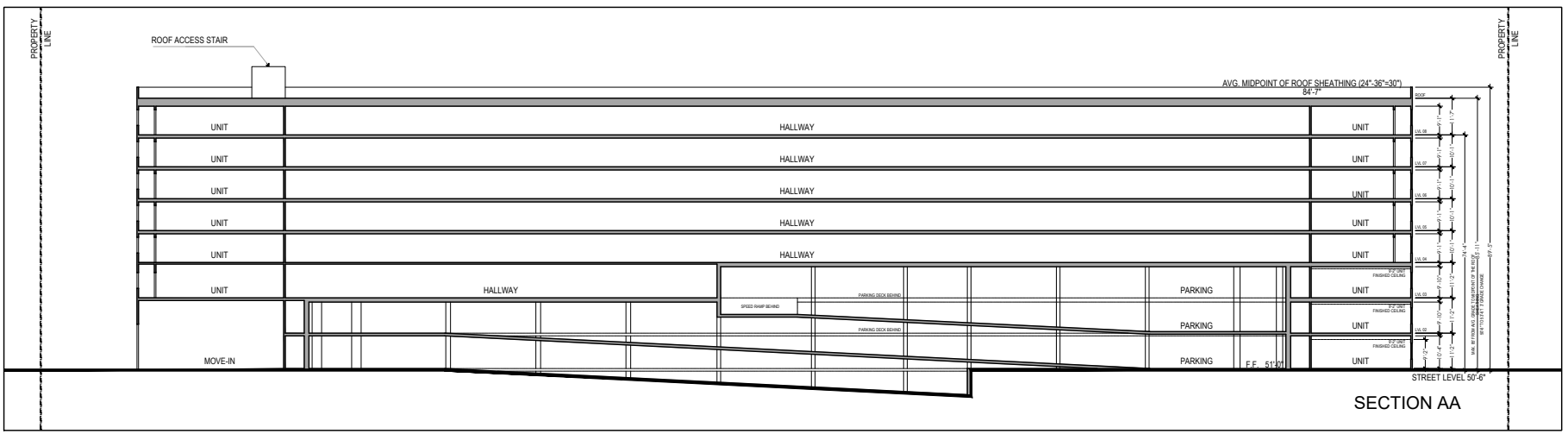
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SECTION BB



SECTION AA

1/16"=1'-0" 0 8' 16' 32' 48'

CONCEPTUAL SITE SECTIONS

A-2.6

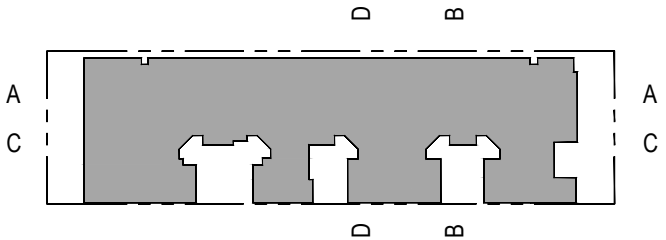
GARDENA T.O.D.

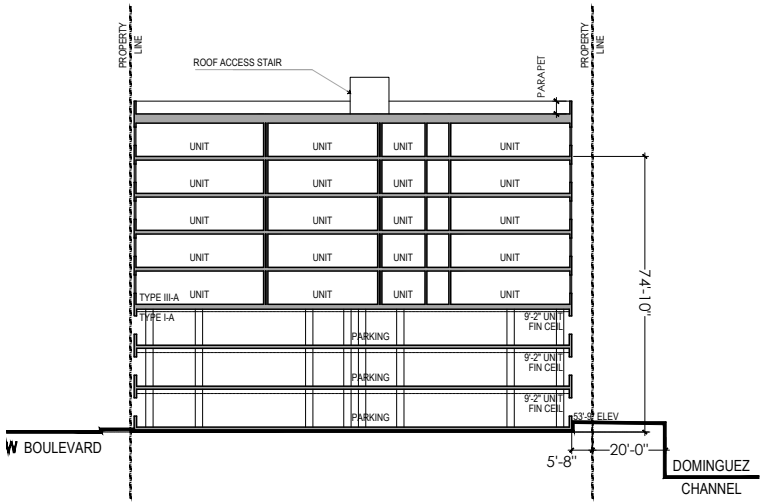
GARDENA, CA

DATE: 10-23-2020
JOB NO.: 2019-446

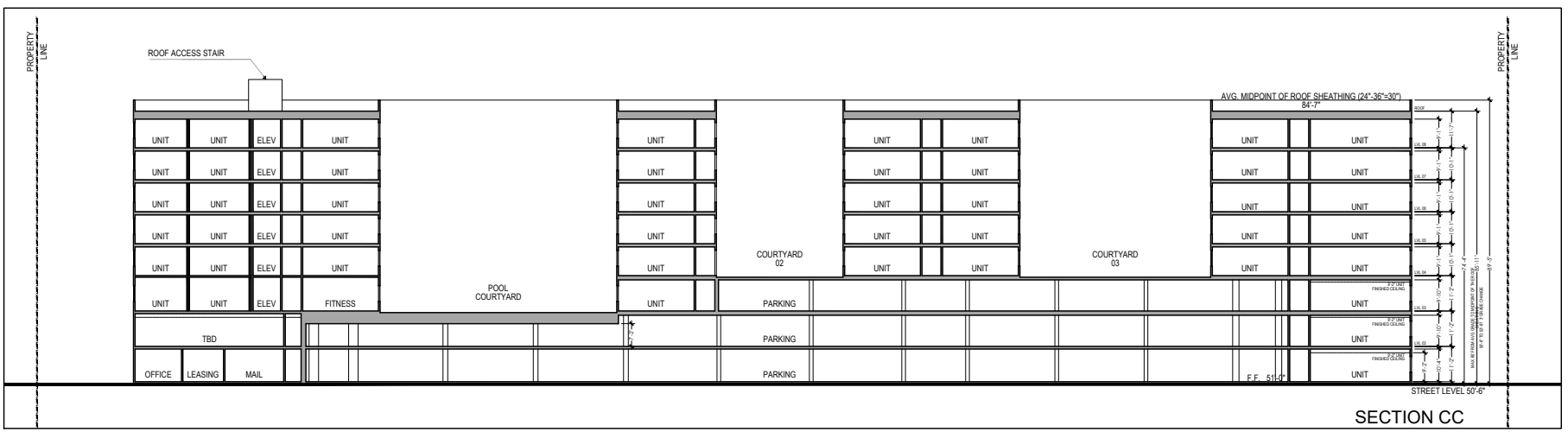
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SECTION DD



SECTION CC

1/16"=1'-0" 0 8' 16' 32' 48'

CONCEPTUAL SITE SECTIONS

A-2.7

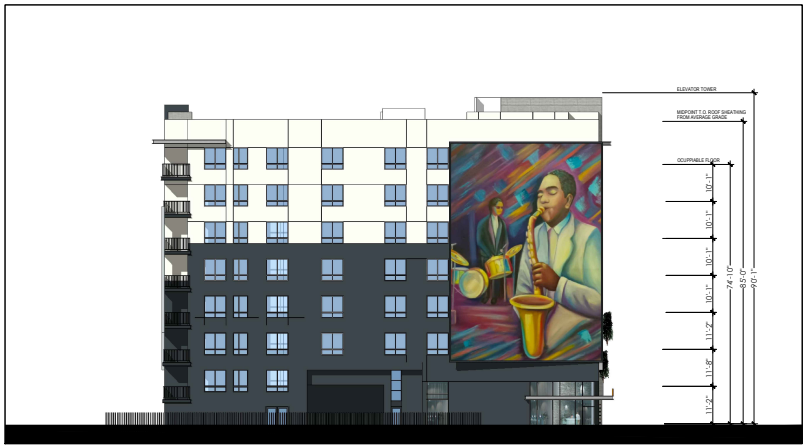
GARDENA T.O.D.

GARDENA, CA

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JOB NO.: 2019-446

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NORTH ELEVATION



CRENSHAW (WEST) ELEVATION

1/16"=1'-0" 0 8' 16' 32' 48'

CONCEPTUAL ELEVATION

A-3.0

GARDENA T.O.D.

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JOB NO.: 2019-446

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SOUTH ELEVATION



EAST ELEVATION

0 8' 16' 32' 48'
1/16"=1'-0"

CONCEPTUAL ELEVATION

A-3.1

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Architecture. Design. Relationships.



CONCEPTUAL PERSPECTIVE
BIRD'S EYE VIEW
DATE: 10-23-2020
JOB NO.: 2019-446

A-3.2

GARDENA T.O.D.

GARDENA, CA

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CONCEPTUAL PERSPECTIVE
NORTHWEST COERNER

A-3.3

GARDENA T.O.D.

GARDENA, CA

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JOB NO.: 2019-446

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CONCEPTUAL PERSPECTIVE
LEASING & RESIDENT ENTRY

DATE: 10-23-2020
JOB NO.: 2019-446

A-3.4

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GARDENA T.O.D.

GARDENA, CA

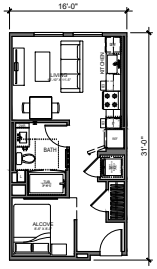
CONCEPTUAL PERSPECTIVE
SOUTHWEST CORNER

DATE: 10-23-2020
JOB NO.: 2019-446

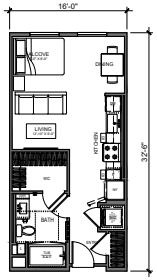
A-3.5

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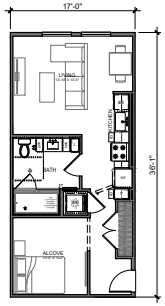
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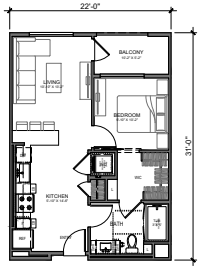
UNIT S1
STUDIO - 1 BATH
UNIT AREA: 493 SQ. FT.
PATIO/BALCONY: 0 SQ. FT.
TOTAL: 52 UNITS



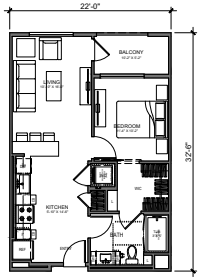
UNIT S2
STUDIO - 1 BATH
UNIT AREA: 517 SQ. FT.
PATIO/BALCONY: 0 SQ. FT.
TOTAL: 34 UNITS



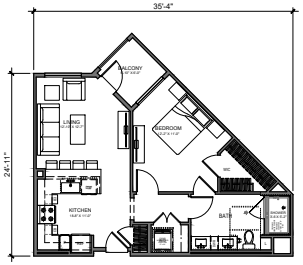
UNIT S3
STUDIO - 1 BATH
UNIT AREA: 614 SQ. FT.
PATIO/BALCONY: 0 SQ. FT.
TOTAL: 6 UNITS



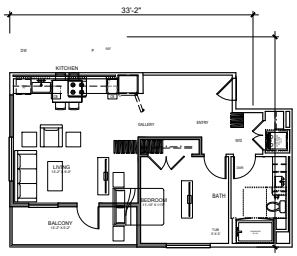
UNIT A1
1 BDRM - 1 BATH
UNIT AREA: 619 SQ. FT.
PATIO/BALCONY: 53 SQ. FT.
TOTAL: 10 UNITS



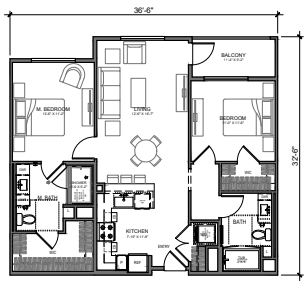
UNIT A2
1 BDRM - 1 BATH
UNIT AREA: 652 SQ. FT.
PATIO/BALCONY: 53 SQ. FT.
TOTAL: 64 UNITS



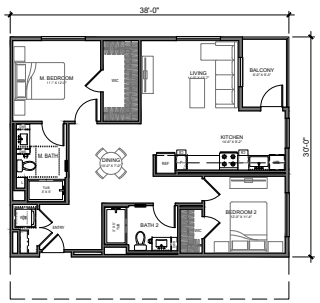
UNIT A3
1 BDRM - 1 BATH
UNIT AREA: 713 SQ. FT.
PATIO/BALCONY: 45 SQ. FT.
TOTAL: 50 UNITS



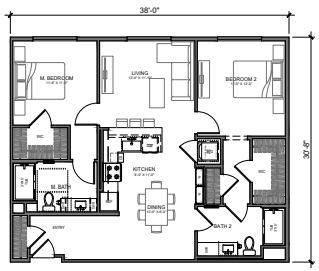
UNIT A4
1 BDRM - 1 BATH
UNIT AREA: 699 SQ. FT.
PATIO/BALCONY: 68 SQ. FT.
TOTAL: 8 UNITS



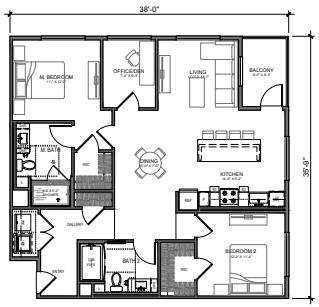
UNIT B1
2 BDRM - 2 BATH
UNIT AREA: 1,080 SQ. FT.
PATIO/BALCONY: 59 SQ. FT.
TOTAL: 10 UNITS



UNIT B2
2 BDRM - 2 BATH
UNIT AREA: 1,076 SQ. FT.
PATIO/BALCONY: 56 SQ. FT.
TOTAL: 8 UNITS



UNIT B2.ALT
2 BDRM - 2 BATH
UNIT AREA: 1,163 SQ. FT.
PATIO/BALCONY: -
TOTAL: 8 UNITS



UNIT B3
2 BDRM - 2 BATH
UNIT AREA: 1,278 SQ. FT.
PATIO/BALCONY: 56 SQ. FT.
TOTAL: 20 UNITS



UNIT PLANS

A-4.0

GARDENA T.O.D.

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EXHIBIT B

CITY OF GARDENA

CONDITIONS OF APPROVAL FOR GENERAL PLAN AMENDMENT #1-20; SPECIFIC PLAN #1-20; ZONE CHANGE #1-20; ZONING CODE AMENDMENT #3-20; DEVELOPMENT AGREEMENT #1-20; SITE PLAN REVIEW #1-20

GENERAL CONDITIONS

Standard

GC 1. Applicant accepts all of the conditions of approval set forth in this document and shall sign the acknowledgement. A copy of the signed document shall be submitted to the Community Development Department prior to issuance of any construction permit.

GC 2. Development of this site shall comply with the requirements and regulations of Title 15 (Building and Construction), Title 17 (Subdivisions) and Title 18 (Zoning) of the Gardena Municipal Code, except as modified by the Specific Plan.

GC 3. Applicant shall comply with all applicable written policies, resolutions, ordinances, and laws in effect at time of approval, or at time of application in the case of the California Building Codes, as modified by the City of Gardena, (including Plumbing, Electrical, Mechanical, Green Building, and Energy Codes). The conditions of approval shall supersede all conflicting notations, specifications, and dimensions which may be shown on the project development plans.

GC 4. Prior to commencement of work, the contractor/applicant shall schedule a pre-job meeting with the City's engineering and building inspectors to minimize construction noise levels, including sound-reduction equipment as deemed necessary by the City. Prior to the issuance of demolition or construction permits, the contractor/applicant shall prepare and implement a construction management plan, approved by the City, which includes procedures to minimize off-site transportation of heavy construction equipment.

GC 5. The site layout and physical appearance of the structure shall be in accordance with the plans presented to and approved by the Planning and Environmental Quality Commission on April 6, 2021, and modified by these conditions of approval. The final completed project shall be in substantial compliance with the plans upon which the Commission based its decision, as modified by such decision. Minor modifications or alterations to the design, style, colors, and materials shall be subject to the review and approval of the Community

Development Director. Significant modifications shall be handled as provided for in the Specific Plan.

GC 6. Trash pick-up and other exterior facility cleaning activities shall be restricted to the hours of 7 a.m. to 6 p.m., Monday through Friday. These activities shall be prohibited during peak traffic hours.

GC 7. Any and all roof-mounted equipment, devices or materials shall be totally screened from public view. The screen enclosures shall be constructed of the same or similar materials, colors and texture of the building.

GC 8. The applicant shall reimburse the City for all attorney's fees spent in processing the project application, including review of all documents required by these conditions of approval.

GC 9. Applicant/developer shall defend, indemnify, and hold harmless the City, its agents, officers, and employees from any claim, action, or proceeding, damages, costs (including, without limitation, attorney's fees), injuries, or liability against the City or its agents, officers, or employees arising out of the City's approval of: General Plan Amendment #1-20; Specific Plan #1-20; Zoning Code Amendment #1-20; Zone Code Amendment #3-20; Development Agreement #1-20; Lot Line Adjustment #1-20; and Site Plan Review #1-20. The City shall promptly notify the applicant/developer of any claim, action, or proceeding and the City shall cooperate fully in the defense. If the City fails to promptly notify the applicant/developer of any claim, action, or proceeding, or if the City fails to cooperate fully in the defense, the applicant/developer shall not thereafter be responsible to defend, indemnify, or hold harmless the City. Although the applicant/developer is the real party in interest in an action, the City may, at its sole discretion, participate in the defense of any action with the attorneys of its own choosing, but such participation shall not relieve the applicant/developer of any obligation under this condition, including the payment of attorney's fees.

<u>Residential Development</u>

RD 1. Applicant shall pay a multiple-unit residential development impact fee of $1,000/unit prior to building permit issuance in accordance with Chapter 15.48 of the Gardena Municipal Code. California Government Code Section 66020(d)(1) requires that the project applicant be notified of all fees, dedications, reservations and other exactions imposed on the development for purposes of defraying all or a portion of the cost of public facilities related to development. Fees for regulatory approvals, including Planning processing fees, building permit fees and park development fees, are not included under this noticing requirement. The applicant has ninety (90) days from the date of adoption of this Resolution to protest the impositions described above. The

applicant is also notified of the 180-day period from the date of this notice during which time any suit to protest impositions must be filed, and that timely filing of a protest within the 90-day period is a prerequisite.

PLANNING

PL1. The approvals granted herein shall be utilized within the time period that the Development Agreement is in effect. Utilization shall mean the issuance of building permits.

PL2. These Conditions of Approval and the signed acknowledgement of acceptance, shall be copied in their entirety and placed directly onto a separate plan sheet behind the cover sheet of the development plans prior to Building and Safety plan check submittal. Said copies shall be included in all development plan submittals, including revisions and the final working drawings.

PL3. The applicant/developer shall submit for review and approval detailed landscape and irrigation plans prepared, signed, and stamped by a licensed landscape architect to the Director of Community Development or designee and the Director of Public Works that is consistent with the State's Water Efficient Landscape Guidelines. At a minimum, tree size shall be 24-inch box and shrubs shall be a minimum of one gallon and five gallon size. Spacing of ground cover plants shall be spaced appropriately by species and variety. Metal cages, painted green, shall be used to protect the back flow devices. All above ground piping, such as a back-flow device for landscaping, shall be screened with landscaping and painted green. Protective bollards shall be of a decorative type and/or painted green where appropriate.

PL4. The apartment management shall maintain landscaping in a healthy and well-kept manner at all times. Dead or damaged landscape material/vegetation shall be replaced immediately per the approved landscape plan. The irrigation system shall be maintained at all times. Trees shall be permitted to grow to their maximum height.

PL5. Colors and materials as shown on the development plans as presented to the Planning Commission on April 6, 2021, are approved. Deviation from colors and materials shall not be made unless approved by the Community Development Director.

PL6. Any signage shall comply with the provisions of Chapter 18.58 of the Gardena Municipal Code, as the same is modified by the Specific Plan and Development Agreement relating to the Digital Display.

PL7. Decorative and colored concrete shall be provided at vehicular entrances along Crenshaw Boulevard to the satisfaction of the Planning Division.

PL8. The Applicant/developer shall place all mailboxes in accordance with U.S. Postal Regulations, as reviewed and approved by the Director of Community Development and the Gardena Postmaster prior to the issuance of a Certificate of Occupancy.

PL9. The Applicant shall be required to apply for a lot line adjustment to combine the four lots into one.

PROJECT DESIGN FEATURES

PDF AQ-1: The Project would include watering of active construction areas at least three times daily to minimize fugitive dust emissions.

PDF AQ-2/PDF GHG 1: The Project would install seven Level 2 electric vehicle (EV) charging stations in the parking structure for the building tenants.

PDF AQ-3/PDF GHG 2: The Project would implement transportation demand management strategies in the Gardena Transit Oriented Development Specific Plan area to advance the vision for multi-modal transportation. These strategies include:

- **Unbundled Parking**: There shall be a charge for parking spaces. The property owner shall unbundle automobile parking charges from the rents or other fees charged for leasing residential units in the Specific Plan area.
- **Pre-Leasing for Area Employees**: Residential units within the Specific Plan area shall be marketed exclusively for a thirty-day period to employees working within a 0.5-mile radius of the development, before the units are offered for rent to the general public. The developer shall submit a pre-leasing marketing plan to the Community Development Director for review and approval prior to issuance of a temporary certificate of occupancy. The developer must then demonstrate compliance with the approved thirty-day exclusive marketing plan prior to issuance of a final certificate of occupancy.
- **Transit Information**: To ensure that residential tenants are aware of transit options and transportation demand management programs available to them, an information board or kiosk shall be posted in a central location in the building.
- **Onsite Residential Bicycle Parking**: One bicycle parking space shall be provided for every residential unit (located in secured facilities accessible only by residents). There would also be unsecured bicycle parking spaces for guests, provided at-grade on a first-come, first-serve basis. All bicycle parking shall be

located in a safe, convenient location, encouraging the use of bicycle transportation by residents and guests.

- **Ride-Sharing Pick-Up/Drop-Off**: A designated loading area within the Gardena Transit-Oriented Development Specific Plan area shall be signed and distinguished (e.g., with paving and/or paint) so that it may be used as a pick-up and drop-off zone for ride-sharing services.

PDF AQ-4/PDF GHG 3: The Project would install a solar swimming pool heating system. The emissions savings from the solar swimming pool heating system were not quantified for this analysis.

PDF NOI-1: The amplified sound system at the Level 3 pool deck/courtyard shall be designed such that it does not exceed a maximum noise level of 85 dBA (L_{eq}) at a distance of 25 feet from the amplified sound system.

PDF AES-1: Location: The Digital Display shall be located or screened to minimize to the greatest reasonable extent possible direct light sources onto any exterior wall of a residential unit in the City of Gardena.

PDF AES-2: Materials: The Digital Display shall not use highly reflective materials such as mirrored glass.

PDF AES-3: Title 24: All light sources, including illuminated signage, shall comply with CALGreen (Part II of Title 24, California Code of Regulations).

PDF AES-4: Dimming: The Digital Display shall be fully dimmable and shall be controlled by a programmable timer so that luminance levels may be adjusted according to the time of day and ambient light conditions.

PDF AES-5: Brightness: The Digital Display shall have a nighttime brightness no greater than 400 candelas per square meter and a daytime brightness no greater than 7,000 candelas per square meter. The displays shall transition smoothly at a consistent rate from the permitted daytime brightness to the permitted nighttime brightness levels, beginning 45 minutes prior to sunset and concluding 20 minutes after sunset, and at all times when the ambient light is less than 100 foot-candles.

PDF AES-6: Ground Spillage: When measured at ground level from any residential property other than the property on which the Digital Display is located, the Digital Display shall not under any circumstance increase the total amount of measurable light more than 8 LUX above the ambient-light level that exists when the Digital Display is extinguished.

PDF AES-7: Interior Spillage: When measured from any location within the building, the Digital Display shall not increase the total amount of measurable light more than 5 LUX

above the ambient-light level that exists when the Digital Display is extinguished.

PDF AES-8: Refresh Rate: The Digital Display would operate under unrestricted refresh rates and shall permit images, videos, animation, parts and/or illumination that flash, change, move, stream, scroll, blink or otherwise incorporate motion to change at an unrestricted rate.

PDF AES-9: Hours of Operation: The Digital Display may be illuminated between the hours of 6:00 a.m. to 2:00 a.m.

PDF AES-10: Animation and Motion: Flashing, strobing, racing effects, and animation that may resemble red or blinking intermittent light or other traffic control devices shall be prohibited.

PDF AES-10: Screen Freezing: The Digital Display shall be equipped with a default system backup server system in the case of a malfunction of the primary server.

ENVIRONMENTAL

MM CUL-1: Inadvertent discovery of an Archaeological Resource. Before ground disturbing activities are initiated on the Project site, the construction personnel conducting the activities shall be notified of the potential for archaeological resources, and the protocols to be implemented in the event of a discovery. Ground disturbing work includes but is not limited to activities such as excavation, grading, digging, trenching, plowing, drilling, tunneling, stripping, and clearing where the ground disturbance exceeds 3.0 feet. In the event that an archaeological resource is observed during construction, all ground disturbing work in the immediate vicinity of the find should temporarily cease until a Qualified Archaeologist can evaluate the find as a historical resources pursuant to Public Resources Code (PRC) §5024.1 and California Code of Regulations Title 14, CEQA Guidelines §15064.5 of the CEQA Guidelines. A Qualified Archaeologist is one who meets the Secretary of the Interior Professional Qualification Standards in archeology. The Qualified Archaeologist or an archaeologist working under their direction would have the authority to stop or divert construction excavation elsewhere on the site while the find is being assessed. Upon discovery, the project proponent will notify the City of Gardena (the City). At the direction of the project proponent and in consultation with the City, the Qualified Archaeologist shall prepare plans for feasible mitigation of impacts to the find, pursuant to Section 15064.5 of the State CEQA Guidelines §15064.5.

MM GEO-1: Retain a Project Paleontologist and Prepare a Monitoring Plan: A Project Paleontologist shall prepare a Paleontological Resources Monitoring and Mitigation Plan (PRMMP). A Project Paleontologist is defined as one who meets the Society of Vertebrate Paleontology (SVP) standards for a Qualified Professional Paleontologist. The PRMMP shall conform to SVP standards and address the specifics of monitoring and procedures to follow in the event of a fossil discovery. The PRMMP shall include a repository

agreement with an accredited paleontological repository, such as the Natural History Museum of Los Angeles County. The PRRMP shall also include a Worker's Environmental Awareness Program that shall describe the legal requirements for preserving fossil resources, procedures to follow in the event of a fossil discovery, and other relevant sections of the PRMMP. This training program shall be given to the crew before ground-disturbing work commences and shall include handouts to be given to new workers.

MM GEO-2: Monitor for Paleontological Resources: Monitoring shall be conducted by a Paleontological Monitor, defined as one who meets the SVP standards for a Paleontological Resource Monitor. The Paleontological Monitor shall be under the supervision of the Project Paleontologist. As defined in the PRMMP, Paleontological monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments that occur in previously undisturbed sediment, which has been estimated as any portion of the Project site where excavation exceeds 0.9 m (3 .0 feet) in depth. The frequency of monitoring shall be based on consultation with or periodic inspection by the Project Paleontologist and shall depend on the rate of excavation and grading activities and the materials being excavated.

MM GEO-3: Evaluate and Treat Fossil Discoveries: In the event of a fossil discovery work shall cease in a 15-m (50-foot) radius of the find while the Project Paleontologist assesses the significance of the fossil and documents its discovery. Work outside this radius may continue. Should the fossil be determined significant, it shall be salvaged following the procedures and guidelines of the SVP and recommendations of the Project Paleontologist. Recovered fossils shall be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and reposited with the paleontological curation facility identified in the PRMMP. The Project Paleontologist shall prepare a report of the monitoring work and any findings after construction is completed.

MM HAZ-1: Prior to issuance of a Building Permit, the building plans shall include an impermeable vapor membrane (or equivalent). The building plans shall be submitted to the City for review and approval prior to commencement of construction activities. The impermeable vapor membrane shall not underlie non-slab areas, such as landscaping and the dog run area, because these spaces are not enclosed. The local Building Department would have oversight/sign-off responsibility for the vapor barrier.

MM HAZ-2: Prior to issuance of a demolition permit of the on-site structure, preparation of a construction management plan addressing procedures and requirements for responding to disturbance of undocumented contaminated soil shall be required. The construction management plan shall be submitted to the City for review and approval prior to commencement of construction activities.

MM NOI-1: A temporary and impermeable sound barrier shall be constructed along the Project eastern property line prior to construction and shall remain during construction. The temporary sound barrier shall be a minimum of 8.0-feet high and shall have a minimum Sound Transmission Class rating of STC-25. The sound barrier must be designed to meet a minimum 10dB(A) attenuation.

MM TRAN-1: Construction Transportation Plan: The contractor shall prepare a detailed Construction Transportation Plan (CTP) for the purpose of minimizing the impact of construction and construction traffic on adjoining and nearby roadways in close consultation with the City. The City shall review and approve the CTP before the contractor commences any construction activities. This plan shall address, in detail, the activities to be carried out in each construction phase, with the requirement of maintaining traffic flow during peak travel periods. Such activities include, but are not limited to, the routing and scheduling of materials deliveries, materials staging and storage areas, construction employee arrival and departure schedules, employee parking locations, and temporary road closures, if any. The CTP shall provide traffic controls pursuant to the California Manual on Uniform Traffic Control Devices sections on temporary traffic controls (Caltrans 2012) and shall include a traffic control plan that includes, at a minimum, the following elements:

- Temporary signage to alert drivers and pedestrians to the construction zone.
- Flag persons or other methods of traffic control.
- Traffic speed limitations in the construction zone.
- Temporary road closures and provisions for alternative access during the closure.
- Detour provisions for temporary road closures—alternating one-way traffic would be considered as an alternative to temporary closures where practicable and where it would result in better traffic flow than would a detour.
- Identified routes for construction traffic.
- Provisions for safe pedestrian and bicycle passage or convenient detour.
- Provisions to minimize access disruption to residents, businesses, customers, delivery vehicles, and buses to the extent practicable—where road closures are required during construction, limit to the hours that are least disruptive to access for the adjacent land uses.
- Provisions for 24-hour access by emergency vehicles.
- Safe vehicular and pedestrian access to local businesses and residences during construction. The plan shall provide for scheduled transit access where construction would otherwise impede such access. Where an existing bus stop is within the work zone, the design-builder shall provide a temporary bus stop at a safe and convenient location away from where construction is occurring in close coordination with the transit operator. Adequate measures shall be taken to separate students and parents walking to and from the temporary bus stop from the construction zone.
- Advance notification to the local school district of construction activities and rigorously maintained traffic control at all school bus loading zones, to provide for the safety of schoolchildren. Review existing or planned Safe Routes to Schools

with school districts and emergency responders to incorporate roadway modifications that maintain existing traffic patterns and fulfill response route and access needs during Project construction operations.
- Identification and assessment of the potential safety risks of Project construction to children, especially in areas where the Project is located near homes, schools, daycare centers, and parks.
- Promotion of child safety within and near the Project area. For example, crossing guards could be provided in areas where construction activities are located near schools, daycare centers, and parks.
- CTPs would consider and account for the potential for overlapping construction projects.

MM TRAN-2: Emergency Vehicle Access: Emergency vehicle access shall be maintained at all times to the construction worksite and adjacent businesses. Emergency vehicle access will be maintained at all times to and from fire stations, hospitals, and medical facilities near the construction site and along the haul routes. Construction activities, road closures, and lane closures will be coordinated with local law enforcement and fire department officials prior to implementation. The implementation of these measures would provide emergency vehicle access to the construction worksite and adjacent businesses and require that construction activities be coordinated with City law enforcement and fire department officials prior to implementation.

MM TCR-1: Retain a Native American Monitor/Consultant: Prior to ground-disturbing construction activities, the Project Applicant shall retain and compensate for the services of a Tribal Monitor/Consultant who is ancestrally affiliated with the Project area, approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government, and listed under the Native American Heritage Commission's (NAHC) Tribal Contact list for the Project area. Applicant shall obtain this list from the NAHC. A Native American Monitor shall be retained by the Lead Agency or Project owner to be on-site to monitor all project-related, ground-disturbing construction activities (i.e., boring, grading, excavation, potholing, trenching, etc.). A monitor associated with one of the NAHC recognized Tribal governments, which have commented on the Project shall provide the Native American Monitor. The Monitor/Consultant shall only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The Tribal Monitor/Consultant shall complete daily monitoring logs that provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the Project site grading and excavation activities are completed, or when the Tribal Representatives and Monitor/Consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.

MM TCR-2: Unanticipated Discovery of Tribal Cultural and Archaeological Resources: Upon discovery of any tribal cultural or archaeological resource, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All tribal cultural and archaeological resources unearthed by Project construction activities shall be evaluated by a qualified archaeologist and Tribal Monitor/Consultant; see MM TCR-8: Professional Standards below. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe requests preservation in place or recovery for educational purposes. Work may continue on other parts of the Project while evaluation and, if necessary, additional protective mitigation takes place (State CEQA Guidelines § 15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with State CEQA Guidelines § 15064.5(f) for historical resources.

MM TCR-3: Public Resources Code §21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. All tribal cultural resources shall be returned to the Tribe. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to the Tribe or a local school or historical society in the area for educational purposes.

MM TCR-4: Unanticipated Discovery of Human Remains and Associated Funerary Objects: Native American human remains are defined in PRC §5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC §5097.98, are also to be treated according to this statute. Pursuant to Health and Safety Code § 7050.5, any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the remains' nature. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC and PRC §5097.98 shall be followed.

MM TCR-5: Resource Assessment & Continuation of Work Protocol: Upon discovery of human remains, the Tribal and/or Archaeological Monitor/Consultant shall immediately divert work at a minimum of 150 feet from the discovery and place an exclusion zone

around the discovery location**.** The Monitor/Consultant(s) shall then notify the Tribe, the qualified Archaeologist, and the construction manager who shall call the coroner. Work shall continue to be diverted, while the coroner determines whether the remains are human and subsequently Native American. The discovery shall be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner shall notify the NAHC as mandated by state law who shall then appoint a Most Likely Descendent (MLD).

MM TCR-6: Kizh-Gabrieleno Procedures for burials and funerary remains: If the Gabrieleno Band of Mission Indians – Kizh Nation is designated MLD, the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

MM TCR-7: Treatment Measures: If human remains/ceremonial objects are discovered, prior to continuation of ground disturbing activities, the landowner shall arrange a designated site location within the Project site footprint for the respectful reburial of the human remains/ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard shall be posted outside of working hours. The Tribe shall make every effort to recommend diverting the Project and keeping the remains in situ and protected. If the Project cannot be diverted, it may be determined that burials shall be removed. The Tribe shall work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations shall either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

Each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects, and objects of cultural patrimony shall be removed to a secure on-site container, if possible. These items shall be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the Project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

MM TCR-8: Professional Standards: Archaeological and Native American monitoring and excavation during construction shall be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.

