GARDENA CITY COUNCIL

Regular Meeting Notice and Agenda

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

Tuesday, January 14, 2025
Closed Session 7:00 p.m.
Open Session 7:30 p.m.

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

MINA SEMENZA, *City Clerk*
GUY H. MATO, *City Treasurer*
CLINT OSORIO, *City Manager*
CARMEN VASQUEZ, *City Attorney*
LISA KRANITZ, *Assistant City Attorney*

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 publiccomment@cityofgardena.org by 5:00p.m. on the day of the meeting and write "Public Comment" in the subject line.

3. **ATTEND THE MEETING IN PERSON**

   PUBLIC COMMENT: The City Council will hear from the public on any item on the agenda or any item of interest that is not on the agenda at the following times:

   - Agenda Items – At the time the City Council considers the item or during Oral Communications
   - Non-agenda Items – During Oral Communications
   - Public Hearings – At the time for Public Hearings listed on the Agenda

   If you wish to address the Council, please complete a "Speaker Request" form and present it to the City Clerk or Sergeant of Arms. You will be called to the podium by name when it is your turn to address the Council. The City Council cannot legally take action on any item not scheduled on the Agenda. Such items may be referred for administrative action or scheduled on a future Agenda. 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 cityclerk@cityofgardena.org at least 24 business hours prior to the scheduled general meeting to ensure assistance is provided. Assistive listening devices are available.

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

2. CLOSED SESSION

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

2.B CONFERENCE WITH LEGAL COUNSEL- ANTICIPATED LITIGATION
Significant exposure to litigation, pursuant to subdivision (d)(2) of Government Code Section 54956.9
One Potential Case.

CITY ATTORNEY REPORT OUT OF CLOSED SESSION

3. PLEDGE OF ALLEGIANCE

4. INVOCATION

Pastor James Chang Gardena
Valley Baptist Church

5. PRESENTATIONS

5.A Presentation of the "Holiday Home Decoration Contest 2024" Winners

5.B Certificate of Commendation in Special Recognition of Retirement and Long-Time Service to the City of Gardena:

1. Vicente Osorio - Captain with the Gardena Police Department - 29.8 Years
2. Anthony Gonzalez - Park Maintenance Worker I with the Public Works Department - 26.4 Years

Vicente Osorio Certificate .pdf
Anthony Gonzalez Certificate.pdf

6. PROCLAMATIONS

6.A "Martin Luther King Jr. Celebration Week," January 13 through 20, 2025. (*To be accepted by Councilmember Paulette C. Francis, Chair of the Dr. Martin Luther King Jr. Cultural Committee of Gardena*)
MLK Proclamation.pdf

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.

PUBLIC COMMENT ON CONSENT CALENDAR

8.A Waiver of Reading in Full of All Ordinances Listed on this Agenda and that they be Read by Title Only
CONTACT: CITY CLERK

8.B Approve Minutes:
Regular Meeting of the City Council, December 17, 2024
CONTACT: CITY CLERK
12-17-2024 REGULAR Minutes CC Meeting - FINAL.pdf

8.C Approval of Warrants/Payroll Register, December 24, 2024
CONTACT: ADMINISTRATIVE SERVICES
Warrant-Payroll Register 12-24-24.pdf

8.D Approval of Warrants/Payroll Register, January 14, 2025
CONTACT: ADMINISTRATIVE SERVICES
Warrant-Payroll Register 01-14-25.pdf

8.E Monthly Investment Portfolio, November 2024
CONTACT: ADMINISTRATIVE SERVICES
November 2024 Investment Report.pdf

8.F Personnel Report P-2025-1 01-14-25
CONTACT: ADMINISTRATIVE SERVICES
PERS RPT P-2025-1 1-14-25.pdf

9. EXCLUDED CONSENT CALENDAR

10. PLANNING & ENVIRONMENTAL QUALITY COMMISSION ACTION SHEET

10.A DECEMBER 17, 2024 - ***Meeting Cancelled***
2024_12_17 CANCELLATION

10.B JANUARY 7, 2025, MEETING

1818 West Redondo Beach Boulevard, the Tire House Progress Report

As requested by the Planning Commission at the October 1, 2024, meeting, staff presented an update report on the Tire House Inc.'s progress with meeting the requirements of Site Plan Review #4-15.

Commission Action: The Planning Commission motioned to postpone the adoption of Resolution No. PC 10-24 to the February 4, 2025 meeting, by a vote of 5-0.

City Council Action: No action needed.

10.C JANUARY 7, 2025, MEETING

CONDITIONAL USE PERMIT #1-24 (MODIFICATION TO CUP #219-68), SITE PLAN REVIEW #1-24, AND ADMINISTRATIVE ADJUSTMENT #1-24

The Planning Commission considered a request to modify the conditional use permit for a high school located within the R- 1 zone, including a site plan review for the demolition of a 9,036 SF church building and proposing a new 7,500 SF facility in its place, featuring two classrooms, an administrative area, and a covered canopy, to continue serving the existing school on the property. The request also included an administrative adjustment to the off-street parking requirements, seeking a 12% reduction in the number of required spaces—from 104 to 93 spaces. The request was considered for an exemption from CEQA.
APPLICANT: Farnaz Golshani- Flecher, Farnaz Golshan-Flechner, Environmental Charter High School
LOCATION: 2818 Manhattan Beach Blvd; APN: (4067-007-005)

Commission Action: The Planning Commission approved Resolution No. PC 1-25, by a vote of 4 -0-1, approving a modification to Conditional Use Permit #219-68, Site Plan Review #1-24, and Administrative Adjustment #1-24, with an added condition for the applicants to work with local church leaders prior to the demolition of the church building, and directed staff to file a Notice of Exemption.

City Council Action: Receive and file **OR** Call for Review (By way of two votes from the City Council).

To view the complete Planning Commission agenda packet, CLICK HERE.
2025_01_07 PCAX.pdf

11. 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.

12. DEPARTMENTAL ITEMS - ADMINISTRATIVE SERVICES

13. DEPARTMENTAL ITEMS - COMMUNITY DEVELOPMENT

13.A **AGENDA TITLE: Consideration of a Project to certify an EIR, adopt a mitigation monitoring program, adopt a statement of overriding considerations and make other CEQA findings, approve a Land Use Plan change, adopt an Ordinance approving a Specific Plan, Site Plan, and Development Agreement to develop a 5.25 acre property located at 16829, 16835, and 16907 South Normandie Avenue (between 169th and 170th Streets and east of Brighton Way) with a 333 unit project consisting of 75 townhomes and a 285 unit apartment building that will be 5 stories above grade (70 feet), and approve a vesting tentative map for the same. Additionally, the Project includes consideration of Land Use Plan changes and zoning map changes for the properties located at 16964 Brighton Avenue and the 0.43 Acre Property located to the east of the Project Site to match existing uses. Entitlement requests include:**

RESOLUTION NO. 6683: 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 Project; and

RESOLUTION NO. 6684: Amending the Land Use Plan of the City of Gardena General Plan for the of the 5.25 Acre Property to Specific Plan, Changing the Land Use Designation of the 0.11 Acre Property located at 16964 Brighton Avenue to Single Family Residential, and the 0.43 Acre Property located at the Eastern Edge of the Specific Plan Area to Public/Institutional and Making Minor Text Changes; and

ORDINANCE NO. 1878: Amending the Gardena Municipal Code to add the Normandie Crossing Specific Plan, Amending the Gardena Zoning Map to Rezone the 5.25 Acre Property to Normandie Crossing Specific Plan, Rezoning the 0.11 Acre Property located at 16964 Brighton Avenue to Single Family Residential, Rezoning the 0.43 Acre Property located at the Eastern Edge of the Specific Plan Area to Official, Approving the Normandie Crossing Specific Plan, including the Site Plan Contained therein, Approving a Development Agreement, and Approving an Affordable Housing Agreement; and

RESOLUTION NO. 6685: Approving Vesting Tentative Map No. 83922 (VTM #4-21), to Merge Four Lots into one with 75 Condominiums for the Townhomes and one Parcel for the Apartment Building.

PROJECT LOCATION: 16829, 16835, 16907, and 16911 S. Normandie Avenue
OTHER LOCATIONS: 16964 Brighton Avenue and unaddressed Union Pacific Railroad parcel (APN: 6106-030-800)

APPLICANT: Fred Shaffer and Steve Ludwig – 16911 Normandie Associates, LLC

Staff Recommendation: Staff respectfully recommends that after presentation by Staff and Environmental Consultant the City Council:

- Open the public hearing;
- Hear the applicant's presentation
- Receive testimony from the public, allow three (3) minutes for each speaker;

- Allow the applicant time to respond; and
- Close the public hearing.

Planning Commission Recommendation for Motion:

- Adopt Resolution Nos. 6683 and 6684
- Introduce Ordinance No. 1878; and
- Adopt Resolution No. 6685, approving the necessary entitlements for the development of the Normandie Crossing Project.

AGENDA STAFF REPORT - NORMANDIE CROSSING PROJECT

Attachments

1. Planning Commission Resolution No. PC 18-24 recommending approval of Revised and Updated Final EIR.pdf
2. Planning Commission Resolution No. PC 19-24 recommending approval of General Plan Amendment.pdf
3. Planning Commission Resolution No. PC 20-24 recommends approval of the Project.pdf
4. Planning Commission Staff Report dated December 3, 2024.pdf
5. Planning Commission Staff Report dated March 19, 2024.pdf
6. Original Economic Analysis Report prepared by RCLCO, dated December 2023.pdf
7. Revised Economic Analysis Memo prepared by RCLCO, Dated November 2024.pdf
8. Public Comments received for January 14, 2025 Public Hearing.pdf
9. Public Comments received for December 3, 2024 Public Hearing.pdf
10. Letters of Support from Local Businesses.pdf

RESOLUTIONS AND ORDINANCE FOR CONSIDERATION

RESOLUTION NO. 6683, 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 Normandie Crossing Specific Plan Project

- Exhibit A - Draft EIR, dated December 2023.pdf
- Exhibit B - Revised and Updated Final EIR, dated November 2024.pdf
- Exhibit C - Mitigation Monitoring and Reporting Program.pdf

RESOLUTION NO. 6684: Amending the Land Use Plan of the Gardena General Plan

- Exhibit A - General Plan Land Use Change for GPA #3-21.pdf
- Exhibit B - General Plan Land Use Text Change Excerpts.pdf

ORDINANCE NO. 1878: Adopting the Specific Plan and Approving the Site Plan, Changing the Zoning, Approving the Zoning Code Amendment, Approving the Development Agreement, and Approving an Affordable Housing Agreement Relating to the Project

- Exhibit A - Normandie Crossing Specific Plan Zone Change for ZC #4-21.pdf
  Exhibit B - Normandie Crossing Specific Plan.pdf
- Exhibit C - Project Plans
- Exhibit D - Conditions of Approval.pdf
- Exhibit E - Draft Development Agreement.pdf
- Exhibit F - Draft Affordable Housing Agreement.pdf

RESOLUTION NO. 6685: Approving Vesting Tentative Map No. 83922 (VTM #4-21), to Merge Four Lots into one with 75 Condominiums for the Townhomes and one Parcel for the Apartment Building

- Exhibit A - Vesting Tentative Tract Map No. 83922 (VTM #4-21).pdf
- Exhibit B - Conditions of Approval.pdf

14. DEPARTMENTAL ITEMS - ELECTED & CITY MANAGER'S OFFICES

15. DEPARTMENTAL ITEMS – POLICE

15.A Rejection of all Bids for Request for Proposals (RFP) for Police Incident Major Response Vehicle (MIRV)

Staff Recommendation: Reject all bids received for the Police Incident Major Response Vehicle (MIRV) project. Authorize Staff to re-issue a Request for Proposals (RFP)

MIRV RFP.pdf
GA Proposal Gardena MIRV Truck.pdf

15.B Approve Three-Year Agreement with Peregrine Technologies, Inc. for Data Integration Services in the Amount Not to Exceed $273,000

Staff Recommendation: Approve Agreement

Contract & Exhibits A, B, C.pdf
Alhambra & Peregrine Contract.pdf

15.C Notification of Eligibility for Funding in the Amount of $99,023 Under the Tobacco Grant Program Award for the 2024 - 2028 Grant Cycle

Staff Recommendation: Accept Grant Award and Authorize Expenditures

Gardena PD_Summary of Award 24-25.pdf

16. DEPARTMENTAL ITEMS - PUBLIC WORKS

17. DEPARTMENTAL ITEMS - RECREATION & HUMAN SERVICES

18. DEPARTMENTAL ITEMS - TRANSPORTATION

19. COUNCIL ITEMS

20. COUNCIL DIRECTIVES

21. CITY MANAGER REMARKS RE: DIRECTIVES / COUNCIL ITEMS

22. COUNCIL REMARKS

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

23. ANNOUNCEMENT(S)

24. REMEMBRANCES

25. 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, January 28, 2025.

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 10th day of January 2025

/s/ MINA SEMENZA
MINA SEMENZA, City Clerk

Certificate of Commendation

presented to

Vicente Osorio

In official acknowledgment and with deep appreciation for an exemplary, outstanding 29.8 years of service to the City of Gardena as a Police Captain

with the

Police Department

We, the Mayor and Members of the City Council of the City of Gardena, California, are pleased to present this special recognition to you for your long-time City service, and express our sincere, best wishes for a healthy, enjoyable, and rewarding retirement, effective December 27, 2024.

Presented ✧14th day of January, 2025

Mayor Tasha Cerda

Councilmember Rodney G. Tanaka

Councilmember Mark E. Henderson

Councilmember Paulette C. Francis

Councilmember Wanda Love

Certificate of Commendation

presented to

Anthony Gonzalez

In official acknowledgment and with deep appreciation for an exemplary, outstanding 26.4 years of service to

the *City of Gardena* as a

Park Maintenance Worker I

with the

Public Works Department

We, the Mayor and Members of the City Council of the City of Gardena, California, are pleased to present this special recognition to you for your long-time City service, and express our sincere, best wishes for a healthy, enjoyable, and rewarding retirement, effective December 30, 2024.

Presented ✧14th day of January, 2025

Mayor Tasha Cerda

Councilmember Rodney G. Tanaka

Councilmember Mark E. Henderson

Councilmember Paulette C. Francis

Councilmember Wanda Love

PROCLAMATION

Whereas, in November 1972, the City Council of the City of Gardena granted a request to two well-known Gardena citizens to establish a Dr. Martin Luther King Jr. Commemorative Committee; and

Whereas, with the enthusiastic support and commitment of its numerous members, that Committee (now known as the Dr. Martin Luther King Jr. Cultural Committee of Gardena) has, for the past 50 years, presented annual commemorative activities dedicated to the memory of Dr. King, a leader in the causes of social justice and civil rights for all who struggled for a better relationship between peoples, and for a better understanding of all cultures; and the Committee will present their 52nd Annual Celebration / Commemoration events on Saturday, January 18, 2025, with the 42nd Annual Commemoration Parade, as well as the "Battle of the Bands,"; and

Whereas, the community of Gardena, California, is known for its multi-ethnic, multi-religion population, representing a great cultural diversity; and

Whereas, this multi-ethnicity and community service awareness of Gardena's citizens encourages involvement in the promotion of programs and activities to observe Dr. King's birthday, thus pioneering such programs many years prior to Dr. King's birthday, January 15, being recognized and celebrated as a federal holiday; and

Whereas, local community individuals, schools, and businesses are now even more involved, and their contributions help to provide for these commemorative activities which allow Gardena's citizens an opportunity to rededicate themselves to the principles that Dr. King inspired in our society in his lifetime – "Peace Among Humanity";

Now, Therefore, I, TASHA CERDA, MAYOR OF THE CITY OF GARDENA, CALIFORNIA, do hereby proclaim **JANUARY 13 through 20, 2025**, to be

DR. MARTIN LUTHER KING JR. CELEBRATION WEEK

in the City of Gardena, urging all citizens to be aware of these annual activities, and to reflect upon the over 50 years of hard work and unselfish dedication of the members of the Committee; and further, to join in and support all of the events planned during this special week.

Tasha Cerda

MAYOR

Dated: 14th day of January, 2025

MINUTES
Regular Meeting of the
Gardena City Council
Tuesday, December 17, 2024

The Regular Meeting Notice and Agenda of the Gardena City Council of the City of Gardena, California, was called to order at 7:47 PM on Tuesday, December 17, 2024, 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 Rodney G. Tanaka; Council Member Mark E. Henderson; Council Member Paulette C. Francis; and Council Member Wanda Love. Other City Officials present: City Manager Clint Osorio; City Attorney Carmen Vasquez; City Clerk Mina Semenza; Treasurer Guy H. Mato; and Deputy City Clerk Becky Romero.

PUBLIC COMMENT ON CLOSED SESSION

2. **CLOSED SESSION** – ***None***

CITY ATTORNEY REPORT OUT OF CLOSED SESSION

3. **PLEDGE OF ALLEGIANCE**

Joanna Espinoza, who is 10 years old and in the 5th grade at Weaver Elementary School, led us in the Pledge of Allegiance. She is the daughter of Jose Espinoza from our Public Works Department. Joanna likes to play handball and her favorite subject in school is social studies. She introduced her mother, Christina, and her father, Jose.

4. **INVOCATION**

Mario Klappoth, church elder from Church of Jesus Christ of Latter-Day Saints led the Invocation.

5. **PRESENTATIONS**

5.A Presentation of our new Detection Dog, Ghost - ***was presented by Chief Mike Saffell and Detective Joel Martinez.***

5.B Posthumous Gardena Military Veteran Recognition for Harry Choi, who served in the U.S. Army. He was chosen at the recommendation of Mayor Tasha Cerda – ***was accepted by Mr. Choi's daughter, Barbara Moncada.***

5.C Presentation on GTrans' New On-Demand Service: Bolt Powered by GTrans – ***Director Ernie Crespo introduced Melyssa Hutauruk, Program Manager, who led the presentation.***

5.D South Bay Cities Council of Governments & Southern California Regional Energy Network Gold Level Achievement Award for the 2024 South Bay Energy and Climate Recognition Program – ***was accepted by Public Works Director Allan Rigg and Program Coordinator Hong Lee.***

5.E Recognition of the SoCal APWA 2024 Chapter Presidential Award – **was *accepted by our Public Works Engineer, Jose Espinoza.***

5.F Gardena Events Video Presentation

6. **PROCLAMATIONS** ***- None***

7. **APPOINTMENTS** ***– None***

8. **CONSENT CALENDAR**

8.A Waiver of Reading in Full of All Ordinances Listed on this Agenda and that they be Read by Title Only
CONTACT: CITY CLERK

8.B Approve Minutes:
Regular Meeting of the City Council, November 19, 2024
CONTACT: CITY CLERK

8.C Receive and File Minutes:
Planning and Environmental Quality Commission, October 1, 2024
CONTACT: COMMUNITY DEVELOPMENT

8.D Approval of Warrants/Payroll Register, November 26, 2024
CONTACT: ADMINISTRATIVE SERVICES

November 26, 2024: Wire Transfer: 12843-12853; Prepay: 178347-178362; Check Numbers: 178363-178517 for Total Warrants issued in the amount of $1,962,165.07; Total Payroll Issued for November 15, 2024: $2,470,008.19

8.E Approval of Warrants/Payroll Register, December 10, 2024
CONTACT: ADMINISTRATIVE SERVICES

December 10, 2024: Wire Transfer: 12854; Prepay: 178518-178524; Check Numbers: 178525-178710 for Total Warrants issued in the amount of $2,330,739.76; Total Payroll Issued for November 29, 2024: $1,972,812.99

8.F Monthly Investment Portfolio, October 2024
CONTACT: ADMINISTRATIVE SERVICES

8.G Personnel Report P-2024-18 12-17-24
CONTACT: ADMINISTRATIVE SERVICES

8.H Annual Report - Retention Schedule
CONTACT: CITY CLERK

8.I SECOND READING AND ADOPTION OF ORDINANCE NO. 1876, Adopting and Amending Sections 2.48.020(A) and 2.48.055 of the Gardena Municipal Code Relating to the Number of Members and Quorum Requirements of the Gardena Youth Commission
CONTACT: RECREATION & HUMAN SERVICES

ORDINANCE NO. 1876

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF GARDENA, CALIFORNIA, ADOPTING AND AMENDING SECTIONS 2.48.020(A) AND 2.48.055 OF THE GARDENA MUNICIPAL CODE RELATING TO THE NUMBER OF MEMBERS AND QUORUM REQUIREMENTS OF THE GARDENA YOUTH COMMISSION

8.J Approve Amendment for RIN Separator with Clean Energy
CONTACT: TRANSPORTATION

8.K Acceptance and Notice of Completion of GTrans Dispatch Remodeling Project
CONTACT: TRANSPORTATION

8.L Approve the GTrans Public Transportation Agency Safety Plan Update
CONTACT: TRANSPORTATION

8.M Approve Agreement with the Los Angeles County Metropolitan Transportation Authority for the Zero Emission Transit Capital Program
CONTACT: TRANSPORTATION

It was moved by Mayor Pro Tem Tanaka, seconded by Council Member Henderson, and carried by the following roll call vote to Approve the Consent Calendar:

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

9. **EXCLUDED CONSENT CALENDAR**

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

10.A DECEMBER 3, 2024 MEETING

Conditional Use Permit #6-24 and Site Plan Review #2-94 (Modification #4) The Planning Commission considered a request for a conditional use permit, per Section 18.46.030.C.23 of the Gardena Municipal Code, to allow for the continuation of an existing automobile service station and modification to an original site plan review for the remodel of the gasoline dispenser canopy and the addition of three gasoline pumps to the existing ARCO gasoline station located at 1001 West Artesia Boulevard, within in the General Commercial (C-3) zone. Environmental Assessment Consideration: The proposed project was considered for a categorical exemption from the provisions of the CEQA pursuant to Guidelines Sections 15303 and 15332.
Project Location: 1001 West Artesia Boulevard (APN: 6111-022-033)
Project Applicant: A&S Engineering / Abigail Jara
Commission Action: The Planning Commission approved Resolution No. PC 17-24, by a vote of 4-0, approving Modification #4 for Conditional Use Permit #6-24 and Site Plan Review #2-94, to allow the continuation of an existing automobile service station and modification to an original site plan review for the remodel of the gasoline dispenser

canopy and the addition of three gasoline pumps, subject to the conditions of approval and directed staff to file a Notice of Exemption.

City Council Action: Receive and file. The time to call this matter for review has since passed.

This Item was Received and Filed.

10.B DECEMBER 3, 2024 MEETING

Environmental Impact Report (Environmental Assessment #20-21); General Plan Amendment #3 -21; Zone Change #4-21; Zone Text Amendment #6-21; Specific Plan #1-21; Site Plan Review #11-21; Vesting Tentative Map #4-21; Development Agreement #2-21, and Affordable Housing Agreement

The Planning Commission reviewed a request for recommendation to the City Council for the entitlements needed to establish the Normandie Crossing Specific Plan. The plan proposes a 333 -unit residential development on a 5.25 -acre site, featuring a six-story apartment building with one below-grade parking level for 258 units, along with 75 three-story townhomes.

Environmental Assessment Consideration: Approval of these items requires certification of an Environmental Impact Report, adoption of a Mitigation Monitoring and Reporting Plan, and CEQA required findings, and a Statement of Overriding Considerations.

Project Location: 16829, 16835, 16907, and 16911 S. Normandie Avenue (APN:6106-030-011, 015, 016, and 017)

Project Applicant: Fred Shaffer and Steve Ludwig – 16911 Normandie Associates, LLC

Other Project Locations: 16964 Brighton Avenue (APN: 6106-030-008) and unaddressed Union Pacific Railroad parcel (APN: 6106-030-800)

Commission Action: The Planning Commission approved Resolution No. PC 17-24, by a vote of 4-0, approving Modification #4 for Conditional Use Permit #6-24 and Site Plan Review #2-94, to allow the continuation of an existing automobile service station and modification to an original site plan review for the remodel of the gasoline dispenser canopy and the addition of three gasoline pumps, subject to the conditions of approval and directed staff to file a Notice of Exemption.

City Council Action: No action necessary. These items will be brought before the City Council on January 14, 2025.

Mayor Cerda read a statement indicating there was a mistake on the Commission Action and read the updated information.

This Item was Received and Filed. This Item Required No Action by the City Council.

10.C DECEMBER 3, 2024 MEETING

Zone Text Amendment #7-24 (Ordinance No. 1877)

Recommendation to the City Council on adoption of Ordinance No. 1877 amending the Gardena Municipal Code Chapter 18.66 and Section 18.36.020 relating to allowing non - storefront retail medicinal cannabis delivery services businesses in the M-1 and M-2 zoning districts.

Commission Action: The Planning Commission approved Resolution No. PC 21-24, by a vote of 4-0, recommending the City Council adopt the Ordinance No. 1877, amending the Gardena Municipal Code Chapter 18.66 and Section 18.36.020 relating to allowing non-storefront retail medicinal cannabis delivery services businesses in the M-1 and M-2 zoning districts.

City Council Action: No action necessary. These items will be brought before the City Council on January 14, 2025.

This Item was Received and Filed. This Item Required No Action by the City Council.

11. **ORAL COMMUNICATIONS**

1) Brandon Smith, resident: came into address his concerns regarding parking and traffic due to the new development project, Normandie Crossing. He suggested street design modifications.

12. **DEPARTMENTAL ITEMS – ADMINISTRATIVE SERVICES**

12.A City of Gardena Audit Reports for Fiscal Year Ended June 30, 2024; Annual Comprehensive Financial Report (ACFR) & GTrans Enterprise Fund Report.

This Item was presented by City Manager Clint Osorio, and Auditor Ron Lopez from Gruber and Lopez, Inc Auditing firm.

Questions and comments were made by all Members of the Council. City Manager Osorio and Auditor Lopez answered all questions.

This Item was Received and Filed.

12.B Authorize the City Manager to Execute Master Equity Lease Agreement and Full Maintenance Agreement for Vehicle Leasing with Enterprise Fleet Management with an Expiration Date of April 18, 2026, with the Option to Extend for One Additional Year.

City Manager Osorio presented the Staff Report.

Mayor Cerda asked if anyone had asked to speak on this item and if the Council had any comments or questions. There were no public speakers.

It was moved by Mayor Pro Tem Tanaka, seconded by Council Member Love, and carried by the following roll call vote to Authorize the City Manager to Execute Master Equity Lease Agreement and Full Maintenance Agreement:

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

12.C Approval of a Side Letter between the City of Gardena and the Gardena Municipal Employees Association ("GMEA")

City Manager Osorio presented the Staff Report.

Mayor Cerda asked if anyone had asked to speak on this item and if the Council had any comments or questions. There were no public speakers.

It was moved by Council Member Love, seconded by Council Member Francis, and carried by the following roll call vote to Approve the Side Letter between the City of Gardena and the Gardena Municipal Employees Association ("GMEA"):

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

13. **DEPARTMENTAL ITEMS – COMMUNITY DEVELOPMENT**

13.A Approval of Consultant Agreement with Kimley-Horn to Provide Environmental Consulting Services in Compliance with the California Environmental Quality Act for the Terreno Industrial Center Private Development Project

City Manager Osorio presented the Staff Report.

Mayor Cerda asked if anyone had asked to speak on this item and if the Council had any comments or questions. There were no public speakers.

Questions and comments were made by Council Member Francis. Community Development Manager Amanda Acuna answered all questions.

It was moved by Mayor Pro Tem Tanaka, seconded by Council Member Love, and carried by the following roll call vote to Approve the consultant agreement with Kimley Horn to provide environmental consulting services for the Terreno Industrial Center Project:

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

14. **DEPARTMENTAL ITEMS – ELECTED & CITY MANAGER'S OFFICES** – ***No Items***

15. **DEPARTMENTAL ITEMS – POLICE**

15.A Authorization to Award a Two-Year Video Policing System Camera Maintenance and Repair Contract to DataGear, Inc. in the Amount Not to Exceed $430,000.

City Manager Osorio presented the Staff Report.

Captain Todd Fox presented a PowerPoint presentation.

Mayor Cerda asked if anyone had asked to speak on this item and if the Council had any comments or questions. There were no public speakers.

Questions and comments were made by Council Members Francis, Henderson and Love and Mayor Cerda. Captain Fox and Lee Coffey of Data Gear answered all questions.

It was moved by Council Member Love, seconded by Council Member Francis, and carried by the following roll call vote to Authorize and execute a two-year contract for the Video Policing System Camera Maintenance and Repair to DataGear, Inc. It is further recommended that Council authorize the Mayor and City Clerk to execute the contract which has been approved as to form by the City Attorney:

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

16. **DEPARTMENTAL ITEMS – PUBLIC WORKS – *No Items***

17. **DEPARTMENTAL ITEMS – RECREATION & HUMAN SERVICES – *No Items***

18. **DEPARTMENTAL ITEMS – TRANSPORTATION**

18.A Approve Easement and Right of Way for Southern California Edison to Provide Electrical Power for Vehicle Charging Stations

City Manager Osorio presented the Staff Report.

Mayor Cerda asked if anyone had asked to speak on this item and if the Council had any comments or questions. There were no public speakers.

A question was asked by Council Member Francis. City Manager Osorio answered her question.

It was moved by Mayor Pro Tem Tanaka, seconded by Council Member Henderson, and carried by the following roll call vote to Approve Grant of Easement and Right of Way and Authorize Signature:

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

19. **COUNCIL ITEMS – *No Items***

20. **COUNCIL DIRECTIVES – *None***

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

1) At our November 19, 2024 Council Meeting, Council Member Henderson made a directive to come up with a tool to help identify abandoned residential properties. They are currently still researching a way to do this; more to come on this.
2) Remembrance of our long time Auditor, Kenneth H. Pun, who has passed away at the age of 48. He has been our auditor since 2007, and a long-time friend. City Manager spoke on the number of years he has served the City of Gardena and the relationship they established; a Certificate of Recognition was presented to Frances J. Kuo of the Pun Group, who spoke on their behalf.

22. **COUNCIL REMARKS**

(1) COUNCIL MEMBER FRANCIS – Since we last met, she attended a holiday boutique, Winter Wonderland, and Jolly Trolley Park tour. She also attended our Beautification Commission meeting and Los Angeles County Greater Vector Control District meeting. She mentioned we're in a holiday season and children will be on break, you'll see a lot more young people around on bicycles, skateboards, and scooters, it's a hectic time, so she encourages all to pack your patience as we're out and about shopping for the holidays. Extend a little grace to folks because you never know, in particular this time of year, whatever another person is going through, and there may be an empty chair at your table this year. A lot of things are going on so just as best you can show some kindness to folks, and we'll have a happy holiday season, she wished everyone a wonderful holiday season, and told everyone to enjoy your family and embrace them because you never know.

(2) COUNCIL MEMBER HENDERSON – Since the last meeting, he attended the Employee Tree Trimming, the Employee Mixer, Breakfast at the North Pole, the Tree Lighting, and the GTrans Safety Awards Banquet. He also ended up going to meet and getting some new work; SCAG has now put him on their legislative committee, so he'll be going to Sacramento talking about “all things transportation,” so GTrans be on alert because he'll be trying to find more resources for us. He wants to say to staff as we close out this calendar year that he appreciates the work that you all do on behalf of our community. He knows we joke about our awards and a lot of the things that we receive, but that comes from the work and the diligence that everybody really takes their position seriously, so he acknowledged that. He also acknowledged that when we do encounter a gap or some mishap, we identify it, we don't shy away from it and we work to remediate the issue right away so that says a lot of courage, it says a lot of things about the leaders that we have in our community, so that is really appreciated. To our community this is the holiday time so please take that time with your family, he wished everybody a Merry Christmas, Happy Hanukkah, and Happy Kwanzaa, and if you don't celebrate anything at all that's fine too, but just take this time to kind of reflect as we gear for the New Year.

(3) MAYOR PRO TEM TANAKA – He attended the Mayme Dear Library installation of officers, the South Bay City COG’s Volunteer Recognition event, the COG Board meeting, Sergeant Luis Contreras's promotion to Lieutenant, congratulations, GTrans CHP Honors celebration. The City of Gardena hosted the Southern California Rent Energy Efficiency Awards luncheon at the Nakaoka Community Center and thank you to Public Works for all the effort that you guys put into getting us that gold medal award and again we're trying for platinum next year. He attended the City Tree Trimming event,

Winter Wonderland Tree Lighting, the Santa celebration, thanks Stephany, you guys did a great job. He attended Cherrystones Annual Christmas party, benefiting the Senior Pioneer project. He attended the COG's Steering Committee meeting, Rowley Park Santa Trolley, thanks Stephany, again, for your staff doing a great job. He attended the homeless task force for the COG, the CERT annual business potluck meeting with the surprise retirement celebration for Captain Osorio, this was a great event, his son Nico danced for him and his wife and her little group did a Hula Hoop presentation, but there was a single dance that his wife choreographed and performed for him that night and it was a great event; but much Aloha to Captain Osorio and his family and thank you for giving us 30 years of service. He attended the South Bay Chamber of Commerce installation of officers, and the Finance Committee with the Mayor; we had some great conversations from what you saw tonight, he attended the GDAAP Red Ribbon Awards dinner; we had a great representative, a bunch of young awesome students that are saying no to drugs, and mind-altering substances. He attended the City's Employee Christmas celebration at Gardena Bowl, and he had a great time watching our employees interact with each other and he just hopes that every city employee here knows how much they are appreciated for all the hard work and dedication that you do to make this the awesome Emerald City that it is. He attended breakfast with Santa at the Nakaoka, Helping Heroes' food donations for the Air Force Base in front of our Gardena sign, he attended Tyler Nash's promotion to Sergeant, congratulations; that's a great addition to our supervisors. He apologized to GTrans for missing the awards Christmas dinner. He'd like to officially wish a happy retirement to Captain Osorio, thank you for the 30 years plus service to our citizens and his family for supporting him all those years and we just wish him a blessed and enjoyed retirement because he knows Captain Osorio is going to be traveling. He's always going to be one of his guys. Condolences to Katherine Rhee and her family on the passing of her beloved mother, he's really sorry Katherine. Lastly, Merry Christmas, Happy Hanukkah, Feliz Navidad, Happy Kwanzaa, and a Happy Prosperous New Year.

(4) MAYOR CERDA – She attended her monthly CCGA meeting, the LA County Sanitation meeting, and the Friends of the Library Christmas party. She was a speaker at Peary Middle School for Career Day, a Thanksgiving event at Village Mobile Home, she also spoke at Grace Chapel Church which is affiliated with Gardena as well as their Pastor who lives in Gardena. She attended the promotion ceremony for Sergeant Contreras. Also, the Thanksgiving dinner celebration that happened at El Pollo Inka. She sends a special thank you to all the groups that participated, the Lions Club, the Elks, the Rotary, and the City of Gardena for making Thanksgiving for so many families, a great event, they served almost 500 people. Also, that same Thanksgiving weekend she attended the Renee Napier event where she honored First Responders, Military personnel, Firemen, Police Officers, and CHP, and she was one of the speakers there as they thanked the first responders for just doing an amazing job year-round. She also attended the swearing-in ceremony for the new District Attorney for the County of Los Angeles, Mr. Nathan Hoffman. She also attended the Police Volunteer dinner and a special memorial event that we had for tonight's veteran that we recognized Mr. Harry Choi with some of his friends there. who attended the senior lunch program, they had a small quick Memorial of recognizing his life. She also attended the Pollo Inka Lions Christmas party. She also attended the grand opening of a new meat market El Pacifico Carniceria; it was nice. She also attended Winter Wonderland. Also, one of our members from our City Clerk's office, Ms. Katherine Rhee, her mother's funeral services, again we just want to give our condolences to Katherine, we know it was very difficult for her to lose her mom.

She has attended two Jolly Trolley events, and she wants to commend the staff, it's so great when you can have not just one department, but three departments working together to make our Jolly Trolley fun. The Police Department, our GTrans Department, and our Parks and Recreations Department, she thanked those departments for being able to work great together. She also attended the Meals on Wheels and Top-Notch Christmas party, the CERT Holiday party, and the Finance meeting that we had and again she always commends our finance guys, you guys doing an amazing job, the GDAAP Red Ribbon Award ceremony. Last Friday she attended the KJLH and GTrans Stuff the Bus event with the DJ host from KJLH, Adai Lamar. She also attended the Second Time Around Clubs Christmas party and their installation where she installed the new Officers for 2025. Then she attended our City of Gardena Employee Christmas party and again she commended Stephany, you guys did an amazing job. She attended a Neighborhood Watch Christmas get-together. Also, the swearing-in ceremony for re-elected council member, Dionne Faulk in the City of Inglewood. She also attended the GTrans Awards Ceremony party and Ernie you throw a great party as well, so kudos to you. Also, she attended the promotion ceremony for Sergeant Tyler Nash. Immediately following that she attended the Helping Hands food distribution where food was donated to the Air Force. She just wanted to take a quick moment to thank all our departments for the amazing job that you guys did in 2024, she can't tell you how many people constantly come up to her and say they love Gardena and it's because of all the great things that we do collectively as a group. Often times when people tell her different department employees did something great, she always likes to tell you guys right away, so she doesn't forget. She doesn't get a chance to say it enough Thank you guys, some people say they don't have to worry about going to events outside of Gardena because we have so many events here this is all the entertainment that they need and she tells everybody that for all of our events we don't charge for parking and no matter where you live in our city you could be home in 5 minutes from any of our events so people just appreciate all that happens here whether it's for the kids, the seniors, or even our pets, so you guys do great, with that you guys have great customer service, and she always says there are only two things that she really demands of everybody and that's do your job and do your job with a smile and treat folks great and you guys showed that in 2024, so she wants to say thank you for that, 2025 is going to be even better.

(5) COUNCIL MEMBER LOVE – She has attended the Second Time Around Christmas party and their new installation of Officers, the first Jolly Trolley, she had a great time with a lot of kids, kids always get excited when it's time to give away the toys. She attended the Rain Barrel giveaway at Serra High School, hundreds of people were in line to gather those rain barrels, early in the morning, so it was great to see the people out being conscious of conserving water with West Basin Water. She attended the Grand Opening of El Pacifico Carniceria she stopped by early that day and if you're ever looking for some fresh squeezed orange juice early in the morning, he is very proud of his amazing orange juice machine, and he's asking everybody to come and try out his new orange juice. She also attended the Winter Wonderland; she was only able to stop by for a minute. She attended the holiday boutique. She also did a check presentation from some of her discretionary funds from the City to the owner of Aunties, the wife has a nonprofit dance studio dance school, and she does really good work, so she reached out to her. Before she ends her report, she wants to say sorry to Ernie for missing the celebration, she was there last year she didn't get a chance to attend this year. She's going to end on a note, kind of co-signing what Council Member Francis said times are really hard and you do not know what people are going through; several times she has

seen posts on social media and has been tagged in posts where people in the community are calling out for everything, there was a post where a lady was asking if anybody had leftover food from Thanksgiving, there was another post where a lady was asking if anybody had toys to donate to her for her two-year-old child, and this is on social media, it's not for us to judge what the situation is or if the calls are legit, but it is for us to meet the needs of our neighborhood, our neighbors, our family, and our friends just calling out for help, so like Councilwoman Francis said just show some kindness and try to be there for our fellow humans. On that note, she also wants to ask that we support our small businesses during this holiday season of spending, our small businesses are struggling like a lot of people are and when you support these small businesses try to use cash versus credit cards because the amount small businesses pay in fees impacts their bottom line, and they're already small businesses. With that, she wants to wish everybody a Happy Holiday, a safe holiday celebrating whatever you celebrate during these holidays.

23. **ANNOUNCEMENT(S)**

1) Jolly Trolley Park Tour – Wednesday, December 18, 2024, from 6:00 p.m. – 8:00 p.m. traveling from 162nd St. and Denker Ave. to Johnson Park.
2) CO-ED Youth Basketball registration period – Sunday, November 24, 2024, to Saturday, December 21, 2024. Encourage young folks to register, and volunteer coaching opportunity is available.
3) Introduction to Basketball registration period – Saturday, January 25, 2025 through March 1, 2025. For children in grades TK-Kindergarten.
4) Glow in the Dark Kickball Game – Saturday, January 11, 2025, 6:30 p.m. at Mas Fukai Park.
5) Dr. Martin Luther King Jr. Commemorative Parade & Celebration – Saturday, January 18, 2025, from 10:00 a.m. – 3:00 p.m. beginning at Serra High School & ends at Rowley Park.
6) Ministerial Association Luncheon – Thursday, January 23, 2025, from 11:00 a.m. – 1:00 p.m. at the Nakaoka Community Center.
7) Candlelight Dinner – Thursday, January 23, 2025, check-in at 4:30 p.m. at the Nakaoka Community Center. Registration required.
8) Activity & Resource Guide available beginning Monday, December 9, 2024, at various city locations or visit us online at www.cityofgardena.org/guide or call (310) 217-9537 to receive a mailed copy.

24. **REMEMBRANCES**

Mrs. Cecillia Yeon Rhee, 63 years of age, and loving mother of Katherine Rhee, who works in our Elected & City Manager's Offices – City Clerk's Office.
Mr. Harry Choi, 99 years of age, Gardena resident and active participant within the Senior Bureau.
Mr. Kenneth H. Pun, who was the founder and managing partner at The Pun Group LLP. He worked with the City of Gardena since 2007 as our auditor.

25. **ADJOURNMENT**

At 10:24 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 January 14, 2025.