BUILDING AND SAFETY

BS1. **School Fees –** Applicant shall pay school impact fees to the Los Angeles Unified School District and provide proof of payment prior to issuance of building permits.

BS2. **LA County Fire Department –** The Applicant/developer shall comply and obtain approvals from the LA County Fire Department based on the latest adopted Los Angeles County Fire Code and Fire Department requirements, as applicable.

BS3. **Sprinklers –** Residential portions of the structures shall have fire protection via a sprinkler system under a NFPA 13R system. Parking portions of the structure shall have fire protection per a NFPA 13 system.

BS4. **Property Maintenance –** The Applicant/developer shall maintain the property in a clean and orderly condition at all times and remove any graffiti from the site within 48 hours of its discovery in matching colors to the existing improvements.

BS5. **Storm Water –** The Applicant/developer shall provide storm water management plan study prepared by a qualified engineer acceptable to the Building Official and the Engineering Division. Drainage from parking lots to the public right-of-way shall be filtered through a City approved filter system. The filter shall be located on the development property and maintained by the property owner.

BS6. **Storm Water Pollution/Prevention Plan –** The Applicant/developer shall demonstrate that coverages has been obtained under California's General Permit for Stormwater Discharges Associated with Construction Activity by providing a copy of the Notice of Intent (NOI) submitted to the State Water Resources Control Board and a copy of the subsequent notification of the

issuance of a Waste Discharge Identification (WDID) Number or other proof of filing shall be provided to the Building Official and the City Engineer. Projects subject to this requirement shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). A copy of the SWPPP shall be kept at the project site and be available for review on request. Best Management Practices shall be used during construction to prevent construction materials and soil from entering the storm drain.

No pollutants, including, but not limited to, sediment, chemicals, trash and contaminated storm water shall be discharged from private property into, or where they could be transported to, City property, the City's or County's storm drain system, streets, storm channels, or waterways, either during or after construction.

The project engineer shall prepare a memo listing short and long-term maintenance requirements, recommended frequency of maintenance, and details of maintenance, for each storm water feature to be installed. Roof drains and gutters shall be directed to landscaping or infiltration structure, unless to do so would result in foundation damage or slope instability, as verified by a statement to that effect, stamp and signature, by qualified engineer, on the improvement plans. All storm water that flows from paved areas of vehicle travel, maintenance, parking or uncovered outdoor storage, shall be filtered for trash, sediment, oil and grease, prior to discharge into City streets and storm drains.

The property owner(s) shall sign a statement accepting responsibility for the operation and proper maintenance of all the Stormwater Control Measures installed on-site, including but not limited to: storm chambers, storm water filters, gutters, landscaping and "No Dumping Drains to the River / Groundwater" stencils or markers on storm drain inlets, in a form acceptable to the City Attorney, which shall be recorded prior to issuance of occupancy permit for the project.

BS7. **Hydrology/Hydraulic Study –** The Applicant/developer shall provide a complete hydrology and hydraulic study prepared by a qualified engineer to the satisfaction of the Building Official.

BS8. **Soils Report –** The Applicant/developer shall provide a geotechnical investigation report prepared by a qualified engineer to the satisfaction of the Building Official and shall comply with the recommendations and revisions deemed necessary by the City's Building Official.

BS9. **Grading –** The Applicant/developer shall grade the subject property in accordance with the Grading Ordinance and to the satisfaction of the Building Official. A grading plan shall be submitted by the Applicant/developer for review and approval. Grading shall be in substantial conformance with the proposed grading that is approved by the Planning Commission. Surety shall be posted to the satisfaction of the Building Official and the City Attorney guaranteeing completion of grading within the project.

BS10. **Final Water Quality Management Plan –** The Applicant/developer shall submit a Final Priority WQMP to the Building Division for review and approval. This plan shall be in conformance with all current NPDES requirements. The WQMP must implement Low Impact Development (LID) principles such that projects infiltrate, harvest, re-use, evapotranspire, or biotreat storm water runoff. Prior to Issuance of Occupancy Permits, privately owned LID features and facilities, and on-site treatment structures and controls shall be inspected by the designing engineer to ensure they are properly in place, per the approved plans. As-built plans shall be produced, signed and stamped by the engineer or a letter issued with signature, date and stamp, verifying the proper installation of the project SCMs, including, but not limited to: Infiltration basins or boxes and interceptors or other required storm water filters.

BS11. **Site Lighting Plan –** The Applicant/developer shall submit a site lighting plan, with photometrics, for review and approval by the Building Official and the Director of Community Development or designee prior to the issuance of building permits. The plan shall ensure that all exterior lighting (i.e., parking areas, building areas, and entries) shall employ illumination in a manner that meets the approval of the Building Official and the Director of Community Development or designee before building permits are issued. All light fixtures shall be designed and located in a manner that does not allow spillover onto adjacent properties. Additionally, the exterior lighting fixtures shall be architecturally consistent with the design of the building, as reviewed and approved by the Director of Community Development or designee. This condition shall not apply to the Digital Display provided it complies with the Specific Plan requirements.

BS12. **Utilities –** Each unit shall be separately sub-metered for ALL metered utilities (Gas, Electric, Water).

BS13. **Solar Requirements- Per 2019 CA Energy Code -** Developer shall install solar Photovoltaic (PV) system.

BS14. **EV Stations -** Developer shall install Electric Vehicle charging stations.

BS15. **Recycling Plan –** The Applicant/developer shall prepare construction and demolition waste recycling plans for review and approval by the Building Division. Applicant/developer shall enroll in the city's waste diversion program.

BS16. **Building/Unit Addressing –** Permits are issued to the building address. Apply for addresses, in the CDD, prior to obtaining building permits.

BS17. **Trash Enclosure**

a. Trash Enclosure shall be sufficiently sized to separately accommodate Rubbish, Recycling waste, and Green Waste, per State of California Guidelines.

b. If outdoor, trash enclosures shall be covered with a solid roof, which is architecturally compatible with the other on-site buildings.

c. Trash enclosure doors shall be opaque.

d. If outdoor, trash enclosure must be enclosed on three sides with a six-foot wall, which is architecturally compatible with the other on-site building.

e. Trash enclosure shall meet Fire code requirements for proximity to property lines and to buildings and shall be sprinklered as required.

BS18. **Knox-Box Access –** Any Entry gates/doors shall have Knox box access or emergency keypad and emergency power back-up.

BS19. **Perimeter Wall Plans –** The Applicant/developer shall submit for review and approval a plan to enclose the property with decorative masonry walls and decorative cap or wrought iron, with the design to be approved by the Director of Community Development or designee.

BS20. **Asbestos (EIR COA HAZ-1) –** Prior to issuance of a demolition permit of the onsite structure, preparation of a demolition plan for the safe dismantling and removal of building components and debris including a plan for lead and asbestos abatement shall be required. The demolition plan shall be submitted to the City for review and approval prior to commencement of construction activities.

Prior to demolition activities, an asbestos survey shall be conducted by an Asbestos Hazard Emergency Response Act (AHERA) and California Division of Occupational Safety and Health (Cal/OSHA) certified building inspector to determine the presence or absence of asbestos-containing materials (ACMs). The sampling method to be used shall be based on the statistical probability that construction materials similar in color and texture contain similar amounts of asbestos. In areas where the material appears to be homogeneous in color and texture over a wide area, bulk samples shall be collected at discrete locations from within these areas. In unique or nonhomogeneous areas, discrete samples of potential ACMs shall be collected. The survey shall identify the likelihood that asbestos is present in concentrations greater than 1 percent in construction materials. If ACMs are located, abatement of asbestos shall be completed prior to any activities that would disturb ACMs or create an airborne asbestos hazard.

Asbestos removal shall be performed by a State certified asbestos containment contractor in accordance with the South Coast Air Quality Management District (SCAQMD) Rule 1403. Common asbestos abatement techniques involve removal, encapsulation, or enclosure. The removal of asbestos is preferred when the material is in poor physical condition and there is sufficient space for the removal technique. The encapsulation of asbestos is preferred when the material has sufficient resistance to ripping, has a hard or sealed surface, or is difficult to reach. The enclosure of asbestos is to be applied when the material is in perfect physical condition, or if the material cannot be removed from the site for reasons of protection against fire, heat, or noise.

BS21. **Lead-Based Paint (EIR COA HAZ-2)** – If paint is separated from building materials (chemically or physically) during demolition of the structures, the paint waste shall be evaluated independently from the building material by a qualified

Environmental Professional. A portable, field X-ray fluorescence (XRF) analyzer shall be used to identify the locations of potential lead paint, and test accessible painted surfaces. The qualified Environmental Professional shall identify the likelihood that lead is present in concentrations greater than 1.0 milligrams per square centimeter (mg/cm2) in/on readily accessible painted surfaces of the buildings.

If lead-based paint is found, abatement shall be completed by a qualified Lead Specialist prior to any activities that would create lead dust or fume hazard. Potential methods to reduce lead dust and waste during removal include wet scraping, wet planning, use of electric heat guns, chemical stripping, and use of local High-Efficiency Particulate Air (HEPA) exhaust systems. Lead-based paint removal and disposal shall be performed in accordance with California Code of Regulation Title 8, §1532.1, which specifies exposure limits, exposure monitoring and respiratory protection, and mandates good worker practices by workers exposed to lead. Contractors performing lead-based paint removal shall provide evidence of abatement activities to the City Engineer.

BS22. **Construction –** Prior to approval of grading plans or prior to issuance of demolition, grading, and building permits, the following noise reduction techniques shall be included in the construction plans or specifications:

- Construction contracts specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other state required noise attenuation devices.
- The Project Applicant shall demonstrate to the satisfaction of the City's Building Official that construction noise reduction methods shall be used where feasible, including shutting off idling equipment.
- During construction, equipment staging areas shall be located such that the greatest distance is between the staging area noise sources and noise-sensitive receptors.
- Per Gardena Municipal Code Section 8.36.080, construction and grading activities shall not occur during the hours of 6:00 p.m. and 7:00 a.m. on weekdays; between the hours of 6:00 p.m. and 9:00 a.m. on Saturday; or any time on Sunday or a Federal holiday.

BS23. **Noise –** Prior to building permit issuance, the Project applicant will be required to demonstrate to the City of Gardena Building Division that the HVAC units proposed to be installed on-site would comply with the City's Noise Ordinance (Gardena Municipal Code Chapter 8.36). Building permit issuance is contingent upon satisfactory demonstration that the HVAC units would comply with the City's noise ordinance.

BS24. **Noise –** An acoustical analysis is required prior to the issuance of building permits for the Project to demonstrate compliance with City's Noise Ordinance (Gardena Municipal Code Chapter 8.36 and specifically Section 8.36.050, Interior noise standards). The interior noise study is required to be submitted to the City of Gardena Building Division for review and approval in conjunction

with building permit application review; building permit issuance is contingent upon satisfactory demonstration that interior noise levels would comply with the City's noise ordinance.

PUBLIC WORKS

PW1. Applicant shall pay sewer fee in the amount of $140 per unit.

PW2. Applicant shall remove and replace all sidewalk fronting the property.

PW3. Applicant shall remove and replace all curb and gutter fronting the property.

PW4. Applicant shall remove all abandoned driveways and replace with new curb, gutter, and sidewalk fronting the property.

PW5. Applicant shall plant street trees per the Public Works Department.

PW6. Applicant shall remove and replace traffic markings fronting the property.

PW7. Applicant shall re-paint existing curbs and install traffic signs fronting the property per City of Gardena.

PW8. Applicant shall show all sidewalk structures on plans (i.e., poles, hydrants and traffic signal conduit)

PW9. Applicant shall provide traffic control plans per W.A.T.C.H. (Work Area Traffic Control Handbook) or California M.U.T.C.D.

PW10. Applicant shall provide street improvement plan showing all requirements. Street plans shall be designed and signed by a registered Civil Engineer.

PW11. Applicant shall pay surety to be determined by the Public Works Department.

PW12. Applicant shall obtain Public Works Encroachment/Excavation permit for any work done in the public right-of-way.

PW13. Requirements are based on preliminary review only. Additional requirements may be imposed upon full plan submittal and review.

GOLDEN STATE WATER COMPANY

GS1. The applicant shall contact GSWC for review of the existing water main once LA County Fire Department has issued their fire protection requirements on the aforementioned project to initiate application for new service installation.

LOS ANGELES COUNTY SANITATION DISTRICTS

SD1. The applicant shall pay a connection fee before a permit to connect to the sewer is issued. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at (562) 908-4288, extension 2727.

LOS ANGELES COUNTY FIRE DEPARTMENT

Land Development Unit

FD1. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.

FD2. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways with an all-weather surface of not less than 26 feet in 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. The roadway shall provide approved signs and/or stripping stating, "NO PARKING - FIRE LANE" and shall be maintained in accordance with the County of Los Angeles Fire Code.

FD3. 503.1 .1 Buildings and facilities. Approved Fire Apparatus Access Roads shall be provided for every facility, building, or portion of a building hereafter constructed or moved into or within the jurisdiction. The Fire Apparatus Access Road shall comply with the requirements of this section and shall extend to within 150 feet of all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building or facility.

FD4. 503.2.1 .2 Commercial, industrial, and multifamily-residential developments. Fire Apparatus Access Roads tor commercial, industrial, and multifamily-residential developments shall be installed and arranged in accordance with Sections 503.2.1.2.1 through 503.2.1 ·.2.2. For purposes of this section, the highest roof surface shall be determined by measurement of the vertical distance between the access roadway and the eave of a pitched roof, the intersection of the roof to the exterior wall, or the top of parapet walls, whichever is greater.

FD5. 503.2.1.2.2 Where the highest roof surface exceeds 30 feet. For buildings where the vertical distance between the access roadway and the highest roof surface exceeds 30 feet, an approved Fire Apparatus Access Roadway with a minimum width of 26 feet, exclusive of shoulders, shall be provided in the immediate vicinity of the building or portion thereof. This roadway shall have an unobstructed clearance of clear to the sky.

FD6. Every building constructed shall provide an adequate water supply for fire protection purposes. The fire hydrant spacing shall be 300 feet and plotted by the County of Los Angeles Fire Department. Fire Flow requirements shall be determined upon submittal to the County of Los Angeles Fire Department's Fire Prevention, Land Development Unit. Actual fire flow will be determined utilizing the County of Los Angeles Fire Code Appendix B, Table B 105.1.

FD7. An approved fire sprinkler system in the proposed building in compliance with applicable codes and regulations will qualify for a fire flow reduction as outlined Table B 105.1 of the County of Los Angeles Fire Code.

FD8. 507.1 Required water supply. An approved water supply capable of supplying the required fire flow for fire protection shall be provided to premises on which facilities, buildings, or portions of buildings are hereafter constructed or moved into or within the jurisdiction.

FD9. 507.3 Fire Flow. Fire flow requirements for buildings or portions of buildings and facilities shall be determined by an approved method or Appendix B.

FD10. Fire Hydrant spacing for the proposed development shall be 300 feet. The County of Los Angeles Fire Department shall plot required fire hydrants as required to meet the spacing requirements.

FD11. 503.2.1.2.2.1 Proximity to Building. At least one required access route meeting this condition shall be located such that the edge of the Fire Apparatus Access Roadway, not including shoulder, that is closest to the building being served, is between 10 feet and 30 feet, from the building, as determined by the fire code official, and shall be positioned parallel to one entire side of the building. The side of the building on which the Fire Apparatus Access Road is positioned shall be approved by the fire code official.

FD12. 503.2.1.2.2.2 Obstructions. Overhead utility and power lines shall not be located over the Fire Apparatus Access Road or between the fire apparatus road and the building. Other obstructions shall be permitted to be placed with the approval of the fire code official.

FD13. The proposed development shall comply with the County of Los Angeles Fire Department Regulation No. 27. Requirements for Building, Construction, and Land Use Within or Adjacent to High Voltage Transmission Lines.

FD14. 503.2.4 Turning radius. The minimum turning radius shall be not less than 32 feet, measured at the centerline of the required access roadway. Clearly indicate the turning radius on the site plan for all turns associated with on-site Fire Department access.

FD15. 503.2.3 Surface. Facilities, buildings, or portions of buildings hereafter constructed shall be accessible to fire department apparatus by way of an approved Fire Apparatus Access Road that is designed and maintained with an asphalt, concrete, or other approved driving surface capable of supporting the imposed load of fire apparatus weighing at least 75,000 pounds.

FD16. 503.2.2.1 Dimensions maintained. The dimensions of approved fire apparatus roads shall be maintained as originally approved by the fire code official.

FD17. 503.6 Gates. The installation of security gates across a Fire Apparatus Access Road shall be approved by the fire code official. Where security gates are installed they shall have an approved means of emergency operation.

FD18. Gates securing the Fire Apparatus Access Roads shall comply with all of the following criteria:

a. Where a single gate is provided, the gate width shall not be less than 20 feet, except on a fire apparatus roadway approved to be a lesser width, in which case the gate shall not restrict that width. Where a fire apparatus road consists of a divided roadway, the gate width shall not be less than 15 feet for residential use and 20 feet for commercial/industrial uses.

b. Gates shall be of the swinging or sliding type.

c. Construction of gates shall be of materials that allow manual operation by one person.

d. Gate components shall be maintained in an operative condition at all times and replaced or repaired when defective.

e. Electric gates shall be equipped with a means of opening the gate by fire department personnel for emergency access. Emergency opening devices shall be approved by the fire code official.

f. Methods of locking shall be submitted for approval by the fire code official.

g. Electric gate operators, where provided, shall be listed in accordance with UL 325.

h. Gates intended for automatic operation shall be designed, constructed, and installed to comply with the requirements of ASTM F2200.

FD19. 503.2.9 Area of firefighting operations. The area of firefighting operations shall not be located underneath high voltage transmission lines.

FD20. 503.3 Marking and signage. Where required by the fire code official, approved signs or other approved notices or markings that include the words "NO PARKING – FIRE LANE" shall be provided for Fire Apparatus Access Roads to identify such roads, to clearly indicate the access to such roads, or to prohibit the obstruction thereof. The means by which fire lanes are designated shall be maintained in a clean and legible condition at all times and be replaced or repaired when necessary to provide adequate visibility. A no-parking designation shall meet the requirements of California Vehicle Code Section 22500.1 and be approved by the fire code official.

FD21. Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be posted on one or both sides of the Fire Apparatus Access Road as required.

FD22. 503.4 Obstruction of Fire Apparatus Access Roads. 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 Sections 503.2.1 and 503.2.2 shall be maintained at all times.

FD23. 503.4.1 Traffic calming devices. Traffic calming devices, including but not limited to, speed bumps and speed humps shall be prohibited unless approved by the fire code official.

FD24. 504.1 Required access. Exterior doors and openings required by this code or the California Building Code shall be maintained readily accessible for emergency access by the fire department. An approval access walkway leading from Fire Apparatus Access Roads to exterior openings shall be provided for where required by the fire code official.

FD25. 504.5 Rooftop barriers and parapets. No person shall install any security barrier, visual barrier screen, or other obstruction on; the roof of any building in such a manner as to obstruct firefighter ingress or egress in the event of fire or other emergency. Parapet shall not exceed 36 inches on at least two sides of the building. These sides should face an access roadway or yard sufficient to accommodate ladder operations.

FD26. 505.1 Address identification. New and existing buildings shall be provided with approved address identification. The address identification shall be legible and placed in a position that is visible from the street or road fronting the property. Address identification shall be legible and placed in a position that is visible from the street or road fronting the property. Address identification characters shall contrast with their background. Address numbers shall be Arabic numbers or alphabetical letters. Numbers shall not be spelled out. Each character shall be not less than 4 inches high with a minimum stroke width of½ inch. Where required by the fire code official, address identification shall be provided in additional approved locations to facilitate emergency response. Where access is by means of a private road and the building cannot be viewed from the public way, a monument, pole or other sign or means shall be used to identify the structure. Address identification shall be maintained.

FD27. 505.1.1 Multiple residential and commercial units. Multiple residential and commercial units having entrance doors not visible from the street or road shall have, in addition to the requirements of Section 505.1 above, approved numbers

grouped for all units within each structure and positioned to be plainly visible from the street or road. Said numbers may be grouped on the wall of the structure or on a mounting post independent of the structure.

FD28. 507.5.4 Obstruction. Unobstructed access to fire hydrants shall be maintained at all times. The fire department shall not be deterred or hindered from gaining immediate access to fire protection equipment or fire hydrants.

Forestry Division

FD29. The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

GARDENA POLICE DEPARTMENT

PD1. Install one surveillance camera at the entrance of the development. Surveillance cameras shall be maintained by the property owner and recordings should be kept for a minimum of 30 days.

PD2. The builders shall use Crime Prevention Through Environmental Design (CPTED) measures including good lighting around the exterior of buildings and parking areas, eliminating blind spots caused by landscaping, and preventing areas prone to graffiti from being targeted by planting landscaping that create barriers.

Din/Cal 4, Inc. certifies that it has read, understood, and agrees to the Project Conditions listed herein.

_____

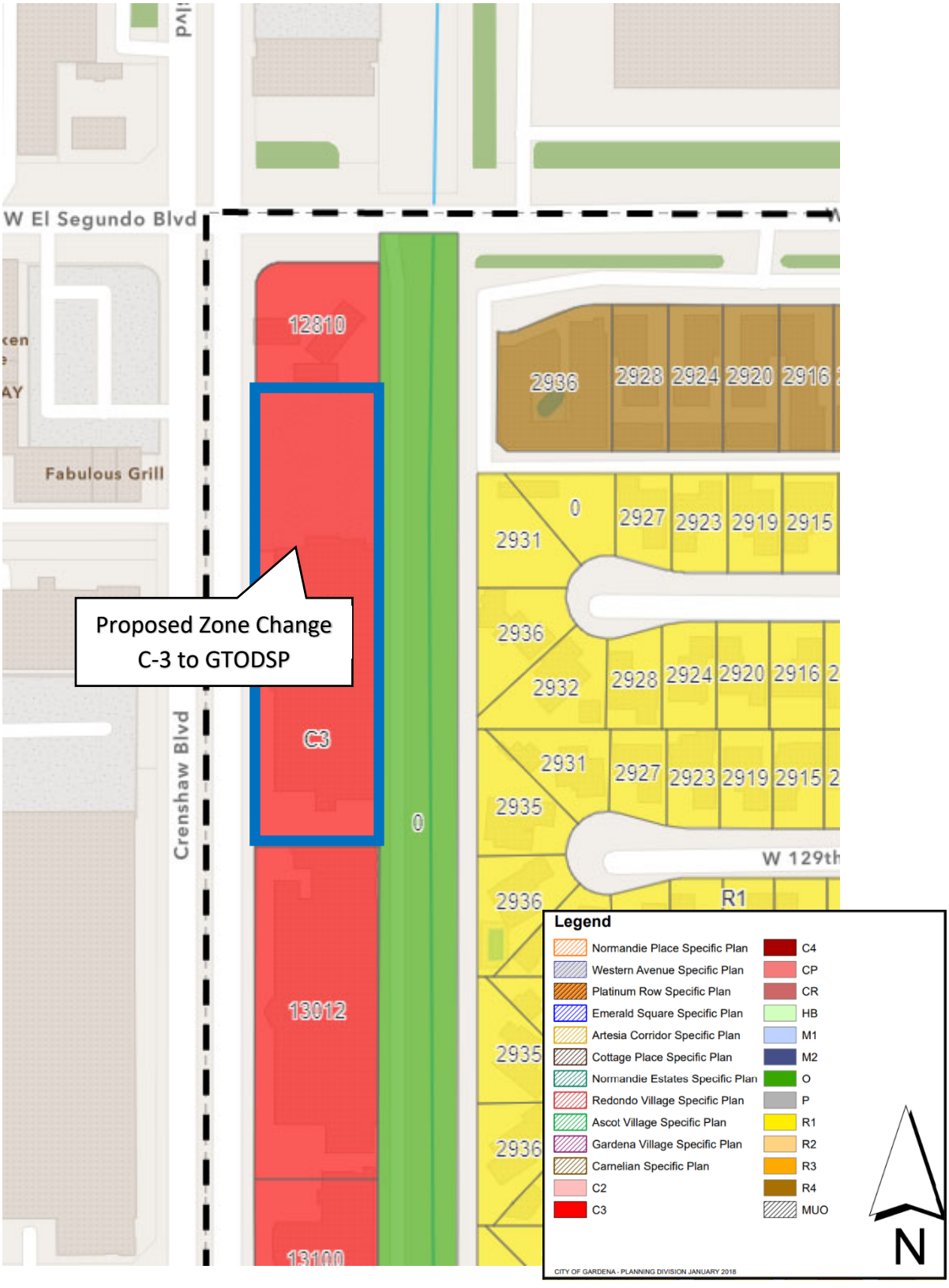
Din/Cal 4, Inc., Representative

By_____

Dated_____

Exhibit C

Proposed Zone Change #1-20



Adopted Zone Change #1-20

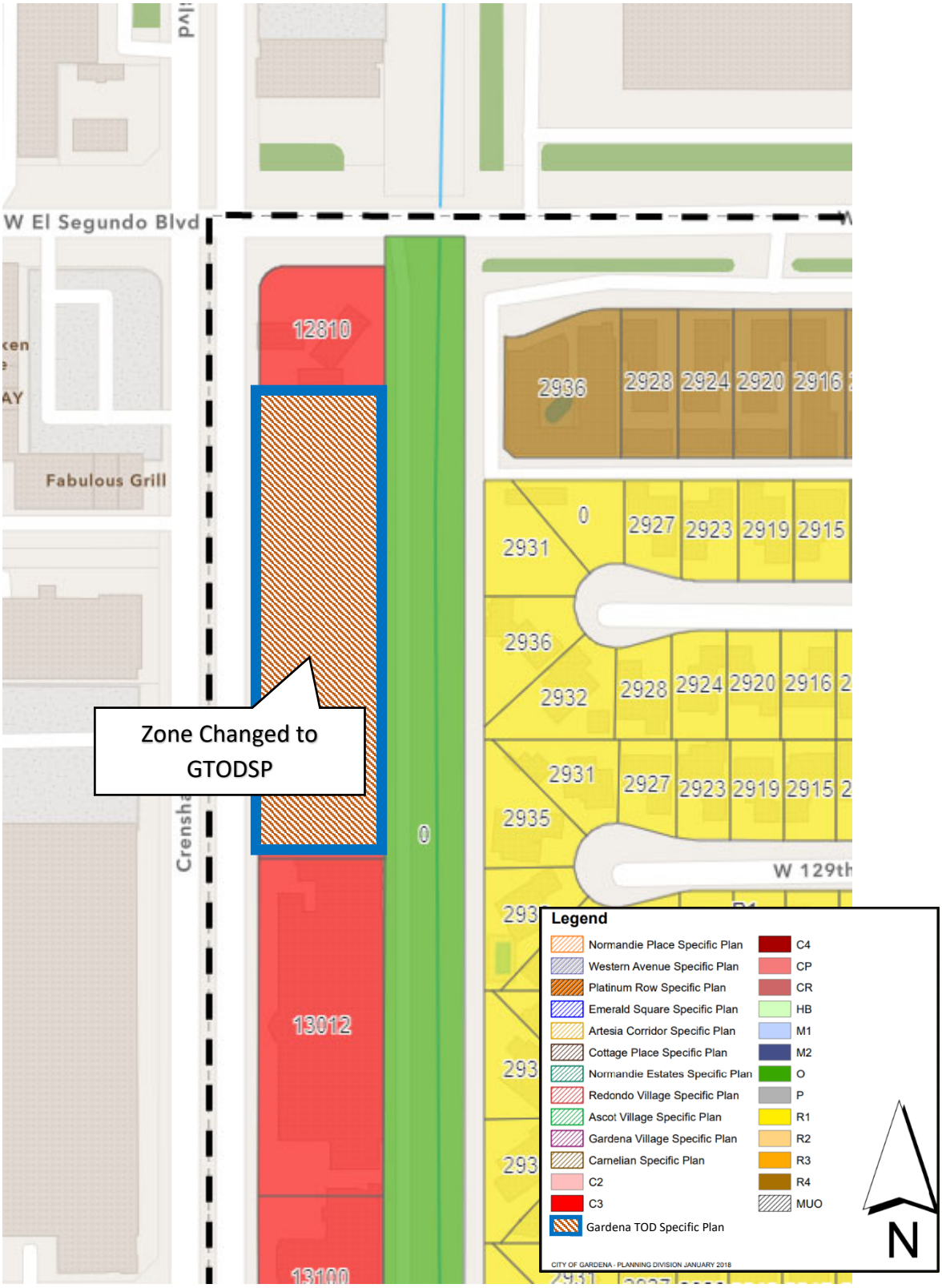


EXHIBIT D

RECORDING REQUESTED BY
AND WHEN RECORDED MAIL TO:

CITY CLERK
CITY OF GARDENA
1700 W. 162nd Street
Gardena, California 90247

Space Above Reserved for Recorder's Use

EXEMPT FROM RECORDER'S FEES
Pursuant to Government Code § 6103

DEVELOPMENT AGREEMENT
BY AND AMONG
THE CITY OF GARDENA
AND
DIN/CAL 4, INC.

THIS AGREEMENT SHALL BE RECORDED WITHIN TEN DAYS OF EXECUTION BY ALL PARTIES HERETO PURSUANT TO THE REQUIREMENTS OF GOVERNMENT CODE §65868.5.

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DEVELOPMENT AGREEMENT

This Development Agreement ("Agreement") is made and entered into by and among the CITY OF GARDENA, a municipal corporation ("City") and Din/Cal 4, Inc., a Texas corporation authorized to do business in California ("Developer") as of this 11th day of May, 2021. City and Developer are referred to hereinafter individually as "Party" and collectively as "Parties." In consideration of the mutual covenants and agreements contained in this Agreement, City and Developer agree as follows:

1. Definitions. Unless the contrary is stated or clearly appears from the context, the following definitions govern the construction of the words and phrases used in this Agreement. Words and phrases not defined in this Section will have the meaning set forth in this Agreement, the Gardena Municipal Code, or in common usage.

"Applicable Rules" means:

- The Gardena General Plan, as it existed on the Approval Date, as modified by the Project Approvals;
- The Gardena Municipal Code, as it existed on the Approval Date, as modified by the Project Approvals;
- Such other laws, ordinances, rules, regulations, and official policies governing permitted uses of the property, density, design, improvement, development fees, and construction standards and specifications applicable to the development of the Property in force at the time of the Effective Date, which are not in conflict with this Agreement.

"Approval Date" means May 11, 2021, the date on which the last of the Project Approval applications were approved by the City Council.

"Approved Plans" means a plan for any aspect of the Project, including, without limitation, the Site Plan, signage plans, and landscaping and irrigation plans, which are approved by the City in accordance with the Applicable Rules, and Project Approvals.

"Building Regulations" means those regulations set forth in Title 15 of the GMC.

"CEQA" means the California Environmental Quality Act, Public Resources Code § 21000 *et seq.*

"CEQA Guidelines" means the regulations implementing CEQA which have been adopted by the State and found at Title 14 of the California Code of Regulations, § 150000 *et seq.*

"City" means the City of Gardena, a municipal corporation.

"City Council" means the City Council of the City of Gardena.

"Developer" means Din/Cal 4, Inc., a Texas corporation authorized to do business in California, and its transferees, assigns and successors in interest.

"Development Standards" means the design and development standards that are applicable to the Project as set forth in the Specific Plan.

"Director" means the Director of Community Development or his designee.

"Effective Date" means the date on which the Enabling Ordinance becomes effective in accordance with Government Code § 36937.

"GMC" means the Gardena Municipal Code.

"Enabling Ordinance" means Ordinance No. 1828, approving this Development Agreement.

"Future Approvals" means such subsequent discretionary and ministerial entitlements, including a lot line adjustment, permits, which are required to develop the Project in addition to the Project Approvals, and which are applied for by the Developer and approved by the City. Once approved, a Future Approval becomes part of the Project Approvals.

"Party" means the City or the Developer.

"Parties" shall mean both the City and the Developer.

"Person" means a natural person or any entity.

"Project" means the development of the Property in accordance with the Project Approvals.

"Project Approvals" means:

- Final Environmental Impact Report (FEIR) No. EA–1248, as certified by Resolution No. 6507 on April 27, 2021;
- Mitigation Monitoring Program for FEIR No. EA-1248, as adopted by Resolution No. 6507 on April 27, 2021;
- General Plan Amendment No. 1-20, as approved by Resolution No. 6508 on April 27, 2021, including a change in the Land Use Map;
- Gardena Transit Oriented Development Specific Plan No. 1-20, as adopted by Ordinance No. 1828 on May 11, 2021;
- Zone Change No. 1-20, as approved by Ordinance No. 1828 on May 11, 2021, including a change in the Zoning Map;
- Zoning Code Amendment No. 3-20, as approved by Ordinance No. 1828 on May 11, 2021;
- Site Plan Review No. 1-20, as approved by Ordinance No. 1828 on May 11, 2021; and
- This Development Agreement #1-20 as approved by Ordinance No. 1828 on May 11, 2021.

"Property" refers to that approximate 1.33 acres which is described in Exhibit A, attached hereto, and incorporated herein by reference.

"Site Plan" refers to the development plans for the Gardena Transit Oriented Development Specific Plan Area as shown on Exhibit B, attached hereto, and incorporated herein by reference.

"Specific Plan" or "GTODSP" means the Gardena Transit Oriented Development Specific Plan.

"Subsequent Rules" means any changes to the Applicable Rules made after the Approval Date, including, without limitation, any change by means of an ordinance, initiative, resolution, policy, order or moratorium, initiated or instituted for any reason whatsoever and adopted by the City Council, the Planning Commission or any other board, agency, commission or department of the City, or any officer or employee thereof, or by the electorate, which would, absent this Agreement, otherwise apply to the Property.

"Transferee" means a Person which assumes in whole or in part the rights and obligations under this Agreement with respect to all or a portion of the Property.

2. Recitals. This Agreement is made with respect to the following facts and for the following purposes, each of which is acknowledged as true and correct by the Parties:

2.1 Pursuant to Government Code § 65865 *et seq*., the City is authorized to enter into a binding contractual agreement with any person having a legal or equitable interest in real property for the development of such property.