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

MEMORANDUM

TO: Honorable Mayor and City Council

FROM: City Treasurer's Office

DATE: December 19, 2024

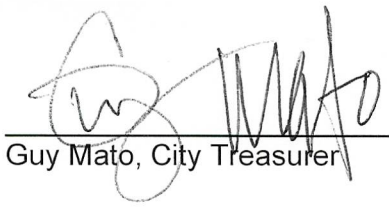
SUBJECT: WARRANT REGISTER
PAYROLL REGISTER

December 24, 2024	TOTAL WARRANTS ISSUED:	$4,449,728.52

Wire Transfer:	12855-12873
Prepay:	178711-178714
Check Numbers:	178715-178919
Checks Voided:	

Total Pages of Register: 25

December 13, 2024	TOTAL PAYROLL ISSUED:	$1,993,091.67



Guy Mato, City Treasurer

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
12855	11/5/2024	112326 LWP CLAIMS SOLUTIONS INC.	110524		WORKERS' COMP CLAIMS	32,604.56
					Total :	**32,604.56**
12856	11/21/2024	112441 ANTHEM BLUE CROSS LIFE &, HEALTH INSUF	365993334585		HEALTH INSURANCE CLAIMS	18,354.55
					Total :	**18,354.55**
12857	11/25/2024	111016 KAISER FOUNDATION HEALTH PLAN	DECEMBER 2024		HEALTH INSURANCE	351,807.28
					Total :	**351,807.28**
12858	11/26/2024	101641 CALPERS	100000017722888		MISC GROUP UAL PAYMENT - NOVEME	37,966.00
					Total :	**37,966.00**
12859	11/26/2024	101641 CALPERS	100000017722898		SAFETY CLASSIC UAL PAYMENT - NOV	68,422.67
					Total :	**68,422.67**
12860	11/26/2024	101641 CALPERS	100000017722909		SAFETY PEPRA UAL PAYMENT- NOVEM	1,292.92
					Total :	**1,292.92**
12861	12/2/2024	112401 PINNACLE CLAIMS MANAGEMENT INC	DECEMBER 2024	023-01546	HEALTH & LIFE INSURANCE, SERVICE	83,683.30
					Total :	**83,683.30**
12862	12/2/2024	419630 U.S. BANK	2736283		2006 COPS REFINANCING PROJECT SI	145,783.00
					Total :	**145,783.00**
12863	12/2/2024	402609 BANK OF NEW YORK, THE	111324		2007 SBRPCA REVENEU BONDS SERIE	157,162.50
					Total :	**157,162.50**
12864	12/2/2024	112326 LWP CLAIMS SOLUTIONS INC.	120224		WORKERS' COMP CLAIMS	66,130.17
					Total :	**66,130.17**
12865	12/2/2024	112401 PINNACLE CLAIMS MANAGEMENT INC	120224		HEALTH INSURANCE CLAIMS	71,676.22
					Total :	**71,676.22**
12866	12/2/2024	112441 ANTHEM BLUE CROSS LIFE &, HEALTH INSUF	365993269295		HEALTH INSURANCE CLAIMS	35,217.82
					Total :	**35,217.82**

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
12867	12/5/2024	112401 PINNACLE CLAIMS MANAGEMENT INC	120424		HEALTH INSURANCE CLAIMS	13,257.30
					Total :	**13,257.30**
12868	12/5/2024	112441 ANTHEM BLUE CROSS LIFE &, HEALTH INSUF	365993716900		HEALTH INSURANCE CLAIMS	45,210.28
					Total :	**45,210.28**
12869	12/5/2024	112401 PINNACLE CLAIMS MANAGEMENT INC	120324		HEALTH INSURANCE CLAIMS	3,023.34
					Total :	**3,023.34**
12870	12/3/2024	112326 LWP CLAIMS SOLUTIONS INC.	120324		WORKERS' COMP CLAIMS	100,000.00
					Total :	**100,000.00**
12871	12/12/2024	112441 ANTHEM BLUE CROSS LIFE &, HEALTH INSUF	365994478391		HEALTH INSURANCE CLAIMS	3,293.88
					Total :	**3,293.88**
12872	12/16/2024	112326 LWP CLAIMS SOLUTIONS INC.	121624		WORKERS' COMP CLAIMS	2,546.35
					Total :	**2,546.35**
12873	12/16/2024	112401 PINNACLE CLAIMS MANAGEMENT INC	121024		HEALTH INSURANCE CLAIMS	43,337.22
					Total :	**43,337.22**
178711	12/17/2024	113169 FLORES ZARATE, ABRAHAM	24-36PW		FINAL SETTLEMENT	5,703.97
					Total :	**5,703.97**
178712	12/17/2024	107461 DEPARTMENT OF HEALTH CARE, SERVICES	24-02PD		FINAL SETTLEMENT	472.26
					Total :	**472.26**
178713	12/17/2024	113170 LAW OFFICES OF JACOB EMRANI, APC AND	24-02PD		FINAL SETTLEMENT	31,527.74
					Total :	**31,527.74**
178714	12/19/2024	113177 LUIS A. CORONA OR	24-39PW		FINAL SETTLEMENT	9,885.48
					Total :	**9,885.48**
178715	12/24/2024	113097 148TH GARDENA LLC	RA-SPIVEY 01/2025		RENTAL ASSISTANCE PROGRAM	420.00
					Total :	**420.00**
178716	12/24/2024	104606 2 BROTHERS TIRES & WHEELS	30045		PD VEHICLE TIRE SUPPLIES	20.00
					Total :	**20.00**

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178717	12/24/2024	106086 ABC COMPANIES	3752560		GTRANS AUTO PARTS	854.40
					Total :	**854.40**
178718	12/24/2024	101748 AFTERMARKET PARTS COMPANY LLC, THE	83570598	037-10360	GTRANS AUTO PARTS	554.34
			83573398	037-10360	GTRANS AUTO PARTS	55.65
			83573453	037-10360	GTRANS AUTO PARTS	382.78
			83573496	037-10360	GTRANS AUTO PARTS	82.94
					Total :	**1,075.71**
178719	12/24/2024	112192 AJ KIRKWOOD & ASSOCIATES	12467551		SERVICE CALL - CARD READER	662.50
					Total :	**662.50**
178720	12/24/2024	113158 ALTHA, SAYLES	CIT #411139197		PARKING CITATION REFUND	52.95
					Total :	**52.95**
178721	12/24/2024	112571 AMBIT CONSTRUCTION &, DESIGN, INC.	JN 512 08/31/24	037-10241	GTRANS DISPATCH REMODELING PRC	12,351.29
					Total :	**12,351.29**
178722	12/24/2024	100925 AMERICAN MOVING PARTS	01A164306		GTRANS AUTO PARTS	482.55
					Total :	**482.55**
178723	12/24/2024	110028 ANSER ADVISORY MANAGEMENT LLC	29047	024-01108	ARTESIA BLVD. STREET IMPROVEMEN	2,687.50
					Total :	**2,687.50**
178724	12/24/2024	108625 ARAD OIL INC.	NOVEMBER 2024		CAR WASH	48.00
					Total :	**48.00**
178725	12/24/2024	101459 ASBURY ENVIRONMENTAL SERVICES	1500-01153748		HAZARDOUS WASTE DISPOSAL SERVI	137.00
					Total :	**137.00**
178726	12/24/2024	104687 AT&T	22738851		TELEPHONE	29,654.79
					Total :	**29,654.79**
178727	12/24/2024	104687 AT&T	22590727		TELEPHONE	29,545.03
			22679368		TELEPHONE	1,602.34
			22686151		TELEPHONE	861.00
					Total :	**32,008.37**

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178728	12/24/2024	616090 AT&T	3103232408 12/01/24		TELEPHONE	5,257.85
					Total :	**5,257.85**
178729	12/24/2024	111170 AT&T FIRSTNET	287290885074X121024	023-01559	CITYWIDE CELL PHONE ACCT #287290	1,652.33
			287293420631X121024	023-01559	PD CELL PHONE ACCT#287293420631	312.58
			287295242065X121024	023-01559	PD CELL PHONE ACCT #287295242065	286.87
			287298156560X121024	023-01559	CITYWIDE CELL PHONE ACCT #287298	1,804.36
			287303490376X121024	023-01559	BUS CELL PHONE ACCT #28730349037	2,085.31
			287324972943X121024	023-01559	GTRANS CELL PHONE ACCT #2873249	50.90
					Total :	**6,192.35**
178730	12/24/2024	100964 AT&T MOBILITY	828667974X121624		CM CELL PHONE ACCT #828667974	86.46
					Total :	**86.46**
178731	12/24/2024	108383 ATKINSON, ANDELSON, LOYA, RUDD & ROMC	731476		PROFESSIONAL SERVICES	165.90
					Total :	**165.90**
178732	12/24/2024	113168 AU, KA	GEPCO 2024		GEPCO LOAN	2,000.00
					Total :	**2,000.00**
178733	12/24/2024	112942 AWP SAFETY	40017379	037-10416	SIGNS - 16"X24" BUS STOP SIGN	5,969.60
			40017451	037-10416	SIGNS - 16"X3.625" BUS STOP DECALS	2,709.51
					Total :	**8,679.11**
178734	12/24/2024	112240 AZ HOLDINGS LLC	RA-BAILEY 12/2024		RENTAL ASSISTANCE PROGRAM	1,075.00
					Total :	**1,075.00**
178735	12/24/2024	112240 AZ HOLDINGS LLC	RA-BAILEY 01/2025		RENTAL ASSISTANCE PROGRAM	537.50
					Total :	**537.50**
178736	12/24/2024	105853 BABCOCK ASSOCIATES, LTD	RA-SMITH 12/2024		RENTAL ASSISTANCE PROGRAM	553.50
					Total :	**553.50**
178737	12/24/2024	105853 BABCOCK ASSOCIATES, LTD	RA-SMITH 01/2025		RENTAL ASSISTANCE PROGRAM	276.75
					Total :	**276.75**
178738	12/24/2024	113094 BEACH FRONT PROPERTIES	RA-SANCHEZ 01/2025		RENTAL ASSISTANCE PROGRAM	368.75

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178738	12/24/2024	113094 113094 BEACH FRONT PROPERTIES	(Continued)		**Total :**	**368.75**
178739	12/24/2024	103641 BECNEL UNIFORMS	70769		BUS UNIFORM SUPPLIES	475.19
					Total :	**475.19**
178740	12/24/2024	102135 BEHRENDS, KENT	297	023-01545	IT NETWORK SUPPORT - NOVEMBER 2	3,400.00
			299		PD NETWORK SUPPORT	3,375.00
					Total :	**6,775.00**
178741	12/24/2024	107747 BENGAR PRODUCTIONS	7541		EMBROIDERY SERVICES	1,440.00
					Total :	**1,440.00**
178742	12/24/2024	102331 BLUE DIAMOND MATERIALS	3943363		STREET MAINT SUPPLIES	2,422.73
					Total :	**2,422.73**
178743	12/24/2024	112674 BUCK SIGNS & GRAPHICS INC	2840		GTRANS BUS DECAL SUPPLIES	392.21
					Total :	**392.21**
178744	12/24/2024	113055 CADMAN GROUP	RA-LEE 01/2025		RENTAL ASSISTANCE PROGRAM	538.50
					Total :	**538.50**
178745	12/24/2024	103029 CALIFORNIA FENCE & SUPPLY	M15014		PARK MAINT SUPPLIES	45.52
					Total :	**45.52**
178746	12/24/2024	103383 CALPORTLAND	96562796		STREET MAINT SUPPLIES	1,208.99
					Total :	**1,208.99**
178747	12/24/2024	110313 CALTIP	94-2024-NOVEMBER	037-10356	INSURANCE CLAIMS DEDUCTIBLE - NC	5,283.22
					Total :	**5,283.22**
178748	12/24/2024	110538 CANNON COMPANY	89960	024-00927	ARTESIA BLVD. STREET IMPROVEMEN	236.90
			90343	024-00788	STORM DRAIN CATCH BASIN SCREEN	2,437.40
					Total :	**2,674.30**
178749	12/24/2024	112073 CAROLLO ENGINEERS, INC	FB58489	024-01090	STORM DRAIN MASTER PLAN PROJEC	3,706.75
					Total :	**3,706.75**
178750	12/24/2024	113062 CBA PROPERTY MANAGEMENT, INC	RA-BRUCE 01/2025		RENTAL ASSISTANCE PROGRAM	343.75

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178750	12/24/2024	113062 113062 CBA PROPERTY MANAGEMENT, INC (Continued)			**Total :**	**343.75**
178751	12/24/2024	113112 CDCE, INC.	122817	037-10417	CRADLEPOINT ROUTER LICENSE	33,583.00
					Total :	**33,583.00**
178752	12/24/2024	113171 CEDELLO, MARIA	CIT #399132533		CITATION OVERPAYMENT REFUND	47.00
					Total :	**47.00**
178753	12/24/2024	110605 CHANDLER ASSET MANAGEMENT	2411GARDENA	013-00032	INVESTMENT MGMT SERVICES - NOVE	2,636.72
					Total :	**2,636.72**
178754	12/24/2024	113048 CHANG, JULIA C	RA-FRANCO 01/2025		RENTAL ASSISTANCE PROGRAM	412.50
					Total :	**412.50**
178755	12/24/2024	108378 CHARLES E. THOMAS COMPANY INC.	114222	037-10367	DESIGNATED OPERATOR SERVICES	222.21
			114448	037-10380	ANNUAL FILTER REPLACEMENT	375.96
					Total :	**598.17**
178756	12/24/2024	104126 CHARTER COMMUNICATIONS	187854501120724	023-01555	CABLE & BACKUP INTERNET SERVICE	4,271.78
					Total :	**4,271.78**
178757	12/24/2024	102388 COPYLAND, INC.	88260	037-10362	GTRANS - 16"X20", 3/16" FOAM BOARD	3,161.49
			88284	037-10362	GTRANS - 6.63"X0.97" COLOR STICKEF	145.46
			88292	037-10362	GTRANS - 3.5"X8.5" TAKE ONE CARDS	3,307.37
					Total :	**6,614.32**
178758	12/24/2024	109913 COSTAR REALTY INFORMATION INC.	121558255	032-00174	COSTAR SUITE - DECEMBER 2024	939.14
					Total :	**939.14**
178759	12/24/2024	105935 CRAFCO, INC.	9403317385		STREET MAINT SUPPLIES	907.90
					Total :	**907.90**
178760	12/24/2024	103353 CRM COMPANY, LLC.	LA26188		SCRAP TIRE DISPOSAL FEE	69.50
			LA26189		SCRAP TIRE DISPOSAL FEE	69.50
			LA26228		SCRAP TIRE DISPOSAL FEE	69.50
					Total :	**208.50**
178761	12/24/2024	106193 CUMMINS SALES AND SERVICE	X4-241052769	037-10370	GTRANS AUTO PARTS	1,182.17

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178761	12/24/2024	106193 CUMMINS SALES AND SERVICE	(Continued)			
			X4-241153703	037-10370	GTRANS AUTO PARTS	1,316.49
			X4-241153765	037-10370	GTRANS AUTO PARTS	417.47
			X4-241253913	037-10370	GTRANS AUTO PARTS	533.90
			X4-52317	037-10370	GTRANS AUTO PARTS	148.50
					Total :	**3,598.53**
178762	12/24/2024	110319 CWE DIRECTOR	F24669	024-01042	MS4 & NPDES MONITORING & COMPLI	21,338.00
					Total :	**21,338.00**
178763	12/24/2024	104736 D&R OFFICE WORKS, INC.	134323	034-00677	REC OFFICE FURNITURE	6,151.95
					Total :	**6,151.95**
178764	12/24/2024	110844 DATA GEAR, INC.	44782	037-10296	GTRANS FACILITY CAMERA UPGRADE	58,774.89
					Total :	**58,774.89**
178765	12/24/2024	312117 DEPARTMENT OF WATER & POWER	120224		LIGHT & POWER	88.20
					Total :	**88.20**
178766	12/24/2024	105861 DIVERSIFIED FALL PROTECTION	04-009602	037-10253	FALL PROTECTION INSPECTION & REF	1,200.00
					Total :	**1,200.00**
178767	12/24/2024	112774 DR. HYDRAULICS, INC	3190		GTRANS HYDRAULIC MAINT SERVICE	860.63
			3259		GTRANS FACILITY MAINT SUPPLIES	990.23
			3273		GTRANS HYDRAULIC MAINT SERVICE	3,166.29
			3627		GTRANS HYDRAULIC MAINT SERVICE	570.00
					Total :	**5,587.15**
178768	12/24/2024	111712 DUNG TANG	RA-PHAM 01/2025		RENTAL ASSISTANCE PROGRAM	450.00
					Total :	**450.00**
178769	12/24/2024	110534 EL DORADO NATIONAL	90877265		GTRANS BUS VEHICLE SUPPLIES	397.55
			90877277		GTRANS BUS VEHICLE SUPPLIES	150.41
			90877308	037-10171	GTRANS BUS VEHICLE SUPPLIES	11,994.87
					Total :	**12,542.83**
178770	12/24/2024	105418 EMPIRE CLEANING SUPPLY	S6536394	034-00666	CUSTODIAL SUPPLIES	1,034.32
			S6639484	034-00666	CUSTODIAL SUPPLIES	1,670.82

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178770	12/24/2024	105418 EMPIRE CLEANING SUPPLY	(Continued)			
			S6790979	034-00666	CUSTODIAL SUPPLIES	750.95
			S6790979.002	034-00666	CUSTODIAL SUPPLIES	358.19
					Total :	**3,814.28**
178771	12/24/2024	105392 ENTENMANN-ROVIN COMPANY	0180276		PD UNIFORM SUPPLIES	306.55
					Total :	**306.55**
178772	12/24/2024	106459 ENTERPRISE FM TRUST	FBN5199199	023-01567	ENTERPRISE LEASE - DECEMBER 202	8,541.69
			FBN5203334	023-01567	ENTERPRISE LEASE - DECEMBER 202	11,922.30
				023-01572		
					Total :	**20,463.99**
178773	12/24/2024	105650 EWING IRRIGATION PRODUCTS	24322704		PARK MAINT SUPPLIES	1,231.13
			24343327		PARK MAINT SUPPLIES	135.66
					Total :	**1,366.79**
178774	12/24/2024	106129 FEDEX	8-668-69436		SHIPPING SERVICES	34.14
			8-683-27162		SHIPPING SERVICES	30.68
			8-703-65192		SHIPPING SERVICES	43.52
			9-686-13637		SHIPPING SERVICES - LATE FEE	2.73
					Total :	**111.07**
178775	12/24/2024	103083 FIRST ADVANTAGE LNS OCC HEALTH, SOLUT	2503052411		DRUG TEST/ADMIN FEE	756.72
					Total :	**756.72**
178776	12/24/2024	113038 FIRSTPRO PROPERTY MANAGEMENT	RA-RIVERS 01/2025		RENTAL ASSISTANCE PROGRAM	440.00
					Total :	**440.00**
178777	12/24/2024	106545 FLEETPRIDE, INC	121535087		BUS AUTO PARTS	222.69
					Total :	**222.69**
178778	12/24/2024	112329 FM THOMAS AIR CONDITIONING INC	47448A	024-01104	NCC HVAC SYSTEM UPGRADE	27,485.00
			47448B		NCC HVAC SYSTEM UPGRADE	4,670.00
			47578		HVAC REPAIR FOR PD	930.00
					Total :	**33,085.00**
178779	12/24/2024	112650 FOSTER & FOSTER, INC.	34050		ACTUARIAL SERVICES - GASBS 68 REI	1,000.00

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178779	12/24/2024	112650 112650 FOSTER & FOSTER, INC.	(Continued)		**Total :**	**1,000.00**
178780	12/24/2024	106465 FOX FIRST AID & SAFETY INC	74171		PARK MAINT SUPPLIES	60.64
					Total :	**60.64**
178781	12/24/2024	113173 G3 URBAN	PERMIT #16850		PERMIT DEPOSIT REFUND - 2129 ROSI	15,000.00
					Total :	**15,000.00**
178782	12/24/2024	113173 G3 URBAN	PERMIT #17876		PERMIT DEPOSIT REFUND - 2500 W RC	12,000.00
					Total :	**12,000.00**
178783	12/24/2024	619005 GAS COMPANY, THE	035-746-60944 120624		CNG FUEL	44,265.22
					Total :	**44,265.22**
178784	12/24/2024	107056 GENFARE	90205661		GTRANS AUTO PARTS	2,136.27
					Total :	**2,136.27**
178785	12/24/2024	106470 GILLIG LLC	41240368	037-10371	GTRANS AUTO PARTS	988.97
			41240369	037-10371	GTRANS AUTO PARTS	988.97
			41240370	037-10371	GTRANS AUTO PARTS	988.97
			41244424	037-10371	GTRANS AUTO PARTS	581.04
			41245878	037-10371	GTRANS AUTO PARTS	446.51
			41248942	037-10371	GTRANS AUTO PARTS	1,477.12
			41249531	037-10371	GTRANS AUTO PARTS	22.24
			41250606	037-10371	GTRANS AUTO PARTS	1,810.98
					Total :	**7,304.80**
178786	12/24/2024	120212 GLENN E. THOMAS CO.	13335		2023 RAM PROMASTER SERVICE & RE	816.22
					Total :	**816.22**
178787	12/24/2024	619004 GOLDEN STATE WATER CO.	120524		WATER	13,994.57
					Total :	**13,994.57**
178788	12/24/2024	107513 GRAINGER	9326608370	037-10372	GTRANS FACILITY SUPPLIES	172.50
			9327562519		GTRANS FACILITY SUPPLIES	27.58
			9328488003		PW AUTO SUPPLIES	63.24
			9329847199		GTRANS FACILITY SUPPLIES	32.26
			9333891654		GTRANS FACILITY SUPPLIES	281.00

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178788	12/24/2024	107513 GRAINGER	(Continued)			
			9336709929	037-10372	GTRANS FACILITY SUPPLIES	433.55
			9340604124		GTRANS FACILITY SUPPLIES	33.73
					Total :	**1,043.86**
178789	12/24/2024	112374 GRIFFIN STRUCTURES, INC.	GSI-GCASC-23 REV	024-00910	AQUATIC & SENIOR CENTER JN978	19,321.30
			GSI-GRCCD-05	024-01052	ROSECRANS COMMUNITY BLDG DEM(	1,787.70
					Total :	**21,109.00**
178790	12/24/2024	113136 GRUBER AND LOPEZ, INC.	4764	023-01576	AUDIT SERVICES FY 2023/2024	53,725.00
					Total :	**53,725.00**
178791	12/24/2024	113096 GUNAWAN, WILLIAM	RA-DUFFEY 01/2025		RENTAL ASSISTANCE PROGRAM	748.75
					Total :	**748.75**
178792	12/24/2024	106701 HARTZOG & CRABILL, INC.	24-0743(HCI#3814)	024-01109	CONSULTANT SERVICES, DRIVEWAY A	1,680.00
			24-0744(HCI#3798)	024-01109	CONSULTANT SERVICES, DRIVEWAY A	2,074.00
					Total :	**3,754.00**
178793	12/24/2024	208114 HASSOLDT, MATTHEW S.	11/17-11/22		POST MANAGEMENT COURSE CLASS	250.00
					Total :	**250.00**
178794	12/24/2024	113148 HATTEN, ANTHONY	111424		DJ SERVICES - GTRANS EMPLOYEE B/	2,100.00
					Total :	**2,100.00**
178795	12/24/2024	113162 HERNANDEZ, RICARDO	PERMIT #18313		PERMIT DEPOSIT REFUND - 1641 W 14	1,000.00
					Total :	**1,000.00**
178796	12/24/2024	112076 HERNANDEZ, ROSA	024 12/11/24		INTERN SERVICES - 11/29-12/11/24	1,365.00
					Total :	**1,365.00**
178798	12/24/2024	108434 HOME DEPOT CREDIT SERVICES	0024281		PD PROGRAM SUPPLIES	275.94
			0332402		PD PROGRAM SUPPLIES	88.47
			0352250		PD PROGRAM SUPPLIES	382.77
			0621849		SIGNS/SIGNALS SUPPLIES	120.15
			0902708		GTRANS MAINT SUPPLIES	188.49
			1510209		PD PROGRAM SUPPLIES	19.05
			2264713		SIGNS /SIGNALS SUPPLIES	-1,233.93

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178798	12/24/2024	108434 HOME DEPOT CREDIT SERVICES	(Continued)			
			2340296		BLDG MAINT SUPPLIES	28.93
			2834443		GTRANS MAINT SUPPLIES	34.11
			2900225		PD PROGRAM SUPPLIES	64.95
			2902992		PD PROGRAM SUPPLIES	55.01
			3027574		GTRANS MAINT SUPPLIES	173.80
			3564914		GTRANS MAINT SUPPLIES	-25.31
			3622357		PARK MAINT SUPPLIES	9.83
			4220069		REC PROGRAM SUPPLIES	-765.41
			4553357		PD PROGRAM SUPPLIES	22.86
			4905495		REC PROGRAM SUPPLIES	61.60
			4905496		REC PROGRAM SUPPLIES	61.60
			5323677		PARK MAINT SUPPLIES	421.17
			5340091		PARK MAINT SUPPLIES	436.59
			5553190		SIGNS/SIGNALS SUPPLIES	62.80
			5905384		REC PROGRAM SUPPLIES	150.00
			5905388		REC PROGRAM SUPPLIES	150.00
			6052452		PARK MAINT SUPPLIES	5.44
			6513612		SIGNS/SIGNALS SUPPLIES	1,032.54
			6530741		GTRANS MAINT SUPPLIES	188.08
			6551603		SIGNS/SIGNALS SUPPLIES	2,201.09
			6904399		GTRANS MAINT SUPPLIES	13.75
			7332271		SIGNS/ SIGNALS SUPPLIES	203.66
			7332272		BLDG MAINT SUPPLIES	40.92
			7352089		PD PROGRAM SUPPLIES	366.86
			7513641		PD PROGRAM SUPPLIES	331.56
			7523366		PARK MAINT SUPPLIES	98.53
			7621310		PD PROGRAM SUPPLIES	38.11
			7903607		PD PROGRAM SUPPLIES	197.06
			7905132		JAIL PROGRAM SUPPLIES	194.81
			8122360		GTRANS MAINT SUPPLIES	27.10
			8164081		GTRANS MAINT SUPPLIES	166.97
			8332465		PD PROGRAM SUPPLIES	50.23
			8332471		BLDG MAINT SUPPLIES	1,280.43
			8720070		GTRANS MAINT SUPPLIES	36.29
			8805045		GTRANS MAINT SUPPLIES	63.28

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178798	12/24/2024	108434 HOME DEPOT CREDIT SERVICES	(Continued)			
			8904884		PD PROGRAM SUPPLIES	4.58
			9495896		GTRANS MAINT SUPPLIES	40.44
			9586690		GTRANS MAINT SUPPLIES	6.92
			9900922		REC PROGRAM SUPPLIES	72.25
					Total :	**7,444.37**
178799	12/24/2024	108430 HOME PIPE & SUPPLY	F49627		BLDG MAINT SUPPLIES	40.25
					Total :	**40.25**
178800	12/24/2024	104144 HOOKER, JASON	GEPCO 2024		GEPCO LOAN	2,000.00
					Total :	**2,000.00**
178801	12/24/2024	113165 IMPERIAL POINT ATHLETICS, LLC	INV21812		GTRANS 7X FOOTBALL JERSEYS	2,465.00
					Total :	**2,465.00**
178802	12/24/2024	111696 INDICATOR REEF, LLC	RA-QUIROZ 12/2024		RENTAL ASSISTANCE PROGRAM	752.50
					Total :	**752.50**
178803	12/24/2024	111696 INDICATOR REEF, LLC	RA-BRYANT 01/2025		RENTAL ASSISTANCE PROGRAM	625.00
					Total :	**625.00**
178804	12/24/2024	111696 INDICATOR REEF, LLC	RA-QUIROZ 01/2025		RENTAL ASSISTANCE PROGRAM	376.25
					Total :	**376.25**
178805	12/24/2024	111593 INTER-CON SECURITY SYSTEMS INC	BD0388796	037-10312	GTRANS SECURITY SERVICES - OCTO	6,610.24
					Total :	**6,610.24**
178806	12/24/2024	106714 INTERSTATE BATTERIES OF, CALIFORNIA CO.	130111295	037-10373	GTRANS AUTO PARTS	2,056.23
			130112347		GTRANS AUTO PARTS	-140.00
			130112385	037-10373	GTRANS AUTO PARTS	279.42
			54631	037-10373	GTRANS AUTO PARTS	258.57
					Total :	**2,454.22**
178807	12/24/2024	111715 ISLAND BREEZE APARTMENTS	RA-HERNANDEZ 01/2025		RENTAL ASSISTANCE PROGRAM	463.00
					Total :	**463.00**
178808	12/24/2024	110733 J & S PROPERTY MANAGEMENT AND, MAINTI	8807		LANDSCAPE MAINTENANCE SERVICE	2,089.65

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178808	12/24/2024	110733 110733 J & S PROPERTY MANAGEMENT AND, M. (Continued)			**Total :**	**2,089.65**
178809	12/24/2024	100436 J.J. KELLER & ASSOCIATES, INC	9109321893	037-10383	FLEET MANAGEMENT AND COMPLIANC	532.18
			9109604399	037-10383	FLEET MANAGEMENT AND COMPLIANC	532.18
					Total :	**1,064.36**
178810	12/24/2024	110853 JONES MAYER	125863		ATTORNEY SERVICES	15,612.51
			125864		ATTORNEY SERVICES	9,832.99
			125865		ATTORNEY SERVICES	28.97
			125866		ATTORNEY SERVICES	115.86
			125867		ATTORNEY SERVICES	3,765.46
					Total :	**29,355.79**
178811	12/24/2024	110853 JONES MAYER	125846		ATTORNEY SERVICES	86.90
			125847		ATTORNEY SERVICES	5,242.73
			125848	020-00055	ATTORNEY SERVICES	11,354.56
			125849		ATTORNEY SERVICES	118.77
			125850		ATTORNEY SERVICES	47.51
			125851		ATTORNEY SERVICES	118.77
			125852		ATTORNEY SERVICES	53.00
			125853		ATTORNEY SERVICES	840.00
			125854		ATTORNEY SERVICES	376.57
			125855		ATTORNEY SERVICES	811.03
			125856		ATTORNEY SERVICES	260.69
			125857		ATTORNEY SERVICES	463.46
			125858		ATTORNEY SERVICES	1,390.35
			125859		ATTORNEY SERVICES	86.90
			125860		ATTORNEY SERVICES	1,282.67
			125861		ATTORNEY SERVICES	6,864.64
			125862		ATTORNEY SERVICES	1,258.91
			126091		ATTORNEY SERVICES	347.58
					Total :	**31,005.04**
178812	12/24/2024	113057 KARON MANAGEMENT SERVICES	RA-PHELPS 01/2025		RENTAL ASSISTANCE PROGRAM	412.50
					Total :	**412.50**
178813	12/24/2024	113166 KAWAKAMI, TODD	PERMIT #50021-1255		PERMIT DEPOSIT REFUND - 16916 S BI	7,500.00

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178813	12/24/2024	113166 113166 KAWAKAMI, TODD	(Continued)		**Total :**	**7,500.00**
178814	12/24/2024	113041 KELLUM, PATRICIA	RA-MASON 01/2025		RENTAL ASSISTANCE PROGRAM	337.50
					Total :	**337.50**
178815	12/24/2024	112812 KIMBALL MIDWEST	102446835		GTRANS SHOP SUPPLIES	546.33
					Total :	**546.33**
178816	12/24/2024	110385 KIMLEY-HORN AND ASSOCIATES, INC	194091010-1024	032-00181	DEVELOPMENT SERVICES - 16911 NOF	28,937.59
					Total :	**28,937.59**
178817	12/24/2024	113159 KUMIYAMA, LOURDES	RECEIPT #73678664		MAINTENANCE DEPOSIT REFUND	250.00
					Total :	**250.00**
178818	12/24/2024	111813 KWIK FLASH PHOTO	11142024		PHOTOGRAPHY SERVICES - 2024 PRE	200.00
					Total :	**200.00**
178819	12/24/2024	312240 L.A. COUNTY DEPARTMENT OF, PUBLIC WOR	24111202195		CATCH BASIN RETROFIT JN 998/JN 999	1,653.24
			24111202411	024-01100	INDUSTRIAL WASTE SERVICES	11,328.60
			24111202492		ROSECRANS/NORMANDIE STRIPING	3,333.65
			24111202742	024-01101	TRAFFIC SIGNAL MAINT - OCTOBER 20	1,939.47
					Total :	**18,254.96**
178820	12/24/2024	104203 L.A. PAINT & BODY WORKS	28541		BODY REPAIR - 2023 HONDA CIVIC #16	937.43
					Total :	**937.43**
178821	12/24/2024	109939 LA UNIFORMS & TAILORING	24361		PD UNIFORM SUPPLIES	350.26
			24374		PD UNIFORM SUPPLIES	49.50
			24532		PD UNIFORM SUPPLIES	733.71
			24545		PD UNIFORM SUPPLIES	434.94
			24546		PD UNIFORM SUPPLIES	434.94
			24554		PD UNIFORM SUPPLIES	99.17
			24629		PD UNIFORM SUPPLIES	110.14
					Total :	**2,212.66**
178822	12/24/2024	112614 LAX AUTO REPAIR	20052		2023 FORD INTRCPTR #1661719 OIL CH	70.00
			20059		2021 FORD INTRCPTR #1614738 OIL &	70.00
			20061		2022 FORD INTRCPTR #1627788 OIL CH	70.00

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178822	12/24/2024	112614 LAX AUTO REPAIR	(Continued)			
			20114		2018 FORD POLICE INTRCPT #1554676	70.00
			20115		2022 FORD INTRCPTR #1630468 OIL &	70.00
			20116		2023 FORD INTRCPTR #1661716 OIL &	70.00
					Total :	**420.00**
178823	12/24/2024	113091 LBPM/150TH APARTMENT (DMM1210)	RA-GORDON 01/2025		RENTAL ASSISTANCE PROGRAM	576.50
					Total :	**576.50**
178824	12/24/2024	109517 LOAD N' GO BUILDING MATERIALS	31783		STREET MAINT SUPPLIES	153.78
			31842		STREET MAINT SUPPLIES	47.72
			31887		STREET MAINT SUPPLIES	62.28
					Total :	**263.78**
178825	12/24/2024	109563 LUCKY LADY CASINO	0850000263		ECONOMIC ASSISTANCE - NOVEMBER	47,340.36
					Total :	**47,340.36**
178826	12/24/2024	112615 LU'S LIGHTHOUSE, INC.	01275312		GTRANS SHOP SUPPLIES	75.59
			01275326		GTRANS SHOP SUPPLIES	818.19
					Total :	**893.78**
178827	12/24/2024	113301 M & K METAL CO.	383260		STREET MAINT SUPPLIES	270.49
			383786		STREET MAINT SUPPLIES	86.34
					Total :	**356.83**
178828	12/24/2024	113042 MA, ANGELA	RA-BELLAMY 12/2024		RENTAL ASSISTANCE PROGRAM	890.00
					Total :	**890.00**
178829	12/24/2024	113042 MA, ANGELA	RA-BELLAMY 01/2025		RENTAL ASSISTANCE PROGRAM	445.00
					Total :	**445.00**
178830	12/24/2024	105082 MAJESTIC LIGHTING, INC.	ML89495		BLDG MAINT SUPPLIES	318.62
					Total :	**318.62**
178831	12/24/2024	110306 MARIPOSA LANDSCAPES, INC	110572	024-01099	MEDIAN LANDSCAPE MAINTENANCE	8,864.00
			111042	024-01099	MEDIAN LANDSCAPE MAINTENANCE	8,864.00
					Total :	**17,728.00**

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178832	12/24/2024	113064 MCMASTER-CARR SUPPLY COMPANY	36894318		GTRANS SHOP SUPPLIES	398.03
			36900016		GTRANS SHOP SUPPLIES	130.48
			37162171		GTRANS SHOP SUPPLIES	147.92
			37325235		GTRANS SHOP SUPPLIES	309.79
					Total :	**986.22**
178833	12/24/2024	100078 MESSINA, BRIAN	11/17-11/22		POST MANAGEMENT COURSE CLASS	250.00
					Total :	**250.00**
178834	12/24/2024	110206 MICHELIN NORTH AMERICA, INC.	DA0061546503	037-10395	GTRANS' BUS TIRE LEASE SERVICES -	8,218.82
					Total :	**8,218.82**
178835	12/24/2024	111604 MICRO ELECTRONICS, INC	13348990	023-01553	COMPUTER REPLACEMENT PARTS	1,718.39
			13409857	023-01553	COMPUTER REPLACEMENT PARTS	1,522.83
					Total :	**3,241.22**
178836	12/24/2024	110824 MIXER INK LLC	106026	034-00678	JAZZ FESTIVAL MERCHANDISE	6,203.66
					Total :	**6,203.66**
178837	12/24/2024	112058 MOBILE CAR & TRUCK WASH JBT	2698	037-10343	40' BUS INTERIOR DETAILING	4,646.25
					Total :	**4,646.25**
178838	12/24/2024	104152 MODEL 1 COMMERCIAL, VEHICLES, INC.	XA128024998		GTRANS AITO PARTS	277.69
					Total :	**277.69**
178839	12/24/2024	113029 MONTEREY APARTMENTS	RA-HILLJONES 12/2024		RENTAL ASSISTANCE PROGRAM	947.50
					Total :	**947.50**
178840	12/24/2024	113029 MONTEREY APARTMENTS	RA-TEMPLE 12/2024		RENTAL ASSISTANCE PROGRAM	700.00
					Total :	**700.00**
178841	12/24/2024	113029 MONTEREY APARTMENTS	RA-HILLJONES 01/2025		RENTAL ASSISTANCE PROGRAM	473.75
					Total :	**473.75**
178842	12/24/2024	113029 MONTEREY APARTMENTS	RA-TEMPLE 01/2025		RENTAL ASSISTANCE PROGRAM	350.00
					Total :	**350.00**
178843	12/24/2024	105622 N/S CORPORATION	0125210	037-10364	GTRANS BUS WASH EQUIPMENT PART	555.34

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178843	12/24/2024	105622 N/S CORPORATION	(Continued)			
			0125211	037-10364	GTRANS BUS WASH EQUIPMENT PART	1,951.06
			0125236	037-10364	GTRANS BUS WASH EQUIPMENT MAIN	674.00
					Total :	**3,180.40**
178844	12/24/2024	112748 NEW DYNASTY CONSTRUCTION CO.	08 REV1	024-01027	AQUATIC & SENIOR CENTER PROJECT	1,001,766.08
					Total :	**1,001,766.08**
178845	12/24/2024	112748 NEW DYNASTY CONSTRUCTION CO.	09	024-01027	AQUATIC & SENIOR CENTER PROJECT	439,167.03
					Total :	**439,167.03**
178846	12/24/2024	113111 OBIAMALU, REGINALD	RA-BAILEY 12/2024		RENTAL ASSISTANCE PROGRAM	900.00
					Total :	**900.00**
178847	12/24/2024	113111 OBIAMALU, REGINALD	RA-BAILEY 01/2025		RENTAL ASSISTANCE PROGRAM	450.00
					Total :	**450.00**
178848	12/24/2024	110575 OCCUPATIONAL HEALTH CENTERS, OF CALIF	85165328	023-01558	RANDOM TESTS	3,323.00
					Total :	**3,323.00**
178849	12/24/2024	115168 OFFICE DEPOT	397648708		HR OFFICE SUPPLIES	52.13
			400022569		PD OFFICE SUPPLIES	87.73
			400391349		PD OFFICE SUPPLIES	71.24
			400451764		PD OFFICE SUPPLIES	62.90
			400452232		PD OFFICE SUPPLIES	16.64
			401393324		PD OFFICE SUPPLIES	31.51
			401398472		PD OFFICE SUPPLIES	13.49
			401416066		BUS OFFICE SUPPLIES	284.09
					Total :	**619.73**
178850	12/24/2024	111358 O'REILLY AUTO PARTS	100671		GTRANS AUTO PARTS	484.26
			474882		GTRANS AUTO PARTS	98.82
			477950		PW AUTO PARTS	56.34
			477970		PW AUTO PARTS	-56.34
			487080		PW AUTO PARTS	66.35
			487085		PW AUTO PARTS	21.74
			487405		PW AUTO PARTS	520.32
			487439		PW AUTO PARTS	74.07

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178850	12/24/2024	111358 O'REILLY AUTO PARTS	(Continued)			
			487712		GTRANS AUTO PARTS	-645.39
			487726		GTRANS AUTO PARTS	645.39
			489868		PW AUTO PARTS	12.95
			494690		GTRANS AUTO PARTS	0.72
			496191		SEWER PROGRAM SUPPLIES	55.00
			499865		SEWER PROGRAM SUPPLIES	349.27
					Total :	**1,683.50**
178851	12/24/2024	115810 ORKIN PEST CONTROL	269506245		PEST CONTROL - ACCT #27336703	249.99
					Total :	**249.99**
178852	12/24/2024	113167 OTERO, CARLOS	PERMIT #50024-0253		PERMIT DEPOSIT REFUND - 2616 W 14	5,000.00
					Total :	**5,000.00**
178853	12/24/2024	113161 PACIFIC COAST CONSTRUCTION INC	PERMIT #18323		PERMIT DEPOSIT REFUND - 1538 W 13	2,000.00
					Total :	**2,000.00**
178854	12/24/2024	103673 PACIFIC PRODUCTS & SERVICE, LLC	35073		SIGNS/ SIGNAL SUPPLIES	1,130.06
					Total :	**1,130.06**
178855	12/24/2024	113049 PARK PLAZA PROPERTIES, LLC	RA-FINNEY 12/2024		RENTAL ASSISTANCE PROGRAM	765.50
					Total :	**765.50**
178856	12/24/2024	113049 PARK PLAZA PROPERTIES, LLC	RA-FINNEY 01/2025		RENTAL ASSISTANCE PROGRAM	382.75
					Total :	**382.75**
178857	12/24/2024	111698 PELLEGRINO, RAY	RA-WALKER 01/2025		RENTAL ASSISTANCE PROGRAM	475.00
					Total :	**475.00**
178858	12/24/2024	108600 PHOENIX GROUP INFORMATION, SYSTEMS	102024211	035-01363	PARKING CONTRACT SERVICES - OCT	27,648.61
					Total :	**27,648.61**
178859	12/24/2024	116225 PLUMBERS DEPOT, INC.	PD-57428		SEWER PROGRAM SUPPLIES	799.31
					Total :	**799.31**
178860	12/24/2024	102677 PROVIDENCE HEALTH & SERVICES	600000283 12/05/24		PRE-EMPLOYMENT PHYSICALS	1,260.00

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178860	12/24/2024	102677 102677 PROVIDENCE HEALTH & SERVICES (Continued)			**Total :**	**1,260.00**
178861	12/24/2024	106092 PRUDENTIAL OVERALL SUPPLY	42985559	037-10365	UNIFORM & SUPPLY RENTAL	735.49
			42986081	024-01082 034-00667	UNIFORM & SUPPLY RENTAL	158.17
			42986083	034-00667	UNIFORM & SUPPLY RENTAL	29.02
			42986084	034-00667	SUPPLY RENTAL - MATS - GTRANS	50.10
			42988035	024-01082 034-00667	UNIFORM & SUPPLY RENTAL	159.09
			42988036	034-00667	UNIFORM & SUPPLY RENTAL	29.79
			42988037	034-00667	SUPPLY RENTAL - MATS - GTRANS	50.10
			42988038	034-00667	SUPPLY RENTAL - MATS - NCC	13.65
			42988039	034-00667	SUPPLY RENTAL - MATS - CH	19.00
			42988040	034-00667	SUPPLY RENTAL - MATS - PD	91.60
			42988041	034-00667	SUPPLY RENTAL - MATS - HS	11.60
			42989567	037-10365	UNIFORM & SUPPLY RENTAL	618.85
					Total :	**1,966.46**
178862	12/24/2024	102283 QUICK COLOR PRINTING	16369		HOLIDAY HOME DECORATING CONTES	66.15
					Total :	**66.15**
178863	12/24/2024	112788 R&S AUTO BODY REPAIR	2606		GTRANS VEHICLE PARTS & LABOR	450.00
			2607		GTRANS VEHICLE PARTS & LABOR	450.00
			2608		GTRANS VEHICLE PARTS & LABOR	550.00
			2609		GTRANS VEHICLE PARTS & LABOR	750.00
					Total :	**2,200.00**
178864	12/24/2024	103072 REACH	122416		EAP SERVICES/ REACHLINE NEWSLE	902.00
					Total :	**902.00**
178865	12/24/2024	108886 REDMON GROUP INC.	RG2022333	037-10418	GTRANS WEBSITE SUPPORT	2,825.00
					Total :	**2,825.00**
178866	12/24/2024	100836 RESOURCE BUILDING MATERIALS	3916704		STREET MAINT SUPPLIES	345.19
					Total :	**345.19**
178867	12/24/2024	112578 RIDECO US INC	2024-485US	037-10254	MICROTRANSIT SOFTWARE	2,192.73

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178867	12/24/2024	112578 112578 RIDECO US INC	(Continued)		**Total :**	**2,192.73**
178868	12/24/2024	112433 RIGHTWAY HEALTHCARE, INC	INV20945	023-01566	CARE NAVIGATION COORDINATORS	1,810.25
					Total :	**1,810.25**
178869	12/24/2024	111867 RJM DESIGN GROUP	36802	024-00795	DESIGN & ENGINEERING - AQUATIC &	2,144.50
					Total :	**2,144.50**
178870	12/24/2024	119126 S.B.R.P.C.A.	04569	023-01532	FY24-25 3RD QUARTER ASSESSMENT	626,727.25
					Total :	**626,727.25**
178871	12/24/2024	119022 SAFE MART OF SOUTHERN, CALIFORNIA, INC	1380		PD PROGRAM SUPPLIES	47.52
					Total :	**47.52**
178872	12/24/2024	119015 SAFETY-KLEEN CORPORATION	95766512		PW CLARIFIER CLEANING SERVICES	410.55
					Total :	**410.55**
178873	12/24/2024	119016 SAM'S CLUB	2202		PD PROGRAM SUPPLIES	53.33
			3770 11/13/24		PD PROGRAM SUPPLIES	91.42
			6121 12/03/24		PD PROGRAM SUPPLIES	1,013.65
			8202		PD PROGRAM SUPPLIES	77.88
					Total :	**1,236.28**
178874	12/24/2024	113146 SAMSARA INC.	310519553563400	024-01113	STREET SWEEPER TRACKING LICENS	2,785.71
					Total :	**2,785.71**
178875	12/24/2024	111535 SANTOYO, AMPARO	RECEIPT #62997		CASINO PERMIT RENEWAL REFUND	125.00
					Total :	**125.00**
178876	12/24/2024	119045 SAXE-CLIFFORD, PH.D., SUSAN	24-1114-3		PSYCHOLOGICAL EVALUATIONS	900.00
					Total :	**900.00**
178877	12/24/2024	108654 SECTRAN SECURITY INC.	24120883		ARMORED TRANSPORTATION SERVICI	883.03
					Total :	**883.03**
178878	12/24/2024	113053 SEGUNDO TERRACE LLC	RA-THOMAS 01/2025		RENTAL ASSISTANCE PROGRAM	473.75
					Total :	**473.75**

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178879	12/24/2024	104451 SELECT ADVANTAGE	10349154		BUS OPERATOR & SUPERVISOR ASSE	595.00
					Total :	**595.00**
178880	12/24/2024	109918 SHIGE'S FOREIGN CAR SERVICE, INC.	8099753	035-01364	2023 FORD INTRCPTR #1661715 SERVI	801.44
			8099776	035-01364	2022 FORD INTRCPTR #1630465 SERVI	395.10
			8099803	035-01364	2023 FORD INTRCPTR #1661715 SERVI	621.94
			8099843	035-01364	2011 FORD CROWN VIC #1367838 SER'	2,045.06
			8099865	035-01364	2023 FORD INTRCPTR #1661717 SERVI	504.11
			8099889	035-01364	2019 FORD INTRCPTR #1576878 SERVI	683.83
			8099928	035-01364	2022 FORD INTRCPTR #P23 SERVICE &	851.08
					Total :	**5,902.56**
178881	12/24/2024	113156 SILYAN, MIKE	CIT #023136		ADMIN CITATION APPEAL REFUND	500.00
					Total :	**500.00**
178882	12/24/2024	113084 SL PROPERTY MANAGEMENT INC	RA-HOPE 01/2025		RENTAL ASSISTANCE PROGRAM	545.35
					Total :	**545.35**
178883	12/24/2024	113021 SOCAL BUILDERS REMODELING &, CONSTRU	15313-2CDBG	032-00187	CDBG HOUSING REHAB PROGRAM	24,111.00
					Total :	**24,111.00**
178884	12/24/2024	113021 SOCAL BUILDERS REMODELING &, CONSTRU	15313-2PHLA	032-00188	PHLA HOUSING REHAB PROGRAM	18,252.00
					Total :	**18,252.00**
178885	12/24/2024	119447 SOUTH BAY FORD	499178		GTRANS AUTO PARTS	98.23
			518021		GTRANS AUTO PARTS	399.40
					Total :	**497.63**
178886	12/24/2024	112633 SOUTH BAY KUSTOMZ, LLC	13299		2022 FORD EXPLR #P13 BATTERY REP	519.95
			13308		2023 FORD EXPLR #P21 SERVICE & RE	1,892.32
			13315		2023 FORD EXPLR #P10 SERVICE & RE	1,991.08
					Total :	**4,403.35**
178887	12/24/2024	119375 SOUTH COAST AIR QUALITY, MANAGEMENT D	4385707 12/03/24		EMISSIONS FEE - CH BLDG EQUIPMEN	41.50
			4386792 12/03/24		EMISSIONS FEE - PW BLDG EQUIPMEN	41.50
					Total :	**83.00**
178888	12/24/2024	619003 SOUTHERN CALIFORNIA EDISON	12022024		LIGHT & POWER	46,376.53

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178888	12/24/2024	619003 619003 SOUTHERN CALIFORNIA EDISON	(Continued)		**Total :**	**46,376.53**
178889	12/24/2024	103202 SOUTHERN COUNTIES LUBRICANTS, LLC	213539		BUS AUTOMOTIVE FLUIDS	2,450.75
			214009		BUS AUTOMOTIVE FLUIDS	3,707.22
					Total :	**6,157.97**
178890	12/24/2024	101570 SOUTHWEST OFFSET PRINTING CO., INC.	207397	034-00676	RECREATION GUIDE SPRING 2025	7,618.28
					Total :	**7,618.28**
178891	12/24/2024	108238 SPARKLETTS	15638236 112924		DRINKING WATER FILTRATION SYSTEM	43.00
					Total :	**43.00**
178892	12/24/2024	119548 ST. JOHN LUTHERAN CHURCH	OCTOBER 2023		SENIOR CITIZEN DAY CARE	750.00
					Total :	**750.00**
178893	12/24/2024	100609 TANK SPECIALISTS OF CALIFORNIA	34322		CERTIFIED DESIGNATED OPERATOR S	198.00
					Total :	**198.00**
178894	12/24/2024	112703 TEAM PORTER INC.	RA-GOMEZ 01/2025		RENTAL ASSISTANCE PROGRAM	487.50
					Total :	**487.50**
178895	12/24/2024	107928 TELECOM LAW FIRM, P.C.	18465		PROFESSIONAL SERVICES - 1925 W R	259.55
					Total :	**259.55**
178896	12/24/2024	113157 TESLA	PERMIT #90024-0022		PERMIT CANCELLATION REFUND	427.20
					Total :	**427.20**
178897	12/24/2024	112931 THERMAL CONCEPTS, INC.	171078		GTRANS HVAC MAINTENANCE	3,492.36
					Total :	**3,492.36**
178898	12/24/2024	120215 THOMPSON TROPHY MFG., INC.	70263		ENGRAVING SERVICES	26.28
					Total :	**26.28**
178899	12/24/2024	110238 TIREHUB, LLC	45804361		TIRES - GY ASSUR MAXLIFE BW 235 60	526.81
			45827854		TIRES - GY EAGLE RS A POLICE 235 55	1,898.85
					Total :	**2,425.66**
178900	12/24/2024	104806 TOYOTA LIFT OF L.A.	PSI-0428788		PM SERVICE - FORKLIFT #8FGCU25	218.48

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178900	12/24/2024	104806 104806 TOYOTA LIFT OF L.A.	(Continued)		**Total :**	**218.48**
178901	12/24/2024	106018 TRANE U.S. INC.	314648322	037-10366	BUS FACILITY SERVICE MAINTENANCE	2,415.53
			314740317	037-10366	BUS FACILITY SERVICE MAINTENANCE	7,995.00
			314801610	037-10366	BUS FACILITY MAINT SUPPLIES	395.51
			314835416	037-10366	BUS FACILITY SERVICE MAINTENANCE	1,123.53
			314901963	037-10366	BUS FACILITY SERVICE MAINTENANCE	1,123.53
			315048575	037-10410	BUS FACILITY SERVICE MAINTENANCE	1,176.19
					Total :	**14,229.29**
178902	12/24/2024	110851 TRAPEZE SOFTWARE GROUP, INC.	TSPAU240168	037-10231	GTRANS SCHEDULING & OPERATIONS	7,359.40
					Total :	**7,359.40**
178903	12/24/2024	105556 TRIANGLE SPORTS, INC.	42703		YOUTH SPORT UNIFORMS	430.88
					Total :	**430.88**
178904	12/24/2024	111481 TRIO COMMUNITY MEALS, LLC	INV2230056083	034-00659	SENIOR FEEDING PROGRAM	5,991.02
			INV2230056391	034-00659	SENIOR COMMUNITY ACTION MEALS F	6,777.74
					Total :	**12,768.76**
178905	12/24/2024	120854 TURF STAR INC.	INV042110		PW AUTO PARTS	31.87
					Total :	**31.87**
178906	12/24/2024	109900 U.S. BANK CORPORATE PAYMENT, SYSTEMS	FINANCE 11/22/24		CAL CARD STATEMENT 10/23-11/22/24	12,097.07
					Total :	**12,097.07**
178907	12/24/2024	109900 U.S. BANK CORPORATE PAYMENT, SYSTEMS	KWAK 11/22/24		CAL CARD STATEMENT 10/23-11/22/24	86.38
			MACIEL 10/22/24		CAL CARD STATEMENT 09/24-10/22/24	294.95
			NOLAN 11/22/24		CAL CARD STATEMENT 10/23-11/22/24	6,942.12
			OROZCO 11/22/24		CAL CARD STATEMENT 10/23-11/22/24	4,009.69
			PD TRAINING 10/22/24		CAL CARD STATEMENT 09/24-10/22/24	3,443.62
			PD TRAINING 11/22/24		CAL CARD STATEMENT 10/23-11/22/24	3,230.26
			PD TRAINING2 112224		CAL CARD STATEMENT 10/23-11/22/24	6,553.65
			PD TRAINING3 112224		CAL CARD STATEMENT 10/23-11/22/24	3,871.40
			PD TRAINING3 102224		CAL CARD STATEMENT 09/24-10/22/24	2,310.24
			PD TRAINING4 112224		CAL CARD STATEMENT 10/23-11/22/24	1,887.63
			RIGG 11/22/24		CAL CARD STATEMENT 10/23-11/22/24	192.33
			ROMERO 11/22/24		CAL CARD STATEMENT 10/23-11/22/24	281.26

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178907	12/24/2024	109900 109900 U.S. BANK CORPORATE PAYMENT, SYST (Continued)			**Total :**	**33,103.53**
178908	12/24/2024	104692 ULINE	186099031		BUS SHOP SUPPLIES	598.11
			186196680		BUS SHOP SUPPLIES	734.82
					Total :	**1,332.93**
178909	12/24/2024	121275 UNDERGROUND SERVICE ALERT, OF SC	1120240295		NEW TICKETS	146.90
			24-251696		STATE REGULATORY COSTS- BILLABLI	67.81
					Total :	**214.71**
178910	12/24/2024	121010 UNITED RENTALS	241893318		STREET MAINT SUPPLIES	33.08
					Total :	**33.08**
178911	12/24/2024	106754 URBAN RESTORATION GROUP US, INC.	00044980		STREET MAINT SUPPLIES	66.61
					Total :	**66.61**
178912	12/24/2024	105254 VISION TIRE	41942		STREET SWEEPER TIRE SERVICES	25.00
					Total :	**25.00**
178913	12/24/2024	122435 VISTA PAINT CORPORATION	2024-732199-00		STREET MAINT SUPPLIES	42.37
					Total :	**42.37**
178914	12/24/2024	108353 WALTERS WHOLESALE ELECTRIC CO	S126327378		BLDG MAINT SUPPLIES	971.97
			S126635137		GTRANS MAINT SUPPLIES	678.58
					Total :	**1,650.55**
178915	12/24/2024	101903 WATER TECHNIQUES	13424		DRINKING WATER SYSTEM RENTAL	45.00
					Total :	**45.00**
178916	12/24/2024	104107 WAXIE SANITARY SUPPLY	82906396		BUS WASH SUPPLIES	135.85
					Total :	**135.85**
178917	12/24/2024	119387 WEX BANK	101497553		FUEL PURCHASES	267.23
					Total :	**267.23**
178918	12/24/2024	113172 XU, JING	RECEIPT #62951		BADGE RENEWAL FEE REFUND	125.00
					Total :	**125.00**

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178919	12/24/2024	125001 YAMADA COMPANY, INC.	84686		PARK MAINT SUPPLIES	90.83
			84704		PARK MAINT SUPPLIES	24.24
			84705		PARK MAINT SUPPLIES	74.47
					Total :	**189.54**

227 Vouchers for bank code : usb **Bank total :** **4,449,728.52**

227 Vouchers in this report **Total vouchers :** **4,449,728.52**

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 25 inclusive of the check register are accurate and funds are available for payment thereof.

By: _____
Director of Administrative Services

This is to certify that the claims or demands covered by checks listed on pages 1 to 25 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:

_____

_____ 12/24/2024
Mayor Date

_____ _____
Councilmember Date

_____ _____
Councilmember Date

Acknowledged:

_____ _____
Councilmember Date

_____ _____
Councilmember Date

MEMORANDUM

TO: Honorable Mayor and City Council

FROM: City Treasurer's Office

DATE: January 9, 2025

SUBJECT: WARRANT REGISTER
PAYROLL REGISTER

January 14, 2025	TOTAL WARRANTS ISSUED:	$3,373,999.98

Wire Transfer: 12874-12886
Prepay: 178920
Check Numbers: 178921-179086
Checks Voided:

Total Pages of Register: 21

December 27, 2024	TOTAL PAYROLL ISSUED:	$2,512,303.40
January 10, 2025	TOTAL PAYROLL ISSUED:	$2,579,957.46

for

Guy Mato, City Treasurer

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
12874	12/18/2024	112401 PINNACLE CLAIMS MANAGEMENT INC	121724		HEALTH INSURANCE CLAIMS	6,424.70
					Total :	**6,424.70**
12875	12/19/2024	112441 ANTHEM BLUE CROSS LIFE &, HEALTH INSUF	365993163219		HEALTH INSURANCE CLAIMS	29,326.69
					Total :	**29,326.69**
12876	12/23/2024	101641 CALPERS	100000017751805		MISC GROUP UAL PAYMENT - DECEME	37,966.00
					Total :	**37,966.00**
12877	12/23/2024	101641 CALPERS	100000017751815		SAFETY CLASSIC UAL PAYMENT - DEC	68,422.67
					Total :	**68,422.67**
12878	12/23/2024	101641 CALPERS	100000017751824		SAFETY PEPRA UAL PAYMENT - DECEI	1,292.92
					Total :	**1,292.92**
12879	12/23/2024	111016 KAISER FOUNDATION HEALTH PLAN	JANUARY 2025		HEALTH INSURANCE	350,168.04
					Total :	**350,168.04**
12880	12/23/2024	112401 PINNACLE CLAIMS MANAGEMENT INC	121924		HEALTH INSURANCE CLAIMS	23,043.62
					Total :	**23,043.62**
12881	12/17/2024	112326 LWP CLAIMS SOLUTIONS INC.	121724		WORKERS' COMP CLAIMS	100,000.00
					Total :	**100,000.00**
12882	12/24/2024	101641 CALPERS	100000017760160		2025 REPLACEMENT BENEFIT CHARGI	23,974.42
					Total :	**23,974.42**
12883	12/27/2024	112441 ANTHEM BLUE CROSS LIFE &, HEALTH INSUF	365993198077		HEALTH INSURANCE CLAIMS	28,733.12
					Total :	**28,733.12**
12884	12/31/2024	101641 CALPERS	CERBT 24/25		ANNUAL CERBT CONTRIBUTION FY202	600,000.00
					Total :	**600,000.00**
12885	1/6/2025	112441 ANTHEM BLUE CROSS LIFE &, HEALTH INSUF	365994404387		HEALTH INSURANCE CLAIMS	10,499.22
					Total :	**10,499.22**
12886	1/7/2025	112326 LWP CLAIMS SOLUTIONS INC.	010625		WORKERS' COMP CLAIMS	23,398.74

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
12886	1/7/2025	112326 112326 LWP CLAIMS SOLUTIONS INC.	(Continued)		**Total :**	**23,398.74**
178920	1/6/2025	121850 U.S. POSTAL SERVICE	122624USPS	037-10424	POSTAGE - BOLT ONE-PAGE MAILER A	6,222.06
					Total :	**6,222.06**
178921	1/14/2025	101748 AFTERMARKET PARTS COMPANY LLC, THE	83588931		GTRANS AUTO PARTS	588.15
			83594987	037-10360	GTRANS AUTO PARTS	468.54
					Total :	**1,056.69**
178922	1/14/2025	112639 ALL GREEN ELECTRONICS, RECYCLING, LLC	4016594		DATA DESTRUCTION SERVICES	3,345.00
					Total :	**3,345.00**
178923	1/14/2025	112667 ANDERSON, JESSICA	11/12-11/15		CALPELRA 2024 ANNUAL TRAINING CC	150.00
					Total :	**150.00**
178924	1/14/2025	110028 ANSER ADVISORY MANAGEMENT LLC	29133	037-10228	PROJECT MGMT SUPPORT - ELECTRIF	10,670.00
					Total :	**10,670.00**
178925	1/14/2025	108625 ARAD OIL INC.	DECEMBER 2024		CAR WASH	60.00
			NOVEMBER 2024.		CAR WASH - PD	252.00
					Total :	**312.00**
178926	1/14/2025	112926 ARION GLOBAL INC	24941		RECYCLING SERVICES	819.90
					Total :	**819.90**
178927	1/14/2025	101459 ASBURY ENVIRONMENTAL SERVICES	I500-01138511		HAZARDOUS WASTE DISPOSAL SERVI	369.59
			I500-01138512		HAZARDOUS WASTE DISPOSAL SERVI	510.17
			I500-01153748		HAZARDOUS WASTE DISPOSAL SERVI	137.00
			I500-01154954		HAZARDOUS WASTE DISPOSAL SERVI	7.00
					Total :	**1,023.76**
178928	1/14/2025	104687 AT&T	22741658		TELEPHONE	218.82
			22791753		TELEPHONE	372.79
					Total :	**591.61**
178929	1/14/2025	111170 AT&T FIRSTNET	287290395417X101024	023-01559	PD CELL PHONE ACCT #287290395417	399.22
			287290395417X111024	023-01559	PD CELL PHONE ACCT #287290395417	389.74
			287290395417X121024	023-01559	PD CELL PHONE ACCT #287290395417	389.74

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178929	1/14/2025	111170 111170 AT&T FIRSTNET	(Continued)		**Total :**	**1,178.70**
178930	1/14/2025	100474 AT&T LONG DISTANCE	121224		TELEPHONE	57.56
					Total :	**57.56**
178931	1/14/2025	100964 AT&T MOBILITY	287275680401X010125		PD CELL PHONE ACCT #287275668040	147.95
					Total :	**147.95**
178932	1/14/2025	110686 AZTECH ELEVATOR COMPANY	AZ19324		ELEVATOR REPAIR - PW	1,620.00
					Total :	**1,620.00**
178933	1/14/2025	102035 BD WHITE TOP SOIL CO., INC.	91643		PARK MAINT SUPPLIES	132.30
			91649		PARK MAINT SUPPLIES	132.30
			91651		PARK MAINT SUPPLIES	198.45
			91652		PARK MAINT SUPPLIES	198.45
			91673		PARK MAINT SUPPLIES	40.79
					Total :	**702.29**
178934	1/14/2025	103641 BECNEL UNIFORMS	75424		BUS UNIFORM SUPPLIES	637.96
			75969		BUS UNIFORM SUPPLIES	32.85
			76065		BUS UNIFORM SUPPLIES	845.89
					Total :	**1,516.70**
178935	1/14/2025	109037 BEEMAN, RAYMOND	11/12-11/15		CALPELRA 2024 ANNUAL CONFERENC	225.00
					Total :	**225.00**
178936	1/14/2025	104669 BEERLING, NICK	101824		EDUCATIONAL REIMBURSEMENT	1,458.00
			112624		EDUCATIONAL REIMBURSEMENT	897.00
					Total :	**2,355.00**
178937	1/14/2025	111875 BOA ARCHITECTURE	DEMCONSUP-1REV	024-00892	ROSECRANS COMMUNITY CENTER PF	11,580.00
					Total :	**11,580.00**
178938	1/14/2025	111902 BPR CONSULTING GROUP LLC	2284	032-00173	CONSULTING SERVICES - NOVEMBER	44,850.61
					Total :	**44,850.61**
178939	1/14/2025	110458 BUS COALITION, THE	25076		BUS COALITION MEMBERSHIP DUES	1,000.00

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178939	1/14/2025	110458 110458 BUS COALITION, THE	(Continued)		**Total :**	**1,000.00**
178940	1/14/2025	105008 CALIFORNIA BUILDING STANDARDS, COMMIS	OCT-DEC 2024		BUILDING STANDARDS ADMIN SPECIA	529.20
					Total :	**529.20**
178941	1/14/2025	113183 CALIZ, VICTOR	PERMIT #50024-0690		PERMIT DEPOSIT REFUND - 14920 S. M	5,000.00
					Total :	**5,000.00**
178942	1/14/2025	103383 CALPORTLAND	96594606		STREET MAINT SUPPLIES	719.50
					Total :	**719.50**
178943	1/14/2025	803420 CARPENTER, ROTHANS & DUMONT, LAW OFF	47882		LEGAL SERVICES	6,976.78
			47886		LEGAL SERVICES	1,196.00
			47973		LEGAL SERVICES	14,055.69
					Total :	**22,228.47**
178944	1/14/2025	303331 CDTFA	2024		USE TAX RETURN	6,024.00
					Total :	**6,024.00**
178945	1/14/2025	113185 CENTENO, RUBEN	CIT #023553		REFUND - ADMINISTRATION CITATION	50.00
					Total :	**50.00**
178946	1/14/2025	108378 CHARLES E. THOMAS COMPANY INC.	113310	037-10367	HEALY QUARTERLY INSPECTION	210.83
			114789	037-10367	HEALY QUARTERLY INSPECTION	222.21
					Total :	**433.04**
178947	1/14/2025	111612 CHARTER COMMUNICATIONS	PERMIT #15396		PERMIT DEPOSIT REFUND - 1300 W 15	3,000.00
					Total :	**3,000.00**
178948	1/14/2025	112352 CIRCLE, THE	198498		TOSHIBA 3525AC COPIER USAGE - CLE	52.78
			198499		TOSHIBA ESTUDIO 3525AC COPIER US	62.14
			198500		TOSHIBA 3525AC COPIER USAGE - HR	302.27
			198501		TOSHIBA 3525AC COPIER USAGE - ADI	52.51
			198502		TOSHIBA 3525AC COPIER USAGE - CDI	121.51
			198503		TOSHIBA 3525AC COPIER USAGE - CDI	191.40
			198504		TOSHIBA 5525AC COPIER USAGE - DB	617.71
			198505		TOSHIBA 908 COPIER USAGE - PRINT S	26.47
			198506		TOSHIBA 6527AC COPIER USAGE - PRI	57.76

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178948	1/14/2025	112352 CIRCLE, THE	(Continued)			
			198507		TOSHIBA 3525AC COPIER USAGE - PW	18.03
			198508		TOSHIBA 3525AC COPIER USAGE - PW	34.30
			198509		TOSHIBA 3525AC COPIER USAGE - GTI	217.12
			198510		TOSHIBA 3525AC COPIER USAGE - NC	144.44
			198511		TOSHIBA 3525AC COPIER USAGE - HS	0.62
			198512		TOSHIBA 3525AC COPIER USAGE - HS	147.92
			198513		TOSHIBA 3525AC COPIER USAGE - RE	126.99
			198514		TOSHIBA 3525AC COPIER USAGE - CH	16.71
			198515		TOSHIBA 3525AC COPIER USAGE - PD	76.50
			198516		TOSHIBA 3525AC COPIER USAGE - WA	120.13
			198517		TOSHIBA 3525AC COPIER USAGE - SR	83.39
			198518		TOSHIBA 6525AC COPIER USAGE - RE	180.55
			198519		TOSHIBA 3525AC COPIER USAGE - GTI	261.86
			198520		TOSHIBA 3525AC COPIER USAGE - GTI	46.13
					Total :	**2,959.24**
178949	1/14/2025	111740 CLEANCOR LNG LLC	S-INV102551		QUARTERLY PREVENTATIVE MAINTEN	845.36
					Total :	**845.36**
178950	1/14/2025	104090 COPWARE, INC.	86934		CA PEACE OFFICERS LEGAL SOURCEI	2,550.00
					Total :	**2,550.00**
178951	1/14/2025	102388 COPYLAND, INC.	88406	037-10362	GTRANS - 3.8"X8.5" COLOR COURTESY	431.82
			88490	037-10362	GTRANS - 8.5"X15" ROUTE & SCHEDUL	10,389.61
			88575	037-10362	GTRANS - 11"X26" COLOR BUS CARDS	694.80
					Total :	**11,516.23**
178952	1/14/2025	104543 COUNTY OF LOS ANGELES	IN1422935		BACKFLOW ASSEMBLY - 1700 W 162ND	148.00
			IN1423843		BACKFLOW ASSEMBLY - 13999 WESTE	148.00
			IN1423844		BACKFLOW ASSEMBLY - VERMONT AV	37.00
			IN1423846		BACKFLOW ASSEMBLY - 15800 BRIGHT	74.00
			IN1423847		BACKFLOW ASSEMBLY - 2100 W 154TH	74.00
			IN1423848		BACKFLOW ASSEMBLY - 160TH ST AND	37.00
			IN1423849		BACKFLOW ASSEMBLY - 13220 VAN NE	185.00
			IN1423850		BACKFLOW ASSEMBLY - 129TH & VERI	37.00
			IN1423851		BACKFLOW ASSEMBLY - 14708 HALLDA	37.00

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178952	1/14/2025	104543 COUNTY OF LOS ANGELES	(Continued)			
			IN1423852		BACKFLOW ASSEMBLY - VERMONT S/(	111.00
			IN1423853		BACKFLOW ASSEMBLY - VERMONT AV	74.00
			IN1423854		BACKFLOW ASSEMBLY - 1718 W 162NI	37.00
					Total :	**999.00**
178953	1/14/2025	107905 CROWN CASTLE	PERMIT #17053		PERMIT DEPOSIT REFUND - MARINE A	1,000.00
					Total :	**1,000.00**
178954	1/14/2025	106193 CUMMINS SALES AND SERVICE	X4-241254145	037-10370	GTRANS AUTO PARTS	3,292.78
					Total :	**3,292.78**
178955	1/14/2025	113182 DE LA MORA, ROBERT	PERMIT #50023-1166		PERMIT DEPOSIT REFUND - 1542 W. 1	5,000.00
					Total :	**5,000.00**
178956	1/14/2025	312558 DEPARTMENT OF ANIMAL CARE, & CONTROL	NOVEMBER 2024		MONTHLY ANIMAL SERVICES - NOVEM	798.61
					Total :	**798.61**
178957	1/14/2025	104310 DEPARTMENT OF CONSERVATION	OCT-DEC 2024		STRONG MOTION INSTRUMENTATION	1,600.70
					Total :	**1,600.70**
178958	1/14/2025	104527 DEPARTMENT OF INDUSTRIAL, RELATIONS	E2128192MR		CONVEYANCE INSPECTION FEE - 1717	225.00
					Total :	**225.00**
178959	1/14/2025	312117 DEPARTMENT OF WATER & POWER	010225		LIGHT & POWER	80.67
			122324		LIGHT & POWER	106.93
					Total :	**187.60**
178960	1/14/2025	111712 DUNG TANG	RA-PHAM 12/2024		RENTAL ASSISTANCE PROGRAM	900.00
					Total :	**900.00**
178961	1/14/2025	110956 DURAN, BRANDON M.	010225		EDUCATIONAL REIMBURSEMENT	300.00
					Total :	**300.00**
178962	1/14/2025	107353 EMERGENCY RESPONSE CRIME SCENE, CLE	T2024-438		SANITIZE & CLEAN-UP POLICE VEHICL	650.00
					Total :	**650.00**
178963	1/14/2025	105392 ENTENMANN-ROVIN COMPANY	0183321		PD UNIFORM SUPPLIES	319.00

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178963	1/14/2025	105392 105392 ENTENMANN-ROVIN COMPANY	(Continued)		**Total :**	**319.00**
178964	1/14/2025	106459 ENTERPRISE FM TRUST	FBN5227599	023-01567	ENTERPRISE LEASE - JANUARY 2025 -	7,516.44
			FBN5236102	023-01567 023-01572	ENTERPRISE LEASE - JANUARY 2025	11,247.54
					Total :	**18,763.98**
178965	1/14/2025	105650 EWING IRRIGATION PRODUCTS	24500782		PARK MAINT SUPPLIES	359.66
					Total :	**359.66**
178966	1/14/2025	100055 FAIR HOUSING FOUNDATION	NOVEMBER 2024		FAIR HOUSING SERVICES	1,572.80
					Total :	**1,572.80**
178967	1/14/2025	106129 FEDEX	8-648-57735		SHIPPING SERVICES	37.16
			8-710-75423		SHIPPING SERVICES	190.02
			8-717-71136		SHIPPING SERVICES	34.29
			8-725-00198		SHIPPING SERVICES	38.98
			8-730-69644		SHIPPING SERVICES	61.54
					Total :	**361.99**
178968	1/14/2025	111415 FILTERBUY, INC	BAFEC8C7-0027		GTRANS AUTO PARTS	793.28
					Total :	**793.28**
178969	1/14/2025	106545 FLEETPRIDE, INC	122218625		SEWER PROGRAM SUPPLIES	74.94
					Total :	**74.94**
178970	1/14/2025	108974 FLEX TECHNOLOGIES, INC.	55441		GTRANS AUTO SUPPLIES	949.97
					Total :	**949.97**
178971	1/14/2025	113005 FORD COMPONENT SALES LLC	SFL/42004711		GTRANS AUTO PARTS	790.00
					Total :	**790.00**
178972	1/14/2025	112650 FOSTER & FOSTER, INC.	33482	023-01478	ACTUARIAL SERVICES - GASB 75 REP(	2,500.00
					Total :	**2,500.00**
178973	1/14/2025	106465 FOX FIRST AID & SAFETY INC	74181		PARK MAINT SUPPLIES	474.08
					Total :	**474.08**

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178974	1/14/2025	107011 GARDENA VALLEY NEWS	00147497		NOTICE INVITING BIDS - JN 529	2,058.00
			00147648		NOTICE INVITING INTERESTED CONTF	434.00
			00147763		NOTICE INVITING BIDS - JN 530	1,438.50
			00147953		NOTICE OF PUBLIC HEARING - ES #20-	462.00
			00147954		NOTICE OF PUBLIC HEARING - ORDIN/	210.00
			00147955		NOTICE OF PUBLIC HEARING - CUP #6	150.50
			00148212		SUMMARY OF ORDINANCE NO. 1876	105.00
					Total :	**4,858.00**
178975	1/14/2025	105722 GARDENA YOUTH FOOTBALL &, CHEERLEAD	LOVE 23/24		COMMUNITY PROMOTIONS	500.00
					Total :	**500.00**
178976	1/14/2025	619005 GAS COMPANY, THE	010325		GAS	11,180.49
					Total :	**11,180.49**
178977	1/14/2025	106470 GILLIG LLC	41251770	037-10371	GTRANS AUTO PARTS	46.95
					Total :	**46.95**
178978	1/14/2025	112692 GOCANVAS	INV00185944		MONTHLY SUBSCRIPTION - JANUARY 2	1,650.00
					Total :	**1,650.00**
178979	1/14/2025	619004 GOLDEN STATE WATER CO.	122024		WATER	21,487.92
					Total :	**21,487.92**
178980	1/14/2025	107513 GRAINGER	9341458538	037-10372	GTRANS FACILITY SUPPLIES	551.72
			9345014667	037-10372	GTRANS FACILITY SUPPLIES	120.65
			9346387971		GTRANS FACILITY SUPPLIES	66.45
			9348632713	037-10372	GTRANS FACILITY SUPPLIES	271.33
			9348757502		PW AUTO SUPPLIES	32.27
			9350512464		GTRANS FACILITY SUPPLIES	513.38
			9350678877		GTRANS FACILITY SUPPLIES	117.76
			9352432588		GTRANS FACILITY SUPPLIES	224.21
					Total :	**1,897.77**
178981	1/14/2025	113189 HAMILTON, NANCY	103		ENTERTAINMENT - BREAKFAST WITH S	250.00
					Total :	**250.00**
178982	1/14/2025	105553 HARRIS, DONNY	03/24-03/28 BAL		TRAPEZE THINK TRANSIT CONFEREN(	26.12

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178982	1/14/2025	105553 105553 HARRIS, DONNY	(Continued)		**Total :**	**26.12**
178983	1/14/2025	208114 HASSOLDT, MATTHEW S.	121224		MGMT ANNUAL HEALTH BENEFIT	347.12
					Total :	**347.12**
178984	1/14/2025	111549 HF & H CONSULTANTS, LLC	9721710	024-01096	CONSULTING SERVICES - SOLID WAST	11,959.50
					Total :	**11,959.50**
178985	1/14/2025	110371 HINDERLITER DE LLAMAS, & ASSOCIATES	SIN046117		CONTRACT SERVICES-TRANSACTION	300.00
					Total :	**300.00**
178986	1/14/2025	108434 HOME DEPOT CREDIT SERVICES	0388637		PD PROGRAM SUPPLIES	132.17
			1524915		PARK MAINT SUPPLIES	489.98
			3553467		PARK MAINT SUPPLIES	154.61
			4216630		CUSTODIAL SUPPLIES	156.94
			4525396		PD PROGRAM SUPPLIES	213.59
			4905495-CM		REC PROGRAM SUPPLIES	-123.20
			4905496-CM		REC PROGRAM SUPPLIES	-123.20
			9900922-CM		REC PROGRAM SUPPLIES	-144.25
					Total :	**756.64**
178987	1/14/2025	112935 INTEGRATED DEMOLITION AND, REMEDIATIO	2024-106D-RET		ROSECRANS COMMUNITY CTR PROJ (	19,145.78
					Total :	**19,145.78**
178988	1/14/2025	100436 J.J. KELLER & ASSOCIATES, INC	9109687664	037-10383	FLEET MANAGEMENT AND COMPLIAN(	532.18
			9109704123	037-10398	FORKLIFT OPERATOR TRAINER CERTI	4,139.62
					Total :	**4,671.80**
178989	1/14/2025	112981 JOE MAR POLYGRAPH	2024-08-024		POLYGRAPH SERVICES	250.00
					Total :	**250.00**
178990	1/14/2025	110853 JONES MAYER	126242		ATTORNEY SERVICES	14,627.66
			126243		ATTORNEY SERVICES	9,552.08
			126244		ATTORNEY SERVICES	289.65
			126245		ATTORNEY SERVICES	285.03
			126246		ATTORNEY SERVICES	260.70
			126247		ATTORNEY SERVICES	3,012.39

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178990	1/14/2025	110853 110853 JONES MAYER	(Continued)		**Total :**	**28,027.51**
178991	1/14/2025	110853 JONES MAYER	126227	020-00055	ATTORNEY SERVICES	11,354.56
			126228		ATTORNEY SERVICES	10,758.19
			126229		ATTORNEY SERVICES	2,589.45
			126230		ATTORNEY SERVICES	1,377.69
			126232		ATTORNEY SERVICES	736.34
			126233		ATTORNEY SERVICES	231.74
			126234		ATTORNEY SERVICES	261.28
			126235		ATTORNEY SERVICES	289.67
			126236		ATTORNEY SERVICES	1,332.42
			126238		ATTORNEY SERVICES	318.62
			126239		ATTORNEY SERVICES	173.79
			126240		ATTORNEY SERVICES	2,945.38
			126241		ATTORNEY SERVICES	166.27
					Total :	**32,535.40**
178992	1/14/2025	211429 KEMP, TAMARA	NOV-DEC 2024		DANCE INSTRUCTOR	1,615.00
					Total :	**1,615.00**
178993	1/14/2025	112812 KIMBALL MIDWEST	102751874		GTRANS SHOP SUPPLIES	136.73
					Total :	**136.73**
178994	1/14/2025	113175 L&S CONSTRUCTION	PERMIT #17436		PERMIT DEPOSIT REFUND - 2500 W RC	5,000.00
					Total :	**5,000.00**
178995	1/14/2025	113175 L&S CONSTRUCTION	PERMIT #16811		PERMIT DEPOSIT REFUND - 2129 ROSI	3,000.00
					Total :	**3,000.00**
178996	1/14/2025	312039 L.A. COUNTY FIRE DEPARTMENT	C0012842	023-01533	FIRE PROTECTION SERVICES - FEBRU	978,310.50
					Total :	**978,310.50**
178997	1/14/2025	112614 LAX AUTO REPAIR	20133		2023 FORD EXPLORER #46945 OIL & FI	70.00
					Total :	**70.00**
178998	1/14/2025	113181 LAYNE, SCOTT	PERMIT #50024-0448		PERMIT DEPOSIT REFUND - 1130 W. RI	5,000.00
					Total :	**5,000.00**

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
178999	1/14/2025	108237 LEO WEB PROTECT	80669399525		POLICE PRIVACY SERVICE SUBSCRIPT	4,499.40
					Total :	**4,499.40**
179000	1/14/2025	112260 LIEBERT CASSIDY WHITMORE	277543		LEGAL SERVICES	765.00
			278649		LEGAL SERVICES	225.00
			278663		LEGAL SERVICES	2,242.67
			278664		LEGAL SERVICES	2,205.00
			278674		LEGAL SERVICES	33.60
			278687		LEGAL SERVICES	9,991.00
			278688		LEGAL SERVICES	11,954.41
			278698		LEGAL SERVICES	2,835.00
			278699		LEGAL SERVICES	1,372.50
			278710		LEGAL SERVICES	828.00
			278724		LEGAL SERVICES	1,648.50
					Total :	**34,100.68**
179001	1/14/2025	112644 LIVINGSTON, GLEN	PERMIT #50021-0292		PERMIT DEPOSIT REFUND - 13217 ARC	7,500.00
					Total :	**7,500.00**
179002	1/14/2025	112326 LWP CLAIMS SOLUTIONS INC.	23153	023-01548	WORKERS' COMP CLAIMS ADMINISTRA	21,925.25
					Total :	**21,925.25**
179003	1/14/2025	105082 MAJESTIC LIGHTING, INC.	ML89562		SIGNS/SIGNALS SUPPLIES	21.31
			ML89571		BLDG MAINT SUPPLIES	48.49
			ML89612		BLDG MAINT SUPPLIES	43.00
			ML89651		BLDG MAINT SUPPLIES	1,031.94
					Total :	**1,144.74**
179004	1/14/2025	813030 MANNING & KASS	821414		LEGAL SERVICES	2,943.15
			821415		LEGAL SERVICES	628.90
			821416		LEGAL SERVICES	570.00
					Total :	**4,142.05**
179005	1/14/2025	110306 MARIPOSA LANDSCAPES, INC	3770		TREE TRIMMING MAINTENANCE SERV	689.05
					Total :	**689.05**
179006	1/14/2025	113003 MARTIN CHEVROLET	28049		PW AUTO PARTS	197.85
			28265		PW AUTO PARTS	367.69

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
179006	1/14/2025	113003 113003 MARTIN CHEVROLET	(Continued)		**Total :**	**565.54**
179007	1/14/2025	113046 MARX BROS. FIRE EXTINGUISHER, CO., INC.	E54605		FIRE EXTINGUISHER SERVICE - CITY H	650.00
			S12811		FIRE EXTINGUISHER SERVICE - PW	95.00
					Total :	**745.00**
179008	1/14/2025	113064 MCMASTER-CARR SUPPLY COMPANY	38246171		GTRANS SHOP SUPPLIES	86.75
					Total :	**86.75**
179009	1/14/2025	112524 MDG ASSOCIATES, INC.	19119	032-00175	CDBG ADMINISTRATION - NOVEMBER	3,721.00
			19120	032-00175	CDBG HOUSING REHAB PROGRAM - N	5,016.00
			19121	032-00175	CDBG HOUSING REHAB PROGRAM - N	26.40
			19122	032-00175	CDBG HOUSING REHAB PROGRAM - N	26.13
					Total :	**8,789.53**
179010	1/14/2025	113299 MERRIMAC ENERGY GROUP	2236034	024-01102	87 OCTANE REGULAR UNLEADED FUE	19,258.59
					Total :	**19,258.59**
179011	1/14/2025	110206 MICHELIN NORTH AMERICA, INC.	DA0060877320	037-10395	GTRANS' BUS TIRE LEASE SERVICES -	8,642.96
			DA0061269568	037-10395	GTRANS' BUS TIRE LEASE SERVICES -	9,051.98
					Total :	**17,694.94**
179012	1/14/2025	111604 MICRO ELECTRONICS, INC	13445649	023-01553	COMPUTER REPLACEMENT PARTS	4,937.66
					Total :	**4,937.66**
179013	1/14/2025	110824 MIXER INK LLC	106581		CODE ENFORCEMENT PROGRAM SUP	325.24
			106582		CODE ENFORCEMENT PROGRAM SUP	71.66
			106661		CDD PROGRAM SUPPLIES	533.61
			106749		CDD PROGRAM SUPPLIES	883.38
					Total :	**1,813.89**
179014	1/14/2025	112058 MOBILE CAR & TRUCK WASH JBT	2701	037-10343	40' BUS INTERIOR DETAILING	4,181.63
			2703	037-10343	40' BUS INTERIOR DETAILING	4,646.25
					Total :	**8,827.88**
179015	1/14/2025	112597 MOBILE ILLUMINATION, INC.	2024.59.1	024-01078	HOLIDAY TREE & DECOR LABOR & INS	5,652.00
			2024.60.1	024-01078	HOLIDAY TREE & DECOR LABOR & INS	4,725.00

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
179015	1/14/2025	112597 112597 MOBILE ILLUMINATION, INC.	(Continued)		**Total :**	**10,377.00**
179016	1/14/2025	107505 MOUSER ELECTRONICS, INC.	82312495		GTRANS AUTO SUPPLIES	123.34
					Total :	**123.34**
179017	1/14/2025	113605 MUTUAL LIQUID GAS & EQUIPMENT, CO., INC	774033		PROPANE GAS	208.98
					Total :	**208.98**
179018	1/14/2025	110575 OCCUPATIONAL HEALTH CENTERS, OF CALIF	85216137	023-01558	RANDOM TESTS	1,764.00
			85294519	023-01558	RANDOM TESTS	1,438.00
					Total :	**3,202.00**
179019	1/14/2025	115168 OFFICE DEPOT	400408013		PD OFFICE SUPPLIES	204.99
			400516964		HR OFFICE SUPPLIES	174.74
			400517193		HR OFFICE SUPPLIES	31.30
			400910117		PD OFFICE SUPPLIES	444.01
			401398473		PD OFFICE SUPPLIES	36.48
			401420039		BUS OFFICE SUPPLIES	4.98
			401793118		FINANCE OFFICE SUPPLIES	31.55
			401830489		FINANCE OFFICE SUPPLIES	73.43
			401842370		PD OFFICE SUPPLIES	610.80
			401843328		PD OFFICE SUPPLIES	489.15
			403048390		FINANCE OFFICE SUPPLIES	80.53
			403946644		PD OFFICE SUPPLIES	160.52
			403948418		PD OFFICE SUPPLIES	30.77
			403948420		PD OFFICE SUPPLIES	11.01
			404169091		FINANCE OFFICE SUPPLIES	168.89
					Total :	**2,553.15**
179020	1/14/2025	108921 OMEGA POLYGRAPH	02053		PRE-EMPLOYMENT POLYGRAPH EXAM	4,275.00
					Total :	**4,275.00**
179021	1/14/2025	111358 O'REILLY AUTO PARTS	100914		PW AUTO PARTS	190.00
			102180		SEWER PROGRAM SUPPLIES	29.41
			102262		SEWER PROGRAM SUPPLIES	98.40
					Total :	**317.81**
179022	1/14/2025	113190 OREJEL, FRANCISCO	GEPCO 2025		GEPCO LOAN	1,954.32

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
179022	1/14/2025	113190 113190 OREJEL, FRANCISCO	(Continued)		**Total :**	**1,954.32**
179023	1/14/2025	115810 ORKIN PEST CONTROL	266441182		PEST CONTROL - ACCT #27336703	313.99
			268084946		PEST CONTROL - ACCT #27336703	313.99
			270899498		PEST CONTROL - ACCT #27336703	313.99
			270899499		PEST CONTROL - ACCT #27336703	313.99
					Total :	**1,255.96**
179024	1/14/2025	108382 OSORIO, CLINT	01/30-02/05		2024 CSMFO CONFERENCE - PER DIEI	225.00
					Total :	**225.00**
179025	1/14/2025	112845 PALICON GROUP	2089	035-01359	BACKGROUND INVESTIGATION SERVI(	1,500.00
			2093	035-01359	BACKGROUND INVESTIGATION SERVI(	4,500.00
			2142	035-01359	BACKGROUND INVESTIGATION SERVI(	2,345.00
					Total :	**8,345.00**
179026	1/14/2025	112728 PATRONAS, ELISSEOS	PERMIT #50024-0145		PERMIT DEPOSIT REFUND - 17321 S D.	7,500.00
					Total :	**7,500.00**
179027	1/14/2025	110403 PENN RECORDS MANAGEMENT	0146017		OFFSITE STORAGE SERVICES - DECEI	65.50
					Total :	**65.50**
179028	1/14/2025	113188 PERSON REALTY INC	RA-MACK 12/2024		RENTAL ASSISTANCE PROGRAM	1,250.00
					Total :	**1,250.00**
179029	1/14/2025	113188 PERSON REALTY INC	RA-MACK 01/2025		RENTAL ASSISTANCE PROGRAM	1,250.00
					Total :	**1,250.00**
179030	1/14/2025	108600 PHOENIX GROUP INFORMATION, SYSTEMS	092024211	035-01363	PARKING CONTRACT SERVICES - SEP'	22,250.79
					Total :	**22,250.79**
179031	1/14/2025	113187 PIPITONE, DAMON	010225		ENTERTAINMENT SERVICES - CANDLE	500.00
					Total :	**500.00**
179032	1/14/2025	116225 PLUMBERS DEPOT, INC.	PD-57684		SEWER PROGRAM SUPPLIES	276.40
					Total :	**276.40**
179033	1/14/2025	108938 PREFERRED AERIAL & CRANE, TECHNOLOG'	26427		ANNUAL INSPECTION & DIELECTRIC T	900.00