2.2 Developer has a legal or equitable interest in the Property.

2.3 Developer desires to redevelop the Property in accordance with the GTODSP.

2.4 By this Agreement, each Party desires to obtain the binding agreement of the other Party to develop the Property in accordance with the Project Approvals, Applicable Rules, and this Agreement. In consideration thereof, the City agrees to limit the future exercise of certain of its governmental and proprietary powers to the extent specified in this Agreement.

2.5 City and Developer have acknowledged and agreed that the consideration that is to be exchanged pursuant to this Agreement is fair, just, and reasonable.

2.6 The Project is consistent with the City's General Plan, as amended pursuant to the Project Approvals (the "General Plan").

2.7 Development of the Project has, and will continue to, further the comprehensive planning objectives contained within the General Plan, and will result in public benefits, including, among others, the following:

2.7.1 Providing needed housing;

2.7.2 Providing fiscal benefits to City's general fund in terms of increased utility, business license, and property and sales tax revenues;

2.7.3 Providing short-term construction employment within City, and

2.7.4 Providing a percentage of the net profits of advertising revenue generated from the Project's digital signage display as more specifically outlined in Section 5.2 below.

2.7.5 Providing a Local Hiring and Local Buying Program, as outlined in Exhibit D.

2.8 On April 6, 2021, the Planning Commission of the City commenced a duly noticed public hearing on the Project Approvals. At the conclusion of the hearing, the Planning Commission recommended that the City Council approve the Project Approvals.

2.9 On April 27, 2021, the City Council commenced a duly noticed public hearing on the Project Approvals. Prior to approving this Agreement by the Enabling Ordinance, the City Council adopted Resolution No. 6507 approving the FEIR.

2.10 All of the Property is subject to this Agreement.

3. Binding Effect. The burdens of this Agreement are binding upon, and the benefits of the Agreement inure to, the City and the Developer and each successive transferee, assign and successor in interest thereto and constitute covenants that run with the land. Any and all rights and obligations that are attributed to the Developer under this Agreement shall run with the land.

3.1 Constructive Notice and Acceptance. Every Person who acquires any right, title, or interest in or to any portion of the Property in which the Developer has a legal interest is, and shall be, conclusively deemed to have consented and agreed to be bound by this Agreement, whether or not any reference to this Agreement is contained in the instrument by which such Person acquired such right, title or interest.

3.2 Rights to Assign and Transfer. Developer may assign or transfer its rights and obligations under this Agreement with respect to the Property, or any portion thereof, to any person at any time during the term of this Agreement without approval of the City. For purpose of this Agreement, the Transferee must be considered the "owner" of that portion of the Property which is covered by such transfer.

3.3 Liabilities Upon Transfer. Upon the delegation of the duties and obligations under this Agreement and the sale, transfer or assignment of all or any portion of the Property, Developer will be automatically released from its obligations under this Agreement with respect to the Property, or portion thereof, so transferred arising prior and subsequent to the effective date of such transfer, if: (i) Developer has provided to the City prior or subsequent written notice of such transfer; and (ii) the Transferee has agreed in writing to be subject to all of the provisions hereof applicable to the portion of the Property so transferred by executing an Assignment and Assumption Agreement in the form of Exhibit C attached hereto and incorporated herein by reference. Upon any transfer of any portion of the Property and the express assumption of Developer's obligations under this Agreement by such Transferee, the City agrees to look solely to the Transferee for compliance by such Transferee with the provisions of this Agreement as such provisions relate to the portion of the Property acquired by such Transferee. Any such Transferee

shall be entitled to the benefits of this Agreement as "Developer" hereunder and shall be subject to the obligations of this Agreement applicable to the parcel(s) transferred. A default by any Transferee shall only affect that portion of the Property owned by such Transferee and shall not cancel or diminish in any way Developer's rights hereunder with respect to any portion of the Property not owned by such Transferee. The Transferee shall be responsible for satisfying the good faith compliance requirements set forth in Section 8 below relating to the portion of the Property owned by such Transferee, and any amendment to this Agreement between the City and a Transferee shall only affect the portion of the Property owned by such Transferee.

3.4 Resumption of Rights. If Transferee defaults with respect to any provision of this Agreement, Developer may, but is not obligated to, resume Transferee's obligations upon written notification to City.

4. Development of the Property. The following provisions, in addition to the Applicable Rules, shall govern the development and use of the Property.

4.1 Permitted Uses and Design and Development Standards. The permitted, administratively permitted, and conditionally permitted uses of the Property, as well as the Development Standards, are set forth in the Project Approvals and Applicable Rules.

4.2 Entitlement to Develop. The Developer is granted the vested right to develop the Project subject to the Applicable Rules, the Project Approvals, and any Future Approvals.

4.3 Building Regulations. Notwithstanding Section 4.4 below, all construction on the Property shall adhere to the Building Regulations in effect at the time an application for a building permit is submitted and to any federal or state building requirements that are then in effect at such time. Additionally, nothing in this Agreement prevents the City from applying "standard specifications" for public improvements (e.g., streets, storm drainage, parking lot standards, driveway widths), as the same may be adopted or amended from time to time by the City, provided that the provisions of any such standards and specifications apply only to the extent they are in effect on a Citywide basis and so long as they do not conflict with the provisions of the Specific Plan.

4.4 Subsequent Rules. Subsequent Rules cannot be applied by the City to any part of the Property unless the Developer gives the City written notice of its election to have such Subsequent Rule applied to the Property, in which case such Subsequent Rule is deemed to be an Applicable Rule.

4.5 Fees, Exactions, Mitigation Measures, Conditions, Reservations and Dedications.

4.5.1 Subject to Sections 4.5.2, 4.5.3, and 5.2 of this Agreement, all fees, exactions, mitigation measures, conditions, reservations, and dedications of land for public purposes that are applicable to the Project are set forth in the Applicable Rules, the Project Approvals, and this Agreement.

4.5.2 Except as otherwise provided in this Agreement, and specifically excluding fees set by entities not controlled by the City that are collected by the City, the City can only charge

and impose those fees and exactions, including, without limitation, dedication and any other fee relating to development or the privilege of development, which are in effect on a City-wide basis as of the Effective Date.

4.5.3 The Developer must pay the amount of the fees that are in effect at the time of application for the building permit pursuant to, or such subsequent resolutions as may be adopted by the City Council in accordance with applicable procedures, but shall not be required to pay any new impact fees that are not in effect at the time of Project Approvals.

4.5.4 This Section 4.5 shall not be construed to limit the authority of the City to charge normal and customary application, processing, and permit fees, including legal and environmental processing costs, for land use approvals, building permits and other similar permits, for Future Approvals, which fees are designed to reimburse City's actual expenses attributable to such application, processing and permitting and are in force and effect on a City-wide basis at such time as applications for such approvals are filed with the City.

4.6 Use of Easements. Notwithstanding the provisions of the Applicable Rules, easements dedicated for vehicular and pedestrian use shall be permitted to include easements for underground drainage, water, sewer, gas, electricity, telephone, cable, and environmental remediation and other utilities and facilities so long as they do not unreasonably interfere with pedestrian and/or vehicular use.

4.7 Timing of Development. In *Pardee Construction Co. v. City of Camarillo* (*Pardee*), 37 Cal.3d 465 (1984), the California Supreme Court held that the failure of the parties therein to provide for the timing or rate of development resulted in a later-adopted initiative restricting the rate of development to prevail against the parties' agreement. City and Developer intend to avoid the result in *Pardee* by acknowledging and providing that Developer shall have the right, without obligation, to develop the Property in such order and at such rate and times as Developer deems appropriate within the exercise of its subjective business judgment subject to the terms of this Agreement.

In furtherance of the Parties' intent, as set forth in this Section, no future amendment of any existing City ordinance or resolution, or future adoption of any ordinance, resolution, or other action, that purports to limit the rate or timing of development over time or alter the sequencing of development phases, whether adopted or imposed by the City Council or through the initiative or referendum process, shall apply to the Property. However, nothing in this Section shall be construed to limit City's right to enforce Developer's obligation pursuant to this Agreement to provide any infrastructure required by the Project Approvals and this Agreement.

4.8 Moratorium.

4.8.1 The City shall not impose a moratorium on the Property unless such is necessary to protect a significant threat to the immediate health, safety and welfare of the City.

4.8.2 Except as provided in Section 4.8.1 above, no City-imposed moratorium or other limitation (whether relating to the rate, timing or sequencing of the development or

construction of all or any part of the Property, whether imposed by ordinance, initiative, resolution, policy, order or otherwise, and whether enacted by the City Council, an agency of the City, the electorate or otherwise) affecting parcel or subdivision maps (whether tentative, vesting tentative, or final), building permits, occupancy certificates, or other entitlements to use or service (including, without limitation, water and sewer), approved, issued or granted within the City, or portions of the City, applies to the Property to the extent such moratorium or other limitation is in conflict with this Agreement. However, the provisions of this Section do not affect the City's compliance with moratoria or other limitations mandated by other governmental agencies or court-imposed moratoria or other limitations.

4.9 Term. This Agreement shall be in effect for a period of five (5) years from the Effective Date of the Enabling Ordinance. However, the Developer or the City shall be entitled to, by written notice to the other Party prior to the Agreement's expiration, one (1) two-year (2-year) administrative extension, provided that the requesting Party is not in material default of this Agreement at such time beyond any applicable period to cure provided for by Sections 8.5 and 10 below. Before the expiration of the two-year (2-year) extension, the Parties may mutually agree to further extensions. In the event of litigation challenging this Agreement, the Term is automatically suspended for the duration of such litigation and resumes upon final disposition of such challenge and any appeal thereof upholding the validity of this Agreement. In the event that a referendum petition concerning this Agreement is duly filed in such a manner that the ordinance approving this Agreement is suspended, then the Term is deemed to commence upon City Council certification of the results of the referendum election approving this Agreement.

4.10 Term of Map(s) and Other Project Approvals. Pursuant to California Government Code Sections 66452.6(a) and 65863.9, the term of any subdivision or parcel map that has been or in the future may be processed on all or any portion of the Property and the term of each of the Project Approvals shall be extended for a period of time through the scheduled termination date of this Agreement as set forth in Section 4.9 above, including any extensions thereto.

4.11 Future Approvals.

4.11.1 Minor Modifications to Project. The Developer may make minor changes to the Project and Project Approvals ("Minor Modifications") without the need to amend this Agreement upon the administrative approval of the Director.

(a) Minor Modifications include:

(i) A modification to the Site Plan, provided the Director determines, in his/her discretion, that the Site Plan is substantially similar to the approved Site Plan attached hereto as Exhibit B and complies with the Specific Plan; and there is no change which would qualify as a Major Modification under Section 4.11.2 below;

(ii) A "minor" modification to the Specific Plan as identified in Chapter 8, Section VI thereof; and

(iii) any other change that does not qualify as a Major

Modification as defined below.

(b) The City shall not unreasonably withhold or delay approval of any Minor Modification. The City shall have the right to impose reasonable conditions in connection with Minor Modifications, provided, however, such conditions shall not be inconsistent with the Applicable Rules, the Project Approvals or with the development of the Project as contemplated by this Agreement.

(c) A Minor Modification approved by the City shall continue to constitute a Project Approval as referenced herein.

4.11.2 Modifications Requiring Amendment to this Agreement. Any proposed modification to the Project which results in any of the following shall constitute a Major Modification, and shall require an amendment to this Agreement pursuant to Section 14 below:

(a) Any change which constitutes a "significant" modification to the Specific Plan as identified in Chapter 8, Section VI thereof; or

(b) Any change which creates a new environmental impact which cannot be mitigated to a level of insignificance.

4.12 Site Plan Review. Site Plan Review approval shall be required in accordance with Chapter 18.44 of the Gardena Municipal Code.

4.13 Issuance of Building Permits. No building permit, final inspection or Certificate of Occupancy will be unreasonably withheld, conditioned, or delayed from the Developer if all infrastructure required to serve the portion of the Property covered by the building permit, final inspection, or Certificate of Occupancy is in place or is suitably guaranteed to be completed (by covenant, bond, letter of credit or otherwise) to the reasonable satisfaction of the City prior to completion of construction and all of the other relevant provisions of the Project Approvals, Future Approvals and this Agreement have been satisfied.

5. Developer Agreements.

5.1 General. The Developer shall comply with: (i) this Agreement; (ii) the Project Approvals, including, without limitation, all mitigation measures required by the determination made pursuant to CEQA; and (iii) all Future Approvals for which it is the applicant or a successor in interest to the applicant.

5.1.1 In the event that any of the mitigation measures or conditions required of Developer hereunder have been implemented by others, Developer shall be conclusively deemed to have satisfied such mitigation measures or conditions, consistent with CEQA. If any such mitigation measures or conditions are rejected by a governmental agency with jurisdiction, the Developer may implement reasonably equivalent substitute mitigation, consistent with CEQA, to the City's satisfaction, in lieu of the rejected mitigation measures or conditions. Such substitution shall be deemed to be a Minor Modification pursuant to Section 4.11.1 above.

5.2 Digital Display.

5.2.1 As part of the Project Approvals, Developer shall install a "digital media display" with full motion and animation capability, up to 2,500 square feet in size, for the purpose of off-site advertising, as more particularly described in the Specific Plan (the "Display").

5.2.2 Display Operations. The Developer shall install the Display and begin operation within nine (9) months of the City's issuance of a final Certificate of Occupancy. Thereafter, the Display may operate daily at any point from 6:00 a.m. to 2:00 a.m. Developer shall not be required to operate the Display (i) when such operation cannot take place because of maintenance issues and/or operational failures, (ii) if the Developer is unable to obtain any necessary governmental permits required to operate the Display, and/or (iii) if operation of the Display has been legally enjoined. Such Display shall remain in operation for a minimum of thirty (30) years.

5.2.3 Display Design and Construction Costs. Developer shall pay for all costs to design, engineer and construct the Display. No public funds shall be used towards the design and installation of the Display.

5.2.4 Revenue Sharing. For a period of thirty (30) years from the first date of operation, Developer shall annually pay to the City the greater of (i) twenty-five percent (25%) of all Net Profits (as defined below) generated from the Display, or (ii) seventy-five thousand dollars ($75,000), provided the Display generates a minimum of seven hundred and fifty thousand dollars ($750,000) in annual Gross Revenue (as defined below). For the avoidance of doubt, should the Display fail to generate at least $750,000 in Gross Revenue in a given year, the maximum City revenue share that year shall be 25% of the Net Profits. Developer shall make such payments to the City once per year, on each anniversary of the first date of operation, for the preceding twelve-month (12-month) period. For purposes of this Section, "Net Profits" means all revenue generated from the Display, after accounting for the costs of a third-party media sales broker and any related commissions, costs to operate and maintain the Display (including administration and overhead) determined in accordance with generally accepted accounting principles ("GAAP") and relating only to the operation and maintenance of the Display and exclusive of the Project's other operations, and replacement reserves based on a ten-year (10-year) period. For purposes of this Section "Gross Revenue" means the total revenue generated from the Display before accounting for third-party consultant related costs and commissions, operational and maintenance related expenses and replacement services.

5.2.5 Community Programming Time. Developer shall provide the City eight percent (8%) of the total Display time and fifty percent (50%) of the Display time that has not been committed to the third-party media sales broker, on a monthly basis, for City business, arts, and community related non-commercial programming ("Community Programming Time"). Utilization of the Community Programming Time shall be at the City's sole election, and the City may from time to time opt to reallocate all or a portion of its Community Programming Time for third-party advertising sales. City shall notify Developer or its designated media sales broker at least forty-five (45) days before the proposed display date of City Programming Time related content. Specific Community Programming Time content should be submitted to Developer or its

designated media sales broker at least ten (10) business days in advance. City shall not charge for, or exchange goods or services for, any Community Programming Time provided on the Display pursuant to this Agreement. In addition, it is expressly understood and agreed that City Community Programming Time related content may only display third-party names or logos when those logos are part of the City Message. The forgoing restriction does not apply to non-profit organizations associated with City events or activities. The City also shall and hereby does agree to indemnify, defend and hold harmless Developer and its media sales broker for, from and against, any claims, costs (including, but not limited to, court costs and reasonable attorney's fees), losses, actions, or liabilities arising from or in connection with any third-party allegation that any portion of any Community Programming Time related content provided by City infringes or violates the rights, including, but not limited to, copyright, trademark, trade secret or any similar right, of any third party.

5.2.6 Emergency Time. Developer shall grant the City first priority to broadcast messages of an urgent nature to Gardena residents on the Display during Emergency Periods (as defined below). Emergency Period content shall preempt Display advertisements at no cost to the City. For purposes of this Section "Emergency Periods" are defined as earthquakes, fires, and other similar natural disasters that cause an imminent risk to public health and safety.

5.2.7 City as Additional Insured. Prior to the commencement of operation of the Display, Developer shall name the City as an additional insured on the commercial general liability insurance policy for the Project, solely with respect to claims of liability related to the Display and provide a copy of said insurance to the City.

5.2.8 No Illegal Advertising. Products and/or activities that are illegal in the City of Gardena may not be advertised or promoted on the Display.

5.2.9 Annual Reporting and Disclosures. Developer shall provide and disclose to City on an annual basis all information and data related to (i) advertising Gross Revenue generated from the Display, (ii) third-party consultant agreements and commissions, and (iii) ongoing operation and maintenance related costs and expenses ("Display Disclosures"). Developer shall provide the Display Disclosures once per year within thirty (30) days of the anniversary of the first date of operation for the preceding twelve-month (12-month) period. City shall have the right to inspect or review the documents and records upon which the Display Disclosures are based. Developer shall make all records and documents to be reviewed and inspected by the City as a part of any review conducted by the City, available for the City's review, inspection and copying within five (5) business days (excluding Saturday, Sunday and holidays) of receiving written notice from the City requesting the same.

5.2.10 Survival. This Section 5.2 shall survive the expiration of the term of this Agreement.

5.3 Development Fees. Subject to the provisions of Section 4.5 above, Developer shall pay the development fees in effect at the time of building permit application. The Developer waives any and all rights it may have to challenge development fees that are in effect at the time of the Effective Date and the City's right to amend its current development fees. However, the

Developer retains the legal right to challenge the amount of any such amended or increased development fees to the extent such are not in compliance with the requirements of Government Code Section 66000, *et seq*. as well as its right to receive credits against such amended or increased fees.

5.4 Maintenance Obligations. The Developer shall maintain all portions of the Property in its possession or control, and any improvements thereon, in a first class clean, neat, and orderly manner. The Parties' respective maintenance obligations shall survive any termination or expiration of this Agreement.

5.5 Sales and Use Tax.

5.5.1 In the event the contract price for any work on the Project is valued at five million dollars ($5,000,000) or more, Developer agrees to report, on a State Board of Equalization Tax Return, any purchases of tangible personal property made in connection with the finishing of and/or installation of materials, or fixtures for the Project, when such purchases were made without sales or use tax due. Developer shall indicate the City as a registered job site location on the State Board of Equalization Tax Return. In such event, Developer shall also obtain a permit or a sub-permit from the State Board of Equalization indicating the City as the registered job site location, in accordance with Revenue and Taxation Code § 7051.3 or State Board of Equalization Compliance Policy and Procedure Manual § 295.060.

5.5.2 Developer further agrees that, if Developer retains contractors or subcontractors to perform a portion of work in the Project, and said contracts or subcontracts are valued at five million dollars ($5,000,000) or more, said contracts or subcontracts shall contain the provisions set forth in Section 5.5.1, above.

5.5.3 The Director of Finance of the City is authorized to relieve Developer and Developer's contractors and subcontractors, from the requirements set forth in this Section 5.5 upon proof to the reasonable satisfaction of the Director of Finance that Developer and/or its contractors or subcontractors have made good faith efforts to obtain said permit or sub-permits, but were denied the same by the State Board of Equalization.

5.6 Local Hire. Developer shall use best efforts to hire locally-based construction workers as set forth in the Local Hiring Plan attached hereto as Exhibit D.

6. City Agreements.

6.1 Expedited Processing. The City shall process, at Developer's expense, in an expedited manner, all plan checking, excavation, grading, building, encroachment and street improvement permits, Certificates of Occupancy, utility connection authorizations, and other ministerial permits or approvals necessary, convenient or appropriate for the grading, excavation, construction, development, improvement, use and occupancy of the Project in accordance with the City's accelerated plan check process under the Applicable Rules. Without limiting the foregoing, if requested by Developer, the City agrees to utilize private planners and plan checkers (upon Developer's request and at Developer's cost) and any other available means to expedite the

processing of Project applications, including concurrent processing of such applications by various City departments.

6.2 Processing Cooperation and Assistance. To the extent permitted by law, the City shall reasonably cooperate with the Developer in securing any and all entitlements, authorizations, permits or approvals which may be required by any other governmental or quasi-governmental entity in connection with the development of the Project or the Property. Without limiting the foregoing, the City shall reasonably cooperate with the Developer in any dealings with federal, state and other local governmental and quasi-governmental entities concerning issues affecting the Property. The City shall keep the Developer fully informed with respect to its communications with such agencies which could impact the development of the Property. The City must not take any actions to encourage any other governmental or quasi-governmental entities from withholding any necessary approvals and any such contrary actions on the part of the City must be considered a breach of this Agreement by City.

6.3 Processing During Third-Party Litigation. The filing of any third-party lawsuit(s) against the City or the Developer relating to this Agreement, the Project Approvals, any Future Approvals or to other development issues affecting any portion of the Property or the Project shall not hinder, delay or stop the development, processing or construction of the Project, approval of the Future Approvals, or issuance of ministerial permits or approvals, unless the third party obtains a court order restraining the activity. The City must not stipulate to or cooperate in the issuance of any such order.

6.4 Performance of Director Duties. The City shall ensure that a person or persons are designated at all times to carry out the duties of the Director set forth in this Agreement.

6.5 No Amendment to Specific Plan. The City shall not initiate any amendment to the Specific Plan during the Term of this Agreement without the Developer or its successor's written agreement and consent.

7. Modification/Suspension.

7.1 Pursuant to Government Code Section 65869.5, in the event that any state or federal law or regulation, enacted after the Effective Date, precludes compliance with any provision of this Agreement, such provision shall be deemed modified or suspended to the extent practicable to comply with such state or federal law or regulation, as reasonably determined necessary by City. Upon repeal of said law or regulation or the occurrence of any other event removing the effect thereof upon the Agreement, the provisions hereof shall be restored to their full original effect.

7.2 In the event any state or federal resources agency (i.e., California Department of Fish and Game, U.S. Fish and Wildlife Service, U.S. Army Corps of Engineers, Regional Water Quality Control Board/State Water Resources Control Board), in connection with its final issuance of a permit or certification for all or a portion of the Project, imposes requirements ("Permitting Requirements") that require modifications to the Project, then the parties will work together in good faith to incorporate such changes into the Project; provided, however, that if Developer appeals or challenges any such Permit Requirements, then the Parties may defer such changes until

the completion of such appeal or challenge.

8. Demonstration of Good Faith Compliance.

8.1 Review of Compliance. In accordance with Government Code Section 65865.1, this Section 8 and the Applicable Rules, once each year, on or before each anniversary of the Effective Date ("Periodic Review"), the Director shall review the extent of the Developer's good faith substantial compliance with the terms and provisions of this Agreement, as well as the performance by the City of its obligations under this Agreement.

8.2 Good Faith Compliance. During each Periodic Review, the Developer shall demonstrate by written status report that, during the preceding twelve-month (12-month) period, that it has been in good faith compliance with this Agreement. For purposes of this Agreement, the phrase "good faith compliance" shall mean that the Developer has demonstrated that it has acted in a commercially reasonable manner (taking into account the circumstances which then exist) and in good faith in and has substantially complied with the Developer's material obligations under this Agreement.

8.3 City Report - Information to be Provided to Developer. At least fourteen (14) days before the annual anniversary of the Effective Date, the City must deliver to the Developer a copy of all staff reports prepared in connection with a Periodic Review, any prior staff reports generated during the review period, written comments from the public, and, to the extent practical, all related exhibits concerning such Periodic Review. This information shall be known as the "City Report."

8.4 Developer's Report. No later than the annual anniversary of the Effective Date, Developer must submit a written status report to the Director addressing the good faith compliance issue set forth in Section 8.2 above and any issues raised by the City Report provided to the Developer in accordance with Section 8.3 above.

8.5 Notice of Non-Compliance; Cure Rights. If, after reviewing the Developer's Report, the Director reasonably concludes, on the basis of substantial evidence, that as to any parcel or parcels comprising the Property, Developer has not demonstrated that it is in good faith compliance with this Agreement, the Director may issue and deliver to the Developer a written Notice of Violation as set forth in Section 10 below.

8.6 Public Notice of Finding. Any appeal of the Director's determination pursuant to Section 8.5 (including any appeal by the Developer) must be filed within thirty (30) days following such decision. Filing such an appeal tolls the cure period specified in the Notice of Violation. Notwithstanding Section 13.1, an appeal regarding the Notice of Violation shall be heard directly by the City Council at a duly-noticed public hearing and the City Council must issue a final decision. Developer retains the right to challenge the City's issuance of any final decision pursuant to Code of Civil Procedure § 1094.5 without complying with the procedures set forth in Section 10.4 below.

8.7 Failure of Periodic Review. The City's failure to review, at least annually, compliance by the Developer with the terms and conditions of this Agreement shall not constitute

or be asserted by any Party as a breach by any other Party of this Agreement. If the City fails to provide the City Report by the Effective Date, Developer will be deemed to be in good faith compliance with this Agreement for that calendar year.

9. Excusable Delays. Performance by any Party of its obligations hereunder shall be excused during any period of "Excusable Delay," as hereinafter defined, provided that the Party claiming the delay gives notice of the delay to the other Party as soon as reasonably possible after the same has been ascertained. For purposes hereof, Excusable Delay shall mean delay that directly affects, and is beyond the reasonable control of, the Party claiming the delay, including, without limitation: (i) act of God; (ii) civil commotion; (iii) riot; (iv) strike, picketing or other labor dispute; (v) shortage of materials or supplies; (vi) damage to work in progress by reason of fire, flood, earthquake or other casualty; (vii) reasonably unforeseeable delay caused by a reasonably unforeseeable restriction imposed or mandated by a governmental entity; (viii) litigation brought by a third-party attacking the validity of this Agreement, a Project Approval, a Future Approval or any other action necessary for development of the Property; (ix) delays caused by any breach or default by City or the Developer hereunder; (x) delays due to a pandemic and/or government mandated quarantine; or (xi) delays due to the presence or remediation of hazardous materials. The term of this Agreement, including any extensions, shall be extended by any period of Excusable Delay.

10. Default Provisions.

10.1 Default. Either Party to this Agreement shall be deemed to be in "Default" under this Agreement if it materially breaches any of the provisions of this Agreement and the same is not cured within the time set forth in a written notice of violation (the "Notice of Violation") from the non-breaching Party to the breaching Party, which period of time shall not be less than ten (10) days for monetary breaches, and not less than sixty (60) days for non-monetary breaches from the date that the notice is deemed received, provided if the breaching Party cannot reasonably cure a non-monetary breach within the time set forth in the notice, then the breaching Party shall not be in Default if it commences to cure the breach within such time limit and diligently effects such cure thereafter. If the City determines that a Default by Developer may have occurred, the City shall give written notice to the Developer of its intention to terminate this Agreement and comply with the notice and public hearing requirements of Government Code Sections 65867 and 65868. At the time and place set for the hearing on termination, the Developer shall be given an opportunity to be heard. If the City Council finds, based upon the evidence, that the Developer is in Default under this Agreement, the City Council may modify or terminate this Agreement. If Developer initiates a resolution of dispute in accordance with the provisions of Section 10.4 below within sixty (60) days following the City Council's determination that Developer is in Default under this Agreement, the City Council's decision to modify or terminate this Agreement is stayed until the issue has been resolved through informal procedures, mediation, or court proceedings.

10.2 Content of Notice of Violation. Every Notice of Violation shall state with specificity that it is given pursuant to this Section of the Agreement, the nature of the alleged breach (including references to the pertinent provisions of this Agreement), the portion of the Property involved, and the manner in which the breach may be satisfactorily cured. The notice shall be deemed given in accordance with Section 19 hereof.

10.3 Remedies for Default. The Parties agree that the remedies for a Default under this Agreement shall be limited to the remedies expressly set forth in this Section. No modification of termination of this Agreement pursuant to Section 10.1 hereof shall invalidate or affect in any manner any of the other Project Approvals. Developer's remedies for any Default under this Agreement by City shall be limited to injunctive relief and/or specific performance.

10.4 Resolution of Disputes. The City and the Developer agree to attempt to settle any claim, dispute or controversy arising from this Agreement through consultation and negotiation in good faith and in spirit of mutual cooperation. If those attempts fail, the dispute may be mediated by a mediator chosen jointly by the City and the Developer within thirty (30) days after notice by one of the parties demanding non-binding mediation. Neither Party may unreasonably withhold consent to the selection of a mediator. The City and the Developer will share the cost of the mediation equally. The Parties may agree to engage in some other form of non-binding alternate dispute resolution ("ADR") procedure in lieu of mediation. Any dispute that cannot be resolved between the Parties through negotiation or mediation within two (2) months after the date of the initial demand for non-binding mediation may then be submitted to a court of competent jurisdiction in the County of Los Angeles, California.

10.5 Attorney's Fees and Costs. Each Party to this Agreement agrees to waive any entitlement of attorney's fees and costs incurred with respect to any dispute arising from this Agreement. The parties will each bear their own attorney's fees and costs in the event of any dispute.

11. Mortgagee Protection. This Agreement shall not prevent or limit the Developer, in any manner, at Developer's sole discretion, from encumbering the Property or any portion thereof or any improvements thereon by any mortgage, deed of trust or other security device. The City acknowledges that the lender(s) providing such financing ("Mortgagee") may require certain Agreement interpretations and agrees, upon request, from time to time, to meet with the Developer and representatives of such lender(s) to provide within a reasonable time period the City's response to such requested interpretations. The City will not unreasonably withhold its consent to any such requested interpretation, provided that such interpretation is consistent with the intent and purposes of this Agreement. Any Mortgagee of a mortgage or a beneficiary of a deed of trust or any successor or assign thereof, including, without limitation, the purchaser at a judicial or non-judicial foreclosure sale, or a person or entity who obtains title by deed-in-lieu of foreclosure on the Property shall be entitled to the following rights and privileges:

11.1 Mortgage Not Rendered Invalid. Neither entering into this Agreement nor a breach of or Default under this Agreement shall defeat, render invalid, diminish, or impair the priority of the lien of any mortgage or deed of trust on the Property made in good faith and for value. No Mortgagee shall have an obligation or duty under this Agreement to perform the Developer's obligations, or to guarantee such performance, prior to Mortgagee taking title to all or a portion of the Property.

11.2 Request for Notice to Mortgagee. The Mortgagee of any mortgage or deed of trust encumbering the Property, or any part thereof, who has submitted a request in writing to the City in the manner specified herein for giving notices, shall be entitled to receive a copy of any Notice of Violation delivered to the Developer.

11.3 Mortgagee's Time to Cure. The City shall provide a copy of any Notice of Violation to the Mortgagee that has requested such copy within ten (10) days of sending the Notice of Violation to the Developer. The Mortgagee shall have the right, but not the obligation, to cure the specified breach for a period of sixty (60) days after receipt of such Notice of Violation, or such longer period of time as may be specified in the Notice. Notwithstanding the foregoing, if such breach shall be a breach which can only be remedied by such Mortgagee obtaining possession of the Property, or any portion thereof, and such Mortgagee seeks to obtain possession, such Mortgagee shall have until sixty (60) days after the date of obtaining such possession to cure or, if such breach cannot reasonably be cured within such period, to commence to cure such breach, provided that such breach is cured no later than one (1) year after Mortgagee obtains such possession of the Property.

11.4 Cure Rights. Any Mortgagee who takes title to all of the Property, or any part thereof, pursuant to foreclosure of the mortgage or deed of trust, or a deed in lieu of foreclosure, shall succeed to the rights and obligations of the Developer under this Agreement as to the Property or portion thereof so acquired; provided, however, in no event shall such Mortgagee be liable for any breaches, Defaults, or monetary obligations of the Developer arising prior to acquisition of title to the Property by such Mortgagee, except that any such Mortgagee shall not be entitled to a new building permit or new occupancy certificate until all delinquent and current fees and other monetary or non-monetary obligations due under this Agreement for the Property, or portion thereof acquired by such Mortgagee, have been satisfied.

11.5 Bankruptcy. If any Mortgagee is prohibited from commencing or prosecuting foreclosure or other appropriate proceedings in the nature of foreclosure by any process or injunction issued by any court or by reason of any action by any court having jurisdiction of any bankruptcy or insolvency proceedings involving the Developer, the times specified in Section 10 above shall be extended for the period of the prohibition, except that any such extension shall not extend the term of this Agreement.

11.6 Disaffirmation. If this Agreement is terminated as to any portion of the Property by reason of (i) any Default, or (ii) as a result of a bankruptcy proceeding, and this Agreement is disaffirmed by a receiver, liquidator, or trustee for the Developer or its property, the City, if requested by any Mortgagee, shall negotiate in good faith with such Mortgagee for a new development agreement for the Project as to such portion of the Property with the most senior Mortgagee requesting such new agreement. This Agreement does not require any Mortgagee or the City to enter into a new development agreement pursuant to this Section.

12. Estoppel Certificate. At any time and from time to time, the Developer may deliver written notice to City and City may deliver written notice to the Developer requesting that such Party certify in writing that, to the knowledge of the certifying Party: (i) this Agreement is in full force and effect and a binding obligation of the Parties; (ii) this Agreement has not been amended, or if

amended, the identity of each amendment; and (iii) the requesting Party is not in breach of this Agreement, or if in breach, a description of each such breach. The Party receiving such a request shall execute and return the certificate within thirty (30) days following receipt of the notice. The failure of the City to deliver such a written notice within such time shall constitute a conclusive presumption against the City that, except as may be represented by the Developer, this Agreement is in full force and effect without modification, and that there are no uncured breaches or Defaults in the performance of the Developer. The Director shall be authorized to execute, on behalf of the City, any Estoppel Certificate requested by the Developer. City acknowledges that a certificate may be relied upon by successors in interest to the Developer who requested the certificate and by holders of record of deeds of trust on the portion of the Property in which that Developer has a legal interest.

13. Administration of Agreement.

13.1 Appeal of Staff Determinations. Any decision by City staff concerning the interpretation or administration of this Agreement or development of the Property in accordance herewith may be appealed by the Developer to the Planning Commission, and thereafter, if necessary, to the City Council pursuant to the Gardena Municipal Code. The Developer shall not seek judicial review of any staff decision without first having exhausted its remedies pursuant to this Section. Final determinations by the City Council are subject to judicial review subject to the restrictions and limitations of California law.

13.2 Operating Memoranda. The provisions of this Agreement require a close degree of cooperation between City and Developer. During the Term of this Agreement, clarifications to this Agreement and the Applicable Rules may be appropriate with respect to the details of performance of City and Developer. If and when, from time to time, during the term of this Agreement, City and Developer agree that such clarifications are necessary or appropriate, they shall effectuate such clarification through a memorandum approved in writing by City and Developer (the "Operating Memoranda"), which, after execution, shall be attached hereto and become part of this Agreement and the same may be further clarified from time to time as necessary with future written approval by City and the Developer. Operating Memoranda are not intended to and shall not constitute an amendment to this Agreement but are mere ministerial clarifications, therefore, public notices and hearings are not required. The City Attorney shall be authorized, upon consultation with, and approval of, the Developer, to determine whether a requested clarification may be effectuated pursuant to this Section or whether the requested clarification is of such character to constitute an amendment hereof which requires compliance with the provisions of Section 14 below. The authority to enter into such Operating Memoranda is hereby delegated to the Director, and the Director is hereby authorized to execute any Operating Memoranda hereunder without further City Council action.

13.3 Certificate of Performance. Upon the completion of the Project, or the completion of development of any parcel within the Project, or upon completion of performance of this Agreement or its earlier revocation and termination, the City shall provide the Developer, upon the Developer's request, with a statement ("Certificate of Performance") evidencing said completion or revocation and the release of the Developer from further obligations hereunder, except for any ongoing obligations hereunder. The Certificate of Performance shall be signed by

the appropriate agents of the Developer and the City and shall be recorded in the official records of Los Angeles County, California. Such Certificate of Performance is not a notice of completion as referred to in California Civil Code § 3093.

14. Amendment or Termination by Mutual Consent. Except as otherwise set forth herein, this Agreement may only be amended or terminated, in whole or in part, by mutual written consent of City and the Developer, and upon compliance with the provisions of Government Code § 65867.

15. Indemnification/Defense.

15.1 Indemnification. The Developer agrees to indemnify and hold the City harmless from and against any claim, action, damages, costs (including, without limitation, attorney's fees), injuries, or liability, arising from the City's approval of the Project, this Agreement, Developer's performance of this Agreement, and all procedures with approving this Agreement (collectively, "Discretionary Approvals"), except to the extent such is a result of the City's sole negligence or intentional misconduct. Should the City be named in any suit, or should any claim be brought against it by suit or otherwise, whether the same be groundless or not, arising out of the Discretionary Approvals, Developer agrees to defend the City (at the City's request and with counsel satisfactory to the City) and will indemnify the City for any judgment rendered against it or any sums paid out in settlement or otherwise, except to the extent such action is a result of the City's sole negligence or intentional misconduct. For purposes of this Section, "the City" includes the City of Gardena's elected officials, appointed officials, officers, consultants, and employees. Developer's indemnification obligation does not cover costs and/or liability resulting from third-party claims associated with the Display operations or advertising. As required by Section 5.2.7 of this Agreement, Developer shall name the City as an additional insured in its commercial liability policy to address any potential future claims related to operation of the Display.

15.2 Defense of Agreement. If the City accepts Developer's indemnification and defense as provided in Section 15.1 above, the City agrees to and shall timely take all actions which are necessary or required to uphold the validity and enforceability of this Agreement, the Discretionary Approvals, Project Approvals, Development Standards, and the Applicable Rules. This Section 15 shall survive the termination of this Agreement.

16. Cooperation in the Event of Legal Challenge.

16.1 Third-Party Challenges. In the event of any administrative, legal, or equitable action or other proceeding instituted by any person or entity not a party to the Agreement challenging the validity of any provision of this Agreement, challenging any Approval, or challenging the sufficiency of any environmental review of either this Agreement or any Approval under CEQA (each a "Third-Party Challenge"), each party must cooperate in the defense of such Third-Party Challenge, in accordance with this Section. Developer agrees to pay City's costs of defending a Third-Party Challenge, including all court costs and reasonable attorney's fees expended by City (including the time and cost of the City Attorney) in defense of any Third-Party Challenge, as well as the time of City's staff spent in connection with such defense. Developer may select its own legal counsel to represent Developer's interests in any Third-Party Challenge at Developer's sole cost and expense. City agrees that it will not enter into a settlement agreement

to any Third-Party Challenge without Developer's written consent. Developer's obligation to pay City's costs in the defense of a Third-Party Challenge shall not extend to those costs incurred on appeal, if Developer notifies the City is writing that it does not wish to pursue the appeal.

16.2 Third-Party Challenges Related to the Applicability of City Laws. The provisions of this Section will apply only in the event of a legal or equitable action or other proceeding, before a court of competent jurisdiction, instituted by any person or entity not a party to the Agreement challenging the applicability to the Project or Property of a conflicting City Law (a "Third-Party Enforcement Action"):

16.2.1 In the event of a Third-Party Enforcement Action, City must: (i) promptly notify Developer of such action or proceeding; and (ii) stipulate to Developer's intervention as a party to such action or proceeding unless Developer has already been named as a respondent or real party in interest to such action or proceeding. In no event will City take any action that would frustrate, hinder, or otherwise complicate Developer's efforts to intervene, join or otherwise participate as a party to any Third-Party Enforcement Action. As requested by Developer, City must use its best efforts to ensure that Developer is permitted to intervene, join or otherwise participate as a party to any Third-Party Enforcement Action. If, for any reason, Developer is not permitted to intervene, join or otherwise participate as a party to any Third-Party Enforcement Action, the parties to this Agreement agree to cooperate, to the maximum extent permitted by law, in the defense of such action or proceeding. For purposes of this Section, the required cooperation between the parties includes, without limitation, developing litigation strategies, preparing litigation briefs and other related documents, conferring on all aspects of the litigation, developing settlement strategies, and, to the extent permitted by law, jointly making significant decisions related to the relevant litigation, throughout the course thereof.

16.2.2 City's costs of defending any Third-Party Enforcement Action, including all court costs, and reasonable attorney's fees expended by City (including the time and cost of the City Attorney) in defense of any Third-Party Enforcement Action, as well as the time of City's staff spent in connection with such defense (the "Enforcement Action Defense Costs"), will be paid in accordance with this Agreement. The Enforcement Action Defense Costs shall extend to, and Developer will be obligated to pay, any costs incurred on appeal unless Developer notifies the City in writing that it does not wish to pursue the appeal.

16.2.3 City must not enter into a settlement agreement or take any other action to resolve any Third Party Enforcement Action without Developer's written consent. City cannot, without Developer's written consent, take any action that would frustrate, hinder or otherwise prevent Developer's efforts to settle or otherwise resolve any Third-Party Enforcement Action.

16.2.4 Provided that City complies with this Section and provided that Developer is a party to the relevant Third-Party Enforcement Action, Developer agrees to be bound by any final judgment (i.e., following all available appeals) arising out of a Third-Party Enforcement Action and further agrees that no default under this Agreement will arise if such final judgment requires City to apply to the Project or Project Site a City Law that conflicts with Applicable Law or this Agreement.

17. Time of Essence. Time is of the essence for each provision of this Agreement of which time is an element.

18. Effective Date. This Agreement shall become operative on the date the Enabling Ordinance approving this Development Agreement becomes effective (the "Effective Date") pursuant to Government Code Section 36937.

19. Notices. Any notice that a party is required or may desire to give the other must be in writing and may be sent by: i) personal delivery; or ii) by deposit in the United States mail, postage paid, registered or certified mail, return receipt requested; or iii) by overnight delivery using a nationally recognized overnight courier, providing proof of delivery; or iv) by facsimile, evidenced by confirmed receipt; or v) by electronic delivery, evidenced by confirmed receipt, addressed as follows:

If to City:
City of Gardena
1700 W. 162nd Street
Gardena, CA 90247
Attention: City Manager
Phone: 310-217-9503
E-mail: cosorio@cityofgardena.org

With a Copy to:
City of Gardena
1700 W. 162nd Street
Gardena, CA 90247
Attention: Community Development Director
Phone: 310-217-9546
E-mail: gmcclain@cityofgardena.org

With a Copy to:
City Attorney's Office
1700 W. 162nd Street
Gardena, CA 90247
Attention: Carmen Vasquez and Lisa Kranitz
Phone: 310-217-9503
E-mail: lkranitzlaw@gmail.com
cv@jones-mayer.com

If to Developer:
Din/Cal 4 Inc.
3411 Richmond Avenue, Suite 200
Houston, Texas 77046
Attention: Josh Vasbinder
Phone: 858-847-9311
E-mail: Josh.Vasbinder@tdc-properties.com

With a Copy to:
Armbruster Goldsmith & Delvac LLP
12100 Wilshire Boulevard, Suite 1600
Los Angeles, CA 90025

Attention: Dave Rand
Phone: 310-209-8800
E-mail: dave@agd-landuse.com

Either City or Developer may change its mailing address at any time by giving written notice of such change to the other in the manner provided herein at least ten days prior to the date such change is affected. Any notice given by mail is deemed to have been given as of the date of delivery (whether accepted or refused) established by the United State Post Office, return receipt, or the overnight carrier's proof of delivery as the case may be. Notices given in any other manner are effective only if and when received by the party to be notified between the hours of 8:00 a.m. and 5:00 p.m., local time of the recipient, of any business day with delivery made after such hours deemed received the following business day.

20. Entire Agreement. This Agreement contains the entire agreement between the Parties regarding the subject matter hereof, and supersedes in its entirety all prior agreements or understandings, oral or written. This Agreement shall not be amended, except as expressly provided herein.

21. Waiver. No waiver of any provision of this Agreement shall constitute a waiver of any other provision, whether or not similar; nor shall any such waiver constitute a continuing or subsequent waiver of the same provision. No waiver shall be binding, unless it is executed in writing by a duly authorized representative of the Party against whom enforcement of the waiver is sought.

22. Supersession of Subsequent Laws of Judicial Action. The provisions of this Agreement must, to the extent feasible, be modified or suspended as may be necessary to comply with any new law or decision issued by a court of competent jurisdiction, enacted or made after the effective date which prevents or precludes compliance with one or more provisions of this Agreement. Immediately after enactment of any such new law, or issuance of such decision, the parties must meet and confer in good faith to determine the feasibility of any such modification or suspension based on the effect such modification or suspension would have on the purposes and intent of this Agreement.

23. Severability. If any provision of this Agreement is determined by a court of competent jurisdiction to be invalid or unenforceable, the remainder of this Agreement shall be effective to the extent the remaining provisions are not rendered impractical to perform, taking into consideration the purposes of this Agreement.

24. Relationship of the Parties. Each Party acknowledges that, in entering into and performing under this Agreement, it is acting as an independent entity and not as an agent of any other Party in any respect. Nothing contained herein or in any document executed in connection herewith shall be construed as creating the relationship of partners, joint ventures or any other association of any king or nature between City and Developer, jointly or severally.

25. No Third-Party Beneficiaries. This Agreement is made and entered into for the sole benefit of the Parties and their successors in interest. No other person or party shall have any right of

action based upon any provision of this Agreement.

26. Recordation of Agreement and Amendments. This Agreement and any amendment thereof shall be recorded with the County Recorder of the County of Los Angeles by the City Clerk of City.

27. Cooperation Between City and Developer. City and Developer shall execute and deliver to the other all such other and further instruments and documents as may be reasonably necessary to carry out the purposes of this Agreement. Upon satisfactory performance by Developer, and subject to the continuing cooperation of the Developer, City will commence and in a timely manner proceed to complete all steps necessary for the implementation of this Agreement and development of the Project or Property in accordance with the terms of this Agreement.

28. Rules of Construction. The captions and headings of the various sections and subsections of this Agreement are for convenience of reference only, and they shall not constitute a part of this Agreement for any other purpose or affect interpretation of the Agreement. Should any provision of this Agreement be found to be in conflict with any provision of the Applicable Rules or the Project Approvals or the Future Approvals, the provisions of this Agreement shall control.

29. Joint Preparation. This Agreement shall be deemed to have been prepared jointly and equally by the Parties, and it shall not be construed against any Party on the ground that the Party prepared the Agreement or caused it to be prepared.

30. Governing Law and Venue. This Agreement is made, entered into, and executed in the County of Los Angeles, California, and the laws of the State of California shall govern its interpretation and enforcement. Any action, suit or proceeding related to, or arising from, this Agreement shall be filed in the appropriate court having jurisdiction in the County of Los Angeles.

31. Counterparts. This Agreement may be executed in multiple counterparts, each of which shall be deemed an original, but all of which constitute one and the same instrument.

32. Weekend/Holiday Dates. Whenever any determination is to be made or action to be taken on a date specified in this Agreement, if such date shall fall upon a Saturday, Sunday or holiday specified in Government Code § 6700, the date for such determination or action shall be extended to the first business day immediately thereafter.

33. Not a Public Dedication. Except as otherwise expressly provided herein, nothing herein contained shall be deemed to be a gift or dedication of the Property, or of the Project, or any portion thereof, to the general public, for the general public, or for any public use or purpose whatsoever, it being the intention and understanding of the Parties that this Agreement be strictly limited to and for the purposes herein expressed for the development of the Project as private property. The Developer shall have the right to prevent or prohibit the use of the Property, or the Project, or any portion thereof, including common areas and buildings and improvements located thereon, by any person for any purpose which is not consistent with the development of the Project. Any portion of the Property conveyed to the City by the Developer as provided herein shall be held and used by the City only for the purposes contemplated herein or otherwise provided in such conveyance,

and the City shall not take or permit to be taken (if within the power or authority of the City) any action or activity with respect to such portion of the Property that would deprive the Developer of the material benefits of this Agreement, or would in any manner interfere with the development of the Project as contemplated by this Agreement.

34. Releases. City agrees that upon written request of Developer and payment of all fees and performance of the requirements and conditions required by Developer by this Agreement, the City must promptly execute and deliver to Developer appropriate release(s) of further obligations imposed by this Agreement in form and substance acceptable to the Los Angeles County Recorder's Office or as otherwise may be necessary to affect the release.

35. Consent. Where the consent or approval of City or Developer is required or necessary under this Agreement, the consent or approval will not be unreasonably withheld, delayed or conditioned.

IN WITNESS WHEREOF, the Developer and the City of Gardena have executed this Development Agreement on the date first above written.

CITY:

City of Gardena, a municipal corporation

By: _____
Tasha Cerda, Mayor

ATTEST:

_____
Mina Semenza, City Clerk

APPROVED AS TO FORM:

By:_____
Carmen Vasquez, City Attorney

DEVELOPER:

Din/Cal 4, Inc.

By:_____
Josh Vasbinder

EXHIBIT A

LEGAL DESCRIPTION

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF GARDENA, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

LOTS 14, 15, 16 AND 17 OF TRACT NO. 18493, IN THE CITY OF GARDENA, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 556, PAGES(S) 14 TO 16 INCLUSIVE OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 4060-004-039

EXHIBIT B

SITE PLAN

EXHIBIT C

ASSIGNMENT AND ASSUMPTION AGREEMENT

Recording Requested By and When Recorded Mail To:	

ASSIGNMENT AND ASSUMPTION AGREEMENT

This ASSIGNMENT AND ASSUMPTION AGREEMENT ("Agreement") is made and entered into by and among DIN/CAL 4, INC., a Texas corporation ("Assignor"), and, _____, a _____ ("Assignee").

R E C I T A L S

A. The City of Gardena ("City") and Assignor entered into that certain Revised and Restated Development Agreement dated _____, 20___ (the "Development Agreement"), with respect to the real property located in the City of Gardena, State of California more particularly described in Exhibit "A" attached hereto (the "Project Site"), and

B. Assignor has obtained from the City certain development approvals and permits with respect to the development of the Project Site, including without limitation, approval of _____ for the Project Site (collectively, the "Project Approvals").

C. Assignor intends to sell, and Assignee intends to purchase, that portion of the Project Site more particularly described in Exhibit "B" attached hereto (the "Transferred Property").

D. In connection with such purchase and sale, Assignor desires to transfer all of the Assignor's right, title, and interest in and to the Development Agreement and the Project Approvals with respect to the Transferred Property. Assignee desires to accept such assignment from Assignor and assume the obligations of Assignor under the Development Agreement and the Project Approvals with respect to the Transferred Property.

THEREFORE, the parties agree as follows:

1. Assignment. Assignor hereby assigns and transfers to Assignee all of Assignor's right, title, and interest in and to the Development Agreement and the Project Approvals with respect to the Transferred Property. Assignee hereby accepts such assignment from Assignor.

2. Assumption. Assignee expressly assumes and agrees to keep, perform, and fulfill all the terms, conditions, covenants, and obligations required to be kept, performed, and fulfilled by Assignor under the Development Agreement and the Project Approvals with respect to the Transferred Property, including but not limited to those obligations specifically allocated to the Transferred Parcel as set forth on Exhibit "C" attached hereto.

3. Effective Date. The execution by City of the attached receipt for this Agreement shall be considered as conclusive proof of delivery of this Agreement and of the assignment and assumption contained herein. This Agreement shall be effective upon its recordation in the Official Records of Los Angeles County, California, provided that Assignee has closed the purchase and sale transaction and acquired legal title to the Transferred Property.

4. Remainder of Project. Any and all rights or obligations pertaining to such portion of the Project Site other than the Transferred Property are expressly excluded from the assignment and assumption provided in Sections 1 and 2 above.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the dates set forth next to their signatures below.

"ASSIGNOR"

[DEVELOPER]

_____

"ASSIGNEE"

[_____]

_____

RECEIPT BY CITY

The attached ASSIGNMENT AND ASSUMPTION AGREEMENT is received by the City of Gardena on this ___ day of _____, _____.

	CITY OF GARDENA _____ By: _____ Community Development Director

[EXHIBITS "A" THROUGH "C" TO BE ADDED AT EXECUTION]

EXHIBIT D

LOCAL HIRING/LOCAL BUYING PROGRAM FOR CONSTRUCTION

Local Hiring Policy for Construction. Developer shall implement a local hiring policy (the "Local Hiring Policy") for construction of the Project, consistent with the following guidelines:

1. Purpose. The purpose of the Local Hiring Policy is to facilitate the employment by Developer and its contractors at the Project of residents of the City of Gardena (the "Targeted Job Applicants"), and in particular, those residents who are "Low-Income Individuals" (defined below) by ensuring Targeted Job Applicants are aware of Project construction employment opportunities and have a fair opportunity to apply and compete for such jobs.

2. Definitions.

   a. "Contract" means a contract or other agreement for the providing of any combination of labor, materials, supplies, and equipment to the construction of the Project that will result in On-Site Jobs, directly or indirectly, either pursuant to the terms of such contract or other agreement or through one or more subcontracts.

   b. "Contractor" means a prime contractor, a sub-contractor, or any other entity that enters into a Contract with Developer for any portion or component of the work necessary to construct the Project (excluding architectural, design and other "soft" components of the construction of the Project).

   c. "Low Income Individual" means a resident of the City of Gardena whose household income is no greater than 80% of the Median Income.

   d. "Median Income means the median family income published from time to time by HUD for the Los Angeles-Long Beach Metropolitan Statistical Area.

   e. "On-Site Jobs" means all jobs by a Contractor under a Contract for which at least fifty percent (50%) of the work hours for such job requires the employee to be at the Project site, regardless of whether such job is in the nature of an employee or an independent contractor. On-Site Jobs shall not include jobs at the Project site which will be performed by the Contractor's established work crew who have not been hired specifically to work at the Project site.

3. Priority for Targeted Job Applicants. Subject to Section 6 below in this Local Hiring Policy provides that the Targeted Job Applicants shall be considered for each On-Site Job in the following order of priority:

   a. First Priority: Any resident of a household with no greater than 80% Median Income that resides within the Low and Moderate Income Areas identified in the City of Gardena's Housing Element;

b. Second Priority: Any resident of a household with no greater than 80% Median Income that resides within the City; and

c. Third Priority: Any resident of a household with no greater than 80% Median Income that resides within a five (5) mile radius of the project site.

d. Fourth Priority: Any resident of a household that resides within the City or a five (5) mile radius of the project site.

4. Coverage. The Local Hiring Policy shall apply to all hiring for On-Site Jobs related to the construction of the Project, by Developer and its Contractors.

5. Outreach. So that Targeted Job Applicants are made aware of the availability of On-Site Jobs, Developer or its Contractors shall:

a. Advertise available On-Site Jobs in the Gardena Valley News or similar local media and electronically on a City-sponsored website, if such a resource exists; and

b. Work with the South Bay Workforce Investment Board to coordinate recruiting and hiring of workers needed for development and operations of the project.

6. Hiring. Developer and its contractor(s) shall consider in good faith all applications submitted by Targeted Job Applicants for On-Site Jobs, in accordance with their normal practice to hire the most qualified candidate for each position and shall make a good faith effort to hire Targeted Job Applicants when most qualified or equally qualified as other applicants. The City acknowledges that the Contractors shall determine in their respective subjective business judgment whether any particular Targeted Job Applicant is qualified to perform the On-Site Job for which such Targeted Job Applicant has applied. Contactors are not precluded from advertising regionally or nationally for employees in addition to its local outreach efforts.

7. Term. The Local Hiring Policy shall continue to apply to the construction of the Project until the final certificate of occupancy for the Project has been issued by the City.

8. Developer and its contractor(s) shall abide by all applicable State and local labor regulations.

Local Buying Program for Materials and Supplies.

1. Local Supplier Requirements. Developer and its contractors shall use best faith efforts to ensure that materials and supplies used for construction of the project come from businesses based in the City of Gardena whenever possible.

a. Developer and its contractors shall coordinate with the City's Economic Development Manager to obtain a list of suppliers in the City.

b. Developer and its contractors shall solicit bids from suppliers located in the City, but nothing shall require Developer and its contractors to purchase from such supplier if it is not the lowest bid.

2. Local Supplier Report. Developer shall prepare a quarterly report for the City's Economic Development Manager which shall quantify in dollar amount the materials and supplies procured from businesses based in the City of Gardena and the amount of material and supplies procured elsewhere. The report shall include a description of efforts made to procure materials and supplies from Gardena businesses.

RESOLUTION NO. PC 4-21

A RESOLUTION OF THE PLANNING AND ENVIRONMENTAL QUALITY COMMISSION OF THE CITY OF GARDENA, CALIFORNIA, RECOMMENDING THAT THE CITY COUNCIL CERTIFY AN ENVIRONMENTAL IMPACT REPORT, ADOPT A MITIGATION MONITORING AND REPORTING PROGRAM, MAKE CEQA FINDINGS AND ADOPT A STATEMENT OF OVERRIDING CONSIDERATION, AND APPROVE A GENERAL PLAN AMENDMENT, SPECIFIC PLAN, ZONE CHANGE, ZONING CODE AMENDMENT, DEVELOPMENT AGREEMENT, AND SITE PLAN REVIEW, ALL RELATED TO THE DEVELOPMENT OF A 265-UNIT RESIDENTIAL APARTMENT PROJECT ON A 1.33-ACRE PARCEL AT 13850-13900 S. CRENSHAW AVENUE

(EA #1-20; GPA #1-20; SP #1-20; ZC #1-20; ZCA #3-20; DA # 1-20; LLA #1-20; SPR #1-20) (APNS: 4060-004-039)

WHEREAS, on January 21, 2020, Din/Cal 4, Inc., filed an application for a General Plan Amendment to the Land Use Plan (the "General Plan Amendment"), Specific Plan, Zone Change, Zoning Code Amendment, Site Plan Review and lot merger to develop an apartment building with up to 265 units on 1.33 acres located at 12850 – 12900 Crenshaw Boulevard (the "Property");

WHEREAS, it was subsequently determined that the Project would also include a Development Agreement, and that the lot merger should be a lot line adjustment;

WHEREAS, the General Plan Amendment, Specific Plan, Zone Change, Zoning Code Amendment, Development Agreement, Site Plan Review, and Lot Line Adjustment are collectively referred to as the Project; and

WHEREAS, on April 6, 2021, the Planning Commission of the City of Gardena held a duly, noticed public hearing on the environmental impact report ("EIR") and the Project at which time it considered all evidence presented, both written and oral;

NOW, THEREFORE, THE PLANNING AND ENVIRONMENTAL QUALITY CONTROL COMMISSION OF THE CITY OF GARDENA DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. PLANNING COMMISSION RECOMMENDATIONS.

Based on the information and findings contained in the exhibits attached hereto, which are incorporated herein by reference, the Planning Commission makes the following recommendations:

A. The City Council should adopt the Resolution attached hereto as Exhibit A, certifying an Environmental Impact Report, adopting a Mitigation Monitoring and Reporting Program, adopting a Statement of Overriding Considerations, and making CEQA findings relating to the adoption of the Gardena Transit Oriented Development Specific Plan and related entitlements for the 1.33-acre property located at 12850 – 12900 Crenshaw Boulevard. In making this recommendation the Planning Commission used its independent judgement.

B. The City Council should adopt the Resolution attached hereto as Exhibit B, changing the Land Use designation of the 1.33-acre property from Commercial to Specific Plan and makes text changes to the Land Use Plan as shown on the exhibits to said Resolution.

C. The City Council should adopt the Ordinance attached hereto as Exhibit C which: amends the Zoning Code to add a new zone of Gardena Transit Oriented Development Specific Plan and makes changes relating to digital billboards; approves the Gardena Transit Oriented Development Specific Plan, including the Site Plan which is a part of the Specific Plan; changes the zoning of the 1.33-acre property from General Commercial to Gardena Transit Oriented Development Specific Plan; and approves a Development Agreement.

SECTION 2. RECORD.

Each and every one of the findings and determinations in this Resolution are based on the competent and substantial evidence, both oral and written, contained in the entire record relating to the Project. All summaries of information in the findings which precede this section are based on the entire record. The absence of any particular fact from any such summary is not an indication that a particular finding is not based in part on that fact.

SECTION 3. CUSTODIAN OF RECORD.

The Custodian of Record for the proceedings relating to the Project, including the MND and MMRP, is Gregg McClain, Interim Community Development Director, City of Gardena, 1700 W. 162nd Street, Gardena, California 90247. Mr. McClain's email is gmcclain@cityofgardena.org and his phone number is (310) 217-9530.

SECTION 4. EFFECTIVE DATE.

This Resolution shall take effect immediately.

SECTION 5. CERTIFICATION.

The Secretary shall certify the passage of this resolution.

PASSED, APPROVED, AND ADOPTED this 6th day of April 2021.

BRENDA JACKSON, CHAIR
PLANNING AND ENVIRONMENTAL
QUALITY COMMISSION

ATTEST:

GREGG MCCLAIN, SECRETARY
PLANNING AND ENVIRONMENTAL QUALITY COMMISSION
STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
CITY OF GARDENA

I, Gregg McClain, Planning and Environmental Quality Commission Secretary of the City of Gardena, do hereby certify the following:

1. That a copy of this Resolution and the attachments will be sent to the applicant and to the City Council as a report of the findings and action of the Planning and Environmental Quality Commission; and

2. That the foregoing Resolution was duly adopted by the Planning and Environmental Quality Commission of the City of Gardena at a regular meeting thereof, held the 6th day of April 2021, by the following vote of the Planning and Environmental Quality Commission:

AYES: Sherman, Pierce, Henderson, Langley, Jackson
NOES:
ABSENT:

Attachments:

- Exhibit 1 – City Council CEQA Resolution
  - Exhibit 1A – Draft EIR
  - Exhibit 1B – Final EIR
  - Exhibit 1C – Mitigation Monitoring and Reporting Program
- Exhibit 2 – City Council General Plan Amendment Resolution
  - Exhibit 2A – Land Use Plan Map Change
  - Exhibit 2B – Updated Land Use Plan

- Exhibit 3 – City Council Ordinance Adopting the Specific Plan, Changing the Zoning, Approving the Zoning Code Amendment, and Approving the Development Agreement
    - Exhibit 3A – Specific Plan
    - Exhibit 3B – Conditions of Approval
    - Exhibit 3C – Zone Change Map
    - Exhibit 3D – Development Agreement

CITY OF GARDENA
PLANNING AND ENVIRONMENTAL QUALITY COMMISSION

STAFF REPORT
RESOLUTION NO. PC 4-21
EA #1-20; GPA #1-20; SP #1-20; ZC #1-20; ZCA #3-20;
DA#1-20; LLA #1-20; SPR #1-20
APN: 4060-004-039

AGENDA ITEM # 5.B

DATE: April 6, 2021

TO: Chair Jackson and Members of the Planning and Environmental Quality Commission

FROM: Gregg McClain, Interim Community Development Director

CASE PLANNER: John F. Signo, AICP, Senior Planner

APPLICANT: Din/Cal 4, Inc.

LOCATION: 12850-12900 Crenshaw Boulevard

REQUEST: The applicant requests the following entitlements for the development of a 265-dwelling unit apartment building on a 1.33-acre site, with a 2,500-square-foot dynamic, digital display on the north side of the building:

1) General Plan Amendment (GPA #1-20) to change the land use designation from General Commercial to Specific Plan and amend the Land Use Plan text;
2) Specific Plan (SP #1-20) to adopt the Gardena Transit Oriented Development Specific Plan (GTODSP);
3) Zone Change (ZC #1-20) to change the zoning from C-3 (General Commercial) to GTODSP;
4) Zoning Code Amendment (ZCA #3-20) to amend the Gardena Municipal Code by adding a new land use category of GTODSP and amending the text to allow for digital signage;
5) Development Agreement (DA #1-20) to provide the developer with vested rights to build over a 5-year period, with the possibility of extensions, in return for community benefits;
6) Site Plan Review (SPR #1-20) to develop the 265-unit apartment building as shown on the plans within the Specific Plan; and

7) Lot Line Adjustment (LLA #1-20) to combine four legal lots into one single lot.

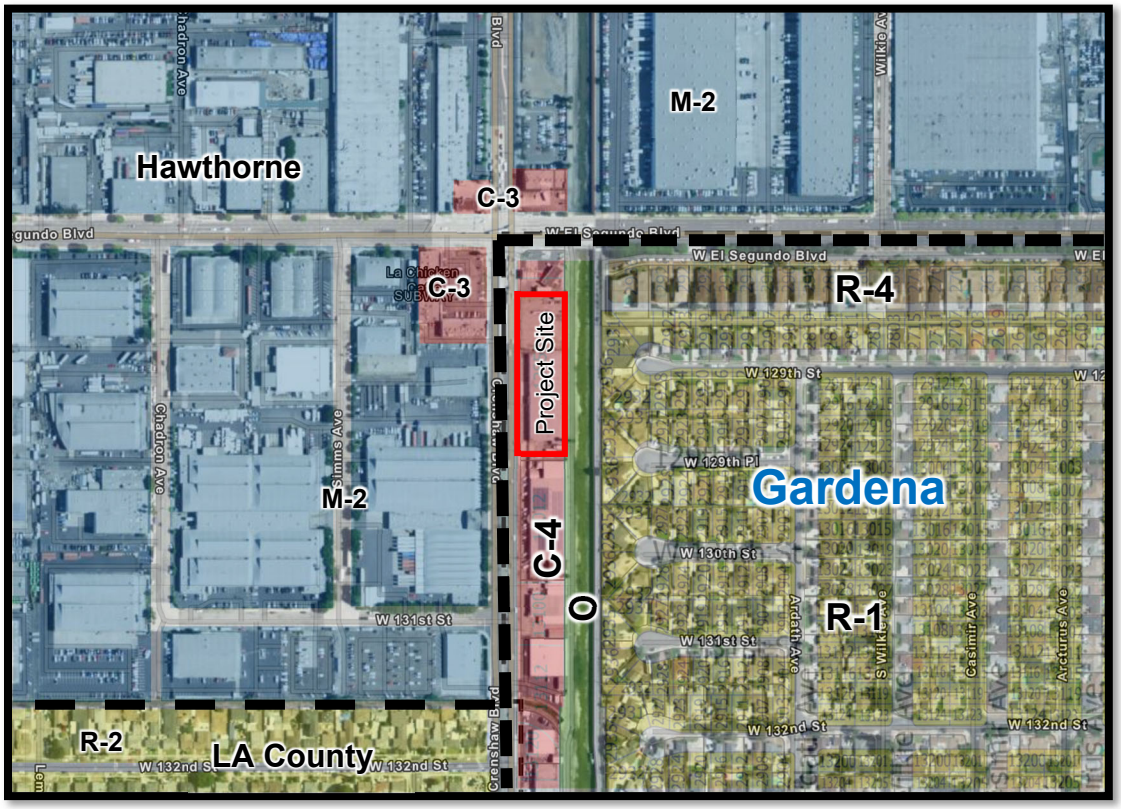
Approval of these items requires certification of an Environmental Impact Report (EA # 1-20), adoption of a Mitigation Monitoring and Reporting Plan, CEQA Findings, and a Statement of Overriding Considerations.

PROJECT DESCRIPTION

Location Map



Zoning and setting



The project site is part of a larger regional industrial, engineering, commercial, and employment area that generally extends north to south from I-105 to Rosecrans Avenue and east to west from Van Ness Avenue to Prairie Avenue. The site is fully developed with one late 1950s, one-story, 24,990-square-foot warehouse building used to store vintage cars and auto parts. The site is a blighted property that is under significant deterioration and disrepair. Additionally, the structure does not conform to current zoning in that it is an industrial building in a commercial zone.

The Los Angeles County Metro Rail Crenshaw Station is located approximately 0.6 miles north of the project site on Crenshaw Boulevard in the city of Hawthorne. In addition, three major freeways are conveniently accessible to the project: I-105 to the north, I-110 to the east, and I-405 to the southwest.

Proposed Development Project

The project is located on a 58,144 square foot parcel that includes up to 247,112 square feet of floor area with a floor area ratio (FAR) of 4.25:1.

Residential Component

The development project includes the demolition of an existing single-story building which will be replaced with an eight-story residential building with up to 265 dwelling units, although only 262 dwelling units are proposed. The maximum density will be just under 200 units per acre. The building will be eight stories with a maximum height of 100 feet, as measured from the finished floor to the highest point on the roof. The building will include five and one-half residential floors over two and one-half parking floors, with the third level being half-residential and half-parking. The developer will provide unbundled on-site parking at one space per unit and secured bicycle parking for the residents.

The proposed building design will incorporate a modern architectural style and scale that is compatible with the intended use. The building will have various horizontal and vertical articulations to create visual interest, and a mix of building colors and materials will be used for variation. Street trees and onsite landscaping will add interest at the pedestrian level.