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
179033	1/14/2025	108938 108938 PREFERRED AERIAL & CRANE, TECHNO (Continued)			**Total :**	**900.00**
179034	1/14/2025	106092 PRUDENTIAL OVERALL SUPPLY	42947254	037-10365	UNIFORM & SUPPLY RENTAL	693.74
			42960198	037-10365	UNIFORM & SUPPLY RENTAL	712.67
			42971192	037-10365	UNIFORM & SUPPLY RENTAL	328.78
			42974820	037-10365	UNIFORM & SUPPLY RENTAL	516.00
			42978358	037-10365	UNIFORM & SUPPLY RENTAL	329.68
			42983485	037-10365	UNIFORM & SUPPLY RENTAL	333.08
			42989616	034-00667	CUSTODIAL SUPPLIES	326.51
			42989617	024-01082	UNIFORM & SUPPLY RENTAL	161.70
				034-00667		
			42989618	034-00667	UNIFORM & SUPPLY RENTAL	52.68
			42989619	034-00667	SUPPLY RENTAL - MATS - GTRANS	50.10
			42991309	037-10365	UNIFORM & SUPPLY RENTAL	324.48
			42991519	034-00667	CUSTODIAL SUPPLIES	1,900.31
			42991520	024-01082	UNIFORM & SUPPLY RENTAL	161.70
				034-00667		
			42991522	034-00667	SUPPLY RENTAL - MATS - GTRANS	50.10
			42991523	034-00667	SUPPLY RENTAL - MATS - NCC	13.65
			42991524	034-00667	SUPPLY RENTAL - MATS - CH	19.00
			42991525	034-00667	SUPPLY RENTAL - MATS - PD	91.60
			42991526	034-00667	SUPPLY RENTAL - MATS - HS	11.60
			42992874	037-10365	UNIFORM & SUPPLY RENTAL	324.48
			42993225	024-01082	UNIFORM & SUPPLY RENTAL	161.70
				034-00667		
			42993227	034-00667	SUPPLY RENTAL - MATS - GTRANS	50.10
					Total :	**6,613.66**
179035	1/14/2025	104901 Q-20 ENTERTAINMENT	25-1801		DJ SERVICES - MLK PARADE	1,000.00
					Total :	**1,000.00**
179036	1/14/2025	102283 QUICK COLOR PRINTING	16360		REC HOLIDAY PROGRAM SUPPLIES	110.25
			16373		GTRANS - COROPLASTIC SIGNS	352.80
					Total :	**463.05**
179037	1/14/2025	111574 RACE COMMUNICATIONS	RC1438821	023-01556	FIBER INTERNET SERVICES - JANUAR'	5,794.90
					Total :	**5,794.90**

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
179038	1/14/2025	113179 REDICK, ADRIA	GEPCO 2024		GEPCO LOAN	1,599.00
					Total :	**1,599.00**
179039	1/14/2025	107953 RENTERIA, ADRIANNA	02/28-03/01		CPRS CONFERENCE & EXPO	266.16
					Total :	**266.16**
179040	1/14/2025	109323 RIVERAS LAWNMOWER SHOP, INC.	8598		TREE PROGRAM SUPPLIES	1,767.98
					Total :	**1,767.98**
179041	1/14/2025	113184 RJG CONSTRUCTION AND, DEVELOPMENT	PERMIT #50024-0527		PERMIT DEPOSIT REFUND - 14004 PUF	5,000.00
					Total :	**5,000.00**
179042	1/14/2025	112681 RJ'S CONSTRUCTION SUPPLIES	220000188879		PARK MAINT SUPPLIES	85.97
					Total :	**85.97**
179043	1/14/2025	100585 RKA CONSULTING GROUP	35518		ENGINEERING & SURVEYING SERVICE	490.00
					Total :	**490.00**
179044	1/14/2025	112885 ROSE EQUIPMENT REPAIR INC.	IN31973		VEHICLE MAINT SUPPLIES	275.05
			IN32020		VEHICLE MAINT SUPPLIES	291.00
			IN32194		VEHICLE MAINT SUPPLIES	424.81
					Total :	**990.86**
179045	1/14/2025	119022 SAFE MART OF SOUTHERN, CALIFORNIA, INC	1103		GTRANS FACILITY SUPPLIES	155.45
			1467		REC PROGRAM SUPPLIES	21.99
					Total :	**177.44**
179046	1/14/2025	103185 SAFETY SERVICES COMPANY	899991		SAFETY MEETINGS : CONSTRUCTION	334.06
			899992		SUBSCRIPTION PRINT FEE	137.81
					Total :	**471.87**
179047	1/14/2025	105934 SANTIN, STEPHANY	FALL 2024		EDUCATIONAL REIMBURSEMENT	2,500.00
					Total :	**2,500.00**
179048	1/14/2025	108654 SECTRAN SECURITY INC.	24112643		ARMORED TRANSPORTATION SERVICI	1,940.60
					Total :	**1,940.60**
179049	1/14/2025	113178 SENG, DALAN	RECEIPT #76049429		MAINTENANCE DEPOSIT REFUND	250.00

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
179049	1/14/2025	113178 113178 SENG, DALAN	(Continued)		**Total :**	**250.00**
179050	1/14/2025	107006 SHAMROCK COMPANIES	2781311		STREET MAINT SUPPLIES	312.44
					Total :	**312.44**
179051	1/14/2025	106975 SHERATON GATEWAY HOTEL	1000815154	037-10412	GTRANS 2024 AWARDS CELEBRATION	14,428.55
					Total :	**14,428.55**
179052	1/14/2025	109918 SHIGE'S FOREIGN CAR SERVICE, INC.	8099959	035-01364	2021 FORD INTRCPTR #1615788 SERVI	635.86
			8099972	035-01364	2018 FORD INTRCPTR #1554676 SERVI	1,548.90
					Total :	**2,184.76**
179053	1/14/2025	119378 SMARDAN SUPPLY CO.	S4180145		BLDG MAINT SUPPLIES	81.64
					Total :	**81.64**
179054	1/14/2025	619003 SOUTHERN CALIFORNIA EDISON	121624		LIGHT & POWER	68,393.88
					Total :	**68,393.88**
179055	1/14/2025	108238 SPARKLETTS	14211220 090424		DRINKING WATER FILTRATION SYSTEM	42.99
			14211220 100224		DRINKING WATER FILTRATION SYSTEM	55.74
			14211220 103024		DRINKING WATER FILTRATION SYSTEM	42.99
			15638236 122724		DRINKING WATER FILTRATION SYSTEM	53.00
					Total :	**194.72**
179056	1/14/2025	111778 SPCALA	202412	032-00172	ANIMAL SHELTER SERVICES	25,800.00
					Total :	**25,800.00**
179057	1/14/2025	119548 ST. JOHN LUTHERAN CHURCH	JANUARY 2025		SENIOR CITIZENS DAY CARE	1,100.00
					Total :	**1,100.00**
179058	1/14/2025	119594 STANLEY PEST CONTROL	1846695		PEST CONTROL SERVICE - 1220 W 170	70.00
			1846696		PEST CONTROL SERVICE - 15800 BRIG	42.00
			1846697		PEST CONTROL SERVICE - 14708 HALL	42.00
			1846700		PEST CONTROL SERVICE - 1651 W 162	85.00
			1846702		PEST CONTROL SERVICE - 1700 W 162	80.00
			1846703		PEST CONTROL SERVICE - 1670 W 162	80.00
			1846704		PEST CONTROL SERVICE - 1718 W 162	65.00
			1846707		PEST CONTROL SERVICE - 1717 W 162	75.00

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
179058	1/14/2025	119594 STANLEY PEST CONTROL	(Continued)			
			1846708		PEST CONTROL SERVICE - 2100 W 154	65.00
			1846709		PEST CONTROL SERVICE - 2320 W 149	42.00
			1846710		PEST CONTROL SERVICE - 14517 CRE	60.00
			1846711		PEST CONTROL SERVICE - 13220 VAN	65.00
					Total :	**771.00**
179059	1/14/2025	104106 SWARCO MCCAIN, INC.	INV0283973		SIGNS/SIGNALS SUPPLIES	2,055.04
					Total :	**2,055.04**
179060	1/14/2025	219620 SWEENEY, NIKKI	02/28-03/01		CPRS CONFERENCE & EXPO - PER DIE	100.00
					Total :	**100.00**
179061	1/14/2025	119550 SWRCB	WD-0280427		ANNUAL PERMIT FEE	3,945.00
					Total :	**3,945.00**
179062	1/14/2025	112505 T Y LIN INTERNATIONAL	102408025	037-10323	PROJECT MGMT SVCS, MAINT & ASSE	1,604.30
			102408026	037-10236	GRID PROJECT MANAGEMENT	585.65
					Total :	**2,189.95**
179063	1/14/2025	100609 TANK SPECIALISTS OF CALIFORNIA	34393		CERTIFIED DESIGNATED OPERATOR S	198.00
					Total :	**198.00**
179064	1/14/2025	112931 THERMAL CONCEPTS, INC.	171229		GTRANS HVAC ANNUAL MAINTENANCE	1,900.00
					Total :	**1,900.00**
179065	1/14/2025	105070 T-MOBILE USA, INC.	9579100092		GPS LOCATE	115.00
			9581034401		GPS LOCATE	50.00
			9581034402		GPS LOCATE	50.00
			9581522244		GPS LOCATE	115.00
					Total :	**330.00**
179066	1/14/2025	111990 TOWNSEND PUBLIC AFFAIRS, INC	22764	020-00051	CONSULTING SERVICES - JANUARY 20	7,000.00
					Total :	**7,000.00**
179067	1/14/2025	110851 TRAPEZE SOFTWARE GROUP, INC.	TSMAU240896	037-10421	SOMPIS YEAR 5 MAINTENANCE FEE	4,474.00
					Total :	**4,474.00**

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Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
179068	1/14/2025	111481 TRIO COMMUNITY MEALS, LLC	INV2230057138	034-00659	SENIOR FEEDING PROGRAM	7,434.77
			INV2230057565	034-00659	SENIOR FEEDING PROGRAM	6,352.12
			INV2230057748	034-00659	SENIOR FEEDING PROGRAM	5,328.18
					Total :	**19,115.07**
179069	1/14/2025	109900 U.S. BANK CORPORATE PAYMENT, SYSTEMS	BEEMAN 12/23/24		CAL CARD STATEMENT 11/23-12/23/24	1,240.54
			CDD 11/22/24		CAL CARD STATEMENT 10/23-11/22/24	114.62
			CDD 12/23/24		CAL CARD STATEMENT 11/23-12/23/24	295.49
			RECREATION 11/22/24		CAL CARD STATEMENT 10/23-11/22/24	19,123.79
			SANTIN 11/22/24		CAL CARD STATEMENT 10/23-11/22/24	6,861.50
			SWEENEY 11/22/24		CAL CARD STATEMENT 10/23-11/22/24	1,176.17
			TSUJIUCHI 11/22/24		CAL CARD STATEMENT 10/23-11/22/24	1,017.08
			TSUJIUCHI 12/23/24		CAL CARD STATEMENT 11/23-12/23/24	4,412.88
				032-00189		
					Total :	**34,242.07**
179070	1/14/2025	104692 ULINE	181459086		BUS SHOP SUPPLIES	436.82
			181908840		BUS SHOP SUPPLIES	392.54
			182049519		BUS SHOP SUPPLIES	177.63
			183053176		BUS SHOP SUPPLIES	187.46
			186401027		REC PROGRAM SUPPLIES	666.69
			186534818		REC PROGRAM SUPPLIES	94.01
			186867577		BUS SHOP SUPPLIES	60.93
			187085801		CUSTODIAL SUPPLIES	275.12
					Total :	**2,291.20**
179071	1/14/2025	121275 UNDERGROUND SERVICE ALERT, OF SC	1220240303		NEW TICKETS	85.85
			24-252065		STATE REGULATORY COSTS- BILLABLI	67.81
					Total :	**153.66**
179072	1/14/2025	113027 UNIFIED PROPERTY MANAGEMENT-, SATBUI	RA-ALLEN 12/2024		RENTAL ASSISTANCE PROGRAM	997.50
					Total :	**997.50**
179073	1/14/2025	113027 UNIFIED PROPERTY MANAGEMENT-, SATBUI	RA-ALLEN 01/2025		RENTAL ASSISTANCE PROGRAM	498.75
					Total :	**498.75**
179074	1/14/2025	107596 UNION PACIFIC RAILROAD COMPANY	90139177	024-01053	NORMANDIE RR CROSSING REHAB, JI	920.83

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
179074	1/14/2025	107596 UNION PACIFIC RAILROAD COMPANY	(Continued)			
			90139683	024-01069	WESTERN AVE RR CROSSING REHAB,	4,095.48
					Total :	**5,016.31**
179075	1/14/2025	107596 UNION PACIFIC RAILROAD COMPANY	90137665	024-01001	WESTERN AVE RR CROSSING REHAB,	1,925.85
			90137751	024-01008	ENGINEERING SERVICES - ARTESIA BI	2,317.88
					Total :	**4,243.73**
179076	1/14/2025	112234 UNITED PACIFIC, APRO LLC	090124-093024		PD CAR WASH	627.00
					Total :	**627.00**
179077	1/14/2025	113022 V V & G CONSTRUCTION	424-4-237:2P		PHLA HOUSING REHAB PROGRAM	2,407.00
					Total :	**2,407.00**
179078	1/14/2025	122050 VERIZON WIRELESS	9979178589		REC CELL PHONE SERVICE	1,139.32
					Total :	**1,139.32**
179079	1/14/2025	101195 WASTE RESOURCES GARDENA	121824		WASTE COLLECTION	300,055.59
					Total :	**300,055.59**
179080	1/14/2025	112737 WELLS FARGO VENDOR FINANCIAL, SERVICE	5032096894	023-01557	CITYWIDE COPIER LEASE - DECEMBEI	3,472.89
					Total :	**3,472.89**
179081	1/14/2025	123350 WEST COAST SAND & GRAVEL, INC.	797084		STREET MAINT SUPPLIES	1,019.40
					Total :	**1,019.40**
179082	1/14/2025	123050 WILLIAMS SCOTSMAN, INC.	9022715485	035-01358	MODULAR BUILDING RENTAL CPX-804	2,279.26
					Total :	**2,279.26**
179083	1/14/2025	110265 WILO'S FOOD	122200		GTRANS CATERING SERVICES	1,878.50
					Total :	**1,878.50**
179084	1/14/2025	125001 YAMADA COMPANY, INC.	84676		PARK MAINT SUPPLIES	105.07
			84742		PARK MAINT SUPPLIES	18.89
			84745		PARK MAINT SUPPLIES	164.25
					Total :	**288.21**
179085	1/14/2025	113180 ZEH CORPORATION	12142025		GTRANS PHOTO BOOTH RENTAL	999.00

Bank code : usb

Voucher	Date	Vendor	Invoice	PO #	Description/Account	Amount
179085	1/14/2025	113180 113180 ZEH CORPORATION	(Continued)		**Total :**	**999.00**
179086	1/14/2025	126122 ZEP SALES & SERVICE	9010621451		BUS SHOP SUPPLIES	1,387.22
					Total :	**1,387.22**
180	**Vouchers for bank code :**	usb			**Bank total :**	**3,373,999.98**
180	**Vouchers in this report**				**Total vouchers :**	**3,373,999.98**

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 21 inclusive of the check register are accurate and funds are available for payment thereof.

By: _____
Director of Administrative Services

This is to certify that the claims or demands covered by checks listed on pages 1 to 21 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:

_____

_____ 01/14/2025
Mayor Date

_____ _____
Councilmember Date

_____ _____
Councilmember Date

Acknowledged:

_____ _____
Councilmember Date

_____ _____
Councilmember Date

CITY OF GARDENA

INVESTMENT REPORT

November 2024

Prepared by Danny Rodriguez, Revenue and Purchasing Manager
Reviewed by Ray Beeman, Director of Administrative Services

CHANDLER ASSET MANAGEMENT

MONTHLY ACCOUNT STATEMENT

City of Gardena Cons | Account #10647 | As of November 30, 2024

CHANDLER ASSET MANAGEMENT | chandlerasset.com

Chandler Team:

For questions about your account, please call (800) 317-4747,
or contact clientservice@chandlerasset.com

Custodian:

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 at the end of the statement.

PORTFOLIO SUMMARY

City of Gardena Cons | Account #10647 | As of November 30, 2024

Portfolio Characteristics

Average Modified Duration	0.63
Average Coupon	4.31%
Average Purchase YTM	4.42%
Average Market YTM	4.60%
Average Quality	AA+
Average Final Maturity	0.74
Average Life	0.65

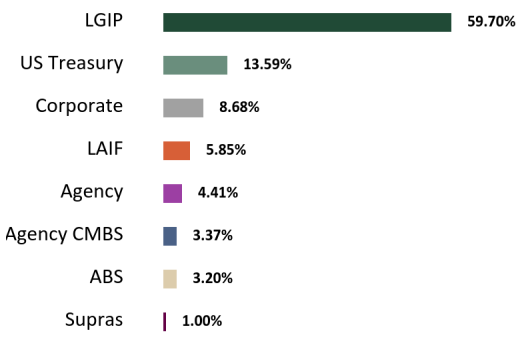
Account Summary

	Beg. Values as of 11/01/2024	End Values as of 11/30/2024
Market Value	96,198,876.80	96,262,629.17
Accrued Interest	245,483.76	255,446.04
Total Market Value	**96,444,360.56**	**96,518,075.21**
Income Earned	416,398.02	498,841.49
Cont/WD	(162,082.19)	(316,328.43)
Par	90,268,285.89	90,267,544.62
Book Value	96,488,385.77	96,517,377.18
Cost Value	96,404,803.07	96,402,940.94

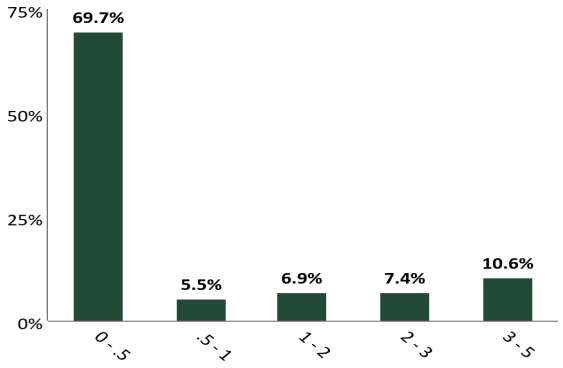
Top Issuers

California Asset Mgmt Program	52.43%
United States	13.59%
CalTrust	7.27%
LAIF	5.85%
FHLMC	3.37%
Farm Credit System	2.70%
Federal Home Loan Banks	1.36%
International Bank for Recon and Dev	1.00%

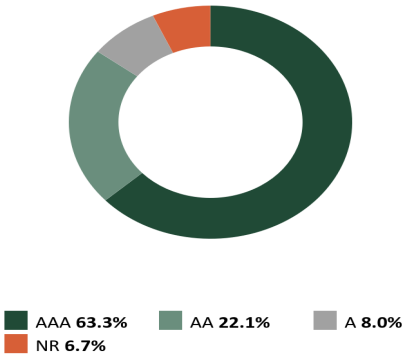
Sector Allocation



Maturity Distribution



Credit Quality



*See Footnote

The credit quality is a weighted average calculation of the highest of S&P, Moody's' and Fitch

RECONCILIATION SUMMARY

City of Gardena Cons | Account #10647 | As of November 30, 2024

Maturities / Calls

Month to Date	**(1,425,000.00)**
Fiscal Year to Date	**(13,075,000.00)**

Principal Paydowns

Month to Date	**(86,775.66)**
Fiscal Year to Date	**(787,217.34)**

Purchases

Month to Date	**3,300,368.20**
Fiscal Year to Date	**37,754,932.14**

Sales

Month to Date	**(1,625,096.71)**
Fiscal Year to Date	**(14,802,831.55)**

Interest Received

Month to Date	**505,217.85**
Fiscal Year to Date	**2,817,036.36**

Purchased / Sold Interest

Month to Date	**(25,393.59)**
Fiscal Year to Date	**(74,085.99)**

Accrual Activity Summary

	Month to Date	Fiscal Year to Date (01/01/2024)
Beginning Book Value	96,488,385.77	87,301,622.17
Maturities/Calls	(1,425,000.00)	(13,075,000.00)
Principal Paydowns	(86,775.66)	(787,217.34)
Purchases	3,300,368.20	37,754,932.14
Sales	(1,625,096.71)	(14,802,831.55)
Change in Cash, Payables, Receivables	(143,559.38)	2,079.15
Amortization/Accretion	9,054.95	123,947.75
Realized Gain (Loss)	0.01	(155.14)
Ending Book Value	96,517,377.18	96,517,377.18

Fair Market Activity Summary

	Month to Date	Fiscal Year to Date (01/01/2024)
Beginning Market Value	96,198,876.79	86,698,685.72
Maturities/Calls	(1,425,000.00)	(13,075,000.00)
Principal Paydowns	(86,775.66)	(787,217.34)
Purchases	3,300,368.20	37,754,932.14
Sales	(1,625,096.71)	(14,802,831.55)
Change in Cash, Payables, Receivables	(143,559.38)	2,079.15
Amortization/Accretion	9,054.95	123,947.75
Change in Net Unrealized Gain (Loss)	34,760.96	348,188.44
Realized Gain (Loss)	0.01	(155.14)
Ending Market Value	96,262,629.17	96,262,629.17

Cusip	Security Description	Par Value/ Units	Purchase Date Purchase Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody's/ S&P/ Fitch	Maturity Duration
ABS									
05593AAC3	BMWLT 2023-1 A3 5.16 11/25/2025	14,557.97	02/07/2023 5.43%	14,557.63 14,557.85	100.08 4.63%	14,569.62 12.52	0.02% 11.76	Aaa/AAA NA	0.99 0.14
43815GAC3	HAROT 2021-4 A3 0.88 01/21/2026	16,460.56	11/16/2021 0.89%	16,457.09 16,459.72	99.03 4.85%	16,300.76 4.02	0.02% (158.97)	Aaa/NA AAA	1.14 0.24
47789QAC4	JDOT 2021-B A3 0.52 03/16/2026	10,638.85	07/13/2021 0.52%	10,637.90 10,638.70	99.24 5.06%	10,557.77 2.46	0.01% (80.93)	Aaa/NA AAA	1.29 0.17
89238JAC9	TAOT 2021-D A3 0.71 04/15/2026	13,436.58	11/09/2021 0.95%	13,436.30 13,436.53	99.07 5.14%	13,311.99 4.24	0.01% (124.53)	NA/AAA AAA	1.37 0.21
43815BAC4	HAROT 2022-1 A3 1.88 05/15/2026	59,595.92	02/15/2022 1.89%	59,586.96 59,593.14	98.99 5.02%	58,992.15 49.80	0.06% (601.00)	Aaa/AAA NA	1.45 0.32
43815PAC3	HAROT 2022-2 A3 3.73 07/20/2026	60,490.89	08/15/2022 3.87%	60,487.28 60,489.63	99.56 4.75%	60,225.41 81.48	0.06% (264.22)	NA/AAA AAA	1.64 0.44
05602RAD3	BMWOT 2022-A A3 3.21 08/25/2026	111,799.95	01/05/2023 4.81%	108,869.57 110,427.74	99.44 4.73%	111,177.96 59.81	0.12% 750.22	Aaa/AAA NA	1.73 0.37
89238FAD5	TAOT 2022-B A3 2.93 09/15/2026	51,670.78	04/07/2022 3.09%	51,669.58 51,670.43	99.27 4.84%	51,295.86 67.29	0.05% (374.57)	Aaa/AAA NA	1.79 0.38
47787JAC2	JDOT 2022 A3 0.36 09/15/2026	43,248.48	03/10/2022 2.34%	43,238.91 43,244.97	99.04 4.82%	42,831.40 44.59	0.04% (413.58)	Aaa/NA AAA	1.79 0.39
379929AD4	GMALT 2023-3 A3 5.38 11/20/2026	75,000.00	08/08/2023 5.38%	74,991.01 74,994.58	100.49 4.67%	75,366.54 123.29	0.08% 371.96	NA/AAA AAA	1.97 0.64
47800AAC4	JDOT 2022-B A3 3.74 02/16/2027	87,588.69	07/12/2022 3.77%	87,580.33 87,585.35	99.39 4.94%	87,051.25 145.59	0.09% (534.10)	Aaa/NA AAA	2.21 0.52
448979AD6	HART 2023-A A3 4.58 04/15/2027	155,000.00	04/04/2023 5.14%	154,984.87 154,991.06	99.95 4.71%	154,920.42 315.51	0.16% (70.64)	NA/AAA AAA	2.37 0.61
36265WAD5	GMCAR 2022-3 A3 3.64 04/16/2027	58,744.52	07/06/2022 3.93%	58,744.12 58,744.36	99.48 4.87%	58,438.80 89.10	0.06% (305.56)	Aaa/NA AAA	2.38 0.43
43815JAC7	HAROT 2023-1 A3 5.04 04/21/2027	70,000.00	02/16/2023 5.09%	69,986.99 69,992.56	100.26 4.71%	70,184.25 98.00	0.07% 191.69	Aaa/NA AAA	2.39 0.69
02582JJT8	AMXCA 2022-2 A 3.39 05/17/2027	185,000.00	05/17/2022 3.42%	184,959.08 184,991.33	99.44 4.69%	183,963.72 278.73	0.19% (1,027.61)	NA/AAA AAA	0.45 0.44
47800BAC2	JDOT 2022-C A3 5.09 06/15/2027	176,237.30	10/12/2022 3.29%	176,223.62 176,230.59	100.23 4.79%	176,636.37 398.69	0.18% 405.78	Aaa/NA AAA	2.54 0.63
58770AAC7	MBART 2023-1 A3 4.51 11/15/2027	91,348.15	01/18/2023 4.56%	91,337.19 91,341.60	99.89 4.71%	91,247.68 183.10	0.09% (93.92)	NA/AAA AAA	2.96 0.71

Cusip	Security Description	Par Value/ Units	Purchase Date Purchase Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody's/ S&P/ Fitch	Maturity Duration
58769GAD5	MBALT 2024-B A3 4.23 02/15/2028	130,000.00	09/17/2024 4.24%	129,978.12 129,979.30	99.53 4.56%	129,382.84 244.40	0.13% (596.47)	NA/AAA AAA	3.21 1.65
362583AD8	GMCAR 2023-2 A3 4.47 02/16/2028	115,000.00	04/04/2023 4.51%	114,996.84 114,997.91	99.93 4.59%	114,922.21 214.19	0.12% (75.70)	Aaa/AAA NA	3.21 0.84
02582JJZ4	AMXCA 2023-1 A 4.87 05/15/2026	125,000.00	06/07/2023 4.87%	124,988.91 124,992.88	100.52 4.54%	125,654.01 270.56	0.13% 661.13	NA/AAA AAA	1.45 1.37
47787CAC7	JDOT 2023-C A3 5.48 05/15/2028	310,000.00	09/12/2023 5.40%	309,978.70 309,984.20	101.23 4.51%	313,814.05 755.02	0.33% 3,829.85	Aaa/NA AAA	3.46 1.18
161571HT4	CHAIT 2023-1 A 5.16 09/15/2028	340,000.00	09/07/2023 5.17%	339,905.75 339,928.60	101.24 4.48%	344,216.37 779.73	0.36% 4,287.77	NR/AAA AAA	3.79 1.67
02582JKD1	AMXCA 2023-3 A 5.23 09/15/2028	340,000.00	09/12/2023 5.29%	339,984.80 339,988.46	101.30 4.51%	344,417.08 790.31	0.36% 4,428.62	NA/AAA AAA	3.79 1.67
44934QAD3	HART 2024-B A3 4.84 03/15/2029	90,000.00	07/16/2024 4.90%	89,986.42 89,987.46	100.75 4.52%	90,678.02 193.60	0.09% 690.55	NA/AAA AAA	4.29 2.04
448976AD2	HART 2024-C A3 4.41 05/15/2029	140,000.00	10/08/2024 4.46%	139,989.75 139,990.03	99.84 4.53%	139,779.71 274.40	0.15% (210.32)	NA/AAA AAA	4.45 2.12
89239TAD4	TAOT 2024-D A3 4.4 06/15/2029	105,000.00	10/10/2024 4.44%	104,994.14 104,994.29	99.96 4.46%	104,954.59 205.33	0.11% (39.71)	Aaa/AAA NA	4.54 2.20
38014AAD3	GMCAR 2024-4 A3 4.4 08/16/2029	95,000.00	10/08/2024 4.32%	94,981.70 94,982.18	99.82 4.52%	94,829.01 174.17	0.10% (153.17)	Aaa/AAA NA	4.71 2.16
Total ABS		**3,070,818.65**	**4.52%**	**3,067,533.55** **3,069,215.48**	**100.30** **4.62%**	**3,079,719.84** **5,859.93**	**3.20%** **10,504.36**	**Aaa/AAA** **AAA**	**2.93** **1.16**
AGENCY									
3133ENKS8	FEDERAL FARM CREDIT BANKS FUNDING CORP 1.125 01/06/2025	750,000.00	-- 1.59%	740,054.10 749,660.49	99.66 4.71%	747,453.89 3,398.44	0.78% (2,206.60)	Aaa/AA+ AA+	0.10 0.09
3133ENPG9	FEDERAL FARM CREDIT BANKS FUNDING CORP 1.75 02/14/2025	415,000.00	02/10/2022 1.84%	413,891.95 414,924.11	99.44 4.54%	412,683.84 2,158.58	0.43% (2,240.27)	Aaa/AA+ AA+	0.21 0.20
3135G06G3	FEDERAL NATIONAL MORTGAGE ASSOCIATION 0.5 11/07/2025	350,000.00	11/18/2020 0.52%	349,639.50 349,932.23	96.46 4.42%	337,625.09 116.67	0.35% (12,307.15)	Aaa/AA+ AA+	0.94 0.91
3130B3A29	FEDERAL HOME LOAN BANKS 4.0 10/09/2026	600,000.00	10/21/2024 4.00%	599,994.00 599,994.33	99.73 4.15%	598,375.73 3,333.33	0.62% (1,618.61)	Aaa/AA+ AA+	1.86 1.76
3133ERFJ5	FEDERAL FARM CREDIT BANKS FUNDING CORP 4.5 05/20/2027	330,000.00	05/23/2024 4.79%	327,333.60 327,800.40	100.67 4.21%	332,212.69 453.75	0.35% 4,412.29	Aaa/AA+ AA+	2.47 2.31

HOLDINGS REPORT

City of Gardena Cons | Account #10647 | As of November 30, 2024

Cusip	Security Description	Par Value/ Units	Purchase Date Purchase Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody's/ S&P/ Fitch	Maturity Duration
3130ATS57	FEDERAL HOME LOAN BANKS 4.5 03/10/2028	700,000.00	03/21/2023 3.99%	715,799.00 710,402.10	101.19 4.11%	708,339.84 7,087.50	0.74% (2,062.26)	Aaa/AA+ AA+	3.28 2.99
3133ERGL9	FEDERAL FARM CREDIT BANKS FUNDING CORP 4.5 06/07/2028	450,000.00	06/25/2024 4.44%	450,984.50 450,876.63	100.99 4.19%	454,447.86 9,787.50	0.47% 3,571.23	Aaa/AA+ AA+	3.52 3.15
3133EPN50	FEDERAL FARM CREDIT BANKS FUNDING CORP 4.25 12/15/2028	650,000.00	12/28/2023 3.89%	660,575.50 658,603.90	100.30 4.17%	651,929.86 12,738.19	0.68% (6,674.04)	Aaa/AA+ AA+	4.04 3.60
Total Agency		**4,245,000.00**	**3.18%**	**4,258,272.15** **4,262,194.19**	**99.97** **4.31%**	**4,243,068.79** **39,073.96**	**4.41%** **(19,125.40)**	**Aaa/AA+** **AA+**	**2.11** **1.93**
AGENCY CMBS									
3137BNGT5	FHMS K-054 A2 2.745 01/25/2026	500,000.00	02/15/2023 4.65%	474,785.16 490,444.90	98.03 4.59%	490,152.20 1,143.75	0.51% (292.70)	Aaa/AA+ AAA	1.15 0.99
3137BVZ82	FHMS K-063 A2 3.43 01/25/2027	320,000.00	02/06/2024 4.48%	310,725.00 313,322.35	97.89 4.46%	313,242.02 914.67	0.33% (80.34)	Aaa/AA+ AAA	2.15 1.90
3137FEBQ2	FHMS K-072 A2 3.444 12/25/2027	500,000.00	08/22/2023 4.98%	470,429.69 479,230.60	97.11 4.44%	485,559.85 1,435.00	0.50% 6,329.25	Aaa/AA+ AAA	3.07 2.78
3137FETN0	FHMS K-073 A2 3.35 01/25/2028	465,000.00	05/24/2023 4.27%	446,908.59 452,852.76	96.82 4.43%	450,197.33 1,298.13	0.47% (2,655.43)	Aaa/AA+ AAA	3.15 2.83
3137FHPJ6	FHMS K-080 A2 3.926 07/25/2028	325,000.00	01/23/2024 4.45%	317,814.45 319,191.16	98.18 4.43%	319,083.08 1,063.29	0.33% (108.08)	Aaa/AA+ AA+	3.65 3.32
3137FJEH8	FHMS K-081 A2 3.9 08/25/2028	155,000.00	09/15/2023 4.86%	148,436.72 150,054.46	98.07 4.43%	152,008.27 503.75	0.16% 1,953.81	Aaa/AA+ AAA	3.74 3.38
3137H4BY5	FHMS K-746 A2 2.031 09/25/2028	315,000.00	10/03/2023 5.30%	270,973.83 281,341.60	91.55 4.47%	288,388.17 533.14	0.30% 7,046.57	Aaa/AA+ AAA	3.82 3.54
3137FJXV6	FHMS K-083 A2 4.05 09/25/2028	297,000.00	12/07/2023 4.60%	289,783.83 291,268.90	98.55 4.43%	292,692.10 1,002.38	0.30% 1,423.21	Aaa/AA+ AAA	3.82 3.45
3137FJKE8	FHMS K-082 A2 3.92 09/25/2028	220,000.00	09/20/2024 3.81%	220,575.78 220,548.93	98.12 4.43%	215,870.05 718.67	0.22% (4,678.88)	Aaa/AA+ AAA	3.82 3.41
3137FJZ93	FHMS K-084 A2 3.78 10/25/2028	240,000.00	10/20/2023 5.34%	223,818.75 227,435.52	97.47 4.47%	233,924.47 756.00	0.24% 6,488.95	Aaa/AA+ AA+	3.90 3.50
Total Agency CMBS		**3,337,000.00**	**4.67%**	**3,174,251.80** **3,225,691.19**	**97.16** **4.46%**	**3,241,117.54** **9,368.76**	**3.37%** **15,426.36**	**Aaa/AA+** **AAA**	**3.04** **2.73**
CASH									
CCYUSD	Receivable	4,128.42	-- 0.00%	4,128.42 4,128.42	1.00 0.00%	4,128.42 0.00	0.00% 0.00	Aaa/AAA AAA	0.00 0.00

HOLDINGS REPORT

City of Gardena Cons | Account #10647 | As of November 30, 2024

Cusip	Security Description	Par Value/ Units	Purchase Date Purchase Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody's/ S&P/ Fitch	Maturity Duration
CCYUSD	Receivable	42,253.17	--	42,253.17	1.00	42,253.17	0.04%	Aaa/AAA	0.00
			0.00%	42,253.17	0.00%	0.00	0.00	AAA	0.00
Total Cash		**46,381.59**	**0.00%**	**46,381.59**	**1.00**	**46,381.59**	**0.05%**	**Aaa/AAA**	**0.00**
				46,381.59	**0.00%**	**0.00**	**0.00**	**AAA**	**0.00**
CORPORATE									
06368LGU4	BANK OF MONTREAL 5.2 12/12/2024	400,000.00	03/25/2024	399,352.00	100.01	400,052.52	0.42%	A2/A-	0.03
			5.42%	399,972.58	4.61%	9,764.44	79.93	AA-	0.03
24422EWB1	JOHN DEERE CAPITAL CORP 2.125 03/07/2025	130,000.00	03/02/2022	129,944.10	99.33	129,127.93	0.13%	A1/A	0.27
			2.14%	129,995.10	4.68%	644.58	(867.17)	A+	0.26
63743HFE7	NATIONAL RURAL UTILITIES COOPERATIVE FINANCE CORP 3.45 06/15/2025	95,000.00	04/27/2022	94,974.35	99.28	94,314.26	0.10%	A2/A-	0.54
			3.46%	94,995.58	4.83%	1,511.29	(681.32)	A	0.52
46625HMN7	JPMORGAN CHASE & CO 3.9 07/15/2025	400,000.00	05/29/2024	392,748.00	99.60	398,393.48	0.41%	A1/A	0.62
			5.58%	396,012.28	4.56%	5,893.33	2,381.19	AA-	0.60
6174468C6	MORGAN STANLEY 4.0 07/23/2025	394,000.00	04/10/2024	386,478.56	99.55	392,211.53	0.41%	A1/A-	0.64
			5.56%	390,231.23	4.72%	5,603.56	1,980.30	A+	0.62
931142EW9	WALMART INC 3.9 09/09/2025	80,000.00	09/06/2022	79,944.00	99.61	79,686.11	0.08%	Aa2/AA	0.77
			3.92%	79,985.59	4.42%	710.67	(299.49)	AA	0.74
437076CR1	HOME DEPOT INC 4.0 09/15/2025	110,000.00	09/12/2022	109,960.40	99.60	109,565.29	0.11%	A2/A	0.79
			4.01%	109,989.56	4.51%	928.89	(424.27)	A	0.76
20030NCS8	COMCAST CORP 3.95 10/15/2025	400,000.00	03/11/2024	393,932.00	99.54	398,141.43	0.41%	A3/A-	0.87
			4.95%	396,678.79	4.50%	2,018.89	1,462.64	A-	0.84
857477BR3	STATE STREET CORP 1.746 02/06/2026	90,000.00	02/02/2022	90,000.00	99.37	89,437.38	0.09%	Aa3/A	1.19
			1.75%	90,000.00	5.06%	501.98	(562.62)	AA-	0.18
037833BY5	APPLE INC 3.25 02/23/2026	400,000.00	05/09/2023	391,672.00	98.70	394,804.03	0.41%	Aaa/AA+	1.23
			4.05%	396,330.45	4.35%	3,538.89	(1,526.42)	NA	1.18
61747YET8	MORGAN STANLEY 4.679 07/17/2026	175,000.00	07/18/2022	175,000.00	99.87	174,775.21	0.18%	A1/A-	1.63
			4.68%	175,000.00	5.73%	3,047.85	(224.79)	A+	0.60
06428CAA2	BANK OF AMERICA NA 5.526 08/18/2026	300,000.00	09/19/2023	299,277.00	101.61	304,830.24	0.32%	Aa1/A+	1.71
			5.61%	299,574.51	4.53%	4,743.15	5,255.74	AA	1.52
931142ER0	WALMART INC 1.05 09/17/2026	40,000.00	09/08/2021	39,924.40	94.43	37,771.98	0.04%	Aa2/AA	1.80
			1.09%	39,972.88	4.31%	86.33	(2,200.90)	AA	1.74
63743HFK3	NATIONAL RURAL UTILITIES COOPERATIVE FINANCE CORP 5.6 11/13/2026	390,000.00	11/14/2023	393,666.00	101.91	397,429.75	0.41%	A2/A-	1.95
			5.25%	392,350.80	4.56%	1,092.00	5,078.95	A	1.75

Cusip	Security Description	Par Value/ Units	Purchase Date Purchase Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody's/ S&P/ Fitch	Maturity Duration
89115A2V3	TORONTO-DOMINION BANK 5.264 12/11/2026	160,000.00	12/04/2023 5.26%	160,000.00 160,000.00	101.30 4.59%	162,074.03 3,977.24	0.17% 2,074.03	A2/A- AA-	2.03 1.86
78016HZT0	ROYAL BANK OF CANADA 4.875 01/19/2027	150,000.00	01/10/2024 4.88%	149,962.50 149,973.35	100.82 4.47%	151,227.60 2,681.25	0.16% 1,254.25	A1/A AA-	2.14 1.97
17275RBQ4	CISCO SYSTEMS INC 4.8 02/26/2027	170,000.00	02/21/2024 4.85%	169,779.00 169,835.26	100.94 4.35%	171,594.21 2,153.33	0.18% 1,758.95	A1/AA- NA	2.24 2.00
857477CL5	STATE STREET CORP 4.993 03/18/2027	365,000.00	03/13/2024 4.99%	365,000.00 365,000.00	101.08 4.49%	368,950.85 3,695.51	0.38% 3,950.85	Aa3/A AA-	2.30 2.05
89115A2W1	TORONTO-DOMINION BANK 4.98 04/05/2027	400,000.00	04/08/2024 5.21%	397,448.00 397,998.20	100.78 4.62%	403,112.50 3,098.67	0.42% 5,114.30	A2/A- AA-	2.34 2.17
665859AW4	NORTHERN TRUST CORP 4.0 05/10/2027	450,000.00	10/05/2022 4.70%	436,909.50 443,048.60	99.02 4.43%	445,607.12 1,050.00	0.46% 2,558.52	A2/A+ A+	2.44 2.29
14913UAL4	CATERPILLAR FINANCIAL SERVICES CORP 5.0 05/14/2027	405,000.00	05/21/2024 4.93%	405,743.58 405,612.12	101.46 4.37%	410,896.93 956.25	0.43% 5,284.82	A2/A A+	2.45 2.28
438516CJ3	HONEYWELL INTERNATIONAL INC 4.95 02/15/2028	400,000.00	02/13/2023 4.44%	408,972.00 405,698.09	101.75 4.36%	406,981.14 5,830.00	0.42% 1,283.05	A2/A A	3.21 2.83
57636QAW4	MASTERCARD INC 4.875 03/09/2028	290,000.00	04/19/2023 4.17%	298,833.40 295,863.77	101.60 4.34%	294,638.00 3,220.21	0.31% (1,225.77)	Aa3/A+ NA	3.27 2.90
74456QBU9	PUBLIC SERVICE ELECTRIC AND GAS CO 3.7 05/01/2028	300,000.00	09/06/2023 5.10%	282,801.00 287,361.72	97.68 4.44%	293,039.79 925.00	0.30% 5,678.07	A1/A WR	3.42 3.16
58933YBH7	MERCK & CO INC 4.05 05/17/2028	90,000.00	05/08/2023 4.07%	89,927.10 89,949.60	99.41 4.24%	89,464.79 141.75	0.09% (484.81)	A1/A+ NA	3.46 3.19
69371RS80	PACCAR FINANCIAL CORP 4.6 01/31/2029	410,000.00	01/24/2024 4.64%	409,331.70 409,443.27	100.65 4.43%	412,655.31 6,339.06	0.43% 3,212.05	A1/A+ NA	4.17 3.70
89236TMF9	TOYOTA MOTOR CREDIT CORP 5.05 05/16/2029	400,000.00	06/25/2024 4.88%	402,872.00 402,617.78	101.91 4.57%	407,621.49 841.67	0.42% 5,003.70	A1/A+ A+	4.46 3.95
341081GT8	FLORIDA POWER & LIGHT CO 5.15 06/15/2029	330,000.00	09/19/2024 4.03%	345,331.80 344,670.00	102.47 4.54%	338,163.30 8,403.08	0.35% (6,506.69)	Aa2/A+ AA-	4.54 3.79
437076DC3	HOME DEPOT INC 4.75 06/25/2029	295,000.00	-- 4.74%	295,110.25 295,111.99	101.07 4.49%	298,153.10 6,072.08	0.31% 3,041.10	A2/A A	4.57 3.92
713448FX1	PEPSICO INC 4.5 07/17/2029	295,000.00	07/15/2024 4.53%	294,542.75 294,577.06	100.71 4.33%	297,095.85 4,941.25	0.31% 2,518.79	A1/A+ NA	4.63 4.01
Total Corporate		**8,314,000.00**	**4.76%**	**8,289,437.39** **8,307,850.15**	**100.47** **4.52%**	**8,351,817.13** **94,412.20**	**8.68%** **43,966.98**	**A1/A** **A+**	**2.35** **2.08**
LAIF									

Cusip	Security Description	Par Value/ Units	Purchase Date Purchase Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody's/ S&P/ Fitch	Maturity Duration
90LAIF$00	Local Agency Investment Fund State Pool	5,635,051.71	-- 4.49%	5,635,051.71 5,635,051.71	1.00 4.49%	5,635,051.71 0.00	5.85% 0.00	NA/NA NA	0.00 0.00
Total LAIF		**5,635,051.71**	**4.49%**	**5,635,051.71 5,635,051.71**	**1.00 4.49%**	**5,635,051.71 0.00**	**5.85% 0.00**	**NA/NA NA**	**0.00 0.00**
LOCAL GOV INVESTMENT POOL									
09CATR$05	CalTrust MTF	711,611.59	-- 4.21%	7,141,421.80 7,141,421.80	9.83 4.21%	6,995,141.97 0.00	7.27% (146,279.83)	NA/AAAm NA	0.00 0.00
90CAMP$00	CAMP	14,224,704.75	-- 4.81%	14,224,704.75 14,224,704.75	1.00 4.81%	14,224,704.75 0.00	14.78% 0.00	NA/AAAm AAA	0.00 0.00
90CAMP$06	CAMP	36,250,000.00	-- 4.81%	36,250,000.00 36,250,000.00	1.00 4.81%	36,250,000.00 0.00	37.66% 0.00	NA/AAAm NA	0.00 0.00
Total Local Gov Investment Pool		**51,186,316.34**	**4.74%**	**57,616,126.55 57,616,126.55**	**2.07 4.74%**	**57,469,846.72 0.00**	**59.70% (146,279.83)**	**NA/ AAAm AAA**	**0.00 0.00**
MONEY MARKET FUND									
31846V203	FIRST AMER:GVT OBLG Y	152,976.32	-- 4.26%	152,976.32 152,976.32	1.00 4.26%	152,976.32 0.00	0.16% 0.00	Aaa/ AAAm AAA	0.00 0.00
Total Money Market Fund		**152,976.32**	**4.26%**	**152,976.32 152,976.32**	**1.00 4.26%**	**152,976.32 0.00**	**0.16% 0.00**	**Aaa/ AAAm AAA**	**0.00 0.00**
SUPRANATIONAL									
459058LK7	INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPM 4.0 08/27/2026	170,000.00	08/20/2024 4.06%	169,802.80 169,828.73	99.60 4.24%	169,321.20 1,775.56	0.18% (507.53)	Aaa/AAA NA	1.74 1.64
459058KT9	INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPM 3.5 07/12/2028	250,000.00	11/28/2023 4.53%	239,372.50 241,685.84	97.78 4.17%	244,451.73 3,378.47	0.25% 2,765.89	Aaa/AAA NA	3.62 3.31