The overhead power lines in front of the project site on the east side of Crenshaw Boulevard will be undergrounded. Additional features of the Project are discussed in the Site Plan Review section below.





CRENSHAW (WEST) ELEVATION

The project is a transit-oriented development that will place urban residential uses near public transit. The site is located within walking distance of the Crenshaw Station, numerous local and regional bus lines, and neighborhood-serving commercial uses, providing residents with a reduced dependence on the personal automobile. In order to reduce such dependency, one secure bicycle parking space will be provided for each unit, a designated loading area will be available for ride-sharing pick-up and drop-off, and parking spaces are to be unbundled from the units—meaning that residents must separately rent parking spaces. The unbundling of automobile and bicycle parking were specific recommendations from CalTrans in order to shift individuals from private vehicles to public and active transportation. There is also co-working space on-site which will allow residents to work on-site rather than commute to an office.

The project is expected to draw residents from nearby businesses such as Space X, and the Transportation Demand Management Plan requires an exclusive pre-leasing period targeted for employees who work within one half-mile of the site. The project will also help to address the regional jobs-housing imbalance, support the local economy by creating new, high-quality, multi-family housing options in northwest Gardena near significant employment centers in the technology and creative industries.

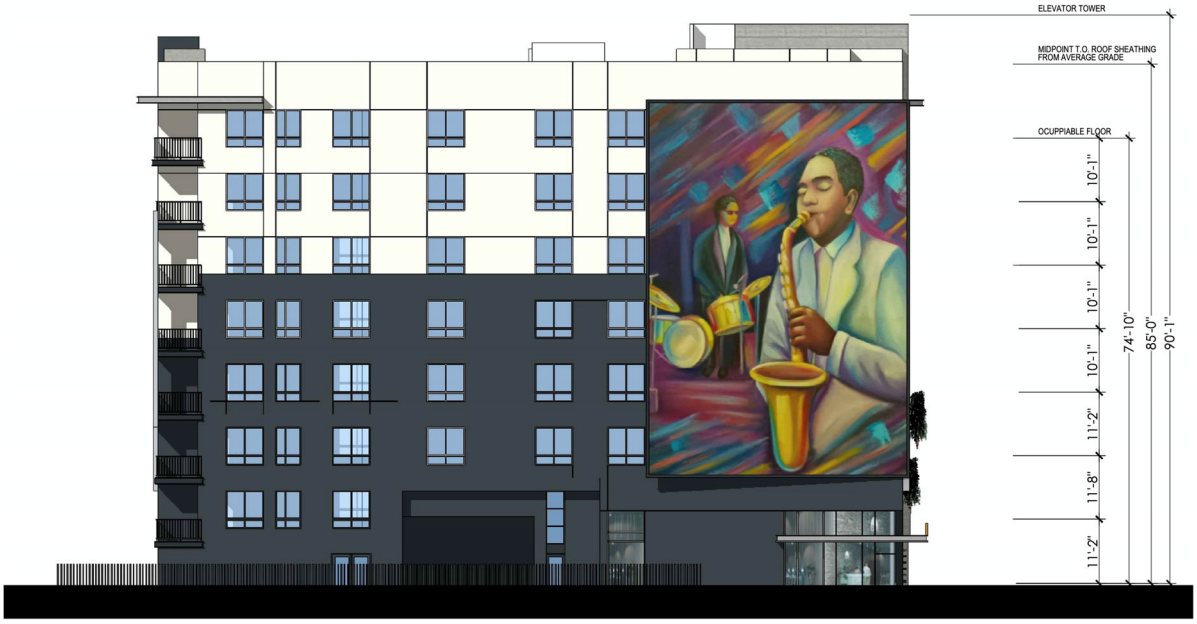
Residents will have access to various elevated courtyards and grade-level open space amenities. A minimum of 8,500 square feet of onsite common open space will be provided. This includes:

- Dog park
- Swimming pool and upper-level courtyards
- Fitness room
- Club house
- Co-working space



Digital Display

The development also includes a single digital billboard on the north side of the building which will have a dynamic display. The display will be approximately 42 feet by 60 feet and will not exceed 2,500 square feet in total. It will be illuminated between the hours of 6:00 a.m. to 2:00 a.m. The display was analyzed in the EIR under the aesthetics section which concluded that there would not be any significant aesthetic impacts from the digital display as designed.



NORTH ELEVATION

As safety was not an issue under the EIR, an analysis was prepared by Fehr & Peers on behalf of the developer relating to the potential effects on distracted driving when reading the display. The Fehr & Peers memorandum indicates that: based on the evidence, it is not possible to conclude that there is a direct relationship between driving behavior changes attributed to roadside advertising and subsequent road crashes; the results remain inconclusive; roadside advertising, may increase crash risk; the empirical studies that have been done feature strong methodological limitations; and there is a need for further research to ensure recent technological advancements are addressed. The Fehr & Peers memo specifically noted that the impact of installing a dynamic sign in an urban location such as the proposed Project is much different than a sign in a rural context or highway. In conclusion the Fehr & Peers memo sates that the design and operational characteristics of the sign were identified to minimize driver distraction and the potential for traffic safety hazards and will be operated to reduce potential for traffic safety hazards. (Attachment B.) All recommendations in the Fehr & Peers report are incorporated into the Specific Plan development regulations.

GENERAL PLAN CONSISTENCY

The project is consistent with General Plan goals and policies from: Community Development Element—Land Use Plan, Economic Development Plan, Community Design Plan, and Circulation Plan; Community Resources Element—Conservation Plan; Community Safety Element—Public Safety Plan and Noise Plan; and the Housing Element. The consistency analysis is set forth in great detail in Section 4.9 of the EIR.

Since the applications were filed, SCAG finalized the Regional Housing Needs Assessment (RHNA) for the 6th Cycle Housing Element. The City of Gardena's final housing allocation is 5,735 units distributed among the various income categories as follows: Very Low—1,485; Low—761; Moderate—894; and Above Moderate—2,595. This project will satisfy approximately 10 percent of the City's Above Moderate housing need in one location.

PROJECT ENTITLEMENTS

The project site is in the C-3 (General Commercial) zoning district. The C-3 zoning district does not permit residential uses, permits a maximum FAR of 0.5:1, and permits a maximum building height of two and one-half stories. By comparison, the GTODSP zoning permits residential density of 200 dwelling units per acre, a maximum FAR of 4.25:1, and building heights of up to eight stories and 100 feet.

This section provides a review of the various entitlements, the following section provides an overview of the various entitlement and CEQA documents required. The Planning Commission will be making a recommendation to the City Council on all approvals with the exception of the Lot Line Adjustment, which is an administrative action subject to the Community Development Director's approval.

Environmental Impact Report

An EIR is generally prepared for projects where there is a fair argument that there may be a significant impact on the environment, and the impacts may not be mitigated below a level of significance. EIRs are generally used for larger and more complex projects.

The EIR process starts with the preparation of an Initial Study and then a Notice of Preparation during which there is a 30-day review period for people and public agencies to comment on what should be studied in the document. There is also a public scoping meeting during this time. The Notice of Preparation public review period for this project ran from August 20 through September 18, 2020. There was a virtual scoping meeting on September 2, 2020, with only two people from the public in attendance.

A Draft EIR (DEIR) covers the same topics as a Mitigated Negative Declaration (MND), but with additional required sections such as a discussion of alternatives and growth inducing impacts. As with an MND, mitigation measures are included in a DEIR to reduce or eliminate significant impacts. Once the DEIR is completed, a Notice of Availability is prepared and the DEIR is circulated for a 30 or 45-day public review period. The public review period for the GTODSP DEIR was from January 15 until March 1, 2021. The DEIR is included in Exhibit A to Exhibit 1.

The DEIR identified several topic areas where there was a possibility of a significant impact from the project and identified mitigation measures to reduce those impacts as well. The topic areas are: cultural and tribal resources; geology, soils, and paleontological resources; hazardous materials and waste; and transportation. The mitigation measures that will alleviate these impacts are listed in the Mitigation Monitoring and Reporting Program (MMRP) which is attached as Exhibit C to Exhibit 1. The DEIR also identified one impact which could not be mitigated below a level of significance, construction noise. While construction noise is exempt from the City's noise standards, it was identified as a significant impact out of an abundance of caution.

A DEIR is required to include an examination of reasonable alternatives, include the "No Project" alternative, i.e., what happens if the Project is not approved. The alternatives are supposed to meet the project objectives. The DEIR analyzed the following alternatives: No Project/No Construction—which leaves the property as is; No Project/Existing Land Use Designation—which allows construction under the General Commercial land use and zoning; No Digital Sign—which would develop the project exactly as proposed with the exception of the digital display; and Reduced Density—to construct 97 fewer dwelling units. Of these alternatives, the DEIR is required to identify the environmentally superior project. In this case, the No Project/No Construction alternative is the environmentally superior project. However, this alternative, like the other No Project alternative, would not achieve any of the goals of the Project. In accordance with the requirements of CEQA, the DEIR identified the Reduced Density alternative as the environmentally superior alternative among the two remaining alternatives. However, neither of the other alternatives would eliminate the only significant and unmitigable impact, which is

construction noise. The only alternative which would eliminate the construction noise impact was considered infeasible because it would render the site nearly undevelopable in order to provide sufficient distance from residences to mitigate the construction noise.

Once the public review period has closed, a Final EIR (FEIR) is prepared. The FEIR is required to include, among other things, all written comments received on the DEIR, responses to comments, and revisions necessitated due to the comments. No comments from the public were received on the DEIR and there were only three comment letters from public agencies, none of which commented on the substantive provisions of the DEIR. The Final EIR is attached as Exhibit B to Exhibit 1.

When an EIR identifies significant impacts, there are findings that the public agency must make in order to approve the Project, and these findings must be supported by substantial evidence. These findings are: changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant effects; the changes or alterations are within the responsibility and jurisdiction of another public agency; or specific economic, legal, social, technological, or other considerations make mitigation measures or project alternatives feasible. In addition to the mitigation measures discussed throughout the EIR and included in the MMRP, the project also included design features which reduced all significant impacts with the exception of construction noise. As explained above, there is no way to eliminate the noise impact without making the project of such a small size that it becomes economically infeasible to build.

When a project has a significant impact which cannot be mitigated, the decision-making body is required to balance the economic, legal, social, technological, or other benefits of a project against the unavoidable impacts in determining whether to approve the project. This is accomplished by the adoption of a Statement of Overriding Considerations. In the present case, the project has a number of benefits, including: increased property and utility user taxes; a one-time residential impact fee of $265,000 to the City; satisfaction of approximately 10 percent of the City's above-moderate housing allocation for the 2021-2029 Housing Cycle; a development agreement that includes revenue sharing related to the digital sign display time to advertise community events and spotlight businesses; and a commitment to hire and buy locally for construction. It is also hoped that this Project will serve as a catalyst to stimulate other development in the area.

<u>Legislative Approvals – General Plan Amendment, Specific Plan, Zone Change, Zoning Code Amendment</u>

Legislative approvals are at the discretion of the City Council, with recommendation from the Planning Commission. Such changes should be approved when it is in the public interest and represents good planning practices. In order to develop the project, the following legislative approvals are required:

- General Plan Amendment to the Land Use Plan—to change the land use designation from Commercial to Specific Plan and to amend the text of the Land Use Plan primarily relating to specific plans.
- Specific Plan—to adopt the Gardena Transit Oriented Development Specific Plan which will act as the zoning for the property.
- Zone Change—to change the zoning of the property from General Commercial (C-3) to Gardena Transit Oriented Development Specific Plan (GTODSP).
- Zoning Code Amendment—to amend the Gardena Municipal Code to add the GTODSP and a previously approved specific plan to the zoning designations and amend the Code to allow digital displays when approved by a Development Agreement and allowed in the zone.

Legislative Approval—Development Agreement

In the normal course of project approvals, a City may not place conditions on projects or demand exactions unless there is a reasonable nexus between the condition and the impact created by the project. Additionally, until a developer obtains vested rights, a City may always change the zoning and other requirements related to entitlements. For example, an applicant could obtain a CUP for a car wash in the commercial zone and before he starts building, the City could change the zoning to residential. However, once a developer starts spending money to construct the project, he obtains a vested right. Once the rights are vested, the City cannot impose new conditions or fees.

A Development Agreement is a contract between the City and a Developer. Under a Development Agreement, a developer gets an “early” vested right that protects his ability to develop. In exchange, the City usually gets benefits it would not otherwise be able to obtain.

In the GTODSP, the City is getting several benefits that it would not otherwise get—in return for providing a (proposed) 5-year time frame, with the possibility of two 2-year extensions, in which the developer may implement the project, the City is getting the following benefits which would not otherwise occur:

- A share of the revenue received from the digital display for a 30-year period; the Development Agreement provides for a minimum of $75,000 per year or 25% of all Net Profits, whichever is greater.
- Community programming time for City business, arts, and community related non-commercial programming.
- A local hiring and local buying program—see Exhibit D to the Development Agreement (Exhibit D to Exhibit 3).

Site Plan Review

Normally the Planning Commission approves the site plan, subject only to a call for review or an appeal to the City Council. However, in this case the Specific Plan and its regulations have been tailored around the specific site plan that is being proposed and the site plan is embedded within the Specific Plan. Therefore, the City Council will approve the site plan along with the Specific Plan. The Los Angeles County Fire Department approved 26-foot fire lanes shown on the north and south side of the development. The table below summarizes the development standards proposed in the Specific Plan. Development standards not covered by the Specific Plan will be regulated by the Gardena Municipal Code.

STANDARD	**REQUIREMENT**
Minimum Lot Area	1.33 acres
Density/Capacity	200 units/acre, up to 265 units
Building Height	8 stories and 100 feet
Floor Area Ratio	4.25:1
Dwelling Unit Size	Studio: 400 SF 1 Bedroom: 550 SF 2+ Bedrooms: 850 SF + 150 SF for each additional bedroom
Setbacks	Front: None Side: 10 feet Rear: None
Encroachments	Canopy or awning: 5 feet Planter boxes: 5 feet Outdoor seating: 5 feet
Minimum Open Space	8,500 SF common 250 SF ground-level planter
Parking	267 spaces; up to 50% compact
Parking Dimensions	Compact: 9’ x 16’ Standard: 9’ x 18’
Drive Aisle	24 feet
Bicycle Parking	1 per unit

The following factors shall be considered in determining whether the site plan shall be approved.

1. *The dimensions, shape and orientation of the parcel;*

   The property is 1.33 acres and 125 feet deep by 464.3 feet wide. It is fairly flat and suitable for development with adoption of the Specific Plan.

2. *The placement of buildings and structures on the parcel;*

   The proposed building covers approximate 71 percent of the property with an eight-story building. Access into the parking garage is via a driveway from Crenshaw Boulevard near the center of the property. A fire lane is provided via driveways on the north and south portions of the property which continues behind the building along the Dominguez Channel to the east. The building includes five and one-half levels of residential floors over two and one-half levels of parking.

3. *The height, setbacks, bulk and building materials;*

   The building includes a maximum of eight stories with a maximum height of up to 100 feet, as measured from the finished floor to the highest point on the roof. Adequate setbacks are provided in the sides and rear due to the fire lane proposed around the building. Although there is no required front yard setback, approximately 250 square feet of planters will be provided along the street. The building design incorporates an architectural style and scale that is compatible with the intended use. Architectural details will include features that contribute to the aesthetic ambience of the immediate area.

4. *The distance between buildings or structures;*

   The proposed building is the only structure being proposed on the subject property. The closest adjacent structures are a car wash building to the north and an industrial building to the south. Due to the fire lane along the sides and rear perimeters, no building will be closer than 26 feet to the building. The residential properties to the east are 100 feet away across the Dominguez Channel.

5. *The location, number, and layout of off-street parking and loading spaces;*

   The project includes 262 dwelling units and a total of 267 parking spaces. Two of the spaces will be designated for leasing, mail, and shared ride services. The building will include two and one-half levels of parking. The project also includes secured bicycle parking spaces for residents at a ratio of one space per unit. Due to the site's proximity to the Green Line Crenshaw Station 0.6 miles to the north, the project is considered a transit-oriented development; retail and transit uses are in close proximity. The number of disabled and electric vehicle charging spaces are set by the Building Code.

The site plan shows 50% of the parking spaces for compact vehicles with dimensions of 9 feet wide by 16 feet deep. The width is six inches wider than Gardena's minimum compact space and one foot shorter. However, as previously noted, when the City Council discussed a revision to parking standards last year, no other jurisdiction in the surrounding area requires a 17-foot long compact space. Almost every other City requires only 15 feet for compact spaces.

LLG Engineers provided a parking study for the Project. (Attachment C.) The Study discusses the Transportation Demand Management (TDM) Program that was developed to reduce single-occupant vehicle travel and take advantage of the project site's proximity to employment, transit, and bicycle and pedestrian facilities. The Study also examines parking ratios at other transit-oriented development projects, discusses the need to reduce the parking aisle width, and reduce the size of the parking spaces. In addition to the study by LLG, the applicant provided an additional parking analysis prepared by Richard Willson, professor in urban and regional planning at Cal Poly Pomona, who specializes in transportation planning and parking. (Professor Willson's Bio is found at Attachment D.) This analysis also supports that the development contains sufficient parking. (Attachment E.)

Both CalTrans and Los Angeles County Metropolitan Transportation Authority submitted letters supporting the reduction or removal of minimum parking requirements.

6. *The internal vehicular patterns and pedestrian safety features;*

Internal vehicular patterns and pedestrian safety features are designed to be safe and secure. Access to the parking garage is via a driveway on Crenshaw Boulevard in the middle of the project site. A public sidewalk abutting the site along Crenshaw Boulevard will allow pedestrians to walk safely. Street lighting and curb and gutters will be provided along the sidewalk.

The internal drive aisles in the parking structure are proposed to be 24 feet. As the Fire Department will have access from fire lanes on the north and south side of the developments, as well as from Crenshaw Boulevard, wider aisles are not needed for fire access. As mentioned above, the LLG Parking Study also justifies the use of a narrower aisle.

7. *The location, amount, and nature of landscaping;*

The project includes 8,500 square feet of common open space and 250 square feet of planter areas along Crenshaw Boulevard. Common open space includes a dog park, swimming pool, upper-level courtyards, fitness room, club house, and co-working space.

8. *The placement, height and, direction of illumination of light standards;*

   Lighting for vehicles and pedestrians will be located in appropriate areas where they do not create a significant light and glare impact. Perimeter light poles will be 12 feet high to illuminate drive aisles and the dog park. Pendant lights and festival lighting will be provided in the courtyard areas for the safety of residents. A 2,500-square-foot dynamic, digital display is proposed on the north side of the building which will automatically adjust to lighting conditions based on the time of day and ambient lighting. Additional development standards for the digital display are incorporated into the Specific Plan.

9. *The location, number, size and height of signs;*

   The top of the proposed digital display is approximately 80 feet high. As this is a residential apartment building, signage will be minimal and limited to identification, directional, and safety signs. All signage will be reviewed by the City prior to issuance of a permit.

10. *The location, height and materials of walls, fences or hedges;*

    All walls and fences in a front yard setback will comply with the requirements of Gardena Municipal Code Section 18.42.070 A.2. All walls or fences in the side and rear yard setbacks will not exceed ten feet in height and will be constructed of solid decorative concrete masonry or open wrought iron. A ten-foot-high solid decorative concrete masonry wall is required along the southern property line to buffer from existing industrial uses, and may also be provided along the northern property line.

11. *The location and method of screening refuse and storage areas, roof equipment, pipes, vents, utility equipment and all equipment not contained in the main buildings of the development;*

    Refuse and storage areas will all be interior to the building and properly screened. Roof equipment will be screened by a parapet along the perimeter of the building. Two staircases will be provided on the roof which are not expected to be visible from street level. These staircases will be painted to match the building. All pipes, vents, and other equipment are required to be incorporated into the building design or painted to match the building.

12. *[Repealed]*

13. *Such other information which the community development director or commission may require to make the necessary findings that the provisions of this code are being complied with.*

    The Specific Plan essentially becomes the zoning and development standards for the project site. Since the Specific Plan was written to incorporate the project's

design features, the project will be consistent with the zoning and development standards once the Specific Plan is approved.

Lot Line Adjustment

The project site is currently made of four legal lots which need to be combined into one. Under the Gardena Municipal Code, lot line adjustments are acted upon by the Director of Community Development. The project will be conditioned to obtain a lot line adjustment.

ECONOMIC IMPACT

The Project is projected to have an overall positive economic impact for the City, including the following:

- One-time residential impact fee of $265,000
- Construction related fees for business license, fees, and permits of approximately $1,250,000
- Yearly property tax of approximately $110,000—current property taxes are estimated at less than $4,000 per year
- Yearly business license fee of approximately $2,660—current yearly business license fee is $125
- Increased yearly Utility User's Tax of approximately $15,000
- An agreement to buy locally for construction related items which will increase the City's sales tax revenues
- An agreement to implement a Local Hiring Policy
- Hiring of approximately 400 full- and part-time workers which will create an indirect economic benefit from workers spending money in the City
- Undetermined economic benefit from spending of new residents in the City
- Minimum revenue of $75,000 per year for the digital display for 30 years

Additionally, this project will serve as a catalyst for other economic development in the area, including other transit-oriented development and high-density residential projects.

Although not an economic impact, under the Development Agreement the City will be granted community programming time of 8 percent of the total display time and 50 percent of uncommitted display time on a monthly basis. This time will be used for City business, arts, and community related non-commercial programming.

RECOMMENDATION

Staff recommends the Planning Commission adopt a resolution recommending the City Council approve this project for several important reasons as described below.

Housing Needs

California is experiencing a housing shortage that is impacting everyone in one way or another. The project will supply about 10% of the City's share of above moderate income RHNA units, which is certainly significant and helpful. Pushing high-density housing projects into areas of low-performing commercial and industrial properties helps avoid disruption to the existing residential community.

Economic argument in favor of this project

The historic pattern of development in Gardena resulted in a little over half of the land built with single-family houses and duplexes. Higher density residential is restricted to less than 10% of the buildable land. While not unusual, it hurts Gardena's economic development efforts. National brands looking to site new retail, service, or hospitality facilities are looking for the right combination of desirable factors to suit their demographic targets. Among the things they often look for are the number of households within certain distances of a site as a gauge of the potential customer base. All other factors being equal, a location with more households nearby will be favored over a location dominated by single-family houses and duplexes. Additional developments like this application over the next eight to ten years will help address the low household count that is contributing to making economic development more difficult than it should be in Gardena. Additionally, having more households in Gardena adds economic stimulus to the local economy when new residents spend and pay taxes.

Environmental argument in favor of this project

When employees work in Gardena and surrounding jobs-rich cities but live to the north or east where housing is relatively affordable, they contribute to pollution and congestion by commuting to work. That degrades the quality of life for residents of Gardena. Having 262 new households in this project represents potentially over 200 significantly shorter commutes to, or passing through, Gardena twice per day. Many of these commutes will be practically eliminated.

Social argument in favor of this project

Many young adults growing up here cannot find affordable housing in Gardena to set down roots to establish their independence or to start their own families. Although this is part of a nationwide trend, the high cost of land in this area makes it even worse here. The most obvious manifestation of this is grown children living with their parents well into adulthood. This development is offering 262 units, of which 85% are one-bedroom and studio units. Although these will be offered at market rate, many of the renters will likely be current residents of Gardena, so the addition of these units into the real estate market should have a positive cascading effect in the rental marketplace. As renters move from older or less conveniently located buildings to the new building, they free up their current

units. This causes a cascading effect that ends with units that are affordable to low income residents entering the rental market, which is a good outcome.

Special considerations in favor of this project

This project is in the far northwest corner of the City and is ideally located to have the minimum negative impact on the low-density residential neighbors nearest its location. This project is buffered from the nearest low-density residential neighborhoods by the Dominguez Channel. The nearest point of entry to the neighborhood is Purche Avenue at El Segundo Boulevard, more than half a mile away. There is also no benefit to drivers using neighborhood streets as a shortcut, so traffic impacts to the neighborhood should be none. Noise is another potential issue. The open space areas where noise is most likely to be generated are located on the west side of the building, away from Gardena homes. As far as visual or aesthetic impacts, this project will be among the highest quality residential projects to be constructed in Gardena. Attention to the back and south side of the building facing Gardena neighborhoods was not overlooked.

Not every residential development will be as well sited as this one to have the least negative impacts on the rest of the City while contributing in positive ways as explained above. Not every residential development will make such as large dent in the City's RHNA allocation as this one does. Typically, the plusses and minuses are more evenly balanced.

Therefore, staff recommends the Planning Commission adopt Resolution No. PC 4-21 which recommends that the City Council take the following actions:

1) Certify the Environmental Impact Report (EA #1-20) and adopt a Mitigation Monitoring and Reporting Program, Findings Relating to Alternatives and Mitigation Measures, and a Statement of Overriding Considerations for purposes of the Project
2) Approve the General Plan Amendment to change the land use designation from General Commercial to Specific Plan and amend the Land Use Plan text (GPA #1-20)
3) Approve the GTODSP (SP #1-20)
4) Approve the Zone Change (ZC #1-20) to change the zoning from C-3 (General Commercial) to GTODSP
5) Approve the Zoning Code Amendment (ZCA #3-20) to amend the Gardena Municipal Code by adding a new land use category of GTODSP and amending the text to allow for digital signage
6) Approve the Development Agreement (DA #1-20) to provide the developer with vested rights to build over a 5-year period, with the possibility of extensions, in return for community benefits

7) Approve the Site Plan Review (SPR #1-20) to develop the 265-unit apartment building as shown on the plans within the Specific Plan

ATTACHMENTS

A – Planning Commission Resolution Making Recommendations to the City Council
[ATTACHMENT A EXCLUDED FROM CITY COUNCIL PACKET]

- Exhibit 1 – City Council CEQA Resolution
  - Exhibit A – Draft EIR
  - Exhibit B – Final EIR
  - Exhibit C – Mitigation Monitoring and Reporting Program
- Exhibit 2 – City Council General Plan Amendment Resolution
  - Exhibit A – Land Use Plan Map Change
  - Exhibit B – Updated Land Use Plan
- Exhibit 3 – City Council Ordinance Adopting the Specific Plan, Changing the Zoning, Approving the Zoning Code Amendment, and Approving the Development Agreement
  - Exhibit A – Specific Plan
  - Exhibit B – Conditions of Approval
  - Exhibit C – Zone Change Map
  - Exhibit D – Development Agreement

B – Fehr & Peers Memorandum dated 12/15/20 regarding distracted driving

C – LLG Parking Memorandum

D – Professor Willson's Bio

E – Parking Analysis by Professor Willson

FEHR PEERS

Memorandum

Date: December 15, 2020

To: Curtis Burnett, Din/Cal 4, Inc.

From: Stephanie Cheng, AICP, Claude Strayer, PE, and Marta Polovin, Fehr & Peers

Subject: Gardena TOD Specific Plan Digital Sign Display and the Potential Effects on Distracted Driving

LB20-0010.00

A literature review was conducted to assess the potential effects on distracted driving as a result of a proposed digital sign display as part of the Gardena Transit Oriented Development (TOD) Specific Plan project in the City of Gardena. This memorandum outlines the key literature findings and considerations to reduce the potential for distracted driving associated with the digital sign display.

Changeable signs that are considered 'active' or 'dynamic' can display multiple messages in sequences. These signs may also be referred to as: changeable message signs, electronic/digital billboards, dynamic/animated signs, or digital reader boards. It should be noted that much of the research to date did not include video-based advertising and research studies have not kept pace with the advances in advertising technology, including animated, emergent video-based, or Light-Emitting Diode (LED) signs. Accordingly, some research factors do not apply to current advanced sign technologies.

Project Description

Din/Cal 4, Inc. proposes an exterior digital LED dynamic, fully animated display for the Gardena TOD Specific Plan project located at 12850 Crenshaw Boulevard, on the southeast quadrant of the intersection of Crenshaw Boulevard and El Segundo Boulevard. The site is located immediately south of an existing gas station. There is another gas station on the northwest corner and retail uses on the northeast and southwest corners of the intersection that all have on-site lighting that remains on at night. Surrounding uses along Crenshaw Boulevard include commercial and industrial uses. The new multi-family residential building will be eight (8) stories tall, including two and a half (2.5) levels of parking and five and a half (5.5) levels of residential units. The proposed sign would be mounted on the north side of the building facade facing El Segundo Boulevard. The dimensions of the proposed sign will be 59.8-feet high by 39.9-feet wide, or an area of 2,386 square

feet of exterior digital display. The sign will have the capability of showing full motion, brilliant colors, and dynamic video content. Display brightness will be adjustable. Hours of operation will be 6:00 AM to 2:00 AM.

Within the immediate vicinity, the sign would generally be visible to drivers on El Segundo Boulevard and Crenshaw Boulevard. When traveling southbound on Crenshaw Boulevard, the sign would be visible when approaching the intersection at El Segundo Boulevard. The sign would not be visible when traveling northbound on Crenshaw Boulevard. Along El Segundo Boulevard, the sign would be visible when traveling eastbound and westbound approaching the intersection at Crenshaw Boulevard.

Literature Review

This review included literature and related references ranging from 1980 to 2019. Many studies were limited in their sample size, conducted along rural or suburban freeways, or did not demonstrate statistically significant causality related to collision patterns. Overall, the potential safety impacts of distracted driving from digital signs remains inconclusive, though the following points were found to be consistent throughout the literature reviewed:

- Additional environmental clutter or distractions can increase crash risk.
- Research regarding the impact of roadside advertising on driving behavior is greatly dependent on study methodology, environmental context, and human factors (e.g., age, driving experience, fatigue) among drivers.[1]
- Additional research and data collection are needed.
- The swift evolution of electronic technologies necessitates a reevaluation of previous legislations and regulations.

The literature review includes general academic research as well as research published or sponsored by the outdoor advertising industry. General research references work from academia as well as the transportation industry officials such as the Federal Highway Administration (FHWA), the American Association of State Highway and Transportation Officials (AASHTO), and the National Highway Traffic Safety Administration (NHTSA). To date, formal guidance to address potential traffic safety effects of digital signs has not been published. Further, the topic has not been addressed by the State CEQA Guidelines or the Los Angeles CEQA Thresholds Guide. FHWA and California Department of Transportation (Caltrans) have evaluated and allow digital billboards along highways, indicating that such signs are in conformance with federal and state regulations.

[1] Oviedo-Trespalacios, O., Truelove, V., Watson, B., & Hinton, J. (2019). "The Impact of Road Advertising Signs on Driver Behaviour and Implications for Road Safety: A Critical Systematic Review," *Transportation Research Part A: Policy and Practice*, Vol. 122.

General Research

The *Highway Safety Manual* describes the interactive effects of human factors, roadway factors, and vehicle factors on vehicle crashes.[2] The manual describes four distracting situations that could lead to failure to detect slowing or stopping vehicles (or pedestrians in a crosswalk) ahead at intersections. One of the four cited sources of distraction is an object of interest on the roadside, such as a roadside advertising sign.

A study commissioned for the City of Seattle in 2001 concluded that dynamic signs contribute to driver distraction for longer intervals than static signs.[3] This report examined how this may be due to the psychological need to follow a task to its conclusion, which is known as the "Zeigarnik Effect". The report also described how this effect is influenced by the delivery and content of the message:

- Scrolling messages of particular importance/interest could result in multiple seconds of distraction depending on its length.
- Sequential image or short video clips that tell a story may also result in longer periods of distraction.
- Anticipation of a new message could cause distraction (even if unrelated to the prior image).

The FHWA has conducted a series of studies that evaluate the possible safety impacts of electronic and digital signage. Many studies focus on human factors research and cognitive psychology to help identify the links between driver behavior, environmental factors (such as digital signage) and traffic safety. In 2009, AASHTO sponsored the study *Safety Impacts of the Emerging Digital Display Technology for Outdoor Advertising Signs* prepared by Jerry Wachtel. Despite being over a decade old, it remains one of the most recent and referenced reports available that provides guidance on digital billboards to date. As part of the study, Wachtel et al. reviewed 150 other studies and concluded that it was difficult to perform research that was not affected by small sample sizes, human factors, and generalizations.[4]

The 2009 Wachtel report, academic studies, and numerous professional reports cite *The 100-Car Naturalistic Driving Study* conducted in 2006 by the NHTSA and the Virginia Department of Transportation. The study included over 18 months of data collection tracking the driver behavior of 100 vehicles equipped with video and sensor devices.[5] The database generated by this study

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[2] AASHTO. (2010). "Highway Safety Manual," *1st Edition*.

[3] Beijer, D., Smiley, A. & Eizenman, M. (2004). "Observed Driver Glance Behavior at Roadside Advertising Signs," *Transportation Research Board (TRB)*.

[4] Wachtel. J. (2009), "Safety Impacts of the Emerging Digital Display Technology for Outdoor Advertising Signs," *NCHRP TRB*.

[5] Wachtel (2009) & Klauer, S.G., Dingus, T., Neale, V., Sudweeks, J., & Ramsey D. (2006). "The Impact of Driver Inattention on Near-Crash/Crash Risk: An Analysis Using the 100-Car Naturalistic Driving Study Data," *USDOT NHTSA*.

allowed for analysis of factors associated with crashes, near crashes, and critical incidents. The study found that a driver's eyes off-road time due to external distractions or inattention was estimated to cause more than 23% of all crashes and near crashes that occurred.

A follow-up analysis to the initial study found that distractions causing the driver to glance away from the forward roadway for more than two seconds increased the risk of crashing or having a near crash by at least two times over normal driving. However, the study also found that for drivers reporting drowsiness, the presence of a demanding driving environment resulted in lower crash risk compared to flat and less visually demanding environments.[6] While crash incidence was shown to increase with diverted glances longer than two seconds, correlations based on the type and severity of crashes were not included in the study.

Since the 2009 Wachtel report, several studies that aim to expand understanding of the effects of digital billboards and signage on driver distraction and traffic safety have been published. These peer-reviewed studies often use the two-second rule established by *The 100-Car Naturalistic Driving Study*.[7] However, the driving environment is often so complex that direct causality between a feature of the external environment and an increase or decrease in the number of traffic collisions remains inconclusive. The 2013 FHWA Study, *Driver Visual Behavior in the Presence of Commercial Electronic Variable Message Signs (CEVMS)*, concluded that typical eye glance duration for digital signs and standard billboards is usually less than 1.4 seconds. [8] While drivers were found to glance at digital billboards longer than non-digital billboards, the study concluded that overall attention was focused on the task of driving and there were no discernable impacts on overall safety.

Smiley et al. conducted pre- and post- digital billboard installation collision analyses on urban intersections.[9] The study evaluated three intersections with video billboards within the City of Toronto, measuring crashes approximately three years before sign installation and one year after

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[6] Klauer et al. (2006).

[7] Edquist, J., Horberry, T., Hosking, S., & Johnston, I. (2011). "Effects of advertising billboards during simulated driving." *Applied Ergonomics*, Volume 42, Issue 4.
Milloy, S. & Caird, J. (2011). "External Distractions: The Effects of Video Billboards and Windfarms on Driving Performance." *Handbook of Driving Simulation for Engineering, Medicine and Psychology*.
Dukic, T., Ahlstrom, C., Patten, C., Kettwich, C., and Kircher, K. (2013). "Effects of electronic billboards on driver distraction." *Traffic Injury Prevention*, Volume 14.
Roberts, P. (2013). "Designing evidence-based guidelines for the safe use of digital billboard installations: Experience and results from Australia." *Proceedings of the 16th International Conference Road Safety on Four Continents; Beijing, China*.
Divekar, G., Pradhan, A., Pollatsek, A., & Fisher, D. (2012). "Effect of External Distractions: Behavior and Vehicle Control of Novice and Experienced Drivers Evaluated." *Transportation Research Record,* Volume 2321.

[8] Perez, W., Bertola, M., Kennedy, J.; & Molino, J. (2013). "Driver Visual Behavior in the Presence of Commercial Electronic Variable Message Signs (CEVMS)," *FHWA*.

[9] Smiley, A., Persaud, B., Bahar, G., Mollett, C., Lyon, C., Smahel, T., and Kelman, W.L. (2005). "Traffic Safety Evaluation of Video Advertising Signs," *Transportation Research Record*, Volume 1937.

sign installation. Two intersections demonstrated increases in both total and rear-end crashes; the third intersection showed no significant increase in crashes. Due to the small sample size, the results were inconclusive with regards to the overall relationship between the potential for traffic safety impacts due to distracted driving and digital billboards.

Driver distraction and associated risks vary depending on the roadway classification and land use setting or context. Numerous studies states that simple driving-related tasks consume relatively little information processing; however, when additional conditions such as traffic congestion, weather, or complicated roadway geometries exist, the additional distraction of a dynamic sign could lead to driving errors. On urban arterials, in contrast to freeways or rural highways, drivers are exposed to a more complex environment and encounter vulnerable road users such as pedestrians and bicyclists.[10] Perez et al. found that drivers on urban arterials were more likely to look at digital billboard displays for longer durations than drivers on freeways, likely attributed to slower travel speeds. However, long "dwell times" (referring to the length of time a driver's eyes remain on the billboard) on digital billboards were not observed or recorded on urban arterials.[11]

Human factors relate to all elements that explain driver behavior. The diversity of published literature acknowledges the role of human factors in the research. Driver characteristics significantly affect the risk of distraction or inattention. Distraction can be caused by internal factors (such as fatigue and medication), factors external to the driver but internal to the vehicle (such as cell phones and navigation systems), and factors external to the vehicle (such as pedestrians and signs). Results from a survey given to all participating drivers as part of *The 100-Car Naturalistic Driving Study* indicated that driver age, experience, self-reported traffic violations and accidents, daytime sleepiness rating, and personality result in substantially different levels of involvement in inattention-related crashes and near crashes.[12]

Industry-Sponsored Research

Four key studies have been published with support from the advertising industry, largely demonstrating no adverse effects from digital billboards.[13] These studies range from more naturalistic experiments with real drivers on real roadways to simulator studies in a laboratory.

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[10] Smiley et al. (2005).

[11] Perez et al. (2013).

[12] Klauer et al. (2006) & Belyusar, D., Reimer, B., Mehler, B., Coughlin, J. (2015). "A field study on the effects of digital billboards on glance behavior during highway driving," *Accident Analysis and Prevention*, Volume 88.

[13] Lee, S. (2007). "Driving Performance and Digital Billboards." *Virginia Tech Transportation Institute & Foundation for Outdoor Advertising Research and Education*.
Tantala, M. & Tantala, A. (2009). "An Update of a Study of the Relationship between Digital Billboards and Traffic Safety in Cuyahoga County, Ohio," *Tantala Associates, Foundation for Outdoor Advertising Research and Education*.
Hawkins, K., Kuo, P. and Lord, D. (2012). "Statistical Analysis of the Relationship between On-Premise Digital Signage and Traffic Safety." *Texas A&M & The Signage Foundation, Inc.*

Industry reports provide summaries and interpretations of the academic research related to digital signage and driver distraction. A 2004 report states that despite the conservative approach to safety concerns, the ensuing 20 years of "inevitable" technology proliferation in billboards has shown there to be no observable spike in traffic safety concerns related to billboards. The report also points out that many cities permit or encourage engaging signage, frequently digital, in the urban core to help cultivate a feeling of excitement and engagement.[14]

Design & Operation Considerations

The following summarizes design and operational considerations obtained from the literature that will minimize the potential for driver distraction associated with the proposed sign. The potential impacts of the proposed sign are addressed in *italics*.

Animation & Movement

Any animation should avoid "flashing, strobing, or racing effects" as such types of movement are more distracting than other types of animation.[15] Additionally, animation that may resemble "red or blinking intermittent light" or may resemble traffic control devices should be prohibited.[16]

The proposed sign content is anticipated to comply with the considerations above.

Placement

Lateral placement should reduce the driver's need to turn their head by minimizing the angle away from the forward view. Signage should not be placed in spaces that are highly demanding for drivers based on roadway geometry or placed in spaces that are visually cluttered.[17]

The roadway segment alignments at the proposed project location are generally straight and the sign will be primarily visible to drivers on Crenshaw Boulevard traveling in a southbound direction. Drivers traveling eastbound and westbound on El Segundo Boulevard may be inclined to turn their head towards the proposed sign. However, the proposed placement is not atypical and the inclination for drivers to turn their heads would be considered comparable to other urban elements in the area.

Spacing

No more than two digital billboards should be located within driver's field of view at the same time.[18]

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[14] US Sign Council, "Electronic Sign Zoning Information," (2004).
[15] Morris, Marya, John Baker and Daniel Mandelker. (2009). "Regulating Digital Signs and Billboards (S606)." *APA National Conference, presented April 28, 2009.*
[16] Outdoor Advertising Act (Article 7, Section 5403 of the California Code of Regulation).
[17] Roberts (2013).
[18] Wachtel et al. (2009).

The proposed sign would be the first digital billboard at the intersection. The nearest digital sign is located on Crenshaw Boulevard approximately 600' north of El Segundo Boulevard in the City of Hawthorne, which is not expected to conflict with the placement of the proposed sign.

Illuminance and Luminance

Illuminance refers to the light energy landing on a surface at a distance from a sign, while luminance refers to the light energy at the sign surface itself. The FHWA recommends adjusting luminance in response to ambient illuminance to ensure signage is not "unreasonably bright for the safety of the motoring public"[19]. For areas of medium to high ambient illuminance, academic literature recommends digital signs should not exceed 0.8 foot candles and that digital signs should be equipped with auto-dimming technology.[20]

The proposed sign content is anticipated to comply with the recommendations above and will provide timed dimmers. A formal lighting study is also underway that will be submitted to the City for review prior to project approval.

Operations

The timeframe during which a sign is operational can be regulated if the standards pass the "time, place, manner" test.[21] The standards must be content-neutral, but may require all digital or internally-lit signage to turn off or dim after a certain time of night, for example. The FHWA recommends requiring a default designed to freeze the image in the event of a malfunction[22]. These types of regulations can ameliorate community concerns about light pollution or about exacerbating the dangers of impaired drivers past a certain time of night.

The proposed sign content is anticipated to comply with the recommendations above. The proposed sign operation would function from a content server with a backup server system. The backup server system would respond in the event of a malfunction in the content server.

[19] FHWA (2007).
[20] Gottwald, R. (2011). "Recommended Night-time Brightness Levels for On-Premise Electronic Message Centers (EMC's)," *International Signage Association*.
[21] Mandelker, D. and Baker, J. (2014). "Bettman Symposium: Reading the Signs (S656)." *APA National Conference*.
[22] FHWA (2007).

Conclusion

The most recent research on the topic concludes that:

> *Based on the available evidence, it is not possible to conclude that there is a direct relationship between the driving behavior changes that can be attributed to roadside advertising and subsequent road crashes. Most of the results in this respect remain inconclusive. However, there is an emerging trend in the literature suggesting that roadside advertising, particularly those signs with changeable messages, can increase crash risk. It is important to bear in mind that most of the empirical studies undertaken to date feature strong methodological limitations. Finally, roadside advertising technology is continually evolving, so there is a need for further research to ensure the recent technological advancements are addressed.*[23]

The impact of installing a dynamic sign in an urban location is much different than a sign installed in a rural context or a highway. Therefore, the recommendations of the research cannot be applied universally. The distracting environment along an urban arterial demands a constant level of attention, particularly at intersections. Higher ambient lighting along urban arterials may neutralize some concerns regarding the effects of dynamic signs that otherwise exist on rural or suburban roads, where highway users can become lulled in inattention and then surprised by unexpected events.

Based on the literature review, design and operational characteristics of the digital sign were identified to minimize driver distraction and the potential for traffic safety hazards. The project is expected to be designed and operated to meet these characteristics to the extent feasible and therefore reduce the potential for traffic safety hazards associated with driver distraction.

[23] Oviedo-Trespalacios et al. (2019).

Attachment C

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MEMORANDUM

To:	Dave Rand Armbruster Goldsmith & Delvac LLP	Date:	September 23, 2020
From:	David S. Shender, P.E. Linscott, Law & Greenspan, Engineers	LLG Ref:	5-20-0518-1
Subject:	**Parking Study for the Proposed Residential Project at 12850 Crenshaw Boulevard** City of Gardena		

This memorandum has been prepared by Linscott, Law & Greenspan, Engineers (LLG) to provide a comprehensive parking study related to the proposed residential project at 12850 Crenshaw Boulevard in the City of Gardena ("the Project"). The Project proposes the development of 265 multi-family residential units. A total of 267 vehicle parking spaces are proposed to be provided on-site. A Specific Plan is proposed to regulate development at the Project site.

The Project site is located approximately two-thirds of a mile walking distance to the nearby Metro Green Line station. As such, the Project site is located adjacent to a Transit Priority Area[1] (TPA) as defined by the Southern California Association of Governments (SCAG). In addition, many of the Project residents are expected to be employed at nearby businesses, including the SpaceX facility located across El Segundo Boulevard from the Project site. The proposed Specific Plan includes a Transportation Demand Management (TDM) Plan. To reduce vehicular trips and on-site parking demands, the TDM Plan requires an exclusive 30-day pre-leasing period targeted for employees who work within a one-half mile radius of the Project Site (e.g., SpaceX).

The Specific Plan's proposes two development standards related to off-street parking that differ from the Gardena Municipal Code:

- Number of Parking Spaces Required (Section 18.40.040). The Project proposes to provide parking at a rate that differs from those defined by Section 18.40.040 of the Gardena Municipal Code. As the characteristics of the Specific Plan are unique to the Project, it is anticipated that parking demand will be less than the rates established by Section 18.40.040. The parking analysis has been prepared to evaluate the proposed parking for the Project using Specific Plan parking rates. Details of the parking demand analysis prepared for the Project are provided in a following section.

[1] A TPA is defined the area located within one-half mile of major transit stops, including an existing rail transit station.

- Size of Parking Spaces (Section 18.40.050). The Project proposes dimensions related to the parking area that differ from Section 18.40.050 of the Gardena Municipal Code. The width of the parcel on which the Project is located makes it impractical to provide parking lot dimensions that comply with the Gardena Municipal Code. The dimensions proposed for the Specific Plan, however, are consistent with parking design standards utilized by other jurisdictions and, therefore are considered to be safe and efficient as described in a following section.

Project Description

The Project consists of a residential development featuring 265 apartment units. A total of 267 vehicle parking spaces are proposed to be provided on-site. Specific components of the Project development plan are as follows:

- Residential with 265 units:
  - 95 Studio apartments
  - 132 1-bedroom units
  - 38 2-bedroom units

Specific Plan Parking Calculation

As previously noted, the Project is proposed to be developed as part of a Specific Plan and proposes off-street parking rates differing from those defined in the Municipal Code. For example, the Section 18.40.040 of the Gardena Municipal Code requires two parking spaces per each unit (i.e., studio units, 1-bedroom units, and 2-bedroom units). The Specific Plan proposes one parking space for each unit (i.e., studio units, 1-bedroom units, and 2-bedroom units). In addition to the 265 parking spaces for the residential units, the Project will provide two (2) additional parking spaces that would serve leasing, mail, and shared ride use (e.g., Uber/Lyft).[2]

Transportation Demand Management

The Specific Plan includes a TDM Plan to reduce single-occupant automobile travel and take advantage of the Project site's proximity to large employment centers, transit services, and bicycle and pedestrian facilities.

[2] It is noted that additional parking spaces would be available as-needed on-site for daytime use by other non-resident vehicles such as the on-site manager, maintenance/contractors, etc. because: 1) not every resident will choose to rent a parking space; and 2) parking spaces will be available during the day as some residents are at work or school.

TDM measures include the following:

Pre-Leasing for Area Employees. Residential units within the Specific Plan area shall be marketed exclusively for a thirty-day period to employees working within a one-mile radius of the development, before the units are offered for rent to the general public. The developer shall submit a pre-leasing marketing plan to the Director of Community Development for review and approval prior to issuance of a temporary certificate of occupancy. The developer must then demonstrate compliance with the approved thirty-day exclusive marketing plan prior to issuance of a final certificate of occupancy.

Transit Information. To ensure that residential tenants and guests are aware of transit options and TDM programs available to them, an information board or kiosk shall be posted in a central location within the Specific Plan area.

One-time Free Monthly Transit Pass. Given the Specific Plan area's location within walking distance (approximately two-thirds of a mile) to the Crenshaw Station, the developer shall offer future residents who commence a 12-month lease a one-time monthly Metro transit pass. These one-time monthly transit passes shall be offered to new residents for a 24-month period ("Free Pass Period") commencing after issuance of any temporary or final certificate of occupancy. The Developer shall demonstrate compliance with this requirement to the satisfaction of the Director of Community Development. In the event the Director of Community Development determines the developer failed to satisfy this requirement, the developer shall be given seven days to demonstrate compliance ("Cure Period"). In the event the developer fails to demonstrate compliance during the Cure Period, the City may extend the Free Pass Period by one week for each resident denied a Metro transit pass. This would encourage and help facilitate a culture of transit use by Project residents.

Unbundled Parking. The Specific Plan requires that the rent for a parking space at the Project be charged separate from the rent of the residential unit. This unbundling of the charge for a parking space brings visibility to the cost of vehicle ownership and allows residents to choose between renting a parking space or using a portion of these funds for other uses, such as purchasing a transit pass and/or maintaining a bicycle. Residents who choose to not rent a parking space must commit in their leases that they will not park a personal vehicle at the Project site or nearby area.

On-site Residential Bicycle Parking. The Specific Plan requires one (1) bicycle parking space per residential unit (located in secured facilities accessible only by residents). All bicycle parking shall be located in a safe, convenient location, encouraging the use of bicycle transportation by residents and residential guests.

Ride-Sharing Pick-Up/Drop-Off. A designated loading zone within the Specific Plan area shall be signed and distinguished (e.g., with paving and/or paint) so that it is utilized as pick-up and drop-off zones for ride-sharing services.

Transit Oriented Development Parking Demand Research

As previously noted, the Project proposes to provide off-street parking based on the rate established as part of a Specific Plan. It is anticipated that many of the Project's residents will be employed at nearby businesses and/or utilize transit options in the area, including the Metro Green Line. As stated above, the Specific Plan TDM Plan requires an exclusive 30-day pre-leasing period targeted for employees who work within a one-half mile radius of the Project Site (e.g., SpaceX employees). As this development is transit-oriented, a parking rate providing fewer spaces than those established in the Municipal Code is proposed. Parking demand research for Transit Oriented Developments ("TODs") was conducted as part of this parking review and is summarized in the following paragraphs.

TOD Letters in Support of Reduced Parking and TDM

LLG understands the City of Gardena will prepare a Draft Environmental Impact Report (Draft EIR) for the Specific Plan. In conjunction with the preparation of the Draft EIR, the City recently issued a Notice of Preparation to affected government agencies and nearby stakeholders. In response, the City has received two letters from government agencies in support of reduced parking for the Specific Plan based on the TOD aspect of the Project.

Caltrans submitted a letter in response to the NOP to the City[3] in support of the TOD nature of Project, including the statement, "Caltrans acknowledges and supports infill development that prioritizes nearby transit service, promotes active transportation, and provides a mixture of land uses that keep the goods and services people need in close proximity to where they work and live." Further the Caltrans letter supports reduced on-site parking for TOD projects including, "Caltrans still recommends reducing the total amount of parking whenever possible, as research on parking suggests that abundant parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transportation and active modes of transportation."

[3] Letter to John Signo, City of Gardena, signed by Miya Edmonson, IGR/CEQA Branch Chief of Caltrans, September 10, 2020.

In addition, the Los Angeles County Metropolitan Transportation Authority (Metro) also submitted a letter[4] to the City in response to the NOP. Within the letter, Metro states, "Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the *reduction or removal of minimum parking requirements* [emphasis added] and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand."

In summary, the Draft EIR NOP letters submitted to the City by Caltrans and Metro support reduced parking for the Specific Plan based on the TOD characteristics of the Project.

TOD Research

LLG conducted a review of studies related to parking demand and recommended parking ratios for residential TOD projects. Below is a summary of two recent studies relevant to the analysis of parking for the Project:

- City of Palo Alto Study. In 2018, the City of Palo Alto reviewed potential adjustments to its parking ratios for multi-family housing, including for market-rate residential projects. The City commissioned a parking study[5] which included parking utilization counts at existing market-rate residential sites. At the project located a half-mile from a Caltrain station, the peak parking demand rate was observed to be 0.79 spaces per unit. At an additional project located 1.2 miles from a Caltrain station, the peak parking demand rate was observed to be 1.0 spaces per unit. Accordingly, as the Project is located approximately two-thirds of a mile from a Green Line station, it is reasonable to foresee that the expected parking demand will likely fall between the 0.79 spaces and 1.0 spaces per unit observed in the Palo Alto study.

- BART TOD Guidelines. In May 2017, Bay Area Rapid Transit (BART) issued a study[6] providing suggested parking supply guidelines for residential projects constructed within a half-mile of its transit stations. The BART TOD guidelines recommend that agencies adopt no minimum parking requirements for residential projects located within a half-mile of transit stations, a maximum of one parking space per unit for residential projects that are a minimum of five stories in height, and 0.5 spaces per unit for projects that are a minimum of seven stories in height. The Project proposes to provide 5.5 levels of residential uses. Accordingly, the parking ratio recommendations in

[4] Letter to John Signo, City of Gardena, signed by Shine Ling, Manager, Transit Oriented Communities, Metro, September 18, 2020
[5] *City of Palo Alto Multi-Family Parking Demand Rates*, Fehr & Peers, April 2018.
[6] *BART Transit-Oriented Development Guidelines*, May 2017.

the BART document for residential projects are consistent with those provided in the proposed Specific Plan.

TOD Ordinances in Other Jurisdictions

Parking requirements at specific TOD projects, as well as jurisdictional requirements, were reviewed as part of this parking study. Many jurisdictions have recognized that residential projects in areas with high levels of transit service experience less parking demand as compared to developments in areas where nearly all travel is done by private automobile.

Table 1 provides a summary of residential parking requirements in TOD areas located in California. *Table 1* provides a breakdown of residential parking requirements for studio, 1-bedroom, and 2-bedroom units, as well as any residential guest parking rates, with a comparison to the Specific Plan residential parking rate.

Table 1
Residential Parking Examples from Other Jurisdictions

Project/Jurisdiction	Location	Minimum Parking Requirements			
		Studio	Bedroom	2-Bedroom	Guest Parking
Proposed Project					
Proposed Specific Plan	Gardena	1 sp/unit	1 sp/unit	1 sp/unit	0 sp/unit
Other Jurisdictions					
L.A. County Metro[7]	L.A County	0 sp/unit	0 sp/unit	0 sp/unit	0 sp/unit
Willowbrook TOD Plan	Los Angeles	.6 sp/unit	.9 sp/unit	1.2 sp/unit	.15 sp/unit
Vermont/Western TOD	Los Angeles	1 sp/unit	1 sp/unit	1 sp/unit	.25 sp/unit
San Diego TPA	San Diego	0 sp/unit	0 sp/unit	0 sp/unit	0 sp/unit
City of Oakland[8]	Oakland	1 sp/unit	1 sp/unit	1 sp/unit	0 sp/unit
City of Berkeley	Berkeley	1 sp/unit	1 sp/unit	1 sp/unit	0 sp/unit

[7] Per the Metro NOP letter, Metro suggests reduction or removal of minimum parking requirements for TOD projects.
[8] Parking rates apply Citywide except in Central Business District, Broadway Valdez District and Coliseum Area District which have reduced parking requirements for multi-family residential.

As shown in *Table 1*, the proposed Specific Plan provides a similar or greater parking rate for residential units as the other existing TOD plans/ordinances. The Willowbrook TOD Plan shown on *Table 1* was recently enacted by the County of Los Angeles. The plan area is located in the vicinity of the Willowbrook station along the Metro Green Line.

In summary, the residential parking rates proposed for the Project as part of the Specific Plan will result in a parking supply that will exceed the existing TOD plans and ordinances adopted by other agencies in California.

Parking Dimensions

The Specific Plan proposes parking space dimensions that vary from Section 18.40.050 of the Gardena Municipal Code. ***Table 2*** provides a comparison of the parking space dimensions required by the Gardena Municipal Code and the corresponding dimensions proposed in conjunction with the Specific Plan.

Table 2
Comparison of Parking Stall Dimensions
Gardena Municipal Code vs. Proposed Specific Plan

Issue Area[9]	Gardena Municipal Code (Section 18.40.050)	Proposed Specific Plan
Standard Parking Stall Dimensions[10]	9 x 18 feet	9 x 18 feet
Compact Parking Stall Dimensions	8 x 17 feet	9 x 16 feet
Drive Aisle Width	26 feet	24 feet
Proportion of Compact Spaces to Overall Number of Required Spaces	Up to 25%[11]	Up to 50%

[9] Based on 90-degree parking spaces
[10] Section 18.40.050 (B) of the Gardena Municipal Code stipulates that parking spaces adjacent to a wall or any obstruction shall have a minimum dimension of 10 feet by 20 feet. The Specific Plan proposes no additional adjustment to the standard and compact space dimensions.
[11] Section 18.40.050 (C) of the Gardena Municipal Code stipulates that compact parking spaces cannot be used to satisfy the required parking supply for residential uses. The Specific Plan proposes that compact spaces may be used to satisfy the required parking supply for residential uses.

The on-site parking garage proposed at the Project provides two "bays" of 90-degree parking spaces. That is, two two-way drive aisles with a row of 90-degree parking spaces located along each side of the both drive aisles. Each bay of parking is proposed to be 58 feet in width consisting of one row of compact spaces (16 feet in length) and one row of standard spaces (18 feet in length) separated by a two-way drive aisle (24 feet in width). In no circumstance will two rows of compact-sized parking spaces be provided within a single parking bay, except in the limited circumstances where a parking space in the row of standard-sized spaces is located adjacent to a wall or other obstruction (in which case it will be designated as a compact space).

Based on the Municipal Code parking dimension requirements (assuming standard size parking spaces), the overall width of the garage would need to be 124 feet: four rows of 90-degree parking spaces that are each 18 feet in length (72 feet overall) and two drive aisles that are 26 feet in width (52 feet overall). However, the existing width of the Project site parcel only permits construction of a parking garage that provides an overall width of 116 feet (i.e., eight feet less than the "standard" width of two bays of parking). Accordingly, the Specific Plan proposes adjustments to the Municipal Code parking dimensions as follows:

- Reduce the width of the drive aisle from 26 feet to 24 feet (resulting in a "savings" of four feet across the two bays of parking); and

- Provide two rows compact parking spaces (which are not permitted to satisfy required residential parking per the Municipal Code) and reduce the stall length from 18 feet to 16 feet (resulting in a "savings" of four feet).

Two additional adjustments to the Municipal Code parking dimensions are proposed based on the limited size of the Project site parcel:

- Allow up to 50% of the parking supply to be designated as compact spaces, instead of the maximum 25% of the supply of parking spaces that may be designated as compact spaces in the Municipal Code[12]; and

- Maintain the proposed parking stall length and width adjacent to walls and obstructions instead of adding additional length and width to the parking space dimensions per the Municipal Code.

[12] As currently designed, approximately 41.2% of the parking supply (110 of the proposed supply of 267 spaces) are proposed to be compact spaces. The Specific Plan provision for designating up to 50% of the parking supply as compact spaces allows for changes to the final parking layout that may be needed at the time of preparation of construction documents.

Justifications for the parking dimensions proposed under the Specific Plan are as follows:

- The proposed parking stall width and length, as well as the drive aisle width are consistent with or exceed the requirements of other jurisdictions. As noted, the Project proposes standard parking stall and compact parking stall dimensions that are 9 x 18 feet and 9 x 16 feet, respectively. In addition, a drive aisle width of 24 feet is proposed.

    - City of Los Angeles.[13] The parking stall dimensions proposed at the Project meet or exceed the minimum standard parking stall (8'-8" x 18 feet) and compact parking stall (7 x 15 feet) dimensions for the City of Los Angeles. In addition, for drive aisles, the City of Los Angeles requires 25'-4" adjacent to standard size stalls[14] and 20 feet adjacent to compact size stalls. The drive aisles proposed within the Project (24 feet) will closely match the City of Los Angeles requirement adjacent to standard size stalls and will exceed the requirement adjacent to compact size stalls by four feet.

    - County of Los Angeles.[15] The parking stall dimensions proposed at the Project exceed the County of Los Angeles minimum standard (8.5 feet) and compact (eight feet) parking width requirement. In addition, for drive aisles, the County requires 26 feet adjacent to standard size stalls and 23 feet adjacent to compact size stalls. The drive aisles proposed within the Project (24 feet) will closely match the County of Los Angeles requirement adjacent to standard size stalls and will exceed the requirement adjacent to compact size stalls by one foot.

- The Project characteristics allow for a deviation of typical parking dimension standards. The Project is a residential development and its vehicle parking area will be used almost exclusively by residents of the Project. Unlike other parking facilities, the parking area will be used by persons who are highly familiar with the layout of the garage. Further, the trip generation characteristics of residential projects are typically highly directional: outbound trips during the weekday morning commuter peak period and inbound trips during the weekday afternoon commuter peak period. Further, there is very little turnover of parking spaces during the course of a typical day. Thus, motorists driving through the garage will have little, if any conflict with other vehicles, including oncoming traffic.

[13] City of Los Angeles Ordinance No. 142306
[14] The City of Los Angeles requires a drive aisle width of 25'-4" adjacent to standard size parking spaces that are nine feet in width.
[15] County Code Section 22.112.080

- Vehicle characteristics support smaller parking spaces. The relatively higher proportion of parking spaces that are 16 feet in length can be provided without adverse impacts to vehicle circulation in the Project garage because vehicle dimensions are generally smaller as compared to prior years. Below is the vehicle length for the five highest selling vehicles in California in 2019[16]:

    - Honda Civic: 15'-3"
    - Tesla Model 3: 15'-5"
    - Honda Accord: 16'-0"
    - Toyota Camry: 16'-0"
    - Toyota RAV4: 15'-2"

    All of the vehicles listed above can be accommodated within the compact parking spaces that are proposed at the Project. Further, the proposal to provide a nine-foot width for the compact spaces at the Project (instead of the minimum eight-foot width for compact spaces permitted by the Gardena Municipal Code) ensures that motorists will be able to readily maneuver to and from the parking spaces with minimal delay. Therefore, the proposal in the Specific Plan to allow up to approximately 50% of the parking stalls at the Project to be designated as compact spaces will not adversely affect the safe and efficient flow of vehicle traffic through the garage. Further, the proposal to designate up to 50% of the parking stalls as compact parking spaces is similar to other jurisdictions, such as the previously referenced City of Los Angeles parking design standards which permit up to 40% of required parking spaces to be designated as compact parking stalls.

- Additional width is not required for parking spaces adjacent to walls or obstructions. The Specific Plan does not propose any additional or length for parking stalls adjacent to walls or obstructions within the Project's parking garage. As previously noted, all parking spaces (standard and compact) will be nine feet in width. This exceeds the City's required width for a compact parking space. Further, as previously noted, the trend in California for smaller-size vehicles, which can readily be accommodated within a nine-foot wide stall, even when located adjacent to a wall or obstruction. Finally, the Project proposes that any parking space adjacent to a wall or obstruction be designated as a compact space. No additional width is required for parking spaces located adjacent to walls or obstructions within the Project's parking garage.

[16] Source: https://www.edmunds.com/most-popular-cars/

Conclusions

Based on the Project's close proximity to employment centers and transit stations, including the Metro Green Line's Crenshaw Station, as well as research of existing parking demand rates and requirements at TOD projects, the 267 parking spaces will adequately serve the Project. In addition, the parking space dimensions as proposed within the Specific Plan will provide for the safe and efficient flow of vehicular traffic within the Project's parking garage.

cc: File

Richard Willson

Professor, Urban and Regional Planning

Expertise:

Transportation Planning, Parking Policy, Urban Planning, Climate Change Planning, Inland Empire Transportation, Traffic Congestion and Mitigation, Greenhouse Gas Emissions & Transportation, Professional Development

Richard Willson's research addresses parking policy, climate change planning, land/use transportation relationships, travel demand management, transit-oriented development, planning theory and professional development. The transportation and land use research links analytic insight on travel behavior with the broader context for transportation decision-making. It addresses parking policy, transit policy, and integrated land use and transportation planning. He consults with regional and local agencies, such as the Bay Area Rapid Transit District, local cities and developers of urban infill projects. Prior to his academic career, he was a transportation planner for the City of Los Angeles Community Redevelopment Agency. Willson is a Fellow of the American Institute of Certified Planners. His research has appeared in the *Journal of the American Planning Association*, *Transportation, Regional Science and Urban Economics*, and others.

Recent Grants and Fellowships:

- "AICP Training Program for Caltrans Employees," California State University San Bernardino William and Barbara Leonard University Transportation Center, $77,000, 2016
- "Incorporation of Greenhouse Gas Emission Reduction, Safety and Congestion Relief Considerations into Transportation Planning," Principal Investigator Wen Cheng, Cal Poly Pomona Strategic Interdisciplinary Research Grant, $13,000 (Willson $4,000), 2012
- "Travel Behavior of Residents of Transit-Oriented Development in the Inland Empire," California State University San Bernardino William and Barbara Leonard University Transportation Center, $50,000, 2009
- "Municipal GIS Practices for Transportation Planning in the Inland Empire," Principal Investigator: Dr. Michael Reibel, California State University San Bernardino University William and Barbara Leonard Transportation Center, $70,000 ($4,000 Willson), 2008

Selected Publications:

- "Being an Idealist in Difficult Times," *American Planning Association*, Aug. 23, 2020
- "A Day in the Life of a Parking Space: A New Metric for Parking Studies," *Transportation Research Record: Journal of the Transportation Research Board*, No. 2651, 2017
- *A Guide for the Idealist: Launching and Navigating Your Planning Career* (Ro*utledge, 2017)*
- *With A. Irish, "Dynamic Parking Pricing Evaluation: A Framework for Metrics," Transportation Research Record: Journal of the Transportation Research Board*, No.2543, 143-151, DOI 10.3141/2543, 17, 2016
- *Parking Management for Smart Growth* (Island Press 2015)
- *Parking Reform Made Easy* (Island Press 2013)
- Launching Your Planning Career: A Guide for Idealists," *org,* regular blog series

Interviews:

- "Why are Trader Joe's parking lots so small?" *KPCC Radio "Take Two,"* August 27, 2017
- "Why transit ridership decline on the Metro System," *CBS2 News at 6pm*, January
- 27, 2016
- "KCAL9 News at 9 p.m.," on the reasons for transit ridership decline on the Metro System, January 27, 2016
- "Is It Time to Reform LA Parking Fines?" KCRW Radio "*Which Way LA*.," June 17, 2014

- "Southern California not so sprawling after all," *Los Angeles Times*, Tim Logan reporter. April 2, 2014
- "Cities Cut Parking Mandates," *Wall Street Journal*, Kris Hudson reporter, July 9, 2013
- Interview with Steve Chiotakis, KCRW segment during "All Things Considered," about the proposed sale of the Los Angeles Dodgers without the parking facilities, February 24, 2012

Education:

B.E.S., Urban and Regional Planning, University of Waterloo (ON)
M. Urban and Regional Planning, University of Southern California and a Ph.D., Urban Planning, University of California

Attachment E

TECHNICAL MEMORANDUM

TO: Gregg McClain
Community Development Director
City of Gardena

FROM: Richard Wilson, Ph.D. FAICP[1]
Richard Wilson Consulting

SUBJECT: Parking Review of a Proposed TOD Residential Project at 12850 Crenshaw Boulevard, City of Gardena

DATE: March 30, 2021

Summary

The 12850 Crenshaw Boulevard (Proposed Project) transit-oriented development (TOD) represents a new form of development for the City of Gardena. Such developments require a different approach to parking than highway-oriented developments. TOD projects generally have lower household vehicle ownership that is based on a smaller share of auto-access trips. Furthermore, TOD sites allow for coordinated parking management and travel demand management (TDM) strategies that moderate parking demand and ensure efficient use of parking resources. Lastly, TOD parking requirements anticipate future transportation conditions that include increased use of shared mobility modes, and lower household vehicle ownership.

Many cities in Southern California are rethinking parking requirements for TODs. Indeed, there is a movement across the country to eliminate minimum parking requirements, city-wide or for specific land uses ("people over parking").[2]

This memo endorses the analysis developed in the Linscott Law & Greenspan (LLG) parking memorandum dated May 5, 2020. I am in agreement with the proposed parking supply of one space per unit and the minor changes to space size and aisle width standards.

The memo provides additional research-based evidence and precedents on TOD parking demand, and outlines Travel Demand Management (TDM) and parking management strategies considerations.