Cusip	Security Description	Par Value/ Units	Purchase Date Purchase Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody's/ S&P/ Fitch	Maturity Duration
459058KW2	INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPM 4.625 08/01/2028	250,000.00	-- 4.97%	246,407.00 247,248.88	101.47 4.19%	253,675.01 3,854.17	0.26% 6,426.13	Aaa/AAA NA	3.67 3.30
459058LN1	INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPM 3.875 10/16/2029	300,000.00	10/08/2024 3.93%	299,217.00 299,236.73	98.54 4.21%	295,608.35 1,453.13	0.31% (3,628.38)	Aaa/AAA NA	4.88 4.37
Total Supranational		**970,000.00**	**4.38%**	**954,799.30 958,000.18**	**99.30 4.20%**	**963,056.29 10,461.32**	**1.00% 5,056.11**	**Aaa/AAA NA**	**3.69 3.34**
US TREASURY									
912828Z52	UNITED STATES TREASURY 1.375 01/31/2025	750,000.00	02/17/2022 1.71%	742,822.27 749,593.84	99.50 4.44%	746,250.00 3,446.84	0.78% (3,343.84)	Aaa/AA+ AA+	0.17 0.16
912828ZF0	UNITED STATES TREASURY 0.5 03/31/2025	350,000.00	03/25/2021 0.58%	348,906.26 349,910.29	98.73 4.44%	345,556.64 298.08	0.36% (4,353.65)	Aaa/AA+ AA+	0.33 0.32
91282CEH0	UNITED STATES TREASURY 2.625 04/15/2025	450,000.00	04/18/2024 5.18%	439,031.25 445,898.11	99.35 4.39%	447,096.09 1,525.24	0.46% 1,197.98	Aaa/AA+ AA+	0.37 0.36
912828ZT0	UNITED STATES TREASURY 0.25 05/31/2025	365,000.00	02/25/2021 0.60%	359,653.32 364,377.65	97.97 4.45%	357,588.79 2.51	0.37% (6,788.86)	Aaa/AA+ AA+	0.50 0.48
91282CEU1	UNITED STATES TREASURY 2.875 06/15/2025	500,000.00	07/30/2024 4.90%	491,425.78 494,731.83	99.21 4.37%	496,070.31 6,637.64	0.52% 1,338.48	Aaa/AA+ AA+	0.54 0.52
91282CEY3	UNITED STATES TREASURY 3.0 07/15/2025	475,000.00	03/15/2024 4.94%	463,273.44 469,524.37	99.18 4.36%	471,089.60 5,382.47	0.49% 1,565.23	Aaa/AA+ AA+	0.62 0.60
9128284Z0	UNITED STATES TREASURY 2.75 08/31/2025	750,000.00	-- 0.99%	800,092.78 759,703.85	98.76 4.46%	740,698.25 5,241.71	0.77% (19,005.61)	Aaa/AA+ AA+	0.75 0.72
91282CFK2	UNITED STATES TREASURY 3.5 09/15/2025	475,000.00	03/15/2024 4.90%	465,537.11 470,008.59	99.32 4.39%	471,760.35 3,536.26	0.49% 1,751.77	Aaa/AA+ AA+	0.79 0.76
91282CFP1	UNITED STATES TREASURY 4.25 10/15/2025	550,000.00	06/23/2023 4.59%	545,982.42 548,482.67	99.88 4.39%	549,333.98 3,018.20	0.57% 851.31	Aaa/AA+ AA+	0.87 0.84
91282CAZ4	UNITED STATES TREASURY 0.375 11/30/2025	750,000.00	-- 0.88%	734,730.47 746,307.44	96.14 4.39%	721,013.67 7.73	0.75% (25,293.77)	Aaa/AA+ AA+	1.00 0.97
91282CGA3	UNITED STATES TREASURY 4.0 12/15/2025	600,000.00	11/18/2024 4.38%	597,632.81 597,705.46	99.64 4.35%	597,857.81 11,081.97	0.62% 152.35	Aaa/AA+ AA+	1.04 0.98
9128286L9	UNITED STATES TREASURY 2.25 03/31/2026	750,000.00	02/25/2022 1.91%	760,078.13 753,276.07	97.40 4.29%	730,488.29 2,874.31	0.76% (22,787.78)	Aaa/AA+ AA+	1.33 1.28
912828R36	UNITED STATES TREASURY 1.625 05/15/2026	250,000.00	10/14/2021 0.99%	257,148.44 252,264.60	96.30 4.27%	240,761.72 179.56	0.25% (11,502.88)	Aaa/AA+ AA+	1.45 1.41

HOLDINGS REPORT

City of Gardena Cons | Account #10647 | As of November 30, 2024

Cusip	Security Description	Par Value/ Units	Purchase Date Purchase Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody's/ S&P/ Fitch	Maturity Duration
91282CHH7	UNITED STATES TREASURY 4.125 06/15/2026	475,000.00	08/26/2024 3.94%	476,502.93 476,283.32	99.80 4.26%	474,072.27 9,047.39	0.49% (2,211.06)	Aaa/AA+ AA+	1.54 1.44
912828YG9	UNITED STATES TREASURY 1.625 09/30/2026	300,000.00	12/28/2021 1.24%	305,296.88 302,038.20	95.51 4.20%	286,523.44 830.36	0.30% (15,514.77)	Aaa/AA+ AA+	1.83 1.77
91282CJC6	UNITED STATES TREASURY 4.625 10/15/2026	475,000.00	08/26/2024 3.84%	482,514.65 481,588.58	100.74 4.21%	478,506.83 2,836.62	0.50% (3,081.75)	Aaa/AA+ AA+	1.87 1.76
912828U24	UNITED STATES TREASURY 2.0 11/15/2026	625,000.00	03/29/2022 2.55%	609,912.11 618,629.36	95.93 4.19%	599,584.96 552.49	0.62% (19,044.40)	Aaa/AA+ AA+	1.96 1.88
91282CJP7	UNITED STATES TREASURY 4.375 12/15/2026	300,000.00	12/27/2023 4.02%	302,906.25 301,996.54	100.35 4.19%	301,054.69 6,060.45	0.31% (941.85)	Aaa/AA+ AA+	2.04 1.89
91282CEF4	UNITED STATES TREASURY 2.5 03/31/2027	750,000.00	-- 2.90%	736,449.21 743,452.09	96.38 4.15%	722,871.09 3,193.68	0.75% (20,581.00)	Aaa/AA+ AA+	2.33 2.22
912828X88	UNITED STATES TREASURY 2.375 05/15/2027	350,000.00	06/09/2022 3.08%	338,666.02 344,364.50	95.90 4.15%	335,644.53 367.40	0.35% (8,719.96)	Aaa/AA+ AA+	2.45 2.34
91282CKZ3	UNITED STATES TREASURY 4.375 07/15/2027	1,000,000.00	11/18/2024 4.29%	1,002,070.31 1,002,044.65	100.60 4.13%	1,006,015.62 16,525.14	1.05% 3,970.98	Aaa/AA+ AA+	2.62 2.41
91282CFM8	UNITED STATES TREASURY 4.125 09/30/2027	570,000.00	10/26/2022 4.19%	568,419.14 569,092.26	100.01 4.12%	570,066.80 4,004.88	0.59% 974.54	Aaa/AA+ AA+	2.83 2.63
9128283F5	UNITED STATES TREASURY 2.25 11/15/2027	800,000.00	12/20/2022 3.84%	743,625.00 766,017.53	94.83 4.13%	758,656.25 795.58	0.79% (7,361.28)	Aaa/AA+ AA+	2.96 2.81
91282CGC9	UNITED STATES TREASURY 3.875 12/31/2027	500,000.00	05/25/2023 3.98%	497,890.63 498,587.48	99.32 4.11%	496,582.03 8,108.02	0.52% (2,005.45)	Aaa/AA+ AA+	3.08 2.83
912828YB0	UNITED STATES TREASURY 1.625 08/15/2029	150,000.00	09/24/2024 3.49%	137,542.97 138,010.54	89.63 4.07%	134,449.22 715.35	0.14% (3,561.33)	Aaa/AA+ AA+	4.71 4.42
Total US Treasury		**13,310,000.00**	**3.15%**	**13,208,110.58** **13,243,889.81**	**98.31** **4.28%**	**13,079,593.23** **96,269.86**	**13.59%** **(164,296.59)**	**Aaa/AA+** **AA+**	**1.55** **1.47**
Total Portfolio		**90,267,544.62**	**4.42%**	**96,402,940.94** **96,517,377.18**	**35.25** **4.60%**	**96,262,629.17** **255,446.04**	**100.00%** **(254,748.01)**	**Aa2/AA+** **AA**	**0.74** **0.63**
Total Market Value + Accrued						**96,518,075.21**			

TRANSACTION LEDGER

City of Gardena Cons | Account #10647 | As of November 30, 2024

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/ Sold	Total Amount	Gain/Loss
ACQUISITIONS										
Purchase	11/01/2024	31846V203	5,625.00	FIRST AMER:GVT OBLG Y	1.000	4.45%	(5,625.00)	0.00	(5,625.00)	0.00
Purchase	11/01/2024	31846V203	505,550.00	FIRST AMER:GVT OBLG Y	1.000	4.45%	(505,550.00)	0.00	(505,550.00)	0.00
Purchase	11/04/2024	31846V203	1,379.26	FIRST AMER:GVT OBLG Y	1.000	4.44%	(1,379.26)	0.00	(1,379.26)	0.00
Purchase	11/07/2024	31846V203	875.00	FIRST AMER:GVT OBLG Y	1.000	4.42%	(875.00)	0.00	(875.00)	0.00
Purchase	11/08/2024	31846V203	175,000.00	FIRST AMER:GVT OBLG Y	1.000	4.42%	(175,000.00)	0.00	(175,000.00)	0.00
Purchase	11/08/2024	31846V203	787.50	FIRST AMER:GVT OBLG Y	1.000	4.42%	(787.50)	0.00	(787.50)	0.00
Purchase	11/12/2024	31846V203	9,000.00	FIRST AMER:GVT OBLG Y	1.000	4.42%	(9,000.00)	0.00	(9,000.00)	0.00
Purchase	11/13/2024	31846V203	10,920.00	FIRST AMER:GVT OBLG Y	1.000	4.42%	(10,920.00)	0.00	(10,920.00)	0.00
Purchase	11/14/2024	31846V203	10,125.00	FIRST AMER:GVT OBLG Y	1.000	4.42%	(10,125.00)	0.00	(10,125.00)	0.00
Purchase	11/15/2024	31846V203	834,821.79	FIRST AMER:GVT OBLG Y	1.000	4.42%	(834,821.79)	0.00	(834,821.79)	0.00
Purchase	11/15/2024	31846V203	856.68	FIRST AMER:GVT OBLG Y	1.000	4.42%	(856.68)	0.00	(856.68)	0.00
Purchase	11/18/2024	31846V203	17,854.38	FIRST AMER:GVT OBLG Y	1.000	4.26%	(17,854.38)	0.00	(17,854.38)	0.00
Purchase	11/18/2024	31846V203	7,397.70	FIRST AMER:GVT OBLG Y	1.000	4.26%	(7,397.70)	0.00	(7,397.70)	0.00
Purchase	11/19/2024	91282CKZ3	1,000,000.00	UNITED STATES TREASURY 4.375 07/15/2027	100.207	4.29%	(1,002,070.31)	(15,098.51)	(1,017,168.82)	0.00
Purchase	11/19/2024	91282CGA3	600,000.00	UNITED STATES TREASURY 4.0 12/15/2025	99.605	4.38%	(597,632.81)	(10,295.08)	(607,927.89)	0.00
Purchase	11/20/2024	31846V203	7,761.25	FIRST AMER:GVT OBLG Y	1.000	4.41%	(7,761.25)	0.00	(7,761.25)	0.00
Purchase	11/21/2024	31846V203	3,621.48	FIRST AMER:GVT OBLG Y	1.000	4.41%	(3,621.48)	0.00	(3,621.48)	0.00
Purchase	11/25/2024	31846V203	29,177.74	FIRST AMER:GVT OBLG Y	1.000	4.26%	(29,177.74)	0.00	(29,177.74)	0.00
Purchase	11/30/2024	09CATR$05	2,375.38	CalTrust MTF	9.830	4.21%	(23,349.99)	0.00	(23,349.99)	0.00
Purchase	11/30/2024	90CAMP$00	56,562.31	CAMP	1.000	4.81%	(56,562.31)	0.00	(56,562.31)	0.00
Total Purchase			**3,279,690.47**				**(3,300,368.20)**	**(25,393.59)**	**(3,325,761.79)**	**0.00**
TOTAL ACQUISITIONS			**3,279,690.47**				**(3,300,368.20)**	**(25,393.59)**	**(3,325,761.79)**	**0.00**
OTHER										
Maturity	11/01/2024	78015K7C2	(500,000.00)	ROYAL BANK OF CANADA 2.25 11/01/2024	100.000	2.25%	500,000.00	0.00	500,000.00	0.00
Maturity	11/08/2024	69371RR57	(175,000.00)	PACCAR FINANCIAL CORP 0.9 11/08/2024	100.000	0.90%	175,000.00	0.00	175,000.00	0.00

TRANSACTION LEDGER

City of Gardena Cons | Account #10647 | As of November 30, 2024

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/ Sold	Total Amount	Gain/Loss
Maturity	11/15/2024	91282CDH1	(750,000.00)	UNITED STATES TREASURY 0.75 11/15/2024	100.000	0.75%	750,000.00	0.00	750,000.00	0.00
Total Maturity			**(1,425,000.00)**				**1,425,000.00**	**0.00**	**1,425,000.00**	**0.00**
Sale	11/19/2024	31846V203	(1,625,096.71)	FIRST AMER:GVT OBLG Y	1.000	4.41%	1,625,096.71	0.00	1,625,096.71	0.00
Total Sale			**(1,625,096.71)**				**1,625,096.71**	**0.00**	**1,625,096.71**	**0.00**
TOTAL OTHER TRANSACTIONS			**(3,050,096.71)**				**3,050,096.71**	**0.00**	**3,050,096.71**	**0.00**
OTHER										
Cash Transfer	11/01/2024	CCYUSD	(167,057.88)	Cash		0.00%	(167,057.88)	0.00	(167,057.88)	0.00
Cash Transfer	11/30/2024	CCYUSD	(149,270.55)	Cash		0.00%	(149,270.55)	0.00	(149,270.55)	0.00
Total Cash Transfer			**(316,328.43)**				**(316,328.43)**	**0.00**	**(316,328.43)**	**0.00**
Coupon	11/01/2024	78015K7C2	0.00	ROYAL BANK OF CANADA 2.25 11/01/2024		2.25%	5,625.00	0.00	5,625.00	0.00
Coupon	11/01/2024	3137FJKE8	0.00	FHMS K-082 A2 3.92 09/25/2028		3.80%	718.67	0.00	718.67	0.00
Coupon	11/01/2024	3137FETN0	0.00	FHMS K-073 A2 3.35 01/25/2028		4.23%	1,298.12	0.00	1,298.12	0.00
Coupon	11/01/2024	3137FHPJ6	0.00	FHMS K-080 A2 3.926 07/25/2028		4.43%	1,063.29	0.00	1,063.29	0.00
Coupon	11/01/2024	3137BVZ82	0.00	FHMS K-063 A2 3.43 01/25/2027		4.44%	914.67	0.00	914.67	0.00
Coupon	11/01/2024	3137BNGT5	0.00	FHMS K-054 A2 2.745 01/25/2026		4.51%	1,143.75	0.00	1,143.75	0.00
Coupon	11/01/2024	3137FJXV6	0.00	FHMS K-083 A2 4.05 09/25/2028		4.57%	1,002.38	0.00	1,002.38	0.00
Coupon	11/01/2024	3137FJEH8	0.00	FHMS K-081 A2 3.9 08/25/2028		4.82%	503.75	0.00	503.75	0.00
Coupon	11/01/2024	3137FEBQ2	0.00	FHMS K-072 A2 3.444 12/25/2027		4.91%	1,435.00	0.00	1,435.00	0.00
Coupon	11/01/2024	74456QBU9	0.00	PUBLIC SERVICE ELECTRIC AND GAS CO 3.7 05/01/2028		5.10%	5,550.00	0.00	5,550.00	0.00

TRANSACTION LEDGER

City of Gardena Cons | Account #10647 | As of November 30, 2024

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/ Sold	Total Amount	Gain/Loss
Coupon	11/01/2024	3137H4BY5	0.00	FHMS K-746 A2 2.031 09/25/2028		5.19%	533.14	0.00	533.14	0.00
Coupon	11/01/2024	3137FJZ93	0.00	FHMS K-084 A2 3.78 10/25/2028		5.28%	756.00	0.00	756.00	0.00
Coupon	11/07/2024	3135G06G3	0.00	FEDERAL NATIONAL MORTGAGE ASSOCIATION 0.5 11/07/2025		0.52%	875.00	0.00	875.00	0.00
Coupon	11/08/2024	69371RR57	0.00	PACCAR FINANCIAL CORP 0.9 11/08/2024		0.90%	787.50	0.00	787.50	0.00
Coupon	11/10/2024	665859AW4	0.00	NORTHERN TRUST CORP 4.0 05/10/2027		4.70%	9,000.00	0.00	9,000.00	0.00
Coupon	11/13/2024	63743HFK3	0.00	NATIONAL RURAL UTILITIES COOPERATIVE FINANCE CORP 5.6 11/13/2026		5.25%	10,920.00	0.00	10,920.00	0.00
Coupon	11/14/2024	14913UAL4	0.00	CATERPILLAR FINANCIAL SERVICES CORP 5.0 05/14/2027		4.93%	10,125.00	0.00	10,125.00	0.00
Coupon	11/15/2024	47789QAC4	0.00	JDOT 2021-B A3 0.52 03/16/2026		0.53%	5.76	0.00	5.76	0.00
Coupon	11/15/2024	89238JAC9	0.00	TAOT 2021-D A3 0.71 04/15/2026		0.71%	9.53	0.00	9.53	0.00
Coupon	11/15/2024	91282CDH1	0.00	UNITED STATES TREASURY 0.75 11/15/2024		0.75%	2,812.50	0.00	2,812.50	0.00
Coupon	11/15/2024	912828R36	0.00	UNITED STATES TREASURY 1.625 05/15/2026		0.99%	2,031.25	0.00	2,031.25	0.00
Coupon	11/15/2024	43815BAC4	0.00	HAROT 2022-1 A3 1.88 05/15/2026		1.90%	106.14	0.00	106.14	0.00
Coupon	11/15/2024	47787JAC2	0.00	JDOT 2022 A3 0.36 09/15/2026		2.35%	97.00	0.00	97.00	0.00
Coupon	11/15/2024	912828U24	0.00	UNITED STATES TREASURY 2.0 11/15/2026		2.55%	6,250.00	0.00	6,250.00	0.00
Coupon	11/15/2024	89238FAD5	0.00	TAOT 2022-B A3 2.93 09/15/2026		2.95%	139.89	0.00	139.89	0.00

TRANSACTION LEDGER

City of Gardena Cons | Account #10647 | As of November 30, 2024

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/ Sold	Total Amount	Gain/Loss
Coupon	11/15/2024	912828X88	0.00	UNITED STATES TREASURY 2.375 05/15/2027		3.08%	4,156.25	0.00	4,156.25	0.00
Coupon	11/15/2024	02582JJT8	0.00	AMXCA 2022-2 A 3.39 05/17/2027		3.42%	522.63	0.00	522.63	0.00
Coupon	11/15/2024	47800AAC4	0.00	JDOT 2022-B A3 3.74 02/16/2027		3.78%	297.62	0.00	297.62	0.00
Coupon	11/15/2024	9128283F5	0.00	UNITED STATES TREASURY 2.25 11/15/2027		3.84%	9,000.00	0.00	9,000.00	0.00
Coupon	11/15/2024	58769GAD5	0.00	MBALT 2024-B A3 4.23 02/15/2028		4.24%	458.25	0.00	458.25	0.00
Coupon	11/15/2024	448976AD2	0.00	HART 2024-C A3 4.41 05/15/2029		4.45%	497.35	0.00	497.35	0.00
Coupon	11/15/2024	89239TAD4	0.00	TAOT 2024-D A3 4.4 06/15/2029		4.51%	359.33	0.00	359.33	0.00
Coupon	11/15/2024	58770AAC7	0.00	MBART 2023-1 A3 4.51 11/15/2027		4.56%	366.03	0.00	366.03	0.00
Coupon	11/15/2024	448979AD6	0.00	HART 2023-A A3 4.58 04/15/2027		4.63%	591.58	0.00	591.58	0.00
Coupon	11/15/2024	44934QAD3	0.00	HART 2024-B A3 4.84 03/15/2029		4.90%	363.00	0.00	363.00	0.00
Coupon	11/15/2024	02582JJZ4	0.00	AMXCA 2023-1 A 4.87 05/15/2026		4.92%	507.29	0.00	507.29	0.00
Coupon	11/15/2024	47800BAC2	0.00	JDOT 2022-C A3 5.09 06/15/2027		5.15%	798.36	0.00	798.36	0.00
Coupon	11/15/2024	161571HT4	0.00	CHAIT 2023-1 A 5.16 09/15/2028		5.23%	1,462.00	0.00	1,462.00	0.00
Coupon	11/15/2024	02582JKD1	0.00	AMXCA 2023-3 A 5.23 09/15/2028		5.29%	1,481.83	0.00	1,481.83	0.00
Coupon	11/15/2024	47787CAC7	0.00	JDOT 2023-C A3 5.48 05/15/2028		5.55%	1,415.67	0.00	1,415.67	0.00
Coupon	11/16/2024	36265WAD5	0.00	GMCAR 2022-3 A3 3.64 04/16/2027		3.67%	195.59	0.00	195.59	0.00
Coupon	11/16/2024	38014AAD3	0.00	GMCAR 2024-4 A3 4.4 08/16/2029		4.32%	371.56	0.00	371.56	0.00

TRANSACTION LEDGER

City of Gardena Cons | Account #10647 | As of November 30, 2024

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/ Sold	Total Amount	Gain/Loss
Coupon	11/16/2024	362583AD8	0.00	GMCAR 2023-2 A3 4.47 02/16/2028		4.51%	428.38	0.00	428.38	0.00
Coupon	11/16/2024	89236TMF9	0.00	TOYOTA MOTOR CREDIT CORP 5.05 05/16/2029		4.88%	10,100.00	0.00	10,100.00	0.00
Coupon	11/17/2024	58933YBH7	0.00	MERCK & CO INC 4.05 05/17/2028		4.07%	1,822.50	0.00	1,822.50	0.00
Coupon	11/18/2024	43815PAC3	0.00	HAROT 2022-2 A3 3.73 07/20/2026		3.76%	207.89	0.00	207.89	0.00
Coupon	11/20/2024	3133ERFJ5	0.00	FEDERAL FARM CREDIT BANKS FUNDING CORP 4.5 05/20/2027		4.79%	7,425.00	0.00	7,425.00	0.00
Coupon	11/20/2024	379929AD4	0.00	GMALT 2023-3 A3 5.38 11/20/2026		5.45%	336.25	0.00	336.25	0.00
Coupon	11/21/2024	43815GAC3	0.00	HAROT 2021-4 A3 0.88 01/21/2026		0.90%	14.50	0.00	14.50	0.00
Coupon	11/21/2024	43815JAC7	0.00	HAROT 2023-1 A3 5.04 04/21/2027		5.11%	294.00	0.00	294.00	0.00
Coupon	11/25/2024	05593AAC3	0.00	BMWLT 2023-1 A3 5.16 11/25/2025		5.22%	84.14	0.00	84.14	0.00
Coupon	11/25/2024	05602RAD3	0.00	BMWOT 2022-A A3 3.21 08/25/2026		6.15%	337.52	0.00	337.52	0.00
Coupon	11/30/2024	912828ZT0	0.00	UNITED STATES TREASURY 0.25 05/31/2025		0.60%	456.25	0.00	456.25	0.00
Coupon	11/30/2024	91282CAZ4	0.00	UNITED STATES TREASURY 0.375 11/30/2025		0.88%	1,406.25	0.00	1,406.25	0.00
Total Coupon			**0.00**				**109,460.36**	**0.00**	**109,460.36**	**0.00**
Dividend	11/30/2024	09CATR$05	0.00	CalTrust MTF		4.21%	23,349.99	0.00	23,349.99	0.00
Dividend	11/30/2024	90CAMP$00	0.00	CAMP		4.81%	56,562.31	0.00	56,562.31	0.00
Dividend	11/30/2024	90CAMP$06	0.00	CAMP		4.81%	149,270.55	0.00	149,270.55	0.00
Dividend	11/30/2024	31846V203	0.00	FIRST AMER:GVT OBLG Y		4.38%	2,265.92	0.00	2,265.92	0.00
Total Dividend			**0.00**				**231,448.77**	**0.00**	**231,448.77**	**0.00**
Principal Paydown	11/15/2024	47789QAC4	2,648.27	JDOT 2021-B A3 0.52 03/16/2026		0.53%	2,648.27	--	2,648.27	0.00

TRANSACTION LEDGER

City of Gardena Cons | Account #10647 | As of November 30, 2024

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/ Sold	Total Amount	Gain/Loss
Principal Paydown	11/15/2024	89238JAC9	2,671.87	TAOT 2021-D A3 0.71 04/15/2026		0.71%	2,671.87	--	2,671.87	0.00
Principal Paydown	11/15/2024	43815BAC4	8,156.21	HAROT 2022-1 A3 1.88 05/15/2026		1.90%	8,156.21	--	8,156.21	(0.00)
Principal Paydown	11/15/2024	47787JAC2	6,921.83	JDOT 2022 A3 0.36 09/15/2026		2.35%	6,921.83	--	6,921.83	(0.00)
Principal Paydown	11/15/2024	89238FAD5	5,620.05	TAOT 2022-B A3 2.93 09/15/2026		2.95%	5,620.05	--	5,620.05	0.00
Principal Paydown	11/15/2024	47800AAC4	7,905.88	JDOT 2022-B A3 3.74 02/16/2027		3.78%	7,905.88	--	7,905.88	0.00
Principal Paydown	11/15/2024	58770AAC7	6,043.88	MBART 2023-1 A3 4.51 11/15/2027		4.56%	6,043.88	--	6,043.88	0.00
Principal Paydown	11/15/2024	47800BAC2	11,981.22	JDOT 2022-C A3 5.09 06/15/2027		5.15%	11,981.22	--	11,981.22	(0.00)
Principal Paydown	11/16/2024	36265WAD5	5,736.29	GMCAR 2022-3 A3 3.64 04/16/2027		3.67%	5,736.29	--	5,736.29	(0.00)
Principal Paydown	11/18/2024	43815PAC3	6,389.87	HAROT 2022-2 A3 3.73 07/20/2026		3.76%	6,389.87	--	6,389.87	0.00
Principal Paydown	11/21/2024	43815GAC3	3,312.98	HAROT 2021-4 A3 0.88 01/21/2026		0.90%	3,312.98	--	3,312.98	0.00
Principal Paydown	11/25/2024	05593AAC3	5,010.31	BMWLT 2023-1 A3 5.16 11/25/2025		5.22%	5,010.31	--	5,010.31	0.00
Principal Paydown	11/25/2024	05602RAD3	14,377.00	BMWOT 2022-A A3 3.21 08/25/2026		6.15%	14,377.00	--	14,377.00	0.00
Total Principal Paydown			**86,775.66**				**86,775.66**	**--**	**86,775.66**	**0.01**
TOTAL OTHER TRANSACTIONS			**(229,552.77)**				**111,356.36**	**0.00**	**111,356.36**	**0.01**

INCOME EARNED

City of Gardena Cons | Account #10647 | As of November 30, 2024

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
CASH & EQUIVALENTS						
31846V203	FIRST AMER:GVT OBLG Y	152,976.32	157,320.25 1,620,752.78 (1,625,096.71) 152,976.32	0.00 1,379.26 0.00 1,379.26	0.00 0.00 0.00 1,379.26	1,379.26
CCYUSD	Receivable	46,381.59	189,940.97 0.00 0.00 46,381.59	0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00	0.00
CCYUSD	Cash	0.00	(0.00) 0.00 0.00 0.00	0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00	0.00
Total Cash & Equivalents		**199,357.91**	**347,261.22** **1,620,752.78** **(1,625,096.71)** **199,357.91**	**0.00** **1,379.26** **0.00** **1,379.26**	**0.00** **0.00** **0.00** **1,379.26**	**1,379.26**
FIXED INCOME						
02582JJT8	AMXCA 2022-2 A 3.39 05/17/2027	05/17/2022 05/24/2022 185,000.00	184,989.75 0.00 0.00 184,991.33	278.73 522.63 278.73 522.63	1.58 0.00 1.58 524.21	524.21
02582JJZ4	AMXCA 2023-1 A 4.87 05/15/2026	06/07/2023 06/14/2023 125,000.00	124,992.48 0.00 0.00 124,992.88	270.56 507.29 270.56 507.29	0.40 0.00 0.40 507.69	507.69
02582JKD1	AMXCA 2023-3 A 5.23 09/15/2028	09/12/2023 09/19/2023 340,000.00	339,988.21 0.00 0.00 339,988.46	790.31 1,481.83 790.31 1,481.83	0.25 0.00 0.25 1,482.08	1,482.08
037833BY5	APPLE INC 3.25 02/23/2026	05/09/2023 05/11/2023 400,000.00	396,085.27 0.00 0.00 396,330.45	2,455.56 0.00 3,538.89 1,083.33	245.18 0.00 245.18 1,328.51	1,328.51

INCOME EARNED

City of Gardena Cons | Account #10647 | As of November 30, 2024

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
05593AAC3	BMWLT 2023-1 A3 5.16 11/25/2025	02/07/2023 02/15/2023 14,557.97	19,568.11 0.00 (5,010.31) 14,557.85	16.83 84.14 12.52 79.83	0.05 0.00 0.05 79.89	79.89
05602RAD3	BMWOT 2022-A A3 3.21 08/25/2026	01/05/2023 01/09/2023 111,799.95	124,554.77 0.00 (14,377.00) 110,427.74	67.50 337.52 59.81 329.83	249.97 0.00 249.97 579.80	579.80
06368LGU4	BANK OF MONTREAL 5.2 12/12/2024	03/25/2024 03/27/2024 400,000.00	399,897.82 0.00 0.00 399,972.58	8,031.11 0.00 9,764.44 1,733.33	74.77 0.00 74.77 1,808.10	1,808.10
06428CAA2	BANK OF AMERICA NA 5.526 08/18/2026	09/19/2023 09/21/2023 300,000.00	299,554.08 0.00 0.00 299,574.51	3,361.65 0.00 4,743.15 1,381.50	20.42 0.00 20.42 1,401.92	1,401.92
14913UAL4	CATERPILLAR FINANCIAL SERVICES CORP 5.0 05/14/2027	05/21/2024 05/23/2024 405,000.00	405,632.66 0.00 0.00 405,612.12	9,393.75 10,125.00 956.25 1,687.50	0.00 (20.54) (20.54) 1,666.96	1,666.96
161571HT4	CHAIT 2023-1 A 5.16 09/15/2028	09/07/2023 09/15/2023 340,000.00	339,927.06 0.00 0.00 339,928.60	779.73 1,462.00 779.73 1,462.00	1.55 0.00 1.55 1,463.55	1,463.55
17275RBQ4	CISCO SYSTEMS INC 4.8 02/26/2027	02/21/2024 02/26/2024 170,000.00	169,829.21 0.00 0.00 169,835.26	1,473.33 0.00 2,153.33 680.00	6.05 0.00 6.05 686.05	686.05
20030NCS8	COMCAST CORP 3.95 10/15/2025	03/11/2024 03/13/2024 400,000.00	396,365.47 0.00 0.00 396,678.79	702.22 0.00 2,018.89 1,316.67	313.32 0.00 313.32 1,629.99	1,629.99
24422EWB1	JOHN DEERE CAPITAL CORP 2.125 03/07/2025	03/02/2022 03/07/2022 130,000.00	129,993.57 0.00 0.00 129,995.10	414.38 0.00 644.58 230.21	1.53 0.00 1.53 231.74	231.74

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3130ATS57	FEDERAL HOME LOAN BANKS 4.5 03/10/2028	03/21/2023 03/22/2023 700,000.00	710,663.24 0.00 0.00 710,402.10	4,462.50 0.00 7,087.50 2,625.00	0.00 (261.14) (261.14) 2,363.86	2,363.86
3130B3A29	FEDERAL HOME LOAN BANKS 4.0 10/09/2026	10/21/2024 10/22/2024 600,000.00	599,994.08 0.00 0.00 599,994.33	1,333.33 0.00 3,333.33 2,000.00	0.25 0.00 0.25 2,000.25	2,000.25
3133ENKS8	FEDERAL FARM CREDIT BANKS FUNDING CORP 1.125 01/06/2025	750,000.00	749,377.57 0.00 0.00 749,660.49	2,695.31 0.00 3,398.44 703.13	282.92 0.00 282.92 986.05	986.05
3133ENPG9	FEDERAL FARM CREDIT BANKS FUNDING CORP 1.75 02/14/2025	02/10/2022 02/15/2022 415,000.00	414,893.75 0.00 0.00 414,924.11	1,553.37 0.00 2,158.58 605.21	30.36 0.00 30.36 635.57	635.57
3133EPN50	FEDERAL FARM CREDIT BANKS FUNDING CORP 4.25 12/15/2028	12/28/2023 12/29/2023 650,000.00	658,778.89 0.00 0.00 658,603.90	10,436.11 0.00 12,738.19 2,302.08	0.00 (174.99) (174.99) 2,127.09	2,127.09
3133ERFJ5	FEDERAL FARM CREDIT BANKS FUNDING CORP 4.5 05/20/2027	05/23/2024 05/24/2024 330,000.00	327,727.08 0.00 0.00 327,800.40	6,641.25 7,425.00 453.75 1,237.50	73.32 0.00 73.32 1,310.82	1,310.82
3133ERGL9	FEDERAL FARM CREDIT BANKS FUNDING CORP 4.5 06/07/2028	06/25/2024 06/26/2024 450,000.00	450,897.11 0.00 0.00 450,876.63	8,100.00 0.00 9,787.50 1,687.50	0.00 (20.48) (20.48) 1,667.02	1,667.02
3135G06G3	FEDERAL NATIONAL MORTGAGE ASSOCIATION 0.5 11/07/2025	11/18/2020 11/19/2020 350,000.00	349,926.27 0.00 0.00 349,932.23	845.83 875.00 116.67 145.83	5.96 0.00 5.96 151.80	151.80
3137BNGT5	FHMS K-054 A2 2.745 01/25/2026	02/15/2023 02/21/2023 500,000.00	489,721.03 0.00 0.00 490,444.90	1,143.75 1,143.75 1,143.75 1,143.75	723.87 0.00 723.87 1,867.62	1,867.62

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3137BVZ82	FHMS K-063 A2 3.43 01/25/2027	02/06/2024 02/09/2024 320,000.00	313,059.11 0.00 0.00 313,322.35	914.67 914.67 914.67 914.67	263.25 0.00 263.25 1,177.92	1,177.92
3137FEBQ2	FHMS K-072 A2 3.444 12/25/2027	08/22/2023 08/25/2023 500,000.00	478,661.58 0.00 0.00 479,230.60	1,435.00 1,435.00 1,435.00 1,435.00	569.02 0.00 569.02 2,004.02	2,004.02
3137FETN0	FHMS K-073 A2 3.35 01/25/2028	05/24/2023 05/30/2023 465,000.00	452,529.12 0.00 0.00 452,852.76	1,298.13 1,298.12 1,298.13 1,298.12	323.64 0.00 323.64 1,621.76	1,621.76
3137FHPJ6	FHMS K-080 A2 3.926 07/25/2028	01/23/2024 01/26/2024 325,000.00	319,057.93 0.00 0.00 319,191.16	1,063.29 1,063.29 1,063.29 1,063.29	133.23 0.00 133.23 1,196.52	1,196.52
3137FJEH8	FHMS K-081 A2 3.9 08/25/2028	09/15/2023 09/20/2023 155,000.00	149,943.65 0.00 0.00 150,054.46	503.75 503.75 503.75 503.75	110.80 0.00 110.80 614.55	614.55
3137FJKE8	FHMS K-082 A2 3.92 09/25/2028	09/20/2024 09/25/2024 220,000.00	220,560.95 0.00 0.00 220,548.93	718.67 718.67 718.67 718.67	0.00 (12.02) (12.02) 706.65	706.65
3137FJXV6	FHMS K-083 A2 4.05 09/25/2028	12/07/2023 12/12/2023 297,000.00	291,143.40 0.00 0.00 291,268.90	1,002.38 1,002.38 1,002.38 1,002.38	125.50 0.00 125.50 1,127.88	1,127.88
3137FJZ93	FHMS K-084 A2 3.78 10/25/2028	10/20/2023 10/25/2023 240,000.00	227,166.29 0.00 0.00 227,435.52	756.00 756.00 756.00 756.00	269.24 0.00 269.24 1,025.24	1,025.24
3137H4BY5	FHMS K-746 A2 2.031 09/25/2028	10/03/2023 10/06/2023 315,000.00	280,604.55 0.00 0.00 281,341.60	533.14 533.14 533.14 533.14	737.05 0.00 737.05 1,270.19	1,270.19

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341081GT8	FLORIDA POWER & LIGHT CO 5.15 06/15/2029	09/19/2024 09/20/2024 330,000.00	344,945.75 0.00 0.00 344,670.00	6,986.83 0.00 8,403.08 1,416.25	0.00 (275.75) (275.75) 1,140.50	1,140.50
362583AD8	GMCAR 2023-2 A3 4.47 02/16/2028	04/04/2023 04/12/2023 115,000.00	114,997.86 0.00 0.00 114,997.91	214.19 428.38 214.19 428.38	0.05 0.00 0.05 428.43	428.43
36265WAD5	GMCAR 2022-3 A3 3.64 04/16/2027	07/06/2022 07/13/2022 58,744.52	64,480.63 0.00 (5,736.29) 58,744.36	97.80 195.59 89.10 186.89	0.02 0.00 0.02 186.91	186.91
379929AD4	GMALT 2023-3 A3 5.38 11/20/2026	08/08/2023 08/16/2023 75,000.00	74,994.35 0.00 0.00 74,994.58	123.29 336.25 123.29 336.25	0.23 0.00 0.23 336.48	336.48
38014AAD3	GMCAR 2024-4 A3 4.4 08/16/2029	10/08/2024 10/16/2024 95,000.00	94,981.87 0.00 0.00 94,982.18	169.02 371.56 174.17 376.71	0.31 0.00 0.31 377.02	377.02
437076CR1	HOME DEPOT INC 4.0 09/15/2025	09/12/2022 09/19/2022 110,000.00	109,988.47 0.00 0.00 109,989.56	562.22 0.00 928.89 366.67	1.09 0.00 1.09 367.75	367.75
437076DC3	HOME DEPOT INC 4.75 06/25/2029	295,000.00	295,114.34 0.00 0.00 295,111.99	4,904.38 0.00 6,072.08 1,167.71	15.37 (17.71) (2.34) 1,165.36	1,165.36
43815BAC4	HAROT 2022-1 A3 1.88 05/15/2026	02/15/2022 02/23/2022 59,595.92	67,748.80 0.00 (8,156.21) 59,593.14	56.61 106.14 49.80 99.33	0.56 0.00 0.56 99.88	99.88
43815GAC3	HAROT 2021-4 A3 0.88 01/21/2026	11/16/2021 11/24/2021 16,460.56	19,772.46 0.00 (3,312.98) 16,459.72	4.83 14.50 4.02 13.69	0.24 0.00 0.24 13.93	13.93

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43815JAC7	HAROT 2023-1 A3 5.04 04/21/2027	02/16/2023 02/24/2023 70,000.00	69,992.31 0.00 0.00 69,992.56	98.00 294.00 98.00 294.00	0.26 0.00 0.26 294.26	294.26
43815PAC3	HAROT 2022-2 A3 3.73 07/20/2026	08/15/2022 08/24/2022 60,490.89	66,879.30 0.00 (6,389.87) 60,489.63	90.08 207.89 81.48 199.28	0.20 0.00 0.20 199.49	199.49
438516CJ3	HONEYWELL INTERNATIONAL INC 4.95 02/15/2028	02/13/2023 02/15/2023 400,000.00	405,848.04 0.00 0.00 405,698.09	4,180.00 0.00 5,830.00 1,650.00	0.00 (149.95) (149.95) 1,500.05	1,500.05
448976AD2	HART 2024-C A3 4.41 05/15/2029	10/08/2024 10/16/2024 140,000.00	139,989.85 0.00 0.00 139,990.03	257.25 497.35 274.40 514.50	0.18 0.00 0.18 514.68	514.68
448979AD6	HART 2023-A A3 4.58 04/15/2027	04/04/2023 04/12/2023 155,000.00	154,990.75 0.00 0.00 154,991.06	315.51 591.58 315.51 591.58	0.31 0.00 0.31 591.89	591.89
44934QAD3	HART 2024-B A3 4.84 03/15/2029	07/16/2024 07/24/2024 90,000.00	89,987.22 0.00 0.00 89,987.46	193.60 363.00 193.60 363.00	0.24 0.00 0.24 363.24	363.24
459058KT9	INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPM 3.5 07/12/2028	11/28/2023 11/30/2023 250,000.00	241,496.74 0.00 0.00 241,685.84	2,649.31 0.00 3,378.47 729.17	189.10 0.00 189.10 918.27	918.27
459058KW2	INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPM 4.625 08/01/2028	250,000.00	247,187.24 0.00 0.00 247,248.88	2,890.63 0.00 3,854.17 963.54	61.64 0.00 61.64 1,025.18	1,025.18
459058LK7	INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPM 4.0 08/27/2026	08/20/2024 08/27/2024 170,000.00	169,820.63 0.00 0.00 169,828.73	1,208.89 0.00 1,775.56 566.67	8.10 0.00 8.10 574.77	574.77

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459058LN1	INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPM 3.875 10/16/2029	10/08/2024 10/16/2024 300,000.00	299,223.86 0.00 0.00 299,236.73	484.38 0.00 1,453.13 968.75	12.86 0.00 12.86 981.61	981.61
46625HMN7	JPMORGAN CHASE & CO 3.9 07/15/2025	05/29/2024 05/30/2024 400,000.00	395,482.94 0.00 0.00 396,012.28	4,593.33 0.00 5,893.33 1,300.00	529.34 0.00 529.34 1,829.34	1,829.34
47787CAC7	JDOT 2023-C A3 5.48 05/15/2028	09/12/2023 09/19/2023 310,000.00	309,983.82 0.00 0.00 309,984.20	755.02 1,415.67 755.02 1,415.67	0.38 0.00 0.38 1,416.05	1,416.05
47787JAC2	JDOT 2022 A3 0.36 09/15/2026	03/10/2022 03/16/2022 43,248.48	50,166.06 0.00 (6,921.83) 43,244.97	51.73 97.00 44.59 89.86	0.75 0.00 0.75 90.61	90.61
47789QAC4	JDOT 2021-B A3 0.52 03/16/2026	07/13/2021 07/21/2021 10,638.85	13,286.92 0.00 (2,648.27) 10,638.70	3.07 5.76 2.46 5.15	0.05 0.00 0.05 5.20	5.20
47800AAC4	JDOT 2022-B A3 3.74 02/16/2027	07/12/2022 07/20/2022 87,588.69	95,490.79 0.00 (7,905.88) 87,585.35	158.73 297.62 145.59 284.48	0.44 0.00 0.44 284.92	284.92
47800BAC2	JDOT 2022-C A3 5.09 06/15/2027	10/12/2022 10/19/2022 176,237.30	188,211.12 0.00 (11,981.22) 176,230.59	425.79 798.36 398.69 771.26	0.69 0.00 0.69 771.94	771.94
57636QAW4	MASTERCARD INC 4.875 03/09/2028	04/19/2023 04/21/2023 290,000.00	296,014.77 0.00 0.00 295,863.77	2,042.08 0.00 3,220.21 1,178.13	0.00 (151.00) (151.00) 1,027.13	1,027.13
58769GAD5	MBALT 2024-B A3 4.23 02/15/2028	09/17/2024 09/25/2024 130,000.00	129,978.77 0.00 0.00 129,979.30	244.40 458.25 244.40 458.25	0.53 0.00 0.53 458.78	458.78