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[1] Richard Willson is professor in the Department of Urban and Regional Planning at Cal Poly Pomona and a consultant on parking and TOD. His academic research focuses on parking supply and management, and has resulted in dozens of journal articles and two books on parking (*Parking Reform Made Easy*, 2013 and *Parking Management for Smart Growth*, 2015). His research on transit-oriented development parking includes "Parking Policy for Transit-Oriented Development: Lessons for Cities, Transit Agencies, and Developers." *Journal of Public Transit*. (2005) 8,5: pp. 79-94.

[2] See *Strongtowns* map of cities implementing reforms. Accessed at https://www.strongtowns.org/parking

Project Description

The Proposed Project is a 265-unit residential development, comprised of 95 studio apartments, 132 1-bedroom apartments, and 38 2-bedroom apartments. The proposed parking supply is 267 spaces. An extensive TDM proposal is included in the LLG memorandum. The Proposed Project is within two-thirds of a mile of a Metro Green Line station.

12850 Crenshaw Boulevard's parking is provided in a structure that uses the site efficiently and support design features for active street frontage and a pedestrian-oriented place. Traditional suburban parking standards are not appropriate for the Proposed Project, given its transit and workforce housing orientation.

Parking Requirements

Across the U.S., there is a trend to eliminate minimum parking requirements. This leaves the decision of how much parking to build up to the developer, considering the intended market for their project. An early adopter of city-wide elimination is Buffalo NY. Evaluation studies showed that developers continued to build parking for their developments, but they did so in accordance with their understanding of the parking demand for the development, as shaped by transit access and context.

Cities are also eliminating parking minimums for particular uses. For example, Berkeley CA recently eliminated minimum parking requirements for most residential developments. Further, some cities eliminate parking requirements in particular districts. For example, City of Los Angeles planners recently proposed a plan and new zoning code that eliminates minimum parking requirements in downtown Los Angeles. In addition, San Diego eliminated minimum parking requirements for residential developments in transit priority areas and Santa Monica has eliminated parking requirements for all uses within its downtown.

Cities that have a tradition of highway-oriented development standards are taking a more incremental approach to reform, reducing parking requirements for their historic cores (e.g., Claremont Village Expansion). In other cases, cities approve variances to reflect the particular characteristics of the mixed-use downtown developments (e.g., City of Riverside).

The suggested parking requirements draw on best practice in parking requirements for TOD in newly developing transit-oriented areas. Four general principles apply to the 12850 Crenshaw Boulevard development parking proposal and program. These include:

1. *Establishing parking requirements for expected future conditions*. Household vehicle ownership is expected to decline in the future with improved transit, greater use of car sharing and shared mobility options, more walking and biking, and work-at-home trends.
2. *Recognizing project context*. This Proposed Project is within easy walk and bike access to nearby SpaceX and other employment. Furthermore, it creates a cluster with a similar housing being built on Crenshaw Boulevard in Hawthorne. Taken together, these developments will increase the market for walkable retail and services.

3. *Considering existing transit services and planned improvements, as well as active transportation use*. In this case, completion of the Crenshaw Line and downtown LA regional connector enhances the connectivity and usefulness of the existing Green Line to a wide range of destinations. Furthermore, communities across the SCAG regional are enhancing local bus service, creating bus rapid transit lines, and improving biking and walking facilities.
4. *Using active parking and travel demand management*. Unlike smaller residential developments, the Proposed Project is of a scale that allows for centralized parking management and development-wide TDM programs. Examples of parking management measures include parking space allocations in leases, regular monitoring of parking use, and coordination with the City regarding on-street parking regulations. While on-street parking is not permitted on Crenshaw Boulevard, district-wide parking management measures could be useful if the cluster of transit-adjacent development expands.

Justification for Residential Rates

The following provides justifications for reduced parking requirements for the Proposed Project.

Travel Mode Choice, Household Vehicle Ownership, and Parking Demand

Residential parking demand is a function of household vehicle ownership, which in turn is influenced by the need to use an automobile for major trip purposes such as getting to work. The American Community Survey (ACS) of the US Census collects information on the commute-to-work travel mode for each city. In 2018, Gardena residents' work trips included the follow non-solo driving shares: 10.6% carpool, 4.4% transit, 2.4% walk, and 0.5% bicycle.[3] These averages are for *all* workers in Gardena, regardless of housing tenure, housing type, and housing and work location. The Proposed Project will have higher levels of use for these alternative modes for the reasons described below, which in turn will lower the need to own and park a private vehicle. The follow summarizes the development's advantages for alternative travel modes:

- Carpool/vanpool/real-time ridematching: critical mass for ridematching is provided by the scale of development, supplemented by nearby TOD developments.
- Public transit: proximity to the Green Line and its connection to the regional rail system.
- Walk: proximity to jobs at SpaceX and other nearby employers, and walkable retail.
- Bicycle: the Laguna/Dominguez Trail bike path provides protected a north south bike lane, with the connections to the Green line station, shopping, and recreation.

In short, the site has natural advantages for travel other than driving alone, and these context advantages are reinforced by the planned travel demand programs, such as preleasing for local employees, unbundled parking, trial transit pass, bike parking, and ridesharing drop off/pick up points.

[3] Accessed at https://datausa.io/profile/geo/gardena-ca/#housing

Providing Options for Car-Free Living with Lower Rents

Parking for multifamily projects near rail transit follows a different model than those in traditional locations. Such developments offer new housing choices for those interested in walkable environments and rail transit connections. They provide a housing option for residents seeking lower levels of household vehicle ownership. Furthermore, social and demographic trends indicate a demand for housing with less parking among millennials, baby boomers looking to downsize, and others seeking sustainable and active lifestyles. Finally, these transit-rich areas are places where alternatives to private vehicle ownership prosper, such as transit, short-term vehicle rental, shared mobility services, bicycle lanes, microtransit, and private shuttles. The residential parking requirements reflect transit-orientation of the Proposed Project.

Supply in Relation to National Parking Standards and TOD Studies

The Institute of Transportation Engineers (ITE) assembles studies of parking occupancy for use in considering parking requirements. The 4th Edition of *Parking Generation* reports a peak occupancy rate for Low/Mid Rise Apartments (Land Use 221) for urban areas of 1.2 spaces occupied per unit (resident plus guest occupancy). This is the peak occupancy measured at the site, including resident and visitor demand. Because it is a national average, it predominantly represents sites that do not have light rail transit access, as the proposed site does.

Academic researchers are studying parking occupancy in TODs to see how it varies from traditional, highway-oriented developments. A study by Ewing et al (2017) measured peak residential parking occupancy at five TOD sites on the west coast of the US and found that peak demand, measured by occupied spaces per unit, was 0.87.[4]

Seen in this light, the Proposed Project's residential parking supply of 1.0 spaces per unit is a modest reduction from non-TOD national demand measurements and greater than actual peak occupancy measured in the five TODs studied by Ewing et al. I conclude that one space per unit is an appropriate rate given the factors noted above.

Travel Demand Management

TDM is the term for a group of programs that encourage arrival at a site by modes other than driving alone and lower vehicle ownership by residents. The LLG memorandum proposes an innovative set of TDM strategies that are appropriate to the site.

The unbundling provision deserves additional explanation. Unbundling is a practice in which the rent of the unit is separated from the rent for a parking space (or spaces). Households that do not have a vehicle to park benefit by paying a lower overall rent. Parking spaces freed up by those households can be rented to other households. This means that not every studio or 1-bedroom unit will rent parking space, and that residents of other units will be able to rent two spaces if they desire.

[4] Accessed at https://www.sciencedirect.com/science/article/pii/S0169204616302687

In the case of the Proposed Project, the proximity to SpaceX, plus the pre-leasing program, means that those employees are likely to represent a noticeable share of the residents. If those employees *do* own a car but walk to work at SpaceX, they may choose to leave their vehicle parked at the large SpaceX parking structure just down the street, walking to retrieve it for other trip purposes such as weekend excursions. The Proposed Project's unbundling provision creates an incentive for them to do this.

Parking Management

Parking management is a useful tool for efficiently using parking and avoiding parking conflicts. The concept is that the property manager anticipates, coordinates, and take actions to efficiently meet patterns of parking demand and ensure policies are implemented. Parking management ideas that are not mentioned in the LLG memorandum include the following:

- *Leasing provisions and terms.* The renting apartments would agree to terms and conditions regarding parking when they sign the lease, regarding registering household vehicles, unbundled parking, and provisions for leasing spaces.
- *Ongoing parking management coordination with city, adjacent property owners, and neighborhoods*. The property owner/manager could provide regular parking occupancy reports to the City of Gardena, and work in coordination city parking management personnel and adjacent property owners to develop parking management strategies.

Parking Dimensions

The parking space and aisle width dimensions supported by the LLG memorandum are consistent with parking design standards intended to efficiently use the building area devoted to parking. Site dimension constraints should be recognized, as proposed in the Proposed Project, otherwise desired housing production will be thwarted by space and aisle width dimensions.

Conclusion

The parking supply discussed in the LLG memorandum is a measured approach in the transition from traditional parking requirements to those focused on developing TOD communities. The proposed supply is focused on the future rather than historical patterns of parking. And importantly, they build on proven travel demand management and on-site parking management techniques. I endorse the proposed requirements, TDM measures, and space size proposals.

City of Gardena

Gardena City Council Meeting

AGENDA REPORT SUMMARY

Agenda Item No. 12.B
Section: DEPARTMENTAL ITEMS - COMMUNITY DEVELOPMENT
Meeting Date: April 27, 2021

TO: THE HONORABLE MAYOR AND MEMBERS OF THE GARDENA CITY COUNCIL

AGENDA TITLE: ORDINANCE NO. 1829, ADOPTING THE MOST RECENT VERSION OF THE LOS ANGELES COUNTY FIRE CODE AS SET FORTH IN TITLE 32 OF THE LOS ANGELES CODE BY REFERENCE.

COUNCIL ACTION REQUIRED:

Staff Recommendation: Introduce Ordinance and set hearing date for May 25, 2021.

RECOMMENDATION AND STAFF SUMMARY:

The California Fire Code was updated in 2019 as it is every three years. A city or county may make amendments to the State Fire Code each time it is updated upon finding that such changes or modifications are reasonably necessary because of local climatic, geologic, or topographic conditions. Los Angeles County has done that, and due to a 1999 voters' initiative, Gardena is required to adopt the most current version of the Los Angeles County Fire Code by reference. This ordinance updates the Gardena Municipal Code to adopt the 2019 Los Angeles County Fire Code, which includes and amends the 2019 California Fire Code, by reference.

FINANCIAL IMPACT/COST:

None.

ATTACHMENTS:

2019 adoption staff report.pdf
Ord. 1829 Fire Code 2019.pdf

APPROVED:



_____

Clint Osorio, City Manager

CITY COUNCIL MEETING
AGENDA STAFF REPORT

Agenda Item No. 12B
Department: Community Development
Meeting Date: April 27, 2021
Ordinance No. 1829

AGENDA TITLE:

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF GARDENA, CALIFORNIA, ADOPTING THE MOST RECENT VERSION OF THE LOS ANGELES COUNTY FIRE CODE AS SET FORTH IN TITLE 32 OF THE LOS ANGELES COUNTY CODE BY REFERENCE

RECOMMENDATION:

Staff respectfully recommends that Council introduce Ordinance No. 1829 and set a public hearing for May 25, 2021.

BACKGROUND:

The California Health and Safety Code requires that the City adopt the same building standards as those contained in the California Building Standards Code with the exception that the City may establish more restrictive building standards as reasonably necessary because of local climatic, geological, and/or topographic conditions. Health and Safety Code Section 18941.5 requires that all City amendments, together with the State Building Standards Code, become effective 180 days after the publication of the State Building Standards Code, or at a later date established by the Building Standards Commission (Commission). The Code went into effect on April 2, 2020, but the updated Code was never adopted by the City. Because the City contracts with the Los Angeles County Fire Department, the City is required to adopt the same Code as the County.

This ordinance adopts by reference, with certain changes and amendments, the 2019 California Fire Code, and adopts as Title 32, the Fire Code for the District. The ordinance includes specific building codes that are more stringent than those adopted by the State Fire Marshal as contained in the California Building Standards Code, and makes the required findings necessary due to local climatic, geological, and/or topographical conditions in Los Angeles County, including the City of Gardena. It is important to note that, no new fees have been established, nor have any fees been raised as a result of this proposed ordinance.

Because the Ordinance is being adopted by reference, there is a slightly different procedure required by State law. The Ordinance must first be introduced and then the City Council is required to set the public hearing at this meeting. Based on the notice requirements, the first available hearing date will be May 25, 2021.

IN CONCLUSION, Staff respectfully recommends that Council introduce Ordinance No. 1829 and set a public hearing for May 25, 2021.

Submitted by: Gregg McClain Date: 4/27/2021

Attachment
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ORDINANCE NO. 1829
AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF GARDENA, CALIFORNIA, ADOPTING THE MOST RECENT VERSION OF THE LOS ANGELES COUNTY FIRE CODE AS SET FORTH IN TITLE 32 OF THE LOS ANGELES COUNTY CODE BY REFERENCE

WHEREAS, California Health & Safety Code section 18901 et seq. provides that the Building Standards Commission shall adopt a California Building Standards Code ("CBSC") based on specified uniform codes with input from various State Departments; and

WHEREAS, the 2019 CBSC has been adopted and is codified in Title 24 of the California Code of Regulations and the 2019 California Fire Code is Part 9 thereof; and

WHEREAS, the 2019 California Fire Code has applied by default to the City since January 1, 2020; and

WHEREAS, California Health & Safety Code provides that a city or county may make changes in the provisions in the CBSC or upon finding that such changes or modifications are reasonably necessary because of local climatic, geologic, or topographic conditions; and

WHEREAS, due to an initiative measure passed by the voters in 1999, the City of Gardena is required to adopt the most current version of the Los Angeles County Fire Code by reference; and

WHEREAS, on March 10, 2020, the Los Angeles County Board of Supervisors adopted the revised Los Angeles County Fire Code which includes changes and amendments to the 2019 California Fire Code (Ordinance No. 2020-0014); and

WHEREAS, pursuant to Government Code section 50022.2, the City may adopt a code by reference; and

WHEREAS, County Ordinance No. 2020-0014 Includes a statement of reasons based on climatic, geological, and topographical conditions for amendments to the 2019 Fire Code; and

WHEREAS, the City Council of Gardena adopts the same justifications as the County for the amendments as set forth In Ordinance No. 2020-014; and

WHEREAS, the City Council of the City of Gardena introduced this Ordinance on April 27, 2021 and set a public hearing for May 25, 2021; and

WHEREAS, a duly noticed public hearing was held on May 25, 2021;

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF GARDENA, CALIFORNIA, DOES HEREBY ORDAIN AS FOLLOWS:

SECTION 1. Section 8.08.020 of the Gardena Municipal Code is hereby amended to read as follows:

Section 8.08.020. Los Angeles County Fire Code Version.

Pursuant to section 8.08.010, which requires the city to adopt the latest version of the Los Angeles County Fire Code by reference, the version of the Los Angeles County Fire Code for the city shall be the version of Title 32 of the Los Angeles County Code as set forth in Ordinance No. 2020-0014 adopted by the Los Angeles County Board of Supervisors on March 10, 2020.

SECTION 2. Severability. If any section, subsection, subdivision, paragraph, sentence, clause or phrase of this ordinance, or any part thereof is for any reason held to be unconstitutional, such decision shall not affect the validity of the remaining portion of the ordinance or any part thereof. The City Council hereby declares that it would have passed each section, subsection, subdivision, paragraph, sentence, clause or phrase thereof, irrespective of the fact that any one or more sections, subsections, subdivisions, paragraphs, sentences, clauses or phrases be declared unconstitutional.

SECTION 3. City Clerk Direction. The City Clerk shall certify to the passage of this ordinance and shall cause the same to be entered in the book of original ordinances of the City; shall make a minute passage and adoption thereof in the records of the meeting at which time the same is passed and adopted; and shall, within fifteen (15) days after the passage and adoption thereof, cause a summary of the ordinance to be published as required by law.

SECTION 4. A fully copy of the code which is adopted by reference herein shall be kept either in the City Clerk's office or in the office of the chief enforcement officer for the fire code during all such times as this ordinance is in effect.

SECTION 5. Effective Date. This ordinance shall not become effective or be in force until thirty days from and after the date of this adoption.

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Passed, approved, and adopted this 25th day of May, 2021

TASHA CERDA, Mayor

ATTEST:

MINA SEMENZA, City Clerk

APPROVED AS TO FORM:

LISA E. KRANITZ, Assistant City Attorney

City of Gardena

Gardena City Council Meeting

AGENDA REPORT SUMMARY

Agenda Item No. 15.A
Section: DEPARTMENTAL ITEMS - PUBLIC WORKS
Meeting Date: April 27, 2021

TO: THE HONORABLE MAYOR AND MEMBERS OF THE GARDENA CITY COUNCIL

AGENDA TITLE: RESOLUTION NO. 6504, APPROVING THE ENGINEER'S REPORT FOR THE GARDENA ARTESIA BOULEVARD LANDSCAPING ASSESSMENT DISTRICT FOR FISCAL YEAR 2021-2022, DECLARING ITS INTENTION TO LEVY AND COLLECT ASSESSMENTS UNDER THE GARDENA ARTESIA BOULEVARD LANDSCAPING ASSESSMENT DISTRICT FOR FISCAL YEAR 2021-2022, AND SETTING A TIME AND PLACE FOR HEARING PROTESTS IN RELATION THERETO (PUBLIC HEARING: MAY 25, 2021)

COUNCIL ACTION REQUIRED:
Staff Recommendation: Adopt Resolution No. 6504

RECOMMENDATION AND STAFF SUMMARY:

Staff respectfully recommends that Council adopt Resolution No. 6504 approving the Engineer's Report pursuant to the requirements of Resolution 6496, regarding the Gardena Artesia Boulevard Landscaping Assessment District for fiscal year 2021-2022, declaring its intention to levy and collect assessments under the Gardena Artesia Boulevard Landscaping Assessment District for the fiscal year 2021-2022, and appointing a time and place for hearing protests in relation thereto (Public Hearing: May 25, 2021).

Artesia Boulevard Landscaping Assessment District between Normandie Avenue and Dalton Avenue was established and commenced in fiscal year 1994-1995 and Artesia Boulevard Landscaping Assessment District between Denker Avenue and Western Avenue was established and commenced in fiscal year 2001-2002.

The assessment will pay for the servicing and maintenance costs of landscaping and appurtenant improvements within the median island on Artesia Boulevard between Western Avenue and Normandie Avenue.

FINANCIAL IMPACT/COST:
Budget Amount: $10,062 + $11,600 = $21,662
Funding Source: Assessment District

ATTACHMENTS:

Engineer's Report - Artesia 2021-2022.pdf
Resolution 6504.pdf

APPROVED:



_____

Clint Osorio, City Manager

CITY OF GARDENA

GARDENA ARTESIA BOULEVARD
LANDSCAPING ASSESSMENT DISTRICT

ENGINEER'S REPORT

2021-2022

March 22, 2021

CITY OF GARDENA

GARDENA ARTESIA BOULEVARD
LANDSCAPING ASSESSMENT DISTRICT

ENGINEER'S REPORT

2021-2022

Prepared according to the provisions of the Landscaping and Lighting Act of 1972, Sections 22500 through 22679 of the California Streets and Highways Code.

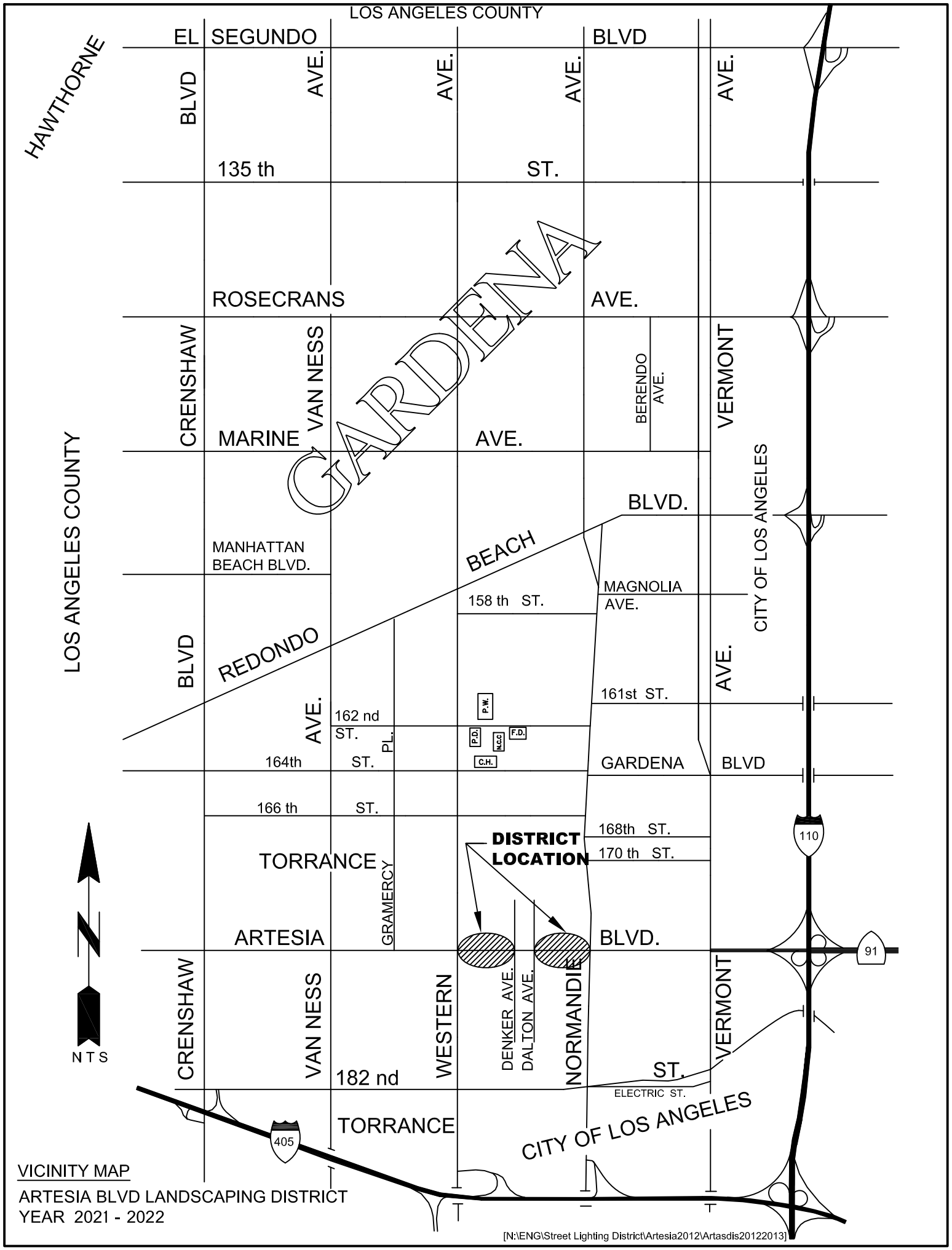
According to Part 2 of Division 15 of the Streets and Highways Code of the State of California, and as directed by resolution of the City Council of the City of Gardena, the City Engineer of the City of Gardena has prepared and submits the Engineer's Report consisting of the following:

1. Vicinity Map
2. Diagram of District
3. Plans and Specifications
4. Estimate of Costs of Maintenance
5. Assessment of Estimated Cost

This report is prepared by:

NV5, INC.

JEFFREY M. COOPER, P.E.
R.C.E. No. 31572
ENGINEER OF WORK
CITY OF GARDENA
STATE OF CALIFORNIA

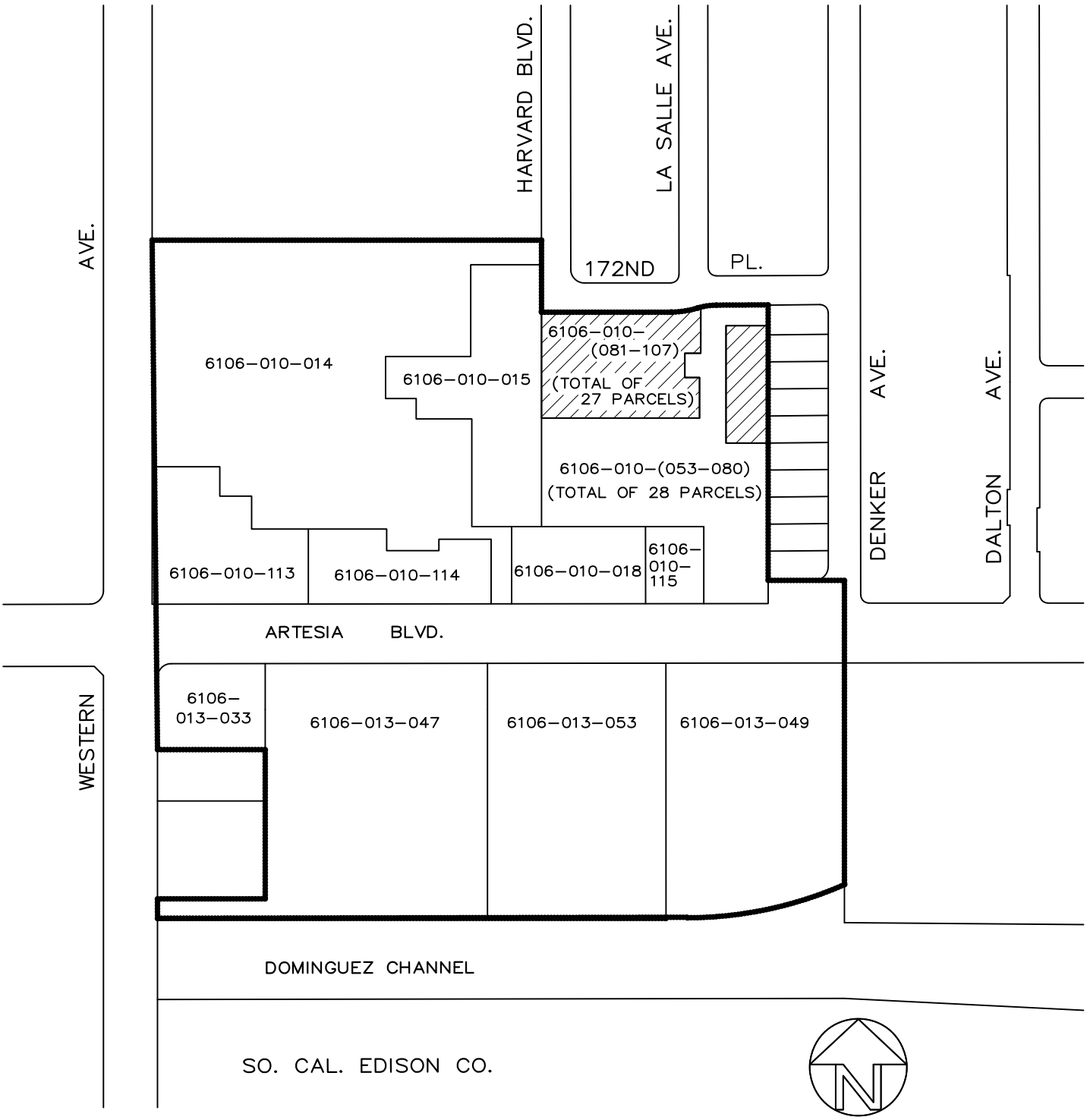


VICINITY MAP

ARTESIA BLVD LANDSCAPING DISTRICT
YEAR 2021 - 2022

[N:\ENG\Street Lighting District\Artesia2012\Artasdis20122013]

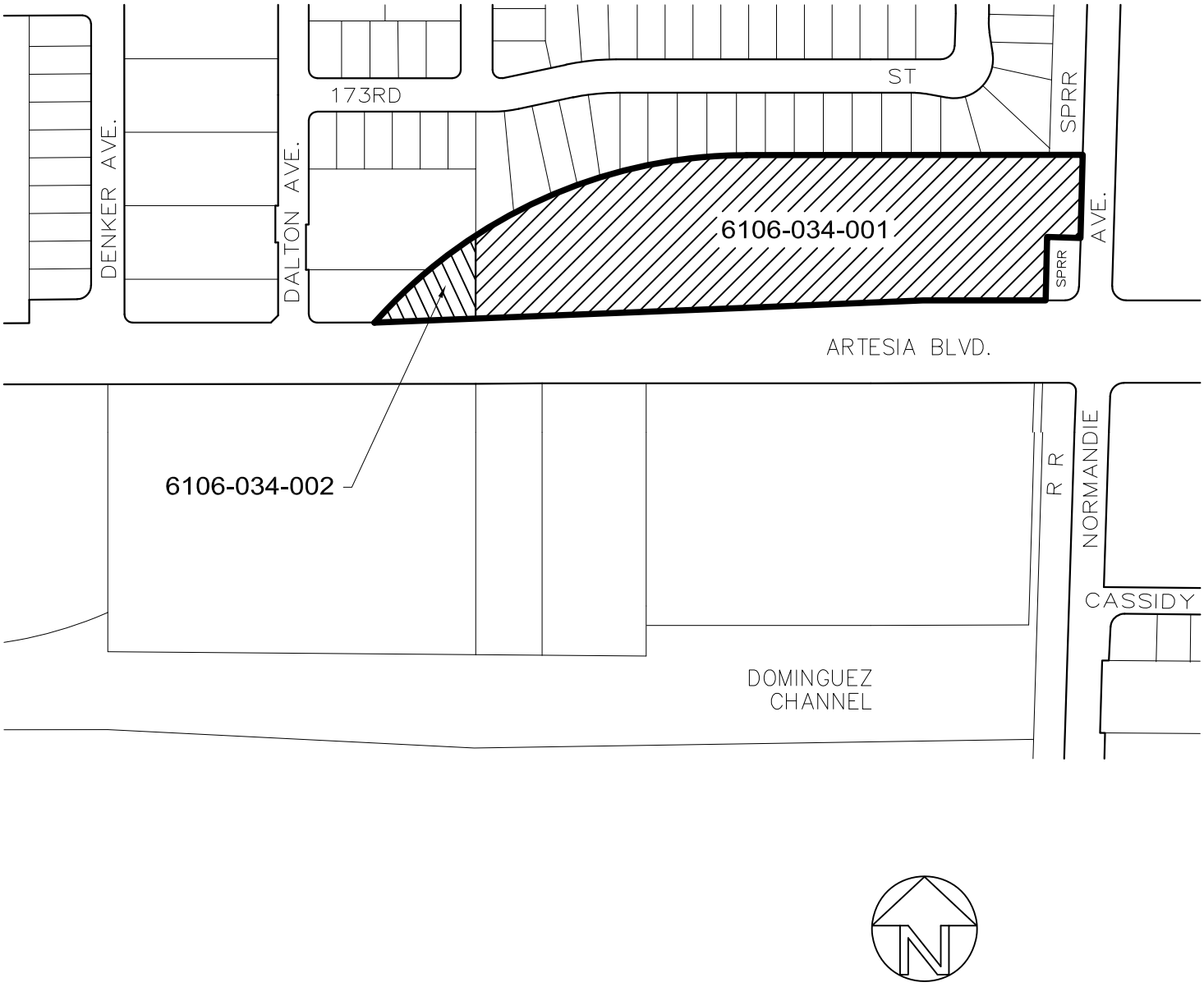
ASSESSMENT DIAGRAM & BOUNDARY MAP
ARTESIA BOULEVARD LANDSCAPING ASSESSMENT DISTRICT
WESTERN AVE. - DENKER AVE.
FISCAL YEAR 2021 - 2022



CITY OF GARDENA

ENGINEERING DIVISION

ASSESSMENT DIAGRAM & BOUNDARY MAP
ARTESIA BOULEVARD LANDSCAPING ASSESSMENT DISTRICT
DALTON AVE. - NORMANDIE AVE.
FISCAL YEAR 2021 - 2022



CITY OF GARDENA ENGINEERING DIVISION

PLANS AND SPECIFICATIONS 2021-2022

Plans and specifications for the improvements provided by the Gardena Artesia Boulevard Landscaping Assessment District are on file in the office of the Public Works Director/City Engineer and incorporated into this report by reference. The plans detail the improvement on Artesia Boulevard between Western Avenue and Denker Avenue, and between Dalton Avenue and Normandie Avenue. The improvements are the construction, servicing and maintenance of landscaping and appurtenant improvements within the median islands on Artesia Boulevard between Western Avenue and Denker Avenue, and between Dalton Avenue and Normandie Avenue. The maintenance and servicing for the improvements include, but are not limited to, personnel, electrical energy, and utilities such as water, materials, contracting services, and other items necessary for the satisfactory servicing and maintenance of these services.

ESTIMATE OF COSTS OF MAINTENANCE AND SERVICING

The cost of the maintenance and servicing of the improvement was determined by the costs of the annual contractual services for the landscaped median, including personnel, electrical energy, and utilities such as water, materials, and other items necessary for the satisfactory servicing and maintenance of the landscaped median.

ESTIMATE OF COST
WESTERN AVENUE - DENKER AVENUE
FY 2021-2022

The 1972 Act provides that the total cost of the maintenance and services, together with incidental expenses, may be financed from the assessments proceeds. The incidental expenses may include engineering fees, legal fees, printing, mailing, postage, publishing, and all other related costs identified with the district proceedings.

Item	Description	Estimated Costs	Prorated Incidental Costs	Estimated Total Costs
A.	Landscaping Construction, Western to Denker	$63,643		
	Additional Median Design	$ 3,600		$76,791
	Construction Mgmt Costs @ 15%	$ 9,548		
B.	1st Annual Payment @ 7% Interest over 5 years	$18,728	$26,138	$44,866
C.	Annual Landscape Maintenance, Western to Denker	$ 4,200	$ 5,862	$10,062
		$99,719	$32,000	$131,719

Items A and B are shown for reference only. Item C is the annual landscape maintenance on Artesia Blvd. between Western Ave. and Denker Ave. in the amount of $10,062.

The 1972 Act requires that a special fund be set-up for the revenues and expenditures of the District. Funds raised by assessment shall be used only for the purpose as stated herein. The City may advance funds to the District, if needed, to ensure adequate cash flow, and will be reimbursed for any such advances upon receipt of assessments. Any surplus or deficit remaining on July 1 must be carried over to the next fiscal year.

CITY OF GARDENA
ARTESIA BLVD.
LANDSCAPING
ASSESSMENT DISTRICT
FISCAL YEAR 2021-2022

CALCULATION OF ASSESSMENT

Western Ave. - Denker Ave.