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58770AAC7	MBART 2023-1 A3 4.51 11/15/2027	01/18/2023 01/25/2023 91,348.15	97,384.85 0.00 (6,043.88) 91,341.60	195.22 366.03 183.10 353.92	0.63 0.00 0.63 354.54	354.54
58933YBH7	MERCK & CO INC 4.05 05/17/2028	05/08/2023 05/17/2023 90,000.00	89,948.41 0.00 0.00 89,949.60	1,660.50 1,822.50 141.75 303.75	1.20 0.00 1.20 304.95	304.95
6174468C6	MORGAN STANLEY 4.0 07/23/2025	04/10/2024 04/12/2024 394,000.00	389,748.05 0.00 0.00 390,231.23	4,290.22 0.00 5,603.56 1,313.33	483.18 0.00 483.18 1,796.51	1,796.51
61747YET8	MORGAN STANLEY 4.679 07/17/2026	07/18/2022 07/20/2022 175,000.00	175,000.00 0.00 0.00 175,000.00	2,365.49 0.00 3,047.85 682.35	0.00 0.00 0.00 682.35	682.35
63743HFE7	NATIONAL RURAL UTILITIES COOPERATIVE FINANCE CORP 3.45 06/15/2025	04/27/2022 05/04/2022 95,000.00	94,994.90 0.00 0.00 94,995.58	1,238.17 0.00 1,511.29 273.13	0.68 0.00 0.68 273.80	273.80
63743HFK3	NATIONAL RURAL UTILITIES COOPERATIVE FINANCE CORP 5.6 11/13/2026	11/14/2023 11/16/2023 390,000.00	392,454.36 0.00 0.00 392,350.80	10,192.00 10,920.00 1,092.00 1,820.00	0.00 (103.56) (103.56) 1,716.44	1,716.44
665859AW4	NORTHERN TRUST CORP 4.0 05/10/2027	10/05/2022 10/07/2022 450,000.00	442,814.28 0.00 0.00 443,048.60	8,550.00 9,000.00 1,050.00 1,500.00	234.32 0.00 234.32 1,734.32	1,734.32
69371RR57	PACCAR FINANCIAL CORP 0.9 11/08/2024	11/02/2021 11/08/2021 0.00	174,999.96 0.00 (175,000.00) 0.00	756.88 787.50 0.00 30.63	0.04 0.00 0.04 30.66	30.66
69371RS80	PACCAR FINANCIAL CORP 4.6 01/31/2029	01/24/2024 01/31/2024 410,000.00	409,432.29 0.00 0.00 409,443.27	4,767.39 0.00 6,339.06 1,571.67	10.97 0.00 10.97 1,582.64	1,582.64

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713448FX1	PEPSICO INC 4.5 07/17/2029	07/15/2024 07/17/2024 295,000.00	294,569.54 0.00 0.00 294,577.06	3,835.00 0.00 4,941.25 1,106.25	7.51 0.00 7.51 1,113.76	1,113.76
74456QBU9	PUBLIC SERVICE ELECTRIC AND GAS CO 3.7 05/01/2028	09/06/2023 09/08/2023 300,000.00	287,057.68 0.00 0.00 287,361.72	5,550.00 5,550.00 925.00 925.00	304.05 0.00 304.05 1,229.05	1,229.05
78015K7C2	ROYAL BANK OF CANADA 2.25 11/01/2024	0.00	500,000.00 0.00 (500,000.00) 0.00	5,625.00 5,625.00 0.00 0.00	0.00 0.00 0.00 0.00	0.00
78016HZT0	ROYAL BANK OF CANADA 4.875 01/19/2027	01/10/2024 01/19/2024 150,000.00	149,972.32 0.00 0.00 149,973.35	2,071.88 0.00 2,681.25 609.38	1.03 0.00 1.03 610.40	610.40
857477BR3	STATE STREET CORP 1.746 02/06/2026	02/02/2022 02/07/2022 90,000.00	90,000.00 0.00 0.00 90,000.00	371.03 0.00 501.98 130.95	0.00 0.00 0.00 130.95	130.95
857477CL5	STATE STREET CORP 4.993 03/18/2027	03/13/2024 03/18/2024 365,000.00	365,000.00 0.00 0.00 365,000.00	2,176.81 0.00 3,695.51 1,518.70	0.00 0.00 0.00 1,518.70	1,518.70
89115A2V3	TORONTO-DOMINION BANK 5.264 12/11/2026	12/04/2023 12/11/2023 160,000.00	160,000.00 0.00 0.00 160,000.00	3,275.38 0.00 3,977.24 701.87	0.00 0.00 0.00 701.87	701.87
89115A2W1	TORONTO-DOMINION BANK 4.98 04/05/2027	04/08/2024 04/10/2024 400,000.00	397,927.96 0.00 0.00 397,998.20	1,438.67 0.00 3,098.67 1,660.00	70.24 0.00 70.24 1,730.24	1,730.24
89236TMF9	TOYOTA MOTOR CREDIT CORP 5.05 05/16/2029	06/25/2024 06/26/2024 400,000.00	402,666.05 0.00 0.00 402,617.78	9,258.33 10,100.00 841.67 1,683.33	0.00 (48.27) (48.27) 1,635.06	1,635.06

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89238FAD5	TAOT 2022-B A3 2.93 09/15/2026	04/07/2022 04/13/2022 51,670.78	57,290.42 0.00 (5,620.05) 51,670.43	74.61 139.89 67.29 132.57	0.06 0.00 0.06 132.63	132.63
89238JAC9	TAOT 2021-D A3 0.71 04/15/2026	11/09/2021 11/15/2021 13,436.58	16,108.38 0.00 (2,671.87) 13,436.53	5.08 9.53 4.24 8.69	0.01 0.00 0.01 8.70	8.70
89239TAD4	TAOT 2024-D A3 4.4 06/15/2029	10/10/2024 10/17/2024 105,000.00	104,994.19 0.00 0.00 104,994.29	179.67 359.33 205.33 385.00	0.10 0.00 0.10 385.10	385.10
9128283F5	UNITED STATES TREASURY 2.25 11/15/2027	12/20/2022 12/21/2022 800,000.00	765,072.70 0.00 0.00 766,017.53	8,315.22 9,000.00 795.58 1,480.36	944.83 0.00 944.83 2,425.20	2,425.20
9128284Z0	UNITED STATES TREASURY 2.75 08/31/2025	750,000.00	760,770.21 0.00 0.00 759,703.85	3,532.46 0.00 5,241.71 1,709.25	0.00 (1,066.36) (1,066.36) 642.90	642.90
9128286L9	UNITED STATES TREASURY 2.25 03/31/2026	02/25/2022 02/28/2022 750,000.00	753,478.71 0.00 0.00 753,276.07	1,483.52 0.00 2,874.31 1,390.80	0.00 (202.64) (202.64) 1,188.15	1,188.15
912828R36	UNITED STATES TREASURY 1.625 05/15/2026	10/14/2021 10/15/2021 250,000.00	252,392.78 0.00 0.00 252,264.60	1,876.70 2,031.25 179.56 334.11	0.00 (128.18) (128.18) 205.92	205.92
912828U24	UNITED STATES TREASURY 2.0 11/15/2026	03/29/2022 03/30/2022 625,000.00	618,361.69 0.00 0.00 618,629.36	5,774.46 6,250.00 552.49 1,028.03	267.67 0.00 267.67 1,295.70	1,295.70
912828X88	UNITED STATES TREASURY 2.375 05/15/2027	06/09/2022 06/10/2022 350,000.00	344,175.60 0.00 0.00 344,364.50	3,840.01 4,156.25 367.40 683.64	188.90 0.00 188.90 872.54	872.54

INCOME EARNED

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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
912828YB0	UNITED STATES TREASURY 1.625 08/15/2029	09/24/2024 09/25/2024 150,000.00	137,801.18 0.00 0.00 138,010.54	516.64 0.00 715.35 198.71	209.36 0.00 209.36 408.07	408.07
912828YG9	UNITED STATES TREASURY 1.625 09/30/2026	12/28/2021 12/29/2021 300,000.00	302,129.74 0.00 0.00 302,038.20	428.57 0.00 830.36 401.79	0.00 (91.54) (91.54) 310.25	310.25
912828Z52	UNITED STATES TREASURY 1.375 01/31/2025	02/17/2022 02/18/2022 750,000.00	749,394.09 0.00 0.00 749,593.84	2,606.15 0.00 3,446.84 840.69	199.75 0.00 199.75 1,040.44	1,040.44
912828ZF0	UNITED STATES TREASURY 0.5 03/31/2025	03/25/2021 03/29/2021 350,000.00	349,887.86 0.00 0.00 349,910.29	153.85 0.00 298.08 144.23	22.43 0.00 22.43 166.66	166.66
912828ZT0	UNITED STATES TREASURY 0.25 05/31/2025	02/25/2021 02/26/2021 365,000.00	364,274.50 0.00 0.00 364,377.65	383.95 0.00 2.51 (381.44)	103.15 0.00 103.15 (278.29)	(278.29)
91282CAZ4	UNITED STATES TREASURY 0.375 11/30/2025	750,000.00	746,003.11 0.00 0.00 746,307.44	1,183.40 0.00 7.73 (1,175.68)	304.33 0.00 304.33 (871.34)	(871.34)
91282CDH1	UNITED STATES TREASURY 0.75 11/15/2024	11/18/2021 11/19/2021 0.00	749,975.96 0.00 (750,000.00) 0.00	2,598.51 2,812.50 0.00 213.99	24.04 0.00 24.04 238.03	238.03
91282CEF4	UNITED STATES TREASURY 2.5 03/31/2027	750,000.00	743,220.99 0.00 0.00 743,452.09	1,648.35 0.00 3,193.68 1,545.33	231.10 0.00 231.10 1,776.43	1,776.43
91282CEH0	UNITED STATES TREASURY 2.625 04/15/2025	04/18/2024 04/19/2024 450,000.00	444,986.58 0.00 0.00 445,898.11	551.68 0.00 1,525.24 973.56	911.53 0.00 911.53 1,885.09	1,885.09

INCOME EARNED

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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
91282CEU1	UNITED STATES TREASURY 2.875 06/15/2025	07/30/2024 07/31/2024 500,000.00	493,925.47 0.00 0.00 494,731.83	5,459.36 0.00 6,637.64 1,178.28	806.35 0.00 806.35 1,984.63	1,984.63
91282CEY3	UNITED STATES TREASURY 3.0 07/15/2025	03/15/2024 03/18/2024 475,000.00	468,797.52 0.00 0.00 469,524.37	4,220.79 0.00 5,382.47 1,161.68	726.85 0.00 726.85 1,888.54	1,888.54
91282CFK2	UNITED STATES TREASURY 3.5 09/15/2025	03/15/2024 03/18/2024 475,000.00	469,488.65 0.00 0.00 470,008.59	2,158.49 0.00 3,536.26 1,377.76	519.94 0.00 519.94 1,897.70	1,897.70
91282CFM8	UNITED STATES TREASURY 4.125 09/30/2027	10/26/2022 10/27/2022 570,000.00	569,065.89 0.00 0.00 569,092.26	2,067.03 0.00 4,004.88 1,937.84	26.36 0.00 26.36 1,964.21	1,964.21
91282CFP1	UNITED STATES TREASURY 4.25 10/15/2025	06/23/2023 06/26/2023 550,000.00	548,339.53 0.00 0.00 548,482.67	1,091.69 0.00 3,018.20 1,926.51	143.14 0.00 143.14 2,069.66	2,069.66
91282CGA3	UNITED STATES TREASURY 4.0 12/15/2025	11/18/2024 11/19/2024 600,000.00	0.00 597,632.81 0.00 597,705.46	0.00 (10,295.08) 11,081.97 786.89	72.65 0.00 72.65 859.54	859.54
91282CGC9	UNITED STATES TREASURY 3.875 12/31/2027	05/25/2023 05/26/2023 500,000.00	498,549.81 0.00 0.00 498,587.48	6,528.53 0.00 8,108.02 1,579.48	37.67 0.00 37.67 1,617.15	1,617.15
91282CHH7	UNITED STATES TREASURY 4.125 06/15/2026	08/26/2024 08/27/2024 475,000.00	476,351.95 0.00 0.00 476,283.32	7,441.34 0.00 9,047.39 1,606.05	0.00 (68.63) (68.63) 1,537.42	1,537.42
91282CJC6	UNITED STATES TREASURY 4.625 10/15/2026	08/26/2024 08/27/2024 475,000.00	481,877.98 0.00 0.00 481,588.58	1,026.01 0.00 2,836.62 1,810.61	0.00 (289.40) (289.40) 1,521.22	1,521.22

INCOME EARNED

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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
91282CJP7	UNITED STATES TREASURY 4.375 12/15/2026	12/27/2023 12/28/2023 300,000.00	302,077.04 0.00 0.00 301,996.54	4,984.63 0.00 6,060.45 1,075.82	0.00 (80.51) (80.51) 995.31	995.31
91282CKZ3	UNITED STATES TREASURY 4.375 07/15/2027	11/18/2024 11/19/2024 1,000,000.00	0.00 1,002,070.31 0.00 1,002,044.65	0.00 (15,098.51) 16,525.14 1,426.63	0.00 (25.67) (25.67) 1,400.96	1,400.96
931142ER0	WALMART INC 1.05 09/17/2026	09/08/2021 09/17/2021 40,000.00	39,971.64 0.00 0.00 39,972.88	51.33 0.00 86.33 35.00	1.24 0.00 1.24 36.24	36.24
931142EW9	WALMART INC 3.9 09/09/2025	09/06/2022 09/09/2022 80,000.00	79,984.06 0.00 0.00 79,985.59	450.67 0.00 710.67 260.00	1.53 0.00 1.53 261.53	261.53
Total Fixed Income		**33,246,818.65**	**32,969,858.59** **1,599,703.12** **(1,511,775.65)** **33,066,841.01**	**245,483.76** **82,204.27** **255,446.04** **92,166.55**	**12,243.28** **(3,188.33)** **9,054.95** **101,221.50**	**101,221.50**
LAIF						
90LAIF$00	Local Agency Investment Fund State Pool	5,635,051.71	5,635,051.71 0.00 0.00 5,635,051.71	0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00	0.00
Total LAIF		**5,635,051.71**	**5,635,051.71** **0.00** **0.00** **5,635,051.71**	**0.00** **0.00** **0.00** **0.00**	**0.00** **0.00** **0.00** **0.00**	**0.00**
LOCAL GOV INVESTMENT POOL						
09CATR$05	CalTrust MTF	711,611.59	7,118,071.81 23,349.99 0.00 7,141,421.80	0.00 23,349.99 0.00 23,349.99	0.00 0.00 0.00 23,349.99	23,349.99

INCOME EARNED

City of Gardena Cons | Account #10647 | As of November 30, 2024

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
90CAMP$00	CAMP	14,224,704.75	14,168,142.44 56,562.31 0.00 14,224,704.75	0.00 56,562.31 0.00 56,562.31	0.00 0.00 0.00 56,562.31	56,562.31
90CAMP$06	CAMP	36,250,000.00	36,250,000.00 0.00 0.00 36,250,000.00	0.00 316,328.43 0.00 316,328.43	0.00 0.00 0.00 316,328.43	316,328.43
Total Local Gov Investment Pool		**51,186,316.34**	**57,536,214.25** **79,912.30** **0.00** **57,616,126.55**	**0.00** **396,240.73** **0.00** **396,240.73**	**0.00** **0.00** **0.00** **396,240.73**	**396,240.73**
TOTAL PORTFOLIO		**90,267,544.62**	**96,488,385.77** **3,300,368.20** **(3,136,872.36)** **96,517,377.18**	**245,483.76** **479,824.26** **255,446.04** **489,786.54**	**12,243.28** **(3,188.33)** **9,054.95** **498,841.49**	**498,841.49**

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
DECEMBER 2024							
12/02/2024	Dividend	31846V203	0.00		2,265.92		2,265.92
12/02/2024	Coupon	912828ZT0	0.00	UNITED STATES TREASURY 0.25 05/31/2025		456.25	456.25
12/02/2024	Coupon	91282CAZ4	0.00	UNITED STATES TREASURY 0.375 11/30/2025		1,406.25	1,406.25
12/09/2024	Coupon	3133ERGL9	0.00	FEDERAL FARM CREDIT BANKS FUNDING CORP 4.5 06/07/2028		10,125.00	10,125.00
12/11/2024	Coupon	89115A2V3	0.00	TORONTO-DOMINION BANK 5.264 12/11/2026		4,211.20	4,211.20
12/12/2024	Coupon	06368LGU4	0.00	BANK OF MONTREAL 5.2 12/12/2024		10,400.00	10,400.00
12/12/2024	Maturity	06368LGU4	(400,000.00)	BANK OF MONTREAL 5.2 12/12/2024	400,000.00		400,000.00
12/16/2024	Coupon	02582JJT8	0.00	AMXCA 2022-2 A 3.39 05/17/2027		522.63	522.63
12/16/2024	Coupon	02582JJZ4	0.00	AMXCA 2023-1 A 4.87 05/15/2026		507.29	507.29
12/16/2024	Coupon	02582JKD1	0.00	AMXCA 2023-3 A 5.23 09/15/2028		1,481.83	1,481.83
12/16/2024	Coupon	161571HT4	0.00	CHAIT 2023-1 A 5.16 09/15/2028		1,462.00	1,462.00
12/16/2024	Coupon	3133EPN50	0.00	FEDERAL FARM CREDIT BANKS FUNDING CORP 4.25 12/15/2028		13,812.50	13,812.50
12/16/2024	Coupon	341081GT8	0.00	FLORIDA POWER & LIGHT CO 5.15 06/15/2029		9,064.00	9,064.00
12/16/2024	Coupon	36265WAD5	0.00	GMCAR 2022-3 A3 3.64 04/16/2027		178.19	178.19
12/16/2024	Principal Paydown	36265WAD5	(5,146.05)	GMCAR 2022-3 A3 3.64 04/16/2027	5,146.05		5,146.05
12/16/2024	Coupon	362583AD8	0.00	GMCAR 2023-2 A3 4.47 02/16/2028		428.38	428.38
12/16/2024	Coupon	38014AAD3	0.00	GMCAR 2024-4 A3 4.4 08/16/2029		348.33	348.33
12/16/2024	Coupon	43815BAC4	0.00	HAROT 2022-1 A3 1.88 05/15/2026		93.37	93.37
12/16/2024	Principal Paydown	43815BAC4	(7,552.27)	HAROT 2022-1 A3 1.88 05/15/2026	7,552.27		7,552.27
12/16/2024	Coupon	448979AD6	0.00	HART 2023-A A3 4.58 04/15/2027		591.58	591.58
12/16/2024	Principal Paydown	448979AD6	(9,510.10)	HART 2023-A A3 4.58 04/15/2027	9,510.10		9,510.10
12/16/2024	Coupon	44934QAD3	0.00	HART 2024-B A3 4.84 03/15/2029		363.00	363.00
12/16/2024	Coupon	448976AD2	0.00	HART 2024-C A3 4.41 05/15/2029		514.50	514.50
12/16/2024	Coupon	47789QAC4	0.00	JDOT 2021-B A3 0.52 03/16/2026		4.61	4.61
12/16/2024	Principal Paydown	47789QAC4	(1,767.62)	JDOT 2021-B A3 0.52 03/16/2026	1,767.62		1,767.62
12/16/2024	Coupon	47787JAC2	0.00	JDOT 2022 A3 0.36 09/15/2026		83.61	83.61
12/16/2024	Principal Paydown	47787JAC2	(5,189.39)	JDOT 2022 A3 0.36 09/15/2026	5,189.39		5,189.39
12/16/2024	Coupon	47800AAC4	0.00	JDOT 2022-B A3 3.74 02/16/2027		272.98	272.98
12/16/2024	Principal Paydown	47800AAC4	(5,177.09)	JDOT 2022-B A3 3.74 02/16/2027	5,177.09		5,177.09

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
12/16/2024	Coupon	47800BAC2	0.00	JDOT 2022-C A3 5.09 06/15/2027		747.54	747.54
12/16/2024	Principal Paydown	47800BAC2	(8,550.14)	JDOT 2022-C A3 5.09 06/15/2027	8,550.14		8,550.14
12/16/2024	Coupon	47787CAC7	0.00	JDOT 2023-C A3 5.48 05/15/2028		1,415.67	1,415.67
12/16/2024	Coupon	58769GAD5	0.00	MBALT 2024-B A3 4.23 02/15/2028		458.25	458.25
12/16/2024	Coupon	58770AAC7	0.00	MBART 2023-1 A3 4.51 11/15/2027		343.32	343.32
12/16/2024	Principal Paydown	58770AAC7	(5,783.53)	MBART 2023-1 A3 4.51 11/15/2027	5,783.53		5,783.53
12/16/2024	Coupon	63743HFE7	0.00	NATIONAL RURAL UTILITIES COOPERATIVE FINANCE CORP 3.45 06/15/2025		1,638.75	1,638.75
12/16/2024	Coupon	89238JAC9	0.00	TAOT 2021-D A3 0.71 04/15/2026		7.95	7.95
12/16/2024	Principal Paydown	89238JAC9	(2,469.15)	TAOT 2021-D A3 0.71 04/15/2026	2,469.15		2,469.15
12/16/2024	Coupon	89238FAD5	0.00	TAOT 2022-B A3 2.93 09/15/2026		126.16	126.16
12/16/2024	Principal Paydown	89238FAD5	(5,157.27)	TAOT 2022-B A3 2.93 09/15/2026	5,157.27		5,157.27
12/16/2024	Coupon	89239TAD4	0.00	TAOT 2024-D A3 4.4 06/15/2029		385.00	385.00
12/16/2024	Coupon	91282CEU1	0.00	UNITED STATES TREASURY 2.875 06/15/2025		7,187.50	7,187.50
12/16/2024	Coupon	91282CGA3	0.00	UNITED STATES TREASURY 4.0 12/15/2025		12,000.00	12,000.00
12/16/2024	Coupon	91282CHH7	0.00	UNITED STATES TREASURY 4.125 06/15/2026		9,796.88	9,796.88
12/16/2024	Coupon	91282CJP7	0.00	UNITED STATES TREASURY 4.375 12/15/2026		6,562.50	6,562.50
12/18/2024	Coupon	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026		188.77	188.77
12/18/2024	Principal Paydown	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026	5,874.61		5,874.61
12/20/2024	Coupon	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026		336.25	336.25
12/23/2024	Coupon	43815GAC3	16,460.56	HAROT 2021-4 A3 0.88 01/21/2026		12.07	12.07
12/23/2024	Principal Paydown	43815GAC3	16,460.56	HAROT 2021-4 A3 0.88 01/21/2026	2,931.40		2,931.40
12/23/2024	Coupon	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027		294.00	294.00
12/23/2024	Principal Paydown	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027	3,036.41		3,036.41
12/25/2024	Coupon	05593AAC3	14,557.97	BMWLT 2023-1 A3 5.16 11/25/2025		61.27	61.27
12/25/2024	Principal Paydown	05593AAC3	14,557.97	BMWLT 2023-1 A3 5.16 11/25/2025	5,481.67		5,481.67
12/25/2024	Coupon	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026		300.84	300.84
12/25/2024	Principal Paydown	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026	12,992.98		12,992.98
12/26/2024	Coupon	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026		1,143.75	1,143.75
12/26/2024	Coupon	3137BVZ82	320,000.00	FHMS K-063 A2 3.43 01/25/2027		914.67	914.67
12/26/2024	Coupon	3137FEBQ2	500,000.00	FHMS K-072 A2 3.444 12/25/2027		1,435.00	1,435.00
12/26/2024	Coupon	3137FETN0	465,000.00	FHMS K-073 A2 3.35 01/25/2028		1,298.13	1,298.13

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
12/26/2024	Coupon	3137FHPJ6	325,000.00	FHMS K-080 A2 3.926 07/25/2028		1,063.29	1,063.29
12/26/2024	Coupon	3137FJEH8	155,000.00	FHMS K-081 A2 3.9 08/25/2028		503.75	503.75
12/26/2024	Coupon	3137FJKE8	220,000.00	FHMS K-082 A2 3.92 09/25/2028		718.67	718.67
12/26/2024	Coupon	3137FJXV6	297,000.00	FHMS K-083 A2 4.05 09/25/2028		1,002.38	1,002.38
12/26/2024	Coupon	3137FJZ93	240,000.00	FHMS K-084 A2 3.78 10/25/2028		756.00	756.00
12/26/2024	Coupon	3137H4BY5	315,000.00	FHMS K-746 A2 2.031 09/25/2028		533.14	533.14
12/26/2024	Coupon	437076DC3	295,000.00	HOME DEPOT INC 4.75 06/25/2029		7,006.25	7,006.25
12/31/2024	Coupon	91282CGC9	500,000.00	UNITED STATES TREASURY 3.875 12/31/2027		9,687.50	9,687.50
December 2024 Total					**488,885.60**	**124,252.74**	**613,138.34**
JANUARY 2025							
01/06/2025	Coupon	3133ENKS8	750,000.00	FEDERAL FARM CREDIT BANKS FUNDING CORP 1.125 01/06/2025		4,218.75	4,218.75
01/06/2025	Final Maturity	3133ENKS8	750,000.00	FEDERAL FARM CREDIT BANKS FUNDING CORP 1.125 01/06/2025	750,000.00		750,000.00
01/13/2025	Coupon	459058KT9	250,000.00	INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPM 3.5 07/12/2028		4,375.00	4,375.00
01/15/2025	Coupon	02582JJT8	185,000.00	AMXCA 2022-2 A 3.39 05/17/2027		522.63	522.63
01/15/2025	Coupon	02582JJZ4	125,000.00	AMXCA 2023-1 A 4.87 05/15/2026		507.29	507.29
01/15/2025	Coupon	02582JKD1	340,000.00	AMXCA 2023-3 A 5.23 09/15/2028		1,481.83	1,481.83
01/15/2025	Coupon	161571HT4	340,000.00	CHAIT 2023-1 A 5.16 09/15/2028		1,462.00	1,462.00
01/15/2025	Coupon	43815BAC4	52,043.65	HAROT 2022-1 A3 1.88 05/15/2026		81.54	81.54
01/15/2025	Principal Paydown	43815BAC4	52,043.65	HAROT 2022-1 A3 1.88 05/15/2026	6,956.60		6,956.60
01/15/2025	Coupon	448976AD2	140,000.00	HART 2024-C A3 4.41 05/15/2029		514.50	514.50
01/15/2025	Coupon	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027		559.22	559.22
01/15/2025	Principal Paydown	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027	10,401.36		10,401.36
01/15/2025	Coupon	44934QAD3	90,000.00	HART 2024-B A3 4.84 03/15/2029		363.00	363.00
01/15/2025	Coupon	46625HMN7	400,000.00	JPMORGAN CHASE & CO 3.9 07/15/2025		7,800.00	7,800.00
01/15/2025	Coupon	47787CAC7	310,000.00	JDOT 2023-C A3 5.48 05/15/2028		1,415.67	1,415.67
01/15/2025	Coupon	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026		71.24	71.24
01/15/2025	Principal Paydown	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026	5,517.49		5,517.49
01/15/2025	Coupon	47789QAC4	8,871.23	JDOT 2021-B A3 0.52 03/16/2026		3.94	3.94

CASH FLOW REPORT

City of Gardena Cons | Account #10647 | As of November 30, 2024

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
01/15/2025	Principal Paydown	47789QAC4	8,871.23	JDOT 2021-B A3 0.52 03/16/2026	2,922.88		2,922.88
01/15/2025	Coupon	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027		256.85	256.85
01/15/2025	Principal Paydown	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027	8,305.50		8,305.50
01/15/2025	Coupon	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027		711.27	711.27
01/15/2025	Principal Paydown	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027	12,719.36		12,719.36
01/15/2025	Coupon	58769GAD5	130,000.00	MBALT 2024-B A3 4.23 02/15/2028		458.25	458.25
01/15/2025	Coupon	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027		329.66	329.66
01/15/2025	Principal Paydown	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027	5,117.10		5,117.10
01/15/2025	Coupon	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026		113.62	113.62
01/15/2025	Principal Paydown	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026	5,030.90		5,030.90
01/15/2025	Coupon	89238JAC9	10,967.43	TAOT 2021-D A3 0.71 04/15/2026		6.37	6.37
01/15/2025	Principal Paydown	89238JAC9	10,967.43	TAOT 2021-D A3 0.71 04/15/2026	2,357.50		2,357.50
01/15/2025	Coupon	89239TAD4	105,000.00	TAOT 2024-D A3 4.4 06/15/2029		385.00	385.00
01/15/2025	Dividend	90LAIF$00	5,635,051.71	Local Agency Investment Fund State Pool	42,253.17		42,253.17
01/15/2025	Coupon	91282CEY3	475,000.00	UNITED STATES TREASURY 3.0 07/15/2025		7,125.00	7,125.00
01/15/2025	Coupon	91282CKZ3	1,000,000.00	UNITED STATES TREASURY 4.375 07/15/2027		21,875.00	21,875.00
01/16/2025	Coupon	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028		428.38	428.38
01/16/2025	Coupon	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027		163.17	163.17
01/16/2025	Principal Paydown	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027	4,851.32		4,851.32
01/16/2025	Coupon	38014AAD3	95,000.00	GMCAR 2024-4 A3 4.4 08/16/2029		338.04	338.04
01/17/2025	Coupon	61747YET8	175,000.00	MORGAN STANLEY 4.679 07/17/2026		4,094.13	4,094.13
01/17/2025	Coupon	713448FX1	295,000.00	PEPSICO INC 4.5 07/17/2029		6,637.50	6,637.50
01/20/2025	Coupon	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026		336.25	336.25
01/20/2025	Coupon	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026		170.51	170.51
01/20/2025	Principal Paydown	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026	5,738.74		5,738.74
01/21/2025	Coupon	43815GAC3	16,460.56	HAROT 2021-4 A3 0.88 01/21/2026		9.92	9.92
01/21/2025	Principal Paydown	43815GAC3	16,460.56	HAROT 2021-4 A3 0.88 01/21/2026	2,866.81		2,866.81
01/21/2025	Coupon	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027		281.25	281.25
01/21/2025	Principal Paydown	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027	4,591.43		4,591.43
01/21/2025	Coupon	78016HZT0	150,000.00	ROYAL BANK OF CANADA 4.875 01/19/2027		3,656.25	3,656.25
01/23/2025	Coupon	6174468C6	394,000.00	MORGAN STANLEY 4.0 07/23/2025		7,880.00	7,880.00
01/27/2025	Coupon	05593AAC3	14,557.97	BMWLT 2023-1 A3 5.16 11/25/2025		37.70	37.70

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
01/27/2025	Principal Paydown	05593AAC3	14,557.97	BMWLT 2023-1 A3 5.16 11/25/2025	5,188.42		5,188.42
01/27/2025	Coupon	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026		266.08	266.08
01/27/2025	Principal Paydown	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026	12,658.56		12,658.56
01/27/2025	Coupon	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026		1,143.75	1,143.75
01/27/2025	Principal Paydown	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026	14,834.31		14,834.31
01/27/2025	Coupon	3137BVZ82	320,000.00	FHMS K-063 A2 3.43 01/25/2027		914.67	914.67
01/27/2025	Coupon	3137FEBQ2	500,000.00	FHMS K-072 A2 3.444 12/25/2027		1,435.00	1,435.00
01/27/2025	Coupon	3137FETN0	465,000.00	FHMS K-073 A2 3.35 01/25/2028		1,298.13	1,298.13
01/27/2025	Coupon	3137FHPJ6	325,000.00	FHMS K-080 A2 3.926 07/25/2028		1,063.29	1,063.29
01/27/2025	Coupon	3137FJEH8	155,000.00	FHMS K-081 A2 3.9 08/25/2028		503.75	503.75
01/27/2025	Coupon	3137FJKE8	220,000.00	FHMS K-082 A2 3.92 09/25/2028		718.67	718.67
01/27/2025	Coupon	3137FJXV6	297,000.00	FHMS K-083 A2 4.05 09/25/2028		1,002.38	1,002.38
01/27/2025	Coupon	3137FJZ93	240,000.00	FHMS K-084 A2 3.78 10/25/2028		756.00	756.00
01/27/2025	Coupon	3137H4BY5	315,000.00	FHMS K-746 A2 2.031 09/25/2028		533.14	533.14
01/31/2025	Coupon	69371RS80	410,000.00	PACCAR FINANCIAL CORP 4.6 01/31/2029		9,430.00	9,430.00
01/31/2025	Coupon	912828Z52	750,000.00	UNITED STATES TREASURY 1.375 01/31/2025		5,156.25	5,156.25
01/31/2025	Final Maturity	912828Z52	750,000.00	UNITED STATES TREASURY 1.375 01/31/2025	750,000.00		750,000.00
January 2025 Total					**1,652,311.45**	**102,891.81**	**1,755,203.26**
FEBRUARY 2025							
02/03/2025	Coupon	459058KW2	250,000.00	INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPM 4.625 08/01/2028		5,781.25	5,781.25
02/06/2025	Coupon	857477BR3	90,000.00	STATE STREET CORP 1.746 02/06/2026		785.70	785.70
02/14/2025	Coupon	3133ENPG9	415,000.00	FEDERAL FARM CREDIT BANKS FUNDING CORP 1.75 02/14/2025		3,631.25	3,631.25
02/14/2025	Final Maturity	3133ENPG9	415,000.00	FEDERAL FARM CREDIT BANKS FUNDING CORP 1.75 02/14/2025	415,000.00		415,000.00
02/17/2025	Coupon	161571HT4	340,000.00	CHAIT 2023-1 A 5.16 09/15/2028		1,462.00	1,462.00
02/17/2025	Coupon	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028		428.38	428.38
02/17/2025	Principal Paydown	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028	5,113.58		5,113.58
02/17/2025	Coupon	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027		148.46	148.46
02/17/2025	Principal Paydown	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027	4,778.43		4,778.43
02/17/2025	Coupon	38014AAD3	95,000.00	GMCAR 2024-4 A3 4.4 08/16/2029		338.04	338.04

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
02/17/2025	Coupon	43815BAC4	52,043.65	HAROT 2022-1 A3 1.88 05/15/2026		70.64	70.64
02/17/2025	Principal Paydown	43815BAC4	52,043.65	HAROT 2022-1 A3 1.88 05/15/2026	6,831.54		6,831.54
02/17/2025	Coupon	448976AD2	140,000.00	HART 2024-C A3 4.41 05/15/2029		514.50	514.50
02/17/2025	Coupon	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027		519.52	519.52
02/17/2025	Principal Paydown	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027	10,246.08		10,246.08
02/17/2025	Coupon	44934QAD3	90,000.00	HART 2024-B A3 4.84 03/15/2029		363.00	363.00
02/17/2025	Coupon	47787CAC7	310,000.00	JDOT 2023-C A3 5.48 05/15/2028		1,415.67	1,415.67
02/17/2025	Coupon	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026		60.57	60.57
02/17/2025	Principal Paydown	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026	4,173.80		4,173.80
02/17/2025	Coupon	47789QAC4	8,871.23	JDOT 2021-B A3 0.52 03/16/2026		2.67	2.67
02/17/2025	Principal Paydown	47789QAC4	8,871.23	JDOT 2021-B A3 0.52 03/16/2026	2,606.68		2,606.68
02/17/2025	Coupon	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027		230.96	230.96
02/17/2025	Principal Paydown	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027	6,940.29		6,940.29
02/17/2025	Coupon	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027		657.32	657.32
02/17/2025	Principal Paydown	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027	11,384.96		11,384.96
02/17/2025	Coupon	58769GAD5	130,000.00	MBALT 2024-B A3 4.23 02/15/2028		458.25	458.25
02/17/2025	Coupon	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027		310.43	310.43
02/17/2025	Principal Paydown	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027	5,037.18		5,037.18
02/17/2025	Coupon	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026		101.34	101.34
02/17/2025	Principal Paydown	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026	4,948.63		4,948.63
02/17/2025	Coupon	89238JAC9	10,967.43	TAOT 2021-D A3 0.71 04/15/2026		4.97	4.97
02/17/2025	Principal Paydown	89238JAC9	10,967.43	TAOT 2021-D A3 0.71 04/15/2026	2,311.40		2,311.40
02/17/2025	Coupon	89239TAD4	105,000.00	TAOT 2024-D A3 4.4 06/15/2029		385.00	385.00
02/18/2025	Coupon	02582JJT8	185,000.00	AMXCA 2022-2 A 3.39 05/17/2027		522.63	522.63
02/18/2025	Coupon	02582JJZ4	125,000.00	AMXCA 2023-1 A 4.87 05/15/2026		507.29	507.29
02/18/2025	Coupon	02582JKD1	340,000.00	AMXCA 2023-3 A 5.23 09/15/2028		1,481.83	1,481.83
02/18/2025	Coupon	06428CAA2	300,000.00	BANK OF AMERICA NA 5.526 08/18/2026		8,289.00	8,289.00
02/18/2025	Coupon	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026		152.67	152.67
02/18/2025	Principal Paydown	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026	5,637.09		5,637.09
02/18/2025	Coupon	438516CJ3	400,000.00	HONEYWELL INTERNATIONAL INC 4.95 02/15/2028		9,900.00	9,900.00
02/18/2025	Coupon	912828YB0	150,000.00	UNITED STATES TREASURY 1.625 08/15/2029		1,218.75	1,218.75

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
02/20/2025	Coupon	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026		336.25	336.25
02/21/2025	Coupon	43815GAC3	16,460.56	HAROT 2021-4 A3 0.88 01/21/2026		7.82	7.82
02/21/2025	Principal Paydown	43815GAC3	16,460.56	HAROT 2021-4 A3 0.88 01/21/2026	2,808.58		2,808.58
02/21/2025	Coupon	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027		261.96	261.96
02/21/2025	Principal Paydown	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027	4,519.92		4,519.92
02/24/2025	Coupon	037833BY5	400,000.00	APPLE INC 3.25 02/23/2026		6,500.00	6,500.00
02/25/2025	Coupon	05593AAC3	14,557.97	BMWLT 2023-1 A3 5.16 11/25/2025		15.39	15.39
02/25/2025	Effective Maturity	05593AAC3	14,557.97	BMWLT 2023-1 A3 5.16 11/25/2025	3,578.72		3,578.72
02/25/2025	Coupon	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026		232.22	232.22
02/25/2025	Principal Paydown	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026	11,597.45		11,597.45
02/25/2025	Coupon	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026		1,109.82	1,109.82
02/25/2025	Principal Paydown	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026	878.98		878.98
02/25/2025	Coupon	3137BVZ82	320,000.00	FHMS K-063 A2 3.43 01/25/2027		914.67	914.67
02/25/2025	Coupon	3137FEBQ2	500,000.00	FHMS K-072 A2 3.444 12/25/2027		1,435.00	1,435.00
02/25/2025	Coupon	3137FETN0	465,000.00	FHMS K-073 A2 3.35 01/25/2028		1,298.13	1,298.13
02/25/2025	Coupon	3137FHPJ6	325,000.00	FHMS K-080 A2 3.926 07/25/2028		1,063.29	1,063.29
02/25/2025	Coupon	3137FJEH8	155,000.00	FHMS K-081 A2 3.9 08/25/2028		503.75	503.75
02/25/2025	Coupon	3137FJKE8	220,000.00	FHMS K-082 A2 3.92 09/25/2028		718.67	718.67
02/25/2025	Coupon	3137FJXV6	297,000.00	FHMS K-083 A2 4.05 09/25/2028		1,002.38	1,002.38
02/25/2025	Coupon	3137FJZ93	240,000.00	FHMS K-084 A2 3.78 10/25/2028		756.00	756.00
02/25/2025	Coupon	3137H4BY5	315,000.00	FHMS K-746 A2 2.031 09/25/2028		533.14	533.14
02/26/2025	Coupon	17275RBQ4	170,000.00	CISCO SYSTEMS INC 4.8 02/26/2027		4,080.00	4,080.00
02/27/2025	Coupon	459058LK7	170,000.00	INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPM 4.0 08/27/2026		3,400.00	3,400.00
02/28/2025	Coupon	9128284Z0	750,000.00	UNITED STATES TREASURY 2.75 08/31/2025		10,312.50	10,312.50
February 2025 Total					**508,393.32**	**74,223.06**	**582,616.38**
MARCH 2025							
03/07/2025	Coupon	24422EWB1	130,000.00	JOHN DEERE CAPITAL CORP 2.125 03/07/2025		1,381.25	1,381.25
03/07/2025	Final Maturity	24422EWB1	130,000.00	JOHN DEERE CAPITAL CORP 2.125 03/07/2025	130,000.00		130,000.00
03/10/2025	Coupon	3130ATS57	700,000.00	FEDERAL HOME LOAN BANKS 4.5 03/10/2028		15,750.00	15,750.00
03/10/2025	Coupon	57636QAW4	290,000.00	MASTERCARD INC 4.875 03/09/2028		7,068.75	7,068.75

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
03/10/2025	Coupon	931142EW9	80,000.00	WALMART INC 3.9 09/09/2025		1,560.00	1,560.00
03/17/2025	Coupon	02582JJT8	185,000.00	AMXCA 2022-2 A 3.39 05/17/2027		522.63	522.63
03/17/2025	Coupon	02582JJZ4	125,000.00	AMXCA 2023-1 A 4.87 05/15/2026		507.29	507.29
03/17/2025	Coupon	02582JKD1	340,000.00	AMXCA 2023-3 A 5.23 09/15/2028		1,481.83	1,481.83
03/17/2025	Coupon	161571HT4	340,000.00	CHAIT 2023-1 A 5.16 09/15/2028		1,462.00	1,462.00
03/17/2025	Coupon	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028		409.33	409.33
03/17/2025	Principal Paydown	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028	5,438.05		5,438.05
03/17/2025	Coupon	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027		133.96	133.96
03/17/2025	Principal Paydown	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027	4,440.73		4,440.73
03/17/2025	Coupon	38014AAD3	95,000.00	GMCAR 2024-4 A3 4.4 08/16/2029		338.04	338.04
03/17/2025	Coupon	437076CR1	110,000.00	HOME DEPOT INC 4.0 09/15/2025		2,200.00	2,200.00
03/17/2025	Coupon	43815BAC4	52,043.65	HAROT 2022-1 A3 1.88 05/15/2026		59.93	59.93
03/17/2025	Principal Paydown	43815BAC4	52,043.65	HAROT 2022-1 A3 1.88 05/15/2026	6,622.08		6,622.08
03/17/2025	Coupon	448976AD2	140,000.00	HART 2024-C A3 4.41 05/15/2029		514.50	514.50
03/17/2025	Coupon	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027		480.42	480.42
03/17/2025	Principal Paydown	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027	9,905.15		9,905.15
03/17/2025	Coupon	44934QAD3	90,000.00	HART 2024-B A3 4.84 03/15/2029		363.00	363.00
03/17/2025	Coupon	47787CAC7	310,000.00	JDOT 2023-C A3 5.48 05/15/2028		1,415.67	1,415.67
03/17/2025	Coupon	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026		52.50	52.50
03/17/2025	Principal Paydown	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026	3,410.00		3,410.00
03/17/2025	Coupon	47789QAC4	8,871.23	JDOT 2021-B A3 0.52 03/16/2026		1.54	1.54
03/17/2025	Principal Paydown	47789QAC4	8,871.23	JDOT 2021-B A3 0.52 03/16/2026	2,187.43		2,187.43
03/17/2025	Coupon	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027		209.33	209.33
03/17/2025	Principal Paydown	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027	6,139.82		6,139.82
03/17/2025	Coupon	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027		609.03	609.03
03/17/2025	Principal Paydown	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027	10,363.06		10,363.06
03/17/2025	Coupon	58769GAD5	130,000.00	MBALT 2024-B A3 4.23 02/15/2028		458.25	458.25
03/17/2025	Coupon	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027		291.50	291.50
03/17/2025	Principal Paydown	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027	4,863.04		4,863.04
03/17/2025	Coupon	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026		89.26	89.26
03/17/2025	Principal Paydown	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026	4,815.20		4,815.20
03/17/2025	Coupon	89238JAC9	10,967.43	TAOT 2021-D A3 0.71 04/15/2026		3.61	3.61

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
03/17/2025	Principal Paydown	89238JAC9	10,967.43	TAOT 2021-D A3 0.71 04/15/2026	2,240.57		2,240.57
03/17/2025	Coupon	89239TAD4	105,000.00	TAOT 2024-D A3 4.4 06/15/2029		385.00	385.00
03/17/2025	Coupon	91282CFK2	475,000.00	UNITED STATES TREASURY 3.5 09/15/2025		8,312.50	8,312.50
03/17/2025	Coupon	931142ER0	40,000.00	WALMART INC 1.05 09/17/2026		210.00	210.00
03/18/2025	Coupon	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026		135.15	135.15
03/18/2025	Principal Paydown	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026	5,455.79		5,455.79
03/18/2025	Coupon	857477CL5	365,000.00	STATE STREET CORP 4.993 03/18/2027		9,112.23	9,112.23
03/20/2025	Coupon	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026		336.25	336.25
03/20/2025	Principal Paydown	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026	6,841.20		6,841.20
03/21/2025	Coupon	43815GAC3	16,460.56	HAROT 2021-4 A3 0.88 01/21/2026		5.76	5.76
03/21/2025	Principal Paydown	43815GAC3	16,460.56	HAROT 2021-4 A3 0.88 01/21/2026	2,727.29		2,727.29
03/21/2025	Coupon	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027		242.98	242.98
03/21/2025	Principal Paydown	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027	4,368.94		4,368.94
03/25/2025	Coupon	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026		201.20	201.20
03/25/2025	Principal Paydown	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026	11,227.90		11,227.90
03/25/2025	Coupon	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026		1,107.81	1,107.81
03/25/2025	Principal Paydown	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026	13,218.48		13,218.48
03/25/2025	Coupon	3137BVZ82	320,000.00	FHMS K-063 A2 3.43 01/25/2027		914.67	914.67
03/25/2025	Coupon	3137FEBQ2	500,000.00	FHMS K-072 A2 3.444 12/25/2027		1,435.00	1,435.00
03/25/2025	Coupon	3137FETN0	465,000.00	FHMS K-073 A2 3.35 01/25/2028		1,298.13	1,298.13
03/25/2025	Coupon	3137FHPJ6	325,000.00	FHMS K-080 A2 3.926 07/25/2028		1,063.29	1,063.29
03/25/2025	Coupon	3137FJEH8	155,000.00	FHMS K-081 A2 3.9 08/25/2028		503.75	503.75
03/25/2025	Coupon	3137FJKE8	220,000.00	FHMS K-082 A2 3.92 09/25/2028		718.67	718.67
03/25/2025	Coupon	3137FJXV6	297,000.00	FHMS K-083 A2 4.05 09/25/2028		1,002.38	1,002.38
03/25/2025	Coupon	3137FJZ93	240,000.00	FHMS K-084 A2 3.78 10/25/2028		756.00	756.00
03/25/2025	Coupon	3137H4BY5	315,000.00	FHMS K-746 A2 2.031 09/25/2028		533.14	533.14
03/31/2025	Coupon	9128286L9	750,000.00	UNITED STATES TREASURY 2.25 03/31/2026		8,437.50	8,437.50
03/31/2025	Coupon	912828YG9	300,000.00	UNITED STATES TREASURY 1.625 09/30/2026		2,437.50	2,437.50
03/31/2025	Coupon	912828ZF0	350,000.00	UNITED STATES TREASURY 0.5 03/31/2025		875.00	875.00
03/31/2025	Final Maturity	912828ZF0	350,000.00	UNITED STATES TREASURY 0.5 03/31/2025	350,000.00		350,000.00
03/31/2025	Coupon	91282CEF4	750,000.00	UNITED STATES TREASURY 2.5 03/31/2027		9,375.00	9,375.00
03/31/2025	Coupon	91282CFM8	570,000.00	UNITED STATES TREASURY 4.125 09/30/2027		11,756.25	11,756.25

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
March 2025 Total					**584,264.73**	**98,518.74**	**682,783.47**
APRIL 2025							
04/07/2025	Coupon	89115A2W1	400,000.00	TORONTO-DOMINION BANK 4.98 04/05/2027		9,960.00	9,960.00
04/09/2025	Coupon	3130B3A29	600,000.00	FEDERAL HOME LOAN BANKS 4.0 10/09/2026		11,866.67	11,866.67
04/15/2025	Coupon	02582JJT8	185,000.00	AMXCA 2022-2 A 3.39 05/17/2027		522.63	522.63
04/15/2025	Coupon	02582JJZ4	125,000.00	AMXCA 2023-1 A 4.87 05/15/2026		507.29	507.29
04/15/2025	Coupon	02582JKD1	340,000.00	AMXCA 2023-3 A 5.23 09/15/2028		1,481.83	1,481.83
04/15/2025	Coupon	161571HT4	340,000.00	CHAIT 2023-1 A 5.16 09/15/2028		1,462.00	1,462.00
04/15/2025	Coupon	20030NCS8	400,000.00	COMCAST CORP 3.95 10/15/2025		7,900.00	7,900.00
04/15/2025	Coupon	43815BAC4	52,043.65	HAROT 2022-1 A3 1.88 05/15/2026		49.56	49.56
04/15/2025	Principal Paydown	43815BAC4	52,043.65	HAROT 2022-1 A3 1.88 05/15/2026	6,709.89		6,709.89
04/15/2025	Coupon	448976AD2	140,000.00	HART 2024-C A3 4.41 05/15/2029		514.50	514.50
04/15/2025	Coupon	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027		442.61	442.61
04/15/2025	Principal Paydown	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027	10,309.97		10,309.97
04/15/2025	Coupon	44934QAD3	90,000.00	HART 2024-B A3 4.84 03/15/2029		363.00	363.00
04/15/2025	Coupon	47787CAC7	310,000.00	JDOT 2023-C A3 5.48 05/15/2028		1,415.67	1,415.67
04/15/2025	Coupon	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026		45.91	45.91
04/15/2025	Principal Paydown	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026	4,336.22		4,336.22
04/15/2025	Coupon	47789QAC4	8,871.23	JDOT 2021-B A3 0.52 03/16/2026		0.60	0.60
04/15/2025	Effective Maturity	47789QAC4	8,871.23	JDOT 2021-B A3 0.52 03/16/2026	1,373.81		1,373.81
04/15/2025	Coupon	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027		190.20	190.20
04/15/2025	Principal Paydown	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027	8,177.24		8,177.24
04/15/2025	Coupon	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027		565.07	565.07
04/15/2025	Principal Paydown	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027	12,266.62		12,266.62
04/15/2025	Coupon	58769GAD5	130,000.00	MBALT 2024-B A3 4.23 02/15/2028		458.25	458.25
04/15/2025	Coupon	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027		273.22	273.22
04/15/2025	Principal Paydown	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027	5,075.59		5,075.59
04/15/2025	Coupon	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026		77.50	77.50
04/15/2025	Principal Paydown	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026	4,929.14		4,929.14
04/15/2025	Coupon	89238JAC9	10,967.43	TAOT 2021-D A3 0.71 04/15/2026		2.28	2.28
04/15/2025	Principal Paydown	89238JAC9	10,967.43	TAOT 2021-D A3 0.71 04/15/2026	2,270.25		2,270.25
04/15/2025	Coupon	89239TAD4	105,000.00	TAOT 2024-D A3 4.4 06/15/2029		385.00	385.00

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
04/15/2025	Coupon	91282CEH0	450,000.00	UNITED STATES TREASURY 2.625 04/15/2025		5,906.25	5,906.25
04/15/2025	Final Maturity	91282CEH0	450,000.00	UNITED STATES TREASURY 2.625 04/15/2025	450,000.00		450,000.00
04/15/2025	Coupon	91282CFP1	550,000.00	UNITED STATES TREASURY 4.25 10/15/2025		11,687.50	11,687.50
04/15/2025	Coupon	91282CJC6	475,000.00	UNITED STATES TREASURY 4.625 10/15/2026		10,984.38	10,984.38
04/16/2025	Coupon	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028		389.07	389.07
04/16/2025	Principal Paydown	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028	6,744.62		6,744.62
04/16/2025	Coupon	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027		120.49	120.49
04/16/2025	Principal Paydown	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027	4,592.64		4,592.64
04/16/2025	Coupon	38014AAD3	95,000.00	GMCAR 2024-4 A3 4.4 08/16/2029		338.04	338.04
04/16/2025	Coupon	459058LN1	300,000.00	INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPM 3.875 10/16/2029		5,812.50	5,812.50
04/18/2025	Coupon	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026		118.19	118.19
04/18/2025	Principal Paydown	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026	5,546.69		5,546.69
04/21/2025	Coupon	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026		305.58	305.58
04/21/2025	Principal Paydown	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026	7,856.39		7,856.39
04/21/2025	Coupon	43815GAC3	16,460.56	HAROT 2021-4 A3 0.88 01/21/2026		3.76	3.76
04/21/2025	Principal Paydown	43815GAC3	16,460.56	HAROT 2021-4 A3 0.88 01/21/2026	2,739.30		2,739.30
04/21/2025	Coupon	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027		224.63	224.63
04/21/2025	Principal Paydown	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027	4,494.14		4,494.14
04/25/2025	Coupon	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026		171.16	171.16
04/25/2025	Principal Paydown	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026	11,470.95		11,470.95
04/25/2025	Coupon	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026		1,077.57	1,077.57
04/25/2025	Principal Paydown	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026	884.47		884.47
04/25/2025	Coupon	3137BVZ82	320,000.00	FHMS K-063 A2 3.43 01/25/2027		914.67	914.67
04/25/2025	Coupon	3137FEBQ2	500,000.00	FHMS K-072 A2 3.444 12/25/2027		1,435.00	1,435.00
04/25/2025	Coupon	3137FETN0	465,000.00	FHMS K-073 A2 3.35 01/25/2028		1,298.13	1,298.13
04/25/2025	Coupon	3137FHPJ6	325,000.00	FHMS K-080 A2 3.926 07/25/2028		1,063.29	1,063.29
04/25/2025	Coupon	3137FJEH8	155,000.00	FHMS K-081 A2 3.9 08/25/2028		503.75	503.75
04/25/2025	Coupon	3137FJKE8	220,000.00	FHMS K-082 A2 3.92 09/25/2028		718.67	718.67
04/25/2025	Coupon	3137FJXV6	297,000.00	FHMS K-083 A2 4.05 09/25/2028		1,002.38	1,002.38
04/25/2025	Coupon	3137FJZ93	240,000.00	FHMS K-084 A2 3.78 10/25/2028		756.00	756.00
04/25/2025	Coupon	3137H4BY5	315,000.00	FHMS K-746 A2 2.031 09/25/2028		533.14	533.14

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
April 2025 Total					**549,777.94**	**83,847.91**	**633,625.85**
MAY 2025							
05/01/2025	Coupon	74456QBU9	300,000.00	PUBLIC SERVICE ELECTRIC AND GAS CO 3.7 05/01/2028		5,550.00	5,550.00
05/06/2025	Coupon	857477BR3	90,000.00	STATE STREET CORP 1.746 02/06/2026		1,127.48	1,127.48
05/07/2025	Coupon	3135G06G3	350,000.00	FEDERAL NATIONAL MORTGAGE ASSOCIATION 0.5 11/07/2025		875.00	875.00
05/12/2025	Coupon	665859AW4	450,000.00	NORTHERN TRUST CORP 4.0 05/10/2027		9,000.00	9,000.00
05/13/2025	Coupon	63743HFK3	390,000.00	NATIONAL RURAL UTILITIES COOPERATIVE FINANCE CORP 5.6 11/13/2026		10,920.00	10,920.00
05/14/2025	Coupon	14913UAL4	405,000.00	CATERPILLAR FINANCIAL SERVICES CORP 5.0 05/14/2027		10,125.00	10,125.00
05/15/2025	Coupon	02582JJT8	185,000.00	AMXCA 2022-2 A 3.39 05/17/2027		522.63	522.63
05/15/2025	Final Maturity	02582JJT8	185,000.00	AMXCA 2022-2 A 3.39 05/17/2027	185,000.00		185,000.00
05/15/2025	Coupon	02582JJZ4	125,000.00	AMXCA 2023-1 A 4.87 05/15/2026		507.29	507.29
05/15/2025	Coupon	02582JKD1	340,000.00	AMXCA 2023-3 A 5.23 09/15/2028		1,481.83	1,481.83
05/15/2025	Coupon	161571HT4	340,000.00	CHAIT 2023-1 A 5.16 09/15/2028		1,462.00	1,462.00
05/15/2025	Coupon	43815BAC4	52,043.65	HAROT 2022-1 A3 1.88 05/15/2026		39.05	39.05
05/15/2025	Principal Paydown	43815BAC4	52,043.65	HAROT 2022-1 A3 1.88 05/15/2026	6,454.96		6,454.96
05/15/2025	Coupon	448976AD2	140,000.00	HART 2024-C A3 4.41 05/15/2029		514.50	514.50
05/15/2025	Coupon	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027		403.26	403.26
05/15/2025	Principal Paydown	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027	9,876.93		9,876.93
05/15/2025	Coupon	44934QAD3	90,000.00	HART 2024-B A3 4.84 03/15/2029		363.00	363.00
05/15/2025	Coupon	47787CAC7	310,000.00	JDOT 2023-C A3 5.48 05/15/2028		1,415.67	1,415.67
05/15/2025	Coupon	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026		37.52	37.52
05/15/2025	Principal Paydown	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026	3,979.98		3,979.98
05/15/2025	Coupon	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027		164.71	164.71
05/15/2025	Principal Paydown	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027	7,218.15		7,218.15
05/15/2025	Coupon	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027		513.04	513.04
05/15/2025	Principal Paydown	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027	10,750.37		10,750.37
05/15/2025	Coupon	58769GAD5	130,000.00	MBALT 2024-B A3 4.23 02/15/2028		458.25	458.25
05/15/2025	Coupon	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027		254.14	254.14

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
05/15/2025	Principal Paydown	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027	4,858.51		4,858.51
05/15/2025	Coupon	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026		65.46	65.46
05/15/2025	Principal Paydown	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026	4,560.83		4,560.83
05/15/2025	Coupon	89238JAC9	10,967.43	TAOT 2021-D A3 0.71 04/15/2026		0.94	0.94
05/15/2025	Effective Maturity	89238JAC9	10,967.43	TAOT 2021-D A3 0.71 04/15/2026	1,584.43		1,584.43
05/15/2025	Coupon	89239TAD4	105,000.00	TAOT 2024-D A3 4.4 06/15/2029		385.00	385.00
05/15/2025	Coupon	9128283F5	800,000.00	UNITED STATES TREASURY 2.25 11/15/2027		9,000.00	9,000.00
05/15/2025	Coupon	912828R36	250,000.00	UNITED STATES TREASURY 1.625 05/15/2026		2,031.25	2,031.25
05/15/2025	Coupon	912828U24	625,000.00	UNITED STATES TREASURY 2.0 11/15/2026		6,250.00	6,250.00
05/15/2025	Coupon	912828X88	350,000.00	UNITED STATES TREASURY 2.375 05/15/2027		4,156.25	4,156.25
05/16/2025	Coupon	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028		363.95	363.95
05/16/2025	Principal Paydown	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028	6,442.58		6,442.58
05/16/2025	Coupon	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027		106.56	106.56
05/16/2025	Principal Paydown	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027	4,402.17		4,402.17
05/16/2025	Coupon	38014AAD3	95,000.00	GMCAR 2024-4 A3 4.4 08/16/2029		338.04	338.04
05/16/2025	Coupon	89236TMF9	400,000.00	TOYOTA MOTOR CREDIT CORP 5.05 05/16/2029		10,100.00	10,100.00
05/19/2025	Coupon	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026		100.95	100.95
05/19/2025	Principal Paydown	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026	5,329.13		5,329.13
05/19/2025	Coupon	58933YBH7	90,000.00	MERCK & CO INC 4.05 05/17/2028		1,822.50	1,822.50
05/20/2025	Coupon	3133ERFJ5	330,000.00	FEDERAL FARM CREDIT BANKS FUNDING CORP 4.5 05/20/2027		7,425.00	7,425.00
05/20/2025	Coupon	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026		270.36	270.36
05/20/2025	Principal Paydown	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026	9,856.77		9,856.77
05/21/2025	Coupon	43815GAC3	16,460.56	HAROT 2021-4 A3 0.88 01/21/2026		1.75	1.75
05/21/2025	Effective Maturity	43815GAC3	16,460.56	HAROT 2021-4 A3 0.88 01/21/2026	2,387.18		2,387.18
05/21/2025	Coupon	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027		205.75	205.75
05/21/2025	Principal Paydown	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027	4,308.38		4,308.38
05/26/2025	Coupon	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026		140.48	140.48
05/26/2025	Principal Paydown	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026	11,015.37		11,015.37
05/26/2025	Coupon	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026		1,075.55	1,075.55
05/26/2025	Principal Paydown	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026	945.18		945.18
05/26/2025	Coupon	3137BVZ82	320,000.00	FHMS K-063 A2 3.43 01/25/2027		914.67	914.67

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
05/26/2025	Coupon	3137FEBQ2	500,000.00	FHMS K-072 A2 3.444 12/25/2027		1,435.00	1,435.00
05/26/2025	Coupon	3137FETN0	465,000.00	FHMS K-073 A2 3.35 01/25/2028		1,298.13	1,298.13
05/26/2025	Coupon	3137FHPJ6	325,000.00	FHMS K-080 A2 3.926 07/25/2028		1,063.29	1,063.29
05/26/2025	Coupon	3137FJEH8	155,000.00	FHMS K-081 A2 3.9 08/25/2028		503.75	503.75
05/26/2025	Coupon	3137FJKE8	220,000.00	FHMS K-082 A2 3.92 09/25/2028		718.67	718.67
05/26/2025	Coupon	3137FJXV6	297,000.00	FHMS K-083 A2 4.05 09/25/2028		1,002.38	1,002.38
05/26/2025	Coupon	3137FJZ93	240,000.00	FHMS K-084 A2 3.78 10/25/2028		756.00	756.00
05/26/2025	Coupon	3137H4BY5	315,000.00	FHMS K-746 A2 2.031 09/25/2028		533.14	533.14
May 2025 Total					**278,970.91**	**97,799.17**	**376,770.08**
JUNE 2025							
06/02/2025	Coupon	26444HAH4	450,000.00	DUKE ENERGY FLORIDA LLC 2.5 12/01/2029		5,625.00	5,625.00
06/02/2025	Coupon	912828ZT0	365,000.00	UNITED STATES TREASURY 0.25 05/31/2025		456.25	456.25
06/02/2025	Final Maturity	912828ZT0	365,000.00	UNITED STATES TREASURY 0.25 05/31/2025	365,000.00		365,000.00
06/02/2025	Coupon	91282CAZ4	750,000.00	UNITED STATES TREASURY 0.375 11/30/2025		1,406.25	1,406.25
06/02/2025	Coupon	91282CMA6	200,000.00	UNITED STATES TREASURY 4.125 11/30/2029		4,125.00	4,125.00
06/09/2025	Coupon	3133ERGL9	450,000.00	FEDERAL FARM CREDIT BANKS FUNDING CORP 4.5 06/07/2028		10,125.00	10,125.00
06/11/2025	Coupon	89115A2V3	160,000.00	TORONTO-DOMINION BANK 5.264 12/11/2026		4,211.20	4,211.20
06/16/2025	Coupon	02582JJZ4	125,000.00	AMXCA 2023-1 A 4.87 05/15/2026		507.29	507.29
06/16/2025	Coupon	02582JKD1	340,000.00	AMXCA 2023-3 A 5.23 09/15/2028		1,481.83	1,481.83
06/16/2025	Coupon	161571HT4	340,000.00	CHAIT 2023-1 A 5.16 09/15/2028		1,462.00	1,462.00
06/16/2025	Coupon	3133EPN50	650,000.00	FEDERAL FARM CREDIT BANKS FUNDING CORP 4.25 12/15/2028		13,812.50	13,812.50
06/16/2025	Coupon	341081GT8	330,000.00	FLORIDA POWER & LIGHT CO 5.15 06/15/2029		8,497.50	8,497.50
06/16/2025	Coupon	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028		339.95	339.95
06/16/2025	Principal Paydown	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028	6,329.51		6,329.51
06/16/2025	Coupon	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027		93.21	93.21
06/16/2025	Principal Paydown	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027	4,318.05		4,318.05
06/16/2025	Coupon	38014AAD3	95,000.00	GMCAR 2024-4 A3 4.4 08/16/2029		338.04	338.04
06/16/2025	Coupon	43815BAC4	52,043.65	HAROT 2022-1 A3 1.88 05/15/2026		28.93	28.93
06/16/2025	Principal Paydown	43815BAC4	52,043.65	HAROT 2022-1 A3 1.88 05/15/2026	6,296.67		6,296.67
06/16/2025	Coupon	448976AD2	140,000.00	HART 2024-C A3 4.41 05/15/2029		514.50	514.50

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
06/16/2025	Coupon	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027		365.57	365.57
06/16/2025	Principal Paydown	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027	9,689.19		9,689.19
06/16/2025	Coupon	44934QAD3	90,000.00	HART 2024-B A3 4.84 03/15/2029		363.00	363.00
06/16/2025	Coupon	47787CAC7	310,000.00	JDOT 2023-C A3 5.48 05/15/2028		1,415.67	1,415.67
06/16/2025	Principal Paydown	47787CAC7	310,000.00	JDOT 2023-C A3 5.48 05/15/2028	13,495.79		13,495.79
06/16/2025	Coupon	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026		29.83	29.83
06/16/2025	Principal Paydown	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026	3,220.47		3,220.47
06/16/2025	Coupon	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027		142.22	142.22
06/16/2025	Principal Paydown	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027	4,570.86		4,570.86
06/16/2025	Coupon	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027		467.44	467.44
06/16/2025	Principal Paydown	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027	9,288.85		9,288.85
06/16/2025	Coupon	58769GAD5	130,000.00	MBALT 2024-B A3 4.23 02/15/2028		458.25	458.25
06/16/2025	Coupon	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027		235.88	235.88
06/16/2025	Principal Paydown	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027	4,767.09		4,767.09
06/16/2025	Coupon	63743HFE7	95,000.00	NATIONAL RURAL UTILITIES COOPERATIVE FINANCE CORP 3.45 06/15/2025		1,638.75	1,638.75
06/16/2025	Final Maturity	63743HFE7	95,000.00	NATIONAL RURAL UTILITIES COOPERATIVE FINANCE CORP 3.45 06/15/2025	95,000.00		95,000.00
06/16/2025	Coupon	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026		54.33	54.33
06/16/2025	Principal Paydown	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026	4,386.38		4,386.38
06/16/2025	Coupon	89239TAD4	105,000.00	TAOT 2024-D A3 4.4 06/15/2029		385.00	385.00
06/16/2025	Coupon	91282CEU1	500,000.00	UNITED STATES TREASURY 2.875 06/15/2025		7,187.50	7,187.50
06/16/2025	Final Maturity	91282CEU1	500,000.00	UNITED STATES TREASURY 2.875 06/15/2025	500,000.00		500,000.00
06/16/2025	Coupon	91282CGA3	600,000.00	UNITED STATES TREASURY 4.0 12/15/2025		12,000.00	12,000.00
06/16/2025	Coupon	91282CHH7	475,000.00	UNITED STATES TREASURY 4.125 06/15/2026		9,796.88	9,796.88
06/16/2025	Coupon	91282CJP7	300,000.00	UNITED STATES TREASURY 4.375 12/15/2026		6,562.50	6,562.50
06/18/2025	Coupon	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026		84.39	84.39
06/18/2025	Principal Paydown	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026	4,787.41		4,787.41
06/20/2025	Coupon	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026		226.16	226.16
06/20/2025	Principal Paydown	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026	8,948.73		8,948.73
06/23/2025	Coupon	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027		187.66	187.66
06/23/2025	Principal Paydown	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027	4,213.50		4,213.50

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
06/25/2025	Coupon	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026		111.01	111.01
06/25/2025	Principal Paydown	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026	10,373.42		10,373.42
06/25/2025	Coupon	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026		1,073.38	1,073.38
06/25/2025	Principal Paydown	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026	17,821.33		17,821.33
06/25/2025	Coupon	3137BVZ82	320,000.00	FHMS K-063 A2 3.43 01/25/2027		914.67	914.67
06/25/2025	Coupon	3137FEBQ2	500,000.00	FHMS K-072 A2 3.444 12/25/2027		1,435.00	1,435.00
06/25/2025	Coupon	3137FETN0	465,000.00	FHMS K-073 A2 3.35 01/25/2028		1,298.13	1,298.13
06/25/2025	Coupon	3137FHPJ6	325,000.00	FHMS K-080 A2 3.926 07/25/2028		1,063.29	1,063.29
06/25/2025	Coupon	3137FJEH8	155,000.00	FHMS K-081 A2 3.9 08/25/2028		503.75	503.75
06/25/2025	Coupon	3137FJKE8	220,000.00	FHMS K-082 A2 3.92 09/25/2028		718.67	718.67
06/25/2025	Coupon	3137FJXV6	297,000.00	FHMS K-083 A2 4.05 09/25/2028		1,002.38	1,002.38
06/25/2025	Coupon	3137FJZ93	240,000.00	FHMS K-084 A2 3.78 10/25/2028		756.00	756.00
06/25/2025	Coupon	3137H4BY5	315,000.00	FHMS K-746 A2 2.031 09/25/2028		533.14	533.14
06/25/2025	Coupon	437076DC3	295,000.00	HOME DEPOT INC 4.75 06/25/2029		7,006.25	7,006.25
06/30/2025	Coupon	91282CGC9	500,000.00	UNITED STATES TREASURY 3.875 12/31/2027		9,687.50	9,687.50
June 2025 Total					**1,072,507.26**	**120,728.63**	**1,193,235.89**
JULY 2025							
07/14/2025	Coupon	459058KT9	250,000.00	INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPM 3.5 07/12/2028		4,375.00	4,375.00
07/15/2025	Coupon	02582JJZ4	125,000.00	AMXCA 2023-1 A 4.87 05/15/2026		507.29	507.29
07/15/2025	Coupon	02582JKD1	340,000.00	AMXCA 2023-3 A 5.23 09/15/2028		1,481.83	1,481.83
07/15/2025	Coupon	161571HT4	340,000.00	CHAIT 2023-1 A 5.16 09/15/2028		1,462.00	1,462.00
07/15/2025	Coupon	43815BAC4	52,043.65	HAROT 2022-1 A3 1.88 05/15/2026		19.07	19.07
07/15/2025	Principal Paydown	43815BAC4	52,043.65	HAROT 2022-1 A3 1.88 05/15/2026	6,132.61		6,132.61
07/15/2025	Coupon	448976AD2	140,000.00	HART 2024-C A3 4.41 05/15/2029		514.50	514.50
07/15/2025	Coupon	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027		328.59	328.59
07/15/2025	Principal Paydown	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027	9,488.10		9,488.10
07/15/2025	Coupon	44934QAD3	90,000.00	HART 2024-B A3 4.84 03/15/2029		363.00	363.00
07/15/2025	Coupon	46625HMN7	400,000.00	JPMORGAN CHASE & CO 3.9 07/15/2025		7,800.00	7,800.00
07/15/2025	Final Maturity	46625HMN7	400,000.00	JPMORGAN CHASE & CO 3.9 07/15/2025	400,000.00		400,000.00
07/15/2025	Coupon	47787CAC7	310,000.00	JDOT 2023-C A3 5.48 05/15/2028		1,354.04	1,354.04
07/15/2025	Principal Paydown	47787CAC7	310,000.00	JDOT 2023-C A3 5.48 05/15/2028	21,507.24		21,507.24

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
07/15/2025	Coupon	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026		23.60	23.60
07/15/2025	Principal Paydown	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026	3,814.77		3,814.77
07/15/2025	Coupon	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027		127.97	127.97
07/15/2025	Principal Paydown	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027	3,871.56		3,871.56
07/15/2025	Coupon	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027		428.04	428.04
07/15/2025	Principal Paydown	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027	10,139.29		10,139.29
07/15/2025	Coupon	58769GAD5	130,000.00	MBALT 2024-B A3 4.23 02/15/2028		458.25	458.25
07/15/2025	Coupon	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027		217.97	217.97
07/15/2025	Principal Paydown	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027	4,672.06		4,672.06
07/15/2025	Coupon	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026		43.62	43.62
07/15/2025	Principal Paydown	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026	4,300.78		4,300.78
07/15/2025	Coupon	89239TAD4	105,000.00	TAOT 2024-D A3 4.4 06/15/2029		385.00	385.00
07/15/2025	Coupon	91282CEY3	475,000.00	UNITED STATES TREASURY 3.0 07/15/2025		7,125.00	7,125.00
07/15/2025	Final Maturity	91282CEY3	475,000.00	UNITED STATES TREASURY 3.0 07/15/2025	475,000.00		475,000.00
07/15/2025	Coupon	91282CKZ3	1,000,000.00	UNITED STATES TREASURY 4.375 07/15/2027		21,875.00	21,875.00
07/16/2025	Coupon	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028		316.37	316.37
07/16/2025	Principal Paydown	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028	6,205.09		6,205.09
07/16/2025	Coupon	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027		80.11	80.11
07/16/2025	Principal Paydown	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027	4,222.72		4,222.72
07/16/2025	Coupon	38014AAD3	95,000.00	GMCAR 2024-4 A3 4.4 08/16/2029		338.04	338.04
07/17/2025	Coupon	61747YET8	175,000.00	MORGAN STANLEY 4.679 07/17/2026		4,094.13	4,094.13
07/17/2025	Effective Maturity	61747YET8	175,000.00	MORGAN STANLEY 4.679 07/17/2026	175,000.00		175,000.00
07/17/2025	Coupon	713448FX1	295,000.00	PEPSICO INC 4.5 07/17/2029		6,637.50	6,637.50
07/18/2025	Coupon	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026		69.51	69.51
07/18/2025	Principal Paydown	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026	4,668.02		4,668.02
07/21/2025	Coupon	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026		186.04	186.04
07/21/2025	Principal Paydown	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026	8,558.25		8,558.25
07/21/2025	Coupon	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027		169.96	169.96
07/21/2025	Principal Paydown	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027	4,113.65		4,113.65
07/21/2025	Coupon	78016HZT0	150,000.00	ROYAL BANK OF CANADA 4.875 01/19/2027		3,656.25	3,656.25
07/23/2025	Coupon	6174468C6	394,000.00	MORGAN STANLEY 4.0 07/23/2025		7,880.00	7,880.00
07/23/2025	Final Maturity	6174468C6	394,000.00	MORGAN STANLEY 4.0 07/23/2025	394,000.00		394,000.00

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
07/25/2025	Coupon	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026		83.26	83.26
07/25/2025	Principal Paydown	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026	9,921.30		9,921.30
07/25/2025	Coupon	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026		1,032.62	1,032.62
07/25/2025	Principal Paydown	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026	10,073.33		10,073.33
07/25/2025	Coupon	3137BVZ82	320,000.00	FHMS K-063 A2 3.43 01/25/2027		914.67	914.67
07/25/2025	Coupon	3137FEBQ2	500,000.00	FHMS K-072 A2 3.444 12/25/2027		1,435.00	1,435.00
07/25/2025	Coupon	3137FETN0	465,000.00	FHMS K-073 A2 3.35 01/25/2028		1,298.13	1,298.13
07/25/2025	Coupon	3137FHPJ6	325,000.00	FHMS K-080 A2 3.926 07/25/2028		1,063.29	1,063.29
07/25/2025	Coupon	3137FJEH8	155,000.00	FHMS K-081 A2 3.9 08/25/2028		503.75	503.75
07/25/2025	Coupon	3137FJKE8	220,000.00	FHMS K-082 A2 3.92 09/25/2028		718.67	718.67
07/25/2025	Coupon	3137FJXV6	297,000.00	FHMS K-083 A2 4.05 09/25/2028		1,002.38	1,002.38
07/25/2025	Coupon	3137FJZ93	240,000.00	FHMS K-084 A2 3.78 10/25/2028		756.00	756.00
07/25/2025	Coupon	3137H4BY5	315,000.00	FHMS K-746 A2 2.031 09/25/2028		533.14	533.14
07/31/2025	Coupon	69371RS80	410,000.00	PACCAR FINANCIAL CORP 4.6 01/31/2029		9,430.00	9,430.00
July 2025 Total					**1,555,688.78**	**91,088.57**	**1,646,777.35**
AUGUST 2025							
08/01/2025	Coupon	459058KW2	250,000.00	INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPM 4.625 08/01/2028		5,781.25	5,781.25
08/06/2025	Coupon	857477BR3	90,000.00	STATE STREET CORP 1.746 02/06/2026		1,127.48	1,127.48
08/15/2025	Coupon	02582JJZ4	125,000.00	AMXCA 2023-1 A 4.87 05/15/2026		507.29	507.29
08/15/2025	Coupon	02582JKD1	340,000.00	AMXCA 2023-3 A 5.23 09/15/2028		1,481.83	1,481.83
08/15/2025	Coupon	161571HT4	340,000.00	CHAIT 2023-1 A 5.16 09/15/2028		1,462.00	1,462.00
08/15/2025	Coupon	43815BAC4	52,043.65	HAROT 2022-1 A3 1.88 05/15/2026		9.46	9.46
08/15/2025	Principal Paydown	43815BAC4	52,043.65	HAROT 2022-1 A3 1.88 05/15/2026	5,945.46		5,945.46
08/15/2025	Coupon	438516CJ3	400,000.00	HONEYWELL INTERNATIONAL INC 4.95 02/15/2028		9,900.00	9,900.00
08/15/2025	Coupon	448976AD2	140,000.00	HART 2024-C A3 4.41 05/15/2029		514.50	514.50
08/15/2025	Coupon	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027		292.37	292.37
08/15/2025	Principal Paydown	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027	9,216.16		9,216.16
08/15/2025	Coupon	44934QAD3	90,000.00	HART 2024-B A3 4.84 03/15/2029		363.00	363.00
08/15/2025	Coupon	47787CAC7	310,000.00	JDOT 2023-C A3 5.48 05/15/2028		1,255.82	1,255.82
08/15/2025	Principal Paydown	47787CAC7	310,000.00	JDOT 2023-C A3 5.48 05/15/2028	16,444.98		16,444.98

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
08/15/2025	Coupon	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026		16.23	16.23
08/15/2025	Principal Paydown	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026	3,456.45		3,456.45
08/15/2025	Coupon	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027		115.90	115.90
08/15/2025	Principal Paydown	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027	3,633.04		3,633.04
08/15/2025	Coupon	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027		385.04	385.04
08/15/2025	Principal Paydown	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027	9,791.34		9,791.34
08/15/2025	Coupon	58769GAD5	130,000.00	MBALT 2024-B A3 4.23 02/15/2028		458.25	458.25
08/15/2025	Coupon	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027		200.41	200.41
08/15/2025	Principal Paydown	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027	4,146.28		4,146.28
08/15/2025	Coupon	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026		33.12	33.12
08/15/2025	Principal Paydown	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026	4,192.48		4,192.48
08/15/2025	Coupon	89239TAD4	105,000.00	TAOT 2024-D A3 4.4 06/15/2029		385.00	385.00
08/15/2025	Coupon	912828YB0	150,000.00	UNITED STATES TREASURY 1.625 08/15/2029		1,218.75	1,218.75
08/18/2025	Coupon	06428CAA2	300,000.00	BANK OF AMERICA NA 5.526 08/18/2026		8,289.00	8,289.00
08/18/2025	Coupon	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028		293.26	293.26
08/18/2025	Principal Paydown	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028	6,021.66		6,021.66
08/18/2025	Coupon	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027		67.30	67.30
08/18/2025	Principal Paydown	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027	3,992.62		3,992.62
08/18/2025	Coupon	38014AAD3	95,000.00	GMCAR 2024-4 A3 4.4 08/16/2029		338.04	338.04
08/18/2025	Coupon	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026		55.00	55.00
08/18/2025	Principal Paydown	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026	4,525.16		4,525.16
08/20/2025	Coupon	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026		147.68	147.68
08/20/2025	Principal Paydown	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026	8,176.37		8,176.37
08/21/2025	Coupon	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027		152.69	152.69
08/21/2025	Principal Paydown	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027	3,988.08		3,988.08
08/25/2025	Coupon	037833BY5	400,000.00	APPLE INC 3.25 02/23/2026		6,500.00	6,500.00
08/25/2025	Coupon	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026		56.72	56.72
08/25/2025	Principal Paydown	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026	9,607.65		9,607.65
08/25/2025	Coupon	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026		1,009.57	1,009.57
08/25/2025	Principal Paydown	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026	859.95		859.95
08/25/2025	Coupon	3137BVZ82	320,000.00	FHMS K-063 A2 3.43 01/25/2027		914.67	914.67
08/25/2025	Coupon	3137FEBQ2	500,000.00	FHMS K-072 A2 3.444 12/25/2027		1,435.00	1,435.00

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
08/25/2025	Coupon	3137FETN0	465,000.00	FHMS K-073 A2 3.35 01/25/2028		1,298.13	1,298.13
08/25/2025	Coupon	3137FHPJ6	325,000.00	FHMS K-080 A2 3.926 07/25/2028		1,063.29	1,063.29
08/25/2025	Coupon	3137FJEH8	155,000.00	FHMS K-081 A2 3.9 08/25/2028		503.75	503.75
08/25/2025	Coupon	3137FJKE8	220,000.00	FHMS K-082 A2 3.92 09/25/2028		718.67	718.67
08/25/2025	Coupon	3137FJXV6	297,000.00	FHMS K-083 A2 4.05 09/25/2028		1,002.38	1,002.38
08/25/2025	Coupon	3137FJZ93	240,000.00	FHMS K-084 A2 3.78 10/25/2028		756.00	756.00
08/25/2025	Coupon	3137H4BY5	315,000.00	FHMS K-746 A2 2.031 09/25/2028		533.14	533.14
08/26/2025	Coupon	17275RBQ4	170,000.00	CISCO SYSTEMS INC 4.8 02/26/2027		4,080.00	4,080.00
08/27/2025	Coupon	459058LK7	170,000.00	INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPM 4.0 08/27/2026		3,400.00	3,400.00
August 2025 Total					**93,997.67**	**58,121.96**	**152,119.63**
SEPTEMBER 2025							
09/02/2025	Coupon	9128284Z0	750,000.00	UNITED STATES TREASURY 2.75 08/31/2025		10,312.50	10,312.50
09/02/2025	Final Maturity	9128284Z0	750,000.00	UNITED STATES TREASURY 2.75 08/31/2025	750,000.00		750,000.00
09/09/2025	Coupon	57636QAW4	290,000.00	MASTERCARD INC 4.875 03/09/2028		7,068.75	7,068.75
09/09/2025	Coupon	931142EW9	80,000.00	WALMART INC 3.9 09/09/2025		1,560.00	1,560.00
09/09/2025	Final Maturity	931142EW9	80,000.00	WALMART INC 3.9 09/09/2025	80,000.00		80,000.00
09/10/2025	Coupon	3130ATS57	700,000.00	FEDERAL HOME LOAN BANKS 4.5 03/10/2028		15,750.00	15,750.00
09/15/2025	Coupon	02582JJZ4	125,000.00	AMXCA 2023-1 A 4.87 05/15/2026		507.29	507.29
09/15/2025	Coupon	02582JKD1	340,000.00	AMXCA 2023-3 A 5.23 09/15/2028		1,481.83	1,481.83
09/15/2025	Coupon	161571HT4	340,000.00	CHAIT 2023-1 A 5.16 09/15/2028		1,462.00	1,462.00
09/15/2025	Coupon	437076CR1	110,000.00	HOME DEPOT INC 4.0 09/15/2025		2,200.00	2,200.00
09/15/2025	Final Maturity	437076CR1	110,000.00	HOME DEPOT INC 4.0 09/15/2025	110,000.00		110,000.00
09/15/2025	Coupon	43815BAC4	52,043.65	HAROT 2022-1 A3 1.88 05/15/2026		0.15	0.15
09/15/2025	Effective Maturity	43815BAC4	52,043.65	HAROT 2022-1 A3 1.88 05/15/2026	93.86		93.86
09/15/2025	Coupon	448976AD2	140,000.00	HART 2024-C A3 4.41 05/15/2029		514.50	514.50
09/15/2025	Coupon	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027		257.20	257.20
09/15/2025	Principal Paydown	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027	9,025.92		9,025.92
09/15/2025	Coupon	44934QAD3	90,000.00	HART 2024-B A3 4.84 03/15/2029		363.00	363.00
09/15/2025	Coupon	47787CAC7	310,000.00	JDOT 2023-C A3 5.48 05/15/2028		1,180.72	1,180.72
09/15/2025	Principal Paydown	47787CAC7	310,000.00	JDOT 2023-C A3 5.48 05/15/2028	13,059.33		13,059.33
09/15/2025	Coupon	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026		9.55	9.55

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
09/15/2025	Principal Paydown	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026	3,366.84		3,366.84
09/15/2025	Coupon	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027		104.58	104.58
09/15/2025	Principal Paydown	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027	3,784.17		3,784.17
09/15/2025	Coupon	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027		343.50	343.50
09/15/2025	Principal Paydown	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027	8,420.99		8,420.99
09/15/2025	Coupon	58769GAD5	130,000.00	MBALT 2024-B A3 4.23 02/15/2028		458.25	458.25
09/15/2025	Coupon	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027		184.82	184.82
09/15/2025	Principal Paydown	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027	4,023.90		4,023.90
09/15/2025	Coupon	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026		22.88	22.88
09/15/2025	Principal Paydown	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026	4,110.12		4,110.12
09/15/2025	Coupon	89239TAD4	105,000.00	TAOT 2024-D A3 4.4 06/15/2029		385.00	385.00
09/15/2025	Coupon	91282CFK2	475,000.00	UNITED STATES TREASURY 3.5 09/15/2025		8,312.50	8,312.50
09/15/2025	Final Maturity	91282CFK2	475,000.00	UNITED STATES TREASURY 3.5 09/15/2025	475,000.00		475,000.00
09/16/2025	Coupon	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028		270.83	270.83
09/16/2025	Principal Paydown	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028	5,902.61		5,902.61
09/16/2025	Coupon	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027		55.19	55.19
09/16/2025	Principal Paydown	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027	3,781.04		3,781.04
09/16/2025	Coupon	38014AAD3	95,000.00	GMCAR 2024-4 A3 4.4 08/16/2029		338.04	338.04
09/17/2025	Coupon	931142ER0	40,000.00	WALMART INC 1.05 09/17/2026		210.00	210.00
09/18/2025	Coupon	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026		40.93	40.93
09/18/2025	Principal Paydown	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026	4,411.02		4,411.02
09/18/2025	Coupon	857477CL5	365,000.00	STATE STREET CORP 4.993 03/18/2027		9,112.23	9,112.23
09/22/2025	Coupon	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026		111.02	111.02
09/22/2025	Principal Paydown	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026	9,415.89		9,415.89
09/22/2025	Coupon	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027		135.94	135.94
09/22/2025	Principal Paydown	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027	3,892.62		3,892.62
09/25/2025	Coupon	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026		31.02	31.02
09/25/2025	Principal Paydown	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026	8,079.00		8,079.00
09/25/2025	Coupon	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026		1,007.61	1,007.61
09/25/2025	Principal Paydown	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026	862.47		862.47
09/25/2025	Coupon	3137BVZ82	320,000.00	FHMS K-063 A2 3.43 01/25/2027		914.67	914.67
09/25/2025	Coupon	3137FEBQ2	500,000.00	FHMS K-072 A2 3.444 12/25/2027		1,435.00	1,435.00