ASSESSOR'S PARCEL NUMBER	ACREAGE	ASSESSMENT
6106010014	6.430	$1,909.00
6106010015	1.300	$386.00
6106010018	0.875	$260.00
6106010053	0.096	$28.42
6106010054	0.096	$28.42
6106010055	0.096	$28.42
6106010056	0.096	$28.42
6106010057	0.096	$28.42
6106010058	0.096	$28.42
6106010059	0.096	$28.42
6106010060	0.096	$28.42
6106010061	0.096	$28.42
6106010062	0.096	$28.42
6106010063	0.096	$28.42
6106010064	0.096	$28.42
6106010065	0.096	$28.42
6106010066	0.096	$28.42
6106010067	0.096	$28.42
6106010068	0.096	$28.42
6106010069	0.096	$28.42
6106010070	0.096	$28.42
6106010071	0.096	$28.42
6106010072	0.096	$28.42
6106010073	0.096	$28.42
6106010074	0.096	$28.42
6106010075	0.096	$28.42
6106010076	0.096	$28.42
6106010077	0.096	$28.42
6106010078	0.096	$28.42
6106010079	0.096	$28.42
6106010080	0.096	$28.42
6106010081	0.096	$28.42
	SUB-TOTAL	$3,379.18

CITY OF GARDENA
ARTESIA BLVD.
LANDSCAPING
ASSESSMENT DISTRICT
FISCAL YEAR 2021-2022

CALCULATION OF ASSESSMENT

Western Ave. - Denker Ave.

ASSESSOR'S PARCEL NUMBER	ACREAGE	ASSESSMENT
6106010082	0.096	$28.42
6106010083	0.096	$28.42
6106010084	0.096	$28.42
6106010085	0.096	$28.42
6106010086	0.096	$28.42
6106010087	0.096	$28.42
6106010088	0.096	$28.42
6106010089	0.096	$28.42
6106010090	0.096	$28.42
6106010091	0.096	$28.42
6106010092	0.096	$28.42
6106010093	0.096	$28.42
6106010094	0.096	$28.42
6106010095	0.096	$28.42
6106010096	0.096	$28.42
6106010097	0.096	$28.42
6106010098	0.096	$28.42
6106010099	0.096	$28.42
6106010100	0.096	$28.42
6106010101	0.096	$28.42
6106010102	0.096	$28.42
6106010103	0.096	$28.42
6106010104	0.096	$28.42
6106010105	0.096	$28.42
6106010106	0.096	$28.42
6106010107	0.096	$28.42
6106010113	0.854	$253.45
6106010114	0.917	$272.55
6106010115	0.384	$113.68
	SUB-TOTAL	$1,378.60

CITY OF GARDENA

ARTESIA BLVD. LANDSCAPING
ASSESSMENT DISTRICT

FISCAL YEAR 2021-2022

CALCULATION OF ASSESSMENT
Western Ave. - Denker Ave.

ASSESSOR'S PARCEL NUMBER	FRONTAGE	ASSESSMENT
6106013033	199.000	$831.00
6106013047	411.000	$1,717.00
6106013049	330.000	$1,378.00
6106013053	330.000	$1,378.00
	SUB-TOTAL	$5,304.00
	GRAND TOTAL	$10,061.78

ESTIMATE OF COST
DALTON AVENUE - NORMANDIE AVENUE
FY 2021-2022

The estimated cost of the construction, operation, servicing and maintenance of the improvements are summarized below. Only construction costs for median landscaping between Normandie Avenue and Dalton Avenue have been included. All costs include administration and utilities where applicable.

A.	Median Landscaping Construction (see details next page)	$ 127,400
	+ Contingencies (±10%)	12,700
	City Administration	10,000
		$ 150,100
B.	Median Landscaping Maintenance	$ 11,600

Item A is shown for reference only. Item B is the annual landscape maintenance on Artesia Blvd. between Dalton Ave and Normandie Ave in the amount of $11,600.

The 1972 Act requires that a special fund be set-up for the revenues and expenditures of the District. Funds raised by assessment shall be used only for the purpose as stated herein. A contribution to the District by the City may be made to reduce assessments, as the City Council deems appropriate. Any balance or deficit remaining on July 1 must be carried over to the next fiscal year.

CITY OF GARDENA
ARTESIA BLVD. LANDSCAPING
ASSESSMENT DISTRICT
FISCAL YEAR 2021-2022
ACCT. # 152.53

CALCULATION OF ASSESSMENT

Dalton Avenue - Normandie Avenue

ASSESSOR'S PARCEL NUMBER		FRONTAGE (FT)	ASSESSMENT
6106-034-001		1028.46	$9,897.00
6106-034-002		176.94	$1,703.00
	TOTAL	1205.40	$11,600.00

RESOLUTION NO. 6504

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF GARDENA, CALIFORNIA, APPROVING THE ENGINEER'S REPORT FOR THE GARDENA ARTESIA BOULEVARD LANDSCAPING ASSESSMENT DISTRICT FOR FISCAL YEAR 2021-2022, DECLARING ITS INTENTION TO LEVY AND COLLECT ASSESSMENTS UNDER THE GARDENA ARTESIA BOULEVARD LANDSCAPING ASSESSMENT DISTRICT FOR THE FISCAL YEAR 2021-2022, AND SETTING A TIME AND PLACE FOR HEARING PROTESTS IN RELATION THERETO (PUBLIC HEARING: May 25, 2021)

WHEREAS, the City of Gardena, California, previously established the Gardena Artesia Boulevard Landscaping Assessment District; and

WHEREAS, on March 9, 2021, the City Council of the City of Gardena, California, adopted Resolution No. 6496 that requires City Council to direct the City Manager to order Engineering Staff to prepare and file a report according to the provisions of the "Landscaping and Lighting Act of 1972" of the State of California Streets and Highways Code, Division 15, Part 2, for assessments to be levied upon and collected through the Gardena Artesia Boulevard Landscaping Assessment District for fiscal year 2021-2022; and

WHEREAS, the Engineer's Report bearing the date of March 22, 2021, was prepared and was filed in the office of the City Clerk; and

WHEREAS, the City Clerk has presented the Engineer's Report to the City Council, and said Council has examined and considered the Engineer's Report and is satisfied with all the items contained in Engineer's Report; and

WHEREAS, the City Council of the City of Gardena, California, proposes to levy and collect annual assessments according to the "Landscaping and Lighting Act of

1972" of the State of California Streets and Highways Code, Division 15, Part 2, for Fiscal Year 2021-2022;

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF GARDENA, CALIFORNIA, DOES HEREBY RESOLVE, AS FOLLOWS:

SECTION 1. That the Engineer's Report bearing the date of March 22, 2021, was prepared and filed with the City Clerk in conformity with the provisions of the State of California Streets and Highways Code, Division 15, Part 2, Landscaping and Lighting Act of 1972. The Engineer's Report contains the plans and specifications for the maintenance of the improvements, an estimate of the costs of the maintenance and servicing, a diagram for the assessment district and an assessment of the estimated costs of the maintenance and servicing of the improvements.

SECTION 2. The City Council approves the Engineer's Report as filed and sets a public hearing for Tuesday, May 25, 2021, at 7:30 p.m., in the Gardena City Council Chambers, 1700 West 162nd Street, in the City of Gardena, California, to consider the levy and collection of the assessment for the Gardena Artesia Boulevard Landscaping Assessment District for Fiscal Year 2021-2022.

SECTION 3. The City Clerk or designee is authorized and directed to give notice of the hearing in time, form, and manner as required by the California Streets and Highways Code, Division 15, Part 2, Landscaping and Lighting Act of 1972.

SECTION 4. That the City Council declares its intention to levy upon and collect assessments at the same rate as previously established through the Gardena Artesia Boulevard Landscaping Assessment District for Fiscal Year 2021-2022, except that no assessments shall be imposed upon property owned by the state or federal government or any local agency.

SECTION 5. That the boundaries of the Gardena Artesia Boulevard Landscaping Assessment District are as shown and described in the attached map and incorporated by reference.

SECTION 6. That the purposes of the District are those provided for in the Engineer's Report on file with the City Clerk.

SECTION 7. That this resolution shall take effect immediately.

BE IT FURTHER RESOLVED that the City Clerk shall certify to the passage and adoption of this Resolution; shall cause the same to be entered among the original Resolutions of said City; and shall make a minute of the passage and adoption thereof in the records of the proceedings of the City Council of said City in the minutes of the meeting at which the same is passed and adopted.

Passed, approved, and adopted this _____ day of _____, 2021.

_____
TASHA CERDA, Mayor

ATTEST:

_____
MINA SEMENZA, City Clerk

APPROVED AS TO FORM:

_____
CARMEN VASQUEZ, City Attorney

City of Gardena

Gardena City Council Meeting

AGENDA REPORT SUMMARY

Agenda Item No. 15.B
Section: DEPARTMENTAL ITEMS - PUBLIC WORKS
Meeting Date: April 27, 2021

TO: THE HONORABLE MAYOR AND MEMBERS OF THE GARDENA CITY COUNCIL

AGENDA TITLE: RESOLUTION NO. 6505, APPROVING THE ENGINEER'S REPORT FOR THE GARDENA CONSOLIDATED STREET LIGHTING ASSESSMENT DISTRICT FOR FISCAL YEAR 2021-2022, DECLARING ITS INTENTION TO LEVY AND COLLECT ASSESSMENTS UNDER THE GARDENA CONSOLIDATED STREET LIGHTING DISTRICT FOR FISCAL YEAR 2021-2022, AND SETTING A TIME AND PLACE FOR HEARING PROTESTS IN RELATION THERETO (PUBLIC HEARING: MAY 25, 2021)

COUNCIL ACTION REQUIRED:

Staff Recommendation: Adopt Resolution No. 6505

RECOMMENDATION AND STAFF SUMMARY:

Staff respectfully recommends that Council adopt Resolution No. 6505 approving the Engineer's Report for the Gardena Consolidated Street Lighting Assessment District for fiscal year 2021-2022, declaring its intention to levy and collect assessments for fiscal year 2021-2022 and setting at time and place for a Public Hearing thereon (Public Hearing: May 25, 2021).

On July 28, 2009, the City Council approved and confirmed an increase in the assessment of the City of Gardena's Consolidated Street Lighting District through Proposition 218 proceedings, and as described in the attached Engineer's Report.

The Consolidated Street Lighting District pays for all energy costs, construction and maintenance costs of the street lighting.

FINANCIAL IMPACT/COST:

Budget Amount: $778,181
Funding Source: Assessment District

ATTACHMENTS:

Resolution 6505.pdf
Consolidated SLD Enginer's Report 2021-20221.pdf

APPROVED:



_____

Clint Osorio, City Manager

RESOLUTION NO. 6505

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF GARDENA, CALIFORNIA, APPROVING THE ENGINEER'S REPORT FOR THE GARDENA CONSOLIDATED STREET LIGHTING ASSESSMENT DISTRICT FOR FISCAL YEAR 2021-2022, DECLARING ITS INTENTION TO LEVY AND COLLECT ASSESSMENTS UNDER THE GARDENA CONSOLIDATED STREET LIGHTING ASSESSMENT DISTRICT FOR FISCAL YEAR 2021-2022 AND SETTING A TIME AND PLACE FOR HEARING PROTESTS IN RELATION THERETO (PUBLIC HEARING: May 25, 2021)

WHEREAS, the City of Gardena, California previously established the Gardena Consolidated Street Lighting Assessment District; and

WHEREAS, on March 9, 2021, the City Council of the City of Gardena, California, adopted Resolution No. 6497 that requires City Council to direct the City Manager to order Engineering Staff to prepare and file a report according to the provisions of the "Landscaping and Lighting Act of 1972" of the California Streets and Highways Code, Division 15, Part 2, for assessments to be levied upon and collected through the Gardena Consolidated Street Lighting Assessment District for fiscal year 2021-2022; and

WHEREAS, the Engineer's Report bearing the date of March 22, 2021, was prepared and filed with the City Clerk in conformity with the provisions of the California Streets and Highways Code, and contains an estimate of the revenues and costs of the improvements, a diagram for the assessment district, and an assessment of the estimated revenues and costs of the improvements; and

WHEREAS, the City Clerk has presented the Engineer's Report to the City Council, and said Council has examined and considered the Engineer's Report and is satisfied with all the items contained in Engineer's Report; and

WHEREAS, the Engineer's report further identifies the need for an annual cost of living adjustment for Fiscal Year 2021-2022 in order to meet that year's costs of operations and maintenance, said adjustment to be made in an amount not to exceed the annual increase over the previous year in the All Items Consumer Price Index (CPI) in the Los Angeles-Long Beach-Anaheim, CA area; and

WHEREAS, the proposed assessment and the cost of living increase was authorized in fiscal year 2009-2010 through an assessment ballot (Prop. 218) proceeding by mailed ballots in accordance with Section 53753 of the Government Code and Section 4000 of the Elections Code;

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF GARDENA, CALIFORNIA, DOES HEREBY RESOLVE, AS FOLLOWS:

SECTION 1. The Engineer's Report bearing the date of March 22, 2021, was prepared and filed with the City Clerk in conformity with the provisions of the California Streets and Highways Code, Division 15, Part 2, Landscaping and Lighting Act of 1972.

SECTION 2. The City Council approves the Engineer's Report as filed and sets a public hearing for Tuesday, May 25, 2021 at 7:30 p.m. in the Gardena Council Chambers, 1700 West 162nd Street, in the City of Gardena, California to consider the levy and collection of the assessment for the Gardena Consolidated Street Lighting Assessment District for Fiscal Year 2021-2022 inclusive of an annual cost of living adjustment of 0.9%

SECTION 3. The City Clerk or designee is authorized and directed to give notice of the hearing in time, form and manner as required by the California Streets and Highways Code, Division 15, Part 2, Landscaping and Lighting Act of 1972.

SECTION 4. That this resolution shall take effect immediately.

BE IT FURTHER RESOLVED that the City Clerk shall certify to the passage and adoption of this Resolution; shall cause the same to be entered among the original Resolutions of said City; and shall make a minute of the passage and adoption thereof in the records of the proceedings of the City Council of said City in the minutes of the meeting at which the same is passed and adopted.

Passed, approved and adopted this _____ day of _____, 2021.

_____
TASHA CERDA, Mayor

ATTEST:

_____
MINA SEMENZA, City Clerk

APPROVED AS TO FORM:

_____
CARMEN VASQUEZ, City Attorney

CITY OF GARDENA

CONSOLIDATED STREET LIGHTING ASSESSMENT DISTRICT

ENGINEER'S REPORT

2021-2022

March 22, 2021

ENGINEER'S REPORT

CITY OF GARDENA
CONSOLIDATED STREET LIGHTING DISTRICT

FISCAL YEAR 2021-2022

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ENGINEER'S REPORT

CITY OF GARDENA
CONSOLIDATED STREET LIGHTING ASSESSMENT DISTRICT

FISCAL YEAR 2021-2022

The undersigned acting on behalf of the City of Gardena, respectfully submits the enclosed Engineer's Report as directed by the Gardena City Council pursuant to the provisions of Article XIIID, Section 4 of the California Constitution, provisions of the Landscaping and Lighting Act of 1972, and Section 22500 et al of the California Streets and Highways Code. The undersigned certifies that he is a Professional Engineer, registered in the State of California.

DATED:

03/22/2021

BY: Jeffrey M. Cooper, P.E.

P.E. No. 31572

I HEREBY CERTIFY that the enclosed Engineer's Report, together with Assessment Roll and Assessment Diagram was filed with me on the_____day of_____, 2021.

Mina Semenza, City Clerk
City of Gardena, Los Angeles County, California

By:

I HEREBY CERTIFY that the enclosed Engineer's Report, together with Assessment Roll and Assessment Diagram was approved and confirmed by the City Council of the City of Gardena, Los Angeles, California, on the _____day of _____, 2021.

Mina Semenza, City Clerk, City of Gardena, Los Angeles County, California

By:

DEFINITION & GENERAL INFORMATION

Assessment District

An Assessment District is a financing mechanism under The California Streets and Highways Code, Division 10 and 12, which enables cities, counties, and special districts organized for the purpose of aiding in the development or improvement to, or within the district, to designate specific areas as Assessment Districts, with the approval of a majority of the landowners based on financial obligations, and allows these Districts to collect funds to finance maintenance efforts or construct improvements. Assessment Districts help each property owner pay a fair share of the costs of such improvements or maintenance obligations over a period of years at reasonable rates and insures that the cost will be spread to all properties that receive direct and special benefit by the improvements constructed or maintained. "Assessment" means any levy or charge by an agency upon real property that is based upon the special benefit conferred upon the real property by a public improvement or service that is imposed to pay the capital cost of the public improvement, the maintenance and operation expenses of the public improvement, or the cost of the service being provided. "Assessment" includes, but is not limited to, "Special Assessment," "Benefit Assessment," and "Maintenance Assessment."

Current Annual Administration

As required by the Landscaping and Lighting Act of 1972, this Engineer's Report describes the improvements to be operated, maintained, and serviced by the District, provides an estimated budget for the District, describes the properties and zones of benefit within the District, describes the method used to allocate the costs to the benefiting properties within the District, and lists the proposed assessments to be levied upon each assessable lot or parcel within the District.

Plans and specifications for the improvements provided by the District are on file in the office of the Public Works Engineering Division and are incorporated into this report by reference. The plans and specifications detail the location, class and type of each existing street lighting fixture. The fixtures are delineated on a plan of the City and the site of each fixture is detailed indicating attributes of the fixture. The attributes include the intensity of the lamp and type of light. A summary is also incorporated listing the number and totals for each type of luminaries.

Payment of the assessment is placed on each property owner's secured property tax roll bill. All funds collected through the assessment must be placed in a special fund and can only be used for the purposes stated in this report.

ENGINEER'S REPORT PREPARED PURSUANT TO THE PROVISIONS OF THE
LANDSCAPING AND LIGHTING ACT OF 1972
SECTION 22500 THROUGH 22679
OF THE CALIFORNIA STREETS AND HIGHWAYS CODE

Pursuant to Part 2 of Division 15 of the Streets and Highways Code of the State of California, and in accordance with the Resolution of Initiation adopted by the Council of the City of Gardena, County of Los Angles, State of California, in connection with the proceedings for:

CITY OF GARDENA
CONSOLIDATED STREET LIGHTING ASSESSMENT DISTRICT

Herein after referred to as the "Assessment District" or "District", I, Jeffrey M. Cooper, P.E., the duly appointed ENGINEER OF WORK, submit herewith the "Report" consisting of six (6) parts as follows:

PART A: DESCRIPTION OF IMPROVEMENTS

Part A describes the improvements in the District. Plans and specifications for the improvements showing and describing the general nature, location, and extent of the improvements are on file in the Office of the City Clerk of the City of Gardena; and are incorporated herein by reference.

PART B: ESTIMATE OF COST

Part B contains an estimate of the cost of the proposed improvements for FY 2021-2022, including incidental costs and expenses in connection therewith.

PART C: ASSESSMENT DISTRICT DIAGRAM

The Diagram of the Assessment District Boundaries showing the exterior boundaries of the Assessment District, the boundaries of any zones within the Assessment District, and the lines and dimensions of each lot or parcel of land within the Assessment District.

The lines and dimensions of each lot or parcel within the Assessment District are those lines and dimensions shown on the maps of the Assessor of the County of Los Angeles for the year when this Report was prepared. The Assessor's maps and records are incorporated by reference herein and made part of this Report.

PART D: METHOD OF APPORTIONMENT OF ASSESSMENTS

The method of apportionment of assessments, indicating the proposed assessment of the total amount of the costs and expenses of the improvements upon the several lots and parcels of land within the Assessment District, in proportion to the estimated benefits to be received by such lots and parcels.

PART E: PROPERTY OWNER LIST & ASSESSMENT ROLL

Part E includes a list of the names and addresses of the owners of real property within the Assessment District, as shown on the last equalized roll of the Assessor of the County of Los Angeles are included in Part E. The list is keyed to the records of the County Assessor of the County of Los Angeles, which are incorporated herein by reference.

PART F: FINANCIAL STUDY AND PROPOSED RATE INCREASE

Part F includes the Financial Study performed for fiscal year 2021-2022 of the base year. This section includes detailed information regarding the proposed rate increase for the District for the fiscal year and provides estimates for future years.

PART A

DESCRIPTION OF IMPROVEMENTS

The facilities, which have been constructed within the boundaries of the City of Gardena District, and those which may be subsequently constructed, will be operated, maintained and serviced as generally described as follows:

DESCRIPTION OF IMPROVEMENTS
FISCAL YEAR 2021-2022

CITY OF GARDENA
CONSOLIDATED STREET LIGHTING ASSESSMENT DISTRICT

The facilities to be maintained and serviced include an annexed area called the West Gardena area in 1995. The costs for the street lighting were paid through the County of Los Angeles by an ad valorem tax and assessment. The lighting costs were transferred to the City of Gardena in 1997 after the removal of the County Lighting District and Assessment District. The ad valorem tax charge of the County for lighting was also transferred to the City of Gardena to fund the lighting costs in this area in 1997. The plans for lighting reflect the addition of the new lighting.

The plans and specifications for the improvements, showing and describing the general nature, location and the extent of the improvements, are on file in the office of Public Works, and are incorporated herein by reference.

PART B

ESTIMATE OF COST

The 1972 Act provides that the total cost of installation, construction, operation, maintenance and servicing of the improvements described in Part A can be recovered by the District. Maintenance can include the repair and replacement of existing facilities. Servicing can include electrical and associated costs from a public utility. Incidental expenses, including administration of the District, engineering fees, legal fees, printing, posting and mailing of notices, and all other costs associated with the annual assessment process can also be included.

The estimated costs of the operation, servicing and maintenance of the improvements for Fiscal Year 2021-2022, as described in Part A, are summarized herein, and described in the Proposed Budgets on the subsequent pages.

The significant increases in energy costs experienced in early 2001 are expected to continue through 2021-2022. The City had anticipated increases in energy costs for several years and had set aside reserves to pay for the increases. However, the depletion of this reserve has warranted an increase in assessments.

The City of Gardena, in 2009-2010 fiscal year increased the assessment by conducting an assessment ballot (Proposition 218) proceeding by mailed ballots for approval of the increase, in accordance with Section 53753 of the Government Code and Section 4000 of the Election's Code.

The increase in assessments in the FY2009-2010 did not allow the District to wipe out its negative reserve in the 2010-2011 and 2011-2012 fiscal years; however, for 2012-2013 fiscal year, with 2.09% increase, the reserve started a modest gain; and for 2021-2022 fiscal year, with projected 0.9% increase the District is also projected to build up reserves in the positive.

The 1972 Act requires that a special fund be set up for the revenues and expenditures of the District. Funds raised by assessment shall be used only for the purpose as stated herein. Any balance or deficit remaining on July 1 must be carried over to the next fiscal year.

The LED Street Light Conversion was completed in year 2019. However, savings will be minimal, if any, until the recouping cost period of 20 years is completed.

CITY OF GARDENA
CONSOLIDATED STREET LIGHTING DISTRICT
ACCT# 152.51

CALCULATION OF ASSESSMENT

2021 - 2022

TOTAL ESTIMATED COSTS OF THE GARDENA CONSOLIDATED STREET LIGHTING DISTRICT **$778,181.44**

REVENUE (0.9 % Increase); per Consumer Price Index (CIP) on page 13

ZONE	DESCRIPTION	$/FRONT FOOT	TOTAL FRONTAGE	ASSESSMENT
1	RESIDENTIAL	0.89	521,506 FT	$463,097.33
2	COMMERCIAL	1.97	79,716 FT	$156,881.09
3	MANUFACTURING	1.31	101,482 FT	$133,144.38
4	GARDENA BOULEVARD	1.97	5,022 FT	$9,883.30
2	UTILITIES	1.97	6,633 FT	$13,053.74
	PUBLIC AGENCY	0.19	11,050 FT	$2,121.60
			TOTAL	**$778,181.44**

PART C

ASSESSMENT DISTRICT DIAGRAM

Diagrams showing the exterior boundaries of the City of Gardena Consolidated Street Lighting Assessment District and the lines and dimensions of each lot or parcel of land within the District are in the Public Works Director's Office and referenced herein.

The lines and dimensions of each lot or parcel within the District are those lines and dimensions shown on the maps of the Assessor of the County of Los Angeles, for the year in which this report was prepared. The Assessor's maps and records are incorporated by reference herein and made part of this report.

PART D

METHOD OF APPORTIONMENT OF ASSESSMENT

GENERAL

Part 2 of Division 15 of the Streets and Highways Code, the Landscaping and Lighting Act of 1972, permits the establishment of assessment districts by public agencies for the purpose of providing certain public improvements, which include operation, maintenance and servicing of street lights, traffic signals, and landscaping.

Section 22573 of the Landscape and Lighting Act of 1972 requires that maintenance assessments be levied according to benefit rather than according to assessed value. This Section States:

> "The net amount to be assessed upon lands within an assessment district may be apportioned by any formula or method which fairly distributes the net amount among all assessable lots or parcels in proportion to the estimated benefit to be received by each such lot or parcel from the improvements."

In addition, Article XIIID, Section 4(a) of the California Constitution limits the amount of any assessment to the proportional special benefit conferred on the property.

The Act permits the designation of benefit zones within any individual assessment district if "by reasons or variations in the nature, location, and extent of the improvements, the various areas will receive different degrees of benefit from the improvement" (Sec. 22574). Thus, the 1972 Act requires the levy of a true "benefit assessment" rather than a "special tax."

ASSESSMENT METHODOLOGY

The total operation, maintenance, and servicing costs for the assessment district improvements are apportioned in accordance with the benefit spread described below.

General versus Special Benefit

The assessment cost for each parcel is determined by the front linear footage of the property, multiplied by the applicable rate for that parcel. If the property faces more than one street or alley, the cost is determined by the linear footage of the longest side facing a street/alley plus 10 percent of the rest of the sides facing a street/alley, multiplied by the rate. Rate of assessment is determined by zone. The rates are determined by the quantity of street lighting in each zone, spacing frequency being most intense in commercial zone and least intense in residential zones and near public properties. This method of apportionment ensures that properties are not assessed in excess of the proportional special benefit conferred.

PART E

PROPERTY OWNER LIST & ASSESSMENT ROLL

The total proposed assessment for Fiscal Year 2021-2022 and the amount of proposed assessment apportioned to each lot or parcel within the District, as shown on the latest roll at the County of Los Angeles Assessor's Office, are contained in the Assessment Rolls and the description of each lot or parcel is part of the records of the Assessor of the County of Los Angeles and these records are, by reference, made part of this Report.

The included tracts of land have been subdivided into four zones, with each of subject lots benefiting from the improvements being maintained. Therefore, the costs associated with the street lighting within and directly adjacent to each tract, as shown in Part B of this report will be apportioned to pay in accordance with the property frontage within each zone.

PART F

FINANCIAL STUDY

Staff has performed a financial study of the District for the 2021-2022 FY to ensure that the maintenance and improvement costs for the district were funded appropriately.

In FY 2009-2010, through Prop. 218, the City of Gardena approved increased assessments for the District as indicated in the summary below. Additionally, the study recommended adjustment of future annual assessments as needed, per the Consumer Price Index (CPI), All Urban Consumers, for the Los Angeles, Long Beach, and Anaheim Areas, not to exceed 50% of operating reserves. The actual assessments levied in any fiscal year will be approved by the City Council. Please see "Appendix A" for a copy of the detailed Financial Study for the District.

Since the increase in the assessments was approved, benefit areas within the District will continue to be maintained at the highest service levels. The proposed increase includes language to adjust assessments per the CPI, future votes regarding this annual increase will not be needed; however, each year staff will present the annual Engineer's Reports with the recommended assessment amount. For FY 2021-2022, an increase of 0.9% is recommended.

LIGHTING ASSESSMENT DISTRICT

	FY 08/09	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	FY 14/15
CPI RATE INCREASE		N/A	Actual	Actual	Actual	Actual	Actual
PERCENTAGE ASSESSMENT RATE INCREASE		28.00%	1.8554%	1.4056%	2.09%	1.96%	.7737%
APPROXIMATE ASSESSMENT (ANNUAL) X 1,000	**$485**	**$620**	**$627**	**$636**	**$649**	**$658**	**$661**

	FY 15/16	FY 16/17	FY 17/18	FY 18/19	FY 19/20	FY 20/21	FY 21/22
CPI RATE INCREASE	Actual	Actual	Actual	Actual	Actual	Actual	Actual
PERCENTAGE ASSESSMENT RATE INCREASE	.726%	3.1%	2.1%	3.5%	3.2%	3.4%	0.9%
APPROXIMATE ASSESSMENT (ANNUAL) X 1,000	**$665**	**$682**	**$696**	**$720**	**$746**	**$771**	**$778**

OPERATING EXPENDITURES

The following information describes the types of costs associated with maintaining the District, as well as information regarding the proposed rate increase. The financial study projects the expenditures and revenues through Fiscal Year 2021/2022.

CPI – Annual Increase According to Need

In FY 2009-2010, the City approved a recommended scaled increase in assessments to occur over a two year period for the District. After the initial scaled increase, the assessments are increased annually per the CPI on an as needed basis (0.9% per year for the study). Should the district reach a reserve level not-to-exceed 50% of operating revenues, the assessment will not be increased per the CPI for the year. Each year, the City will evaluate the reserves and the expenditures, and inform the residents whether or not an increase per the CPI will be necessary for the upcoming year.

Maintenance Upgrades/Projects

The line item in the proposed budget and financial study for "Maintenance Upgrades/Projects" includes any new projects such as new conduits, wiring, lights, or poles, etc. that can be scheduled for the upcoming year. Often, City staff receives input from residents on any projects that a district may like to see completed. The proposed budget includes an estimate for these projects, and if the amount actually spent each year is less than the estimate, the remaining balance returns to the District's reserve fund. Should the amount exceed the estimate, then the funds needed would be taken from the reserve fund.

Reserve Fund

Any remaining funds not used from the previous year are added to the District's reserve fund. The reserve fund should have sufficient funds available to lessen the fiscal impact of any unforeseen expenditures. Staff is recommending that the district maintain a healthy reserve balance of an amount not-to-exceed 50% of the total annual assessments.

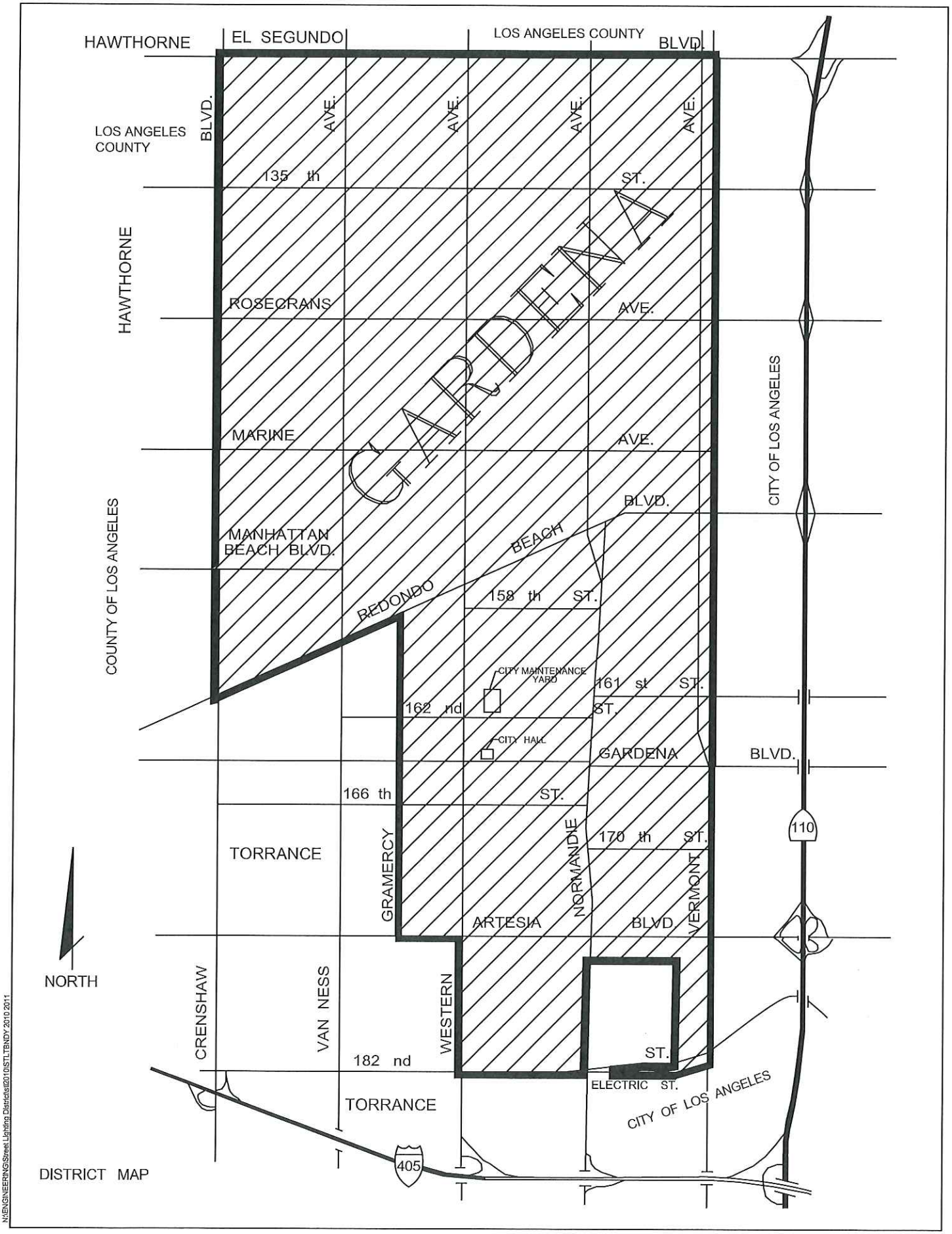
APPENDIX A

FINANCIAL STUDY DETAIL

ESTIMATE OF COSTS*
2021-2022

UTILITY-OWNED SYSTEMS	
(LS-1) Energy Cost	$546,000
CITY-OWNED SYSTEM	
(LS-2) Energy Cost	$14,000
SUBTOTAL	**$560,000**
FUEL CONTINGENCY (5%)	$28,000
SUBTOTAL	**$588,000**
OVERHEAD	$41,000
OTHER PROGRAM EXPENSES	$70,000
CAPITAL OUTLAY	$50,000
CONTINGENCY	$29,181
TOTAL ESTIMATED COST OF STREET LIGHTING DISTRICT	**$778,181**

* Expenses are provided by the City of Gardena Finance Department



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