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
09/25/2025	Coupon	3137FETN0	465,000.00	FHMS K-073 A2 3.35 01/25/2028		1,298.13	1,298.13
09/25/2025	Coupon	3137FHPJ6	325,000.00	FHMS K-080 A2 3.926 07/25/2028		1,063.29	1,063.29
09/25/2025	Coupon	3137FJEH8	155,000.00	FHMS K-081 A2 3.9 08/25/2028		503.75	503.75
09/25/2025	Coupon	3137FJKE8	220,000.00	FHMS K-082 A2 3.92 09/25/2028		718.67	718.67
09/25/2025	Coupon	3137FJXV6	297,000.00	FHMS K-083 A2 4.05 09/25/2028		1,002.38	1,002.38
09/25/2025	Coupon	3137FJZ93	240,000.00	FHMS K-084 A2 3.78 10/25/2028		756.00	756.00
09/25/2025	Coupon	3137H4BY5	315,000.00	FHMS K-746 A2 2.031 09/25/2028		533.14	533.14
09/30/2025	Coupon	9128286L9	750,000.00	UNITED STATES TREASURY 2.25 03/31/2026		8,437.50	8,437.50
09/30/2025	Coupon	912828YG9	300,000.00	UNITED STATES TREASURY 1.625 09/30/2026		2,437.50	2,437.50
09/30/2025	Coupon	91282CEF4	750,000.00	UNITED STATES TREASURY 2.5 03/31/2027		9,375.00	9,375.00
09/30/2025	Coupon	91282CFM8	570,000.00	UNITED STATES TREASURY 4.125 09/30/2027		11,756.25	11,756.25
September 2025 Total					**1,497,229.78**	**104,023.08**	**1,601,252.87**
OCTOBER 2025							
10/06/2025	Coupon	89115A2W1	400,000.00	TORONTO-DOMINION BANK 4.98 04/05/2027		9,960.00	9,960.00
10/09/2025	Coupon	3130B3A29	600,000.00	FEDERAL HOME LOAN BANKS 4.0 10/09/2026		12,000.00	12,000.00
10/15/2025	Coupon	02582JJZ4	125,000.00	AMXCA 2023-1 A 4.87 05/15/2026		507.29	507.29
10/15/2025	Coupon	02582JKD1	340,000.00	AMXCA 2023-3 A 5.23 09/15/2028		1,481.83	1,481.83
10/15/2025	Coupon	161571HT4	340,000.00	CHAIT 2023-1 A 5.16 09/15/2028		1,462.00	1,462.00
10/15/2025	Coupon	20030NCS8	400,000.00	COMCAST CORP 3.95 10/15/2025		7,900.00	7,900.00
10/15/2025	Final Maturity	20030NCS8	400,000.00	COMCAST CORP 3.95 10/15/2025	400,000.00		400,000.00
10/15/2025	Coupon	448976AD2	140,000.00	HART 2024-C A3 4.41 05/15/2029		514.50	514.50
10/15/2025	Coupon	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027		222.75	222.75
10/15/2025	Principal Paydown	448979AD6	145,489.90	HART 2023-A A3 4.58 04/15/2027	8,699.01		8,699.01
10/15/2025	Coupon	44934QAD3	90,000.00	HART 2024-B A3 4.84 03/15/2029		363.00	363.00
10/15/2025	Coupon	47787CAC7	310,000.00	JDOT 2023-C A3 5.48 05/15/2028		1,121.08	1,121.08
10/15/2025	Principal Paydown	47787CAC7	310,000.00	JDOT 2023-C A3 5.48 05/15/2028	15,261.21		15,261.21
10/15/2025	Coupon	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026		3.04	3.04
10/15/2025	Effective Maturity	47787JAC2	38,059.09	JDOT 2022 A3 0.36 09/15/2026	1,570.47		1,570.47
10/15/2025	Coupon	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027		92.79	92.79
10/15/2025	Principal Paydown	47800AAC4	82,411.60	JDOT 2022-B A3 3.74 02/16/2027	4,429.30		4,429.30
10/15/2025	Coupon	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027		307.79	307.79

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
10/15/2025	Principal Paydown	47800BAC2	167,687.16	JDOT 2022-C A3 5.09 06/15/2027	6,287.94		6,287.94
10/15/2025	Coupon	58769GAD5	130,000.00	MBALT 2024-B A3 4.23 02/15/2028		458.25	458.25
10/15/2025	Coupon	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027		169.70	169.70
10/15/2025	Principal Paydown	58770AAC7	85,564.63	MBART 2023-1 A3 4.51 11/15/2027	3,874.79		3,874.79
10/15/2025	Coupon	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026		12.84	12.84
10/15/2025	Principal Paydown	89238FAD5	46,513.51	TAOT 2022-B A3 2.93 09/15/2026	3,987.72		3,987.72
10/15/2025	Coupon	89239TAD4	105,000.00	TAOT 2024-D A3 4.4 06/15/2029		385.00	385.00
10/15/2025	Coupon	91282CFP1	550,000.00	UNITED STATES TREASURY 4.25 10/15/2025		11,687.50	11,687.50
10/15/2025	Final Maturity	91282CFP1	550,000.00	UNITED STATES TREASURY 4.25 10/15/2025	550,000.00		550,000.00
10/15/2025	Coupon	91282CJC6	475,000.00	UNITED STATES TREASURY 4.625 10/15/2026		10,984.38	10,984.38
10/16/2025	Coupon	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028		248.84	248.84
10/16/2025	Principal Paydown	362583AD8	115,000.00	GMCAR 2023-2 A3 4.47 02/16/2028	5,667.00		5,667.00
10/16/2025	Coupon	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027		43.72	43.72
10/16/2025	Principal Paydown	36265WAD5	53,598.47	GMCAR 2022-3 A3 3.64 04/16/2027	3,633.81		3,633.81
10/16/2025	Coupon	38014AAD3	95,000.00	GMCAR 2024-4 A3 4.4 08/16/2029		338.04	338.04
10/16/2025	Coupon	459058LN1	300,000.00	INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPM 3.875 10/16/2029		5,812.50	5,812.50
10/20/2025	Coupon	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026		68.80	68.80
10/20/2025	Principal Paydown	379929AD4	75,000.00	GMALT 2023-3 A3 5.38 11/20/2026	8,815.83		8,815.83
10/20/2025	Coupon	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026		27.22	27.22
10/20/2025	Principal Paydown	43815PAC3	60,490.89	HAROT 2022-2 A3 3.73 07/20/2026	4,253.65		4,253.65
10/21/2025	Coupon	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027		119.59	119.59
10/21/2025	Principal Paydown	43815JAC7	70,000.00	HAROT 2023-1 A3 5.04 04/21/2027	3,748.22		3,748.22
10/27/2025	Coupon	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026		9.41	9.41
10/27/2025	Effective Maturity	05602RAD3	111,799.95	BMWOT 2022-A A3 3.21 08/25/2026	3,518.45		3,518.45
10/27/2025	Coupon	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026		1,005.63	1,005.63
10/27/2025	Principal Paydown	3137BNGT5	500,000.00	FHMS K-054 A2 2.745 01/25/2026	17,503.34		17,503.34
10/27/2025	Coupon	3137BVZ82	320,000.00	FHMS K-063 A2 3.43 01/25/2027		914.67	914.67
10/27/2025	Coupon	3137FEBQ2	500,000.00	FHMS K-072 A2 3.444 12/25/2027		1,435.00	1,435.00
10/27/2025	Coupon	3137FETN0	465,000.00	FHMS K-073 A2 3.35 01/25/2028		1,298.13	1,298.13
10/27/2025	Coupon	3137FHPJ6	325,000.00	FHMS K-080 A2 3.926 07/25/2028		1,063.29	1,063.29
10/27/2025	Coupon	3137FJEH8	155,000.00	FHMS K-081 A2 3.9 08/25/2028		503.75	503.75

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
10/27/2025	Coupon	3137FJKE8	220,000.00	FHMS K-082 A2 3.92 09/25/2028		718.67	718.67
10/27/2025	Coupon	3137FJXV6	297,000.00	FHMS K-083 A2 4.05 09/25/2028		1,002.38	1,002.38
10/27/2025	Coupon	3137FJZ93	240,000.00	FHMS K-084 A2 3.78 10/25/2028		756.00	756.00
10/27/2025	Coupon	3137H4BY5	315,000.00	FHMS K-746 A2 2.031 09/25/2028		533.14	533.14
October 2025 Total					**1,041,250.74**	**75,532.50**	**1,116,783.24**
Grand Total			**137,996,939.19**		**9,323,278.18**	**1,031,028.18**	**10,354,306.36**

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.

Information contained in this monthly statement is confidential and is provided for informational purposes only and should not be construed as specific investment or legal advice. The information contained herein was obtained from sources believed to be reliable as of the date of this statement, but may become outdated or superseded at any time without notice.

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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Index returns assume reinvestment of all distributions. Historical performance results for investment indexes generally do not reflect the deduction of transaction and/or custodial charges or the deduction of an investment management fee, the incurrence of which would have the effect of decreasing historical performance results. It is not possible to invest directly in an index.

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

Report No. P-2025-1

TO: THE HONORABLE MAYOR AND CITY COUNCIL

SUBJECT: PERSONNEL REPORT

1. Request City Council approval for Judicate West to provide a list of hearing officers to be considered for selection to serve as the Administrative Hearing Officer in the Quentin Washington termination appeal.

2. Report the appointment of the following individuals:
   a. ***MARIA MARTINEZ*** to the position of Custodian II, Schedule 34 ($4,023 - $5,135/month) with the Recreation and Human Services Department, effective December 8, 2024.
   b. ***KEYSHA RANDLE,*** to the position of Bus Operator, Schedule 90 ($4,952 - $6,321/month) with the Transportation Department, effective December 9, 2024.
   c. ***CHARMIRA HAWKINS,*** to the position of Bus Operator, Schedule 90 ($4,952 - $6,321/month) with the Transportation Department, effective December 9, 2024.
   d. ***CAROLINA RUIZ-UGAITAFA,*** to the position of Human Resources Coordinator, Schedule 43 ($5,024 - $6,412/month) with the Administrative Services Department, effective December 11, 2024.
   e. ***MARTHA BERMUDEZ,*** to the position of Bus Operator, Schedule 90 ($4,952 - $6,321/month) with the Transportation Department, effective December 16, 2024.

3. Report the Promotion of ***TYLER NASH*** to the position of Police Sergeant, Schedule 203 ($10,544 - $13,458/month) with the Police Department, effective December 17, 2024.

4. Report the Service Retirement of the following individuals:
   a. ***JOHNNY WASHINGTON***, Transportation Operations Supervisor, with the Transportation Department, effective December 23, 2024. Mr. Washington provided 16.3 years of full-time service to the City.
   b. ***VINCE OSORIO***, Police Captain, with the Police Department, effective December 27, 2024. Captain Osorio provided 29.8 years of service to the City.
   c. ***ANTHONY GONZALEZ***, Park Maintenance Worker I, with the Public Works Department, effective December 30, 2024. Mr. Gonzalez provided 26.4 years of full-time service to the City.
   d. ***JACQUELINE DAVIS***, Custodian II, with the Recreation and Human Services Department, effective December 30, 2024. Ms. Davis provided 18.4 years of service to the City.

5. Report the separation of the following individuals:
   a. ***KEMILYAH HAYWOOD***, Bus Operator, with the Transportation Department, effective December 13, 2024. Ms. Haywood provided two months of full-time service to the City.
   b. ***ORSON DEL ROSARIO***, Bus Operator, with the Transportation Department, effective December 30, 2024. Mr. Del Rosario provided two months of full-time service to the City.

6. Report the Recruitment for the Open/Competitive position of Administrative Analyst I (Administrative Services Department). This recruitment is open until filled.

7. Report the Recruitment for the Open/Competitive position of Police Officer/Lateral (Police Department). This is a continuous recruitment.

8. Report the Recruitment for the Open/Competitive position of Recreation Leader I/II (Recreation and Human Services Department). This is a continuous recruitment.

9. Report the Recruitment for the Open/Competitive position of Bus Operator (Transportation Department). This is a continuous recruitment.

10. Report the Recruitment for the Open/Competitive position of Transit Mechanic (Transportation Department). This recruitment is open until filled.

11. Report the Recruitment for the Open/Competitive position of Transportation Operations Supervisor (Transportation Department). This recruitment is open until filled.

NOTICE OF CANCELLATION

City of Gardena

Planning & Environmental Quality Commission

Notice is hereby given that the regular meeting of the Planning & Environmental Quality Commission scheduled for December 17, 2024, **has been canceled.**

The next regularly scheduled meeting will be held on January 7, 2025, at 7 p.m.

Dated this 12th day of December 2024

/s/ MINA SEMENZA
City Clerk

PLANNING AND ENVIRONMENTAL QUALITY COMMISSION

Regular PEQC Meeting Notice and Agenda

Website: www.cityofgardena.org

Tuesday, January 7, 2025 – 7:00 PM

Council Chamber at City Hall
1700 W. 162nd Street, Gardena, California

6. **OTHER ITEMS**

6.A **1818 West Redondo Beach Boulevard, the Tire House Progress Report**

As requested by the Planning Commission at the October 1, 2024, meeting, staff presented an update report on the Tire House Inc.'s progress with meeting the requirements of Site Plan Review #4-15.

Staff Report
Attachment A - PC Resolution 10-24
Attachment B - November 21, 2024 Property Pictures
Attachment C - December 17, 2024 Property Owner Pictures
Attachment D - December 20, 2024, Property Pictures
Attachment E - Planning Commission Agenda Packet, dated February 20, 2024
Attachment F - Planning Commission Agenda Packet, dated April 16, 2024
Attachment G - Planning Commission Agenda Packet, dated July 16, 2024
Attachment H - Planning Commission Agenda Packet, dated October 1, 2024

Commission Action: The Planning Commission motioned to postpone the adoption of Resolution No. PC 10-24 for one additional month, by a vote of 5-0. The Planning Commission directed staff to bring a report of the applicant's progress to the February 4, 2025, Planning Commission meeting.

City Council Action: No action needed.

7. **PUBLIC HEARING ITEMS**

7.A **CONDITIONAL USE PERMIT #1-24 (MODIFICATION TO CUP #219-68), SITE PLAN REVIEW #1-24, AND ADMINISTRATIVE ADJUSTMENT #1-24**

The Planning Commission considered a request to modify the conditional use permit for a high school located within the R-1 zone, including a site plan review for the demolition of a 9,036 SF church building and proposing a new 7,500 SF facility in its place, featuring two classrooms, an administrative area, and a covered canopy, to continue serving the existing school on the property. The request also included an administrative adjustment to the off-street parking requirements, seeking a 12% reduction in the number of required spaces—from 104 to 93 spaces. The request was considered for an exemption from CEQA.

APPLICANT: Farnaz Golshani- Flecher, Farnaz Golshan-Flechner, Environmental Charter High School
LOCATION: 2818 Manhattan Beach Blvd; APN: (4067-007-005)
Staff Report (ECS).pdf
Resolution No. PC 1-25 (ECS).pdf
Exhibit A - Project Plans.pdf

Exhibit B - Conditions of Approval.pdf
Attachment B - Parking Study.pdf

Commission Action: The Planning Commission approved Resolution No. PC 1-25, by a vote of 4-0-1, approving a modification to Conditional Use Permit #219-68, Site Plan Review #1-24, and Administrative Adjustment #1-24, with an added condition for the applicants to work with local church leaders prior to the demolition of the church building, and directed staff to file a Notice of Exemption.

City Council Action: Receive and file **OR** Call for Review (By way of two votes from the City Council).

City of Gardena

Gardena City Council Meeting

AGENDA REPORT SUMMARY

Agenda Item No. 13.A
Section: DEPARTMENTAL ITEMS - COMMUNITY DEVELOPMENT
Meeting Date: January 14, 2025

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

AGENDA TITLE: **AGENDA TITLE: Consideration of a Project to certify an EIR, adopt a mitigation monitoring program, adopt a statement of overriding considerations and make other CEQA findings, approve a Land Use Plan change, adopt an Ordinance approving a Specific Plan, Site Plan, and Development Agreement to develop a 5.25 acre property located at 16829, 16835, and 16907 South Normandie Avenue (between 169th and 170th Streets and east of Brighton Way) with a 333 unit project consisting of 75 townhomes and a 285 unit apartment building that will be 5 stories above grade (70 feet), and approve a vesting tentative map for the same. Additionally, the Project includes consideration of Land Use Plan changes and zoning map changes for the properties located at 16964 Brighton Avenue and the 0.43 Acre Property located to the east of the Project Site to match existing uses. Entitlement requests include: RESOLUTION NO. 6683: 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 Project; and RESOLUTION NO. 6684: Amending the Land Use Plan of the City of Gardena General Plan for the of the 5.25 Acre Property to Specific Plan, Changing the Land Use Designation of the 0.11 Acre Property located at 16964 Brighton Avenue to Single Family Residential, and the 0.43 Acre Property located at the Eastern Edge of the Specific Plan Area to Public/Institutional and Making Minor Text Changes; and ORDINANCE NO. 1878: Amending the Gardena Municipal Code to add the Normandie Crossing Specific Plan, Amending the Gardena Zoning Map to Rezone the 5.25 Acre Property to Normandie Crossing Specific Plan, Rezoning the 0.11 Acre Property located at 16964 Brighton Avenue to Single Family Residential, Rezoning the 0.43 Acre Property located at the Eastern Edge of the Specific Plan Area to Official, Approving the Normandie Crossing Specific Plan, including the Site Plan Contained therein, Approving a Development Agreement, and Approving an Affordable Housing Agreement; and RESOLUTION NO. 6685: Approving Vesting Tentative Map No. 83922 (VTM #4-21), to Merge Four Lots into one with 75 Condominiums for the Townhomes and one Parcel for the Apartment Building. PROJECT LOCATION: 16829, 16835, 16907, and 16911 S. Normandie Avenue OTHER LOCATIONS: 16964 Brighton Avenue and unaddressed Union Pacific Railroad parcel (APN: 6106-030-800) APPLICANT: Fred Shaffer and Steve Ludwig – 16911 Normandie Associates, LLC**

COUNCIL ACTION REQUIRED:

Staff Recommendation: Staff respectfully recommends that after presentation by Staff and Environmental Consultant the City Council:

- Open the public hearing;
- Hear the applicant's presentation
- Receive testimony from the public, allow three (3) minutes for each speaker;
- Allow the applicant time to respond; and
- Close the public hearing.

Planning Commission Recommendation for Motion:

- Adopt Resolution Nos. 6683 and 6684
- Introduce Ordinance No. 1878; and
- Adopt Resolution No. 6685, approving the necessary entitlements for the development of the Normandie Crossing Project.

RECOMMENDATION AND STAFF SUMMARY:

On December 22, 2021, Saiko Investment Corporation, the Applicant, submitted an application for the Normandie Crossing Specific Plan for a 5.25-acre site located between 169th and 170th Streets, bordered by Normandie Avenue and east of Brighton Way.

On December 3, 2024, the Planning Commission held a public hearing to review a recommendation to the City Council regarding the project entitlement request. The proposal seeks approval for the development of a 333-unit project, including 75 townhomes and a 285-unit, five-story apartment building. The project also includes proposed changes to the Land Use Plan and zoning map for the properties at 16964 Brighton Avenue and a 0.43-acre parcel to the east of the project site, aligning them with existing uses. The Commission passed resolutions recommending approval to the City Council, with two commissioners recused from voting, leaving three commissioners to cast votes. Additionally, the Commission considered actions to certify the Environmental Impact Report, adopt a Mitigation Monitoring and Reporting Program, adopt a Statement of Overriding Considerations, and make CEQA findings related to the project.

As the applicants' request involves legislative actions, it is now being presented to the City Council for consideration.

FINANCIAL IMPACT/COST:

No impact to the general fund.

ATTACHMENTS:

AGENDA STAFF REPORT - NORMANDIE CROSSING PROJECT
1_Planning Commission Resolution No. PC 18-24 recommending approval of Revised and Updated Final EIR.pdf
2_Planning Commission Resolution No. PC 19-24 recommending approval of General Plan Amendment.pdf
3_Planning Commission Resolution No. PC 20-24 recommends approval of the Project.pdf
4_Planning Commission Staff Report dated December 3, 2024.pdf

5_Planning Commission Staff Report dated March 19, 2024.pdf
6_Original Economic Analysis Report prepared by RCLCO, dated December 2023.pdf
7_Revised Economic Analysis Memo prepared by RCLCO, Dated November 2024.pdf
8_Public Comments received for January 14, 2025 Public Hearing.pdf
9_Public Comments received for December 3, 2024 Public Hearing.pdf
10_Letters of Support from Local Businesses.pdf
RESOLUTION NO. 6683, 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 Normandie Crossing Specific Plan Project
Exhibit A - Draft EIR, dated December 2023.pdf
Exhibit B - Revised and Updated Final EIR, dated November 2024.pdf
Exhibit C - Mitigation Monitoring and Reporting Program.pdf
RESOLUTION NO. 6684: Amending the Land Use Plan of the Gardena General Plan
Exhibit A - General Plan Land Use Change for GPA #3-21.pdf
Exhibit B - General Plan Land Use Text Change Excerpts.pdf
ORDINANCE NO. 1878: Adopting the Specific Plan and Approving the Site Plan, Changing the Zoning, Approving the Zoning Code Amendment, Approving the Development Agreement, and Approving an Affordable Housing Agreement Relating to the Project
Exhibit A - Normandie Crossing Specific Plan Zone Change for ZC #4-21.pdf
Exhibit B - Normandie Crossing Specific Plan.pdf
Exhibit C - Project Plans
Exhibit D - Conditions of Approval.pdf
Exhibit E - Draft Development Agreement.pdf
Exhibit F - Draft Affordable Housing Agreement.pdf
RESOLUTION NO. 6685: Approving Vesting Tentative Map No. 83922 (VTM #4-21), to Merge Four Lots into one with 75 Condominiums for the Townhomes and one Parcel for the Apartment Building
Exhibit A - Vesting Tentative Tract Map No. 83922 (VTM #4-21).pdf
Exhibit B - Conditions of Approval.pdf

APPROVED:

_____
Clint Osorio, City Manager

City of Gardena
City Council Meeting

Agenda Item No.: 13.A
Department: Community Development
Meeting Date: January 14, 2025

AGENDA STAFF REPORT

AGENDA TITLE: Consideration of a Project to certify an EIR, adopt a mitigation monitoring program, adopt a statement of overriding considerations and make other CEQA findings, approve a Land Use Plan change, adopt an Ordinance approving a Specific Plan, Site Plan, and Development Agreement to develop a 5.25 acre property located at 16829, 16835, and 16907 South Normandie Avenue (between 169th and 170th Streets and east of Brighton Way) with a 333 unit project consisting of 75 townhomes and a 285 unit apartment building that will be 5 stories above grade (70 feet), and approve a vesting tentative map for the same. Additionally, the Project includes consideration of Land Use Plan changes and zoning map changes for the properties located at 16964 Brighton Avenue and the 0.43 Acre Property located to the east of the Project Site to match existing uses. Entitlement requests include:

RESOLUTION NO. 6683, 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 Project; and

RESOLUTION NO. 6684: Amending the Land Use Plan of the City of Gardena General Plan for the of the 5.25 Acre Property to Specific Plan, Changing the Land Use Designation of the 0.11 Acre Property located at 16964 Brighton Avenue to Single Family Residential, and the 0.43 Acre Property located at the Eastern Edge of the Specific Plan Area to Public/Institutional and Making Minor Text Changes; and

ORDINANCE NO. 1878: Amending the Gardena Municipal Code to add the Normandie Crossing Specific Plan, Amending the Gardena Zoning Map to Rezone the 5.25 Acre Property to Normandie Crossing Specific Plan, Rezoning the 0.11 Acre Property located at 16964 Brighton Avenue to Single Family Residential, Rezoning the 0.43 Acre Property located at the Eastern Edge of the Specific Plan Area to Official, Approving the Normandie Crossing Specific Plan, including the Site Plan Contained therein, Approving a Development Agreement, and Approving an Affordable Housing Agreement; and

RESOLUTION NO. 6685: Approving Vesting Tentative Map No. 83922 (VTM #4-21), to Merge Four Lots into one with 75 Condominiums for the Townhomes and one Parcel for the Apartment Building.

PROJECT LOCATION: 16829, 16835, 16907, and 16911 S. Normandie Avenue

OTHER LOCATIONS: 16964 Brighton Avenue and unaddressed Union Pacific Railroad parcel (APN: 6106-030-800)

APPLICANT: Fred Shaffer and Steve Ludwig – 16911 Normandie Associates, LLC

RECOMMENDATION:

Staff respectfully recommends that after presentation by Staff and Environmental Consultant the City Council:

1) Open the public hearing;
2) Hear the applicant's presentation
3) Receive testimony from the public, allow three (3) minutes for each speaker;
4) Allow the applicant time to respond; and
5) Close the public hearing.

Planning Commission Recommendation for Motion:

1) Adopt Resolution Nos. 6683 and 6684
2) Introduce Ordinance No. 1878; and
3) Adopt Resolution No. 6685, approving the necessary entitlements for the development of the Normandie Crossing Project.

BACKGROUND:

In October 2021, the Gardena City Council held a study session on a proposed high-density residential development west of Normandie Avenue, between 169th and 170th Streets. The Council raised concerns about issues such as proposed railroad improvements, access via Normandie Avenue, open space, parking, building massing, traffic, lighting, and landscaping.

On December 22, 2021, the Applicant, Saiko Investment Corporation filed an application for the Normandie Crossing Specific Plan, initially proposing 273 units in a seven-story apartment building and 76 townhomes. The project was later revised to 328 apartment units and 75 townhomes, 403 units in total.

In compliance with CEQA, the City's environmental consultant prepared an EIR for the revised project, which was available for public review from December 4, 2023, to January 20, 2024.

In March 2024, the Applicant presented the proposal for the 403 units, with 20 apartment units reserved for lower-income households, to the Planning Commission. Public feedback included both support and concerns over density and the project's impact. The Planning Commission, after hearing the public comments, voted to recommend the City Council certify the Environmental Impact Report (EIR) and approve the General Plan Amendments, but failed to approve the remaining entitlements in a 2-1- vote, with two members abstaining due to conflicts of interest.

On April 2, 2024, the Applicant announced they would not proceed with the 403-unit plan. Instead, they intended to resubmit an alternative project with reduced density. After engaging with the community and addressing concerns about height, density, parking, and access, the Applicant submitted revised plans on September 30, 2024, which reduced the project's height and density and made changes to the parking and layout.

Following the submission of the revised plans, an alternative called the “Community Input Alternative” was analyzed. A Revised and Updated Final EIR was prepared to document that there was no need for recirculation of the EIR.

On December 3, 2024, the Planning Commission held a public hearing on the revised project and updated EIR. The Commission passed resolutions recommending approval to the City Council, with two commissioners recused from voting, leaving the remaining three to cast the votes. The following resolutions were adopted by the Planning Commission:

- The Planning Commission approved Resolution No. PC 18-24 (**Attachment 1**), by a vote of 2-1, recommending the City Council certify the Final EIR and adopt a Mitigation Monitoring and Reporting Program, Findings Relating to Alternatives and Mitigation Measures, and a Statement of Overriding Considerations for the purposes of the project; and

- The Planning Commission approved Resolution No. PC 19-24 (**Attachment 2**), by a vote of 3-0, recommending the City Council to approve General Plan Amendment #3-21, for the Project and the changes to the two adjacent properties; and

- The Planning Commission approved Resolution No. PC 20-24 (**Attachment 3**), by a vote of 2-1, recommending the City Council approve Zone Change #4-21, which includes the changes to the two adjacent properties; Zone Text Amendment #6-21; Specific Plan #1-21; Vesting Tentative Map #4-21; Site Plan Review #11-21; Development Agreement #2-21; and Affordable Housing Agreement for the Project subject to the attached conditions of approval for the Community Input Alternative which responds to community concerns.

The staff report presented to the Planning Commission on December 3, 2024, is attached here as **Attachment 4**.

The applicants' request involves legislative actions and is therefore being presented to the City Council for adoption.

SITE SETTING

The project area consists of four separate parcels, totaling approximately 5.25 acres, that are generally bound by 169th Street to the north, 170th Street to the south, Normandie Avenue to the east, and a public alleyway to the west, known as Brighton Way. The project area does not include the single-family home located at 16964 Brighton Avenue or the property owned by the Union Pacific Railroad to the east. The properties are currently developed with six industrial buildings totaling 115,424 square feet. Other existing site conditions include asphalt surface parking lots and other hardscapes throughout with minimal landscaping located along the southern end of the site. For a detailed discussion of the project area, surrounding uses, and property history, please refer to the staff report presented to the Planning Commission on March 19, 2024, attached as **Attachment 5**.

PROJECT DESCRIPTION - COMMUNITY INPUT ALTERNATIVE

The revised project being presented to the City Council proposes the demolition of all existing structures and the construction of a residential development. Instead of the original plan for 403 units, the revised proposal includes 333 units: 258 apartment units (7 of which are affordable for moderate-income households) and 75 townhomes. The project is divided into two subareas: Subarea A, which contains the five-story above-grade apartment building, and Subarea B, which includes the 75 three-story townhomes. Table 1 below outlines the details of the previous proposal and the revised changes now being presented.

Table 1 – Project Comparison

Normandie Crossing Specific Plan			
	Previous Proposal	**Community Input Alternative**	**Change**
Total Number of Dwelling Units	403	333	-70
Apartment Bldg.	328	258	-70
Townhome Bldgs.	75	75	Same
Number of Stories for Apartment Bldg.	7-stories above grade	6-stories total 5 above grade 1 subterranean	-1 in total -2 above grade
Height			
Apartment Bldg.	90 feet	70 feet	-20 feet
Townhome Bldg.	40 feet	40 feet	Same
Parking			
Apartments	399 spaces Avg. 1 space/unit No guest parking	387 spaces Avg. 1.5 space/unit 29 guest stalls	+0.5 spaces/unit +29 guest stalls
Townhomes	150 spaces 10 guest stalls	150 spaces 19 guest stalls	Same +9 guest stalls

OFFSITE IMPROVEMENTS

Approximately 266 linear feet of offsite sidewalk improvements will be provided along the south side of 169th Street, just west of the project area, between Brighton Way and the alley just west of Brighton Avenue. The sidewalk improvements will be constructed pursuant to Municipal Code Section 17.08.170.

Additionally, the project will include various railroad track and roadway improvements along South Normandie Avenue pursuant to current California Public Utilities Commission (CPUC) standards and UPRR guidelines which will improve the safety of the railroad crossing at that location.

PROJECT BENEFITS

The Applicant has prepared an economic analysis report by RCLCO, a real estate economics and market research consultant, outlining the overall benefits the project would bring to the City. An initial report was prepared for the original project and is attached as **Attachment 6**. After the project was reduced to 333 total units, an updated report was provided and is attached as **Attachment 7**.

In addition to providing 7 moderate-income units and fulfilling about 10 percent of the City's remaining above-moderate allocation, while revitalizing a site with outdated development standards and deteriorating buildings, the project would also demonstrate the additional fiscal and economic benefits it would bring to the City, including the following:

- The project will create around 1,580 construction jobs, contributing approximately $109 million in labor income, and generate over $3 million in one-time revenues, including fees and taxes;
- It will also provide ongoing annual revenues, such as $455,538 in new tax revenues and approximately $12.6 million in local economic output;
- Additionally, the project will boost local businesses through increased residential spending, promote alternate transportation with free transit passes, and improve public safety with sidewalk and railroad crossing upgrades.

REQUESTED ENTITLEMENTS

The Applicant requests the following entitlements to establish the Normandie Crossing Specific Plan to construct a 333 residential unit development:

1. **General Plan Amendment (GPA #3-21)**: changing the land use designation on the General Plan Land Use Map from Industrial and Industrial/High Density 30 Overlay to Specific Plan.
2. **Specific Plan (SP #1-21)**: providing for development of a six-story residential apartment building with one level below grade, which would include 258 residential dwelling units, including 7 units for moderate income households, and 75 three-story residential townhomes.
3. **Zone Change (ZC #4-21)**: changing the zoning from M-1 with HO-4 overlay and M-2 zone to the Normandie Crossing Specific Plan Zone.
4. **Zone Text Amendment (ZTA #6-21)**: amending the Gardena Municipal Code by adding a new zoning designation of the Normandie Crossing Specific Plan Zone.
5. **Site Plan Review (SPR #11-21):** approving the physical design of the development.
6. **Vesting Tentative Map (VTM #4-21)**: to merge four lots into one with condominiums for the townhomes and one parcel for the apartment building.
7. **Development Agreement (DA #2-21)**: between the City and developer that guarantees the right to build the development as set forth in this Specific Plan for a period of 5 years with one five-year extension, and provides community benefits to the City.
8. **Affordable Housing Agreement:** between the City and the developer that guarantees 7 units will remain affordable to moderate income households for a 55-year period.

Approval of these items requires certification of the Environmental Impact Report (EA # 20-21; SCH #2023050241), adoption of a Mitigation Monitoring and Reporting Plan, and CEQA required findings, and a Statement of Overriding Considerations.

Additional Zone Change & General Plan Amendments: As part of the overall project, staff is recommending the Zoning map and General Plan Land Use map amendments of two separate parcels, immediately adjacent to the project site, to correspond to the existing land uses within each parcel.

NOTICING/PUBLIC COMMENTS

The public hearing notice for the project was published in the Gardena Valley News and mailed via first-class mail to property owners and occupants within a 300-foot radius of the site, as well as to individuals who have previously submitted public comments or spoken at a public hearing, on January 2, 2025. A copy of Proof of Publication and Affidavit of Mailing are on file in the office of the Community Development Department, Room 101, City Hall, and are considered part of the administrative record.

Since the publication of the notice for the public hearing of the January 14th City Council meeting, staff has received a total of 15 comments from the public regarding this item and one petition in opposition of the project. These comments and petition are compiled and attached as **Attachment 8**. All public comments received during the December 3rd Planning Commission meeting are included as **Attachment 9**.

Additionally, in 2024, the Applicant met individually with local business owners, resulting in 35 letters of support, which are attached as **Attachment 10**.

CONCLUSION:

Staff respectfully recommends that the City Council open the public hearing, have the applicant make the presentation, receive public testimony with each speaker allowed three (3) minutes, allow the applicant time to respond, and then close the public hearing.

Following this, the City Council will consider the adoption of Resolution Nos. 6683, 6684, Ordinance No. 1878, and Resolution No. 6685 to approve the residential development known as the Normandie Crossing Specific Plan Project.

FISCAL IMPACT:

No impact to the general fund.

Submitted by: Amanda Acuna **Date:** 1/10/2025

ATTACHMENTS TO STAFF REPORT

1. Planning Commission Resolution No. PC 18-24 recommending approval of Revised and Updated Final EIR
2. Planning Commission Resolution No. PC 19-24 recommending approval of General Plan Amendment
3. Planning Commission Resolution No. PC 20-24 recommends approval of the Project
4. Planning Commission Staff Report dated December 3, 2024
5. Planning Commission Staff Report dated March 19, 2024
6. Original Economic Analysis Report prepared by RCLCO, dated December 2023
7. Revised Economic Analysis Memo prepared by RCLCO, Dated November 2024
8. Public Comments received for January 14, 2025 Public Hearing
9. Public Comments received for December 3, 2024 Public Hearing
10. Letters of Support from Local Businesses

RESOLUTIONS AND ORDINANCE FOR CONSIDERATION

RESOLUTION NO. 6683, 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 Normandie Crossing Specific Plan Project.

- Exhibit A – Draft EIR, dated December 2023
- Exhibit B – Revised and Updated Final EIR, dated November 2024
- Exhibit C – Mitigation Monitoring and Reporting Program

RESOLUTION NO. 6684: Amending the Land Use Plan of the Gardena General Plan.

- Exhibit A – General Plan Land Use Change for GPA #3-21
- Exhibit B – General Plan Land Use Text Change Excerpts

ORDINANCE NO. 1878: Adopting the Specific Plan and Approving the Site Plan, Changing the Zoning, Approving the Zoning Code Amendment, Approving the Development Agreement, and Approving an Affordable Housing Agreement Relating to the Normandie Crossing Specific Plan.

- Exhibit A – Normandie Crossing Specific Plan Zone Change for ZC #4-21
- Exhibit B – Normandie Crossing Specific Plan
- Exhibit C – Project Plans
- Exhibit D – Conditions of Approval
- Exhibit E – Draft Development Agreement
- Exhibit F – Draft Affordable Housing Agreement

<u>RESOLUTION NO. 6685</u>: Approving Vesting Tentative Map No. 83922 (VTM #4-21), to Merge Four Lots into one with 75 Condominiums for the Townhomes and one Parcel for the Apartment Building.

- Exhibit A – Vesting Tentative Tract Map No. 83922 (VTM #4-21)
- Exhibit B – Conditions of Approval

RESOLUTION NO. PC 18-24

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF GARDENA, CALIFORNIA RECOMMENDING THE CITY COUNCIL CERTIFY AN ENVIRONMENTAL IMPACT REPORT, ADOPTING A MITIGATION MONITORING AND REPORTING PROGRAM, ADOPTING A STATEMENT OF OVERRIDING CONSIDERATIONS AND MAKING CEQA FINDINGS RELATING TO THE NORMANDIE CROSSING SPECIFIC PLAN AND RELATED ENTITLEMENTS FOR THE 5.25 ACRE PROPERTY LOCATED AT 16829, 16835, AND 16907 SOUTH NORMANDIE AVENUE AND LAND USE AND ZONING CHANGES FOR THE 0.11 ACRE PROPERTY LOCATED AT 16964 BRIGHTON AVENUE AND THE 0.43 ACRE PROPERTY LOCATED TO THE EAST OF THE PROJECT SITE

WHEREAS, on December 22, 2021, 16911 Normandie Associates, LLC ("Developer"), filed an application for a General Plan Amendment to the Land Use Plan (the "General Plan Amendment"), Specific Plan, Zone Change, Zoning Code Amendment, Vesting Tentative Tract Map, and Site Plan Review to develop a 273 unit apartment building and 76 townhome style units on a total of 5.25 acres located at 16829, 16835, and 16907 South Normandie Avenue (APN ## 6106-030-011, 6106-030-015, 6106-030-016 - 6106-030-017) (the "Property); and

WHEREAS, on December 22, 2022, Developer amended its project to develop a 328 unit apartment building and 75 townhomes on the Property; and

WHEREAS, the City determined that in addition to the residential development and needed entitlements proposed by Developer, the project should also include revisions to the General Plan land use designations and zoning for two adjacent properties on the same block as the Project to match the actual uses of the properties. Specifically, for the property located at 16964 Brighton Avenue (APN # 6106-030-008), change the General Plan Amendment from Industrial to Single Family Residential and change the zoning from General Industrial (M-2) to Single Family Residential (R-1); and for the property just to the east of the Project site owned by the Southern Pacific Railroad (APN # 6106-030-800), change the General Plan land use designation from Industrial to Public/Institutional and change the zoning from General Industrial (M-2) to Official (O); and

WHEREAS, the General Plan Amendments, Specific Plan, Zone Changes, Zoning Code Amendment, Development Agreement, Site Plan Review, and Vesting Tentative Tract map are collectively referred to as the Project; and

WHEREAS, on March 19, 2024, 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; and

WHEREAS, on April 2, 2024, the Planning Commission adopted PC Resolution No. 4-24, recommending that the City Council certify the Environmental Impact Report ("EIR"), but did not recommend approval of the Project; and

WHEREAS, after the Planning Commission's actions, Developer attended a meeting where the project was discussed;

WHEREAS, on September 30, 2024, Developer submitted revised plans to the City for a new project to be considered which consists of 70 fewer units in the apartment building and a reduction in height level from ground floor from seven stories to five stories, with one underground level of parking (hereafter the "Community Input Alternative;") and

WHEREAS, on December 3, 2024, the Planning Commission of the City of Gardena held a duly, noticed public hearing on the Project, including the Revised and Updated Final EIR to address the new Community Input Alternative submitted by the Developer, at which time it considered all evidence presented, both written and oral.

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF GARDENA DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1.

The Planning Commission hereby recommend to the City Council to certify the Revised and Updated FEIR dated November 2024 and adopt a Mitigation Monitoring and Reporting Program, make CEQA Findings Relating to Alternatives and Mitigation Measures, and adopt a Statement of Overriding Considerations for purposes of the Project. For all the reasons set forth in the Draft City Council Resolution attached as Exhibit 1, the Planning Commission believes that these changes represent good land use practices which are required by public necessity, convenience, and the general welfare.

PASSED, APPROVED, AND ADOPTED this 3rd day of December 2024.

DERYL HENDERSON, CHAIR
PLANNING AND ENVIRONMENTAL
QUALITY COMMISSION

ATTEST:

GREG TSUJIUCHI, SECRETARY
PLANNING AND ENVIRONMENTAL QUALITY COMMISSION
STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
CITY OF GARDENA

I, Greg Tsujiuchi, Planning and Environmental Quality Commission Secretary of the City of Gardena, do hereby certify 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 on the 3rd day of December, 2024, by the following vote:

AYES: Henderson and Kanhan
NOES: Sherman
ABSENT: Langley
RECUSE: Wright-Scherr

- Exhibit 1 – City Council CEQA Resolution
    - Exhibit A – Draft EIR
    - Exhibit B – Final EIR
    - Exhibit C – Mitigation Monitoring and Reporting Program

RESOLUTION NO.

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 NORMANDIE CROSSING SPECIFIC PLAN AND RELATED ENTITLEMENTS FOR THE 5.25 ACRE PROPERTY LOCATED AT 16829, 16835, and 16907 SOUTH NORMANDIE AVENUE AND LAND USE AND ZONING CHANGES FOR THE 0.11 ACRE PROPERTY LOCATED AT 16964 BRIGHTON AVENUE AND THE 0.43 ACRE PROPERTY LOCATED TO THE EAST OF THE PROJECT SITE

WHEREAS, on December 22, 2021, 16911 Normandie Associates, LLC ("Developer"), filed an application for a General Plan Amendment to the Land Use Plan (the "General Plan Amendment"), Specific Plan, Zone Change, Zoning Code Amendment, Vesting Tentative Tract Map, and Site Plan Review to develop a 273 unit apartment building and 76 townhome style units on a total of 5.25 acres located at 16829, 16835, and 16907 South Normandie Avenue (APN ## 6106-030-011, 6106-030-015, 6106-030-016 - 6106-030-017) (the "Property); and

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WHEREAS, the City determined that in addition to the residential development and needed entitlements proposed by Developer, the project should also include revisions to the General Plan land use designations and zoning for two adjacent properties on the same block as the Project to match the actual uses of the properties. Specifically, for the property located at 16964 Brighton Avenue (APN # 6106-030-008), change the General Plan Amendment from Industrial to Single Family Residential and change the zoning from General Industrial (M-2) to Single Family Residential (R-1); and for the property just to the east of the Project site owned by the Southern Pacific Railroad (APN # 6106-030-800), change the General Plan land use designation from Industrial to Public/Institutional and change the zoning from General Industrial (M-2) to Official (O); and

WHEREAS, the General Plan Amendments, Specific Plan, Zone Changes, Zoning Code Amendment, Development Agreement, Site Plan Review, and Vesting Tentative Tract Map are collectively referred to as the Project; and

WHEREAS, on March 19, 2024, 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; and

WHEREAS, on April 2, 2024, the Planning Commission adopted PC Resolution No. 4-24, recommending that the City Council certify the Environmental Impact Report ("EIR"), but did not recommend approval of the Project; and

WHEREAS, after the Planning Commission's actions, Developer attended a community meeting where the project was discussed; and

WHEREAS, on September 30, 2024, Developer submitted revised plans to the City for a new alternative to be considered which consists of 70 fewer units in the apartment building and a reduction in height level from ground floor from seven stories to five stories, with one underground level of parking (hereafter the "Community Input Alternative;" and

WHEREAS, on December 3, 2024, the Planning Commission held a duly noticed public hearing on the Project, including revisions to the Final EIR to address the new Community Input Alternative submitted by the Developer; and

WHEREAS, at the close of the public hearing the Planning Commission recommended that the City Council certify the Revised and Updated Final EIR, make CEQA findings regarding mitigation measures and alternatives, and adopt a statement of overriding considerations; and

WHEREAS, on January XX, 2025, the City Council held a duly noticed public hearing on the Project, at which time it also considered the EIR prepared for 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 December 2021, the City entered into a consultant agreement with Kimley-Horn and Associates to prepare an EIR for the Project.

B. On June 23, 2022, a First Amendment to the consultant agreement was entered into to account for the change in the project description submitted by the applicant. The City entered into a number of other amendments to the consultant agreement and reimbursement agreement required of the Developer throughout the process.

C. 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 was from May 10, 2023 through June 9, 2023.

D. On May 8, 2023, the City held a scoping meeting in accordance with Public Resources Code § 21083.9 and CEQA Guidelines § 15082(c).

E. The Draft EIR was made available for a 45-day public review period from December 4, 2023, through January 20, 2024. 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 filed with 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.

F. 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.

G. The City received and reviewed comments on the Draft EIR and prepared responses to those comments which were incorporated into that document entitled Final EIR and dated March 2024. The Final EIR consisted of the Draft EIR and all Appendices thereto, incorporating the written comments and responses thereto, as well as the changes to the DEIR.

H. Prior to releasing the Final EIR dated March 2024, the applicant submitted changes to the previous Project plans that were primarily required by the Los Angeles County Fire Department and Southern California Edison. The changes do not modify the total number of units or impacts associated with the Project. Instead, the changes primarily have to do with reductions in open space and landscaped area, size of the townhome units, and layout of the amenity space in the townhome area.

I. Responses were sent to the public agencies that commented on the DEIR and the Final EIR was made available for public review on March 13, 2024.

J. None of the comments received or the changes submitted resulted in any changes that necessitated recirculation of the DEIR. The comments did not disclose any significant information. The changes in the plans did not lead to any new or different

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impacts. The changes made to the document merely clarify/amplify and make insignificant modifications to the DEIR.

K. After Developer submitted plans for the Community Input Alternative, the City's Consultant provided an analysis of this alternative. The analysis showed that there would be no new significant impacts, no increase in the severity of any identified significant impacts, and no new mitigation measures that would be required.

L. City, through its Consultant, prepared a Revised and Updated Final EIR dated November 2024. This document amended the previous Final EIR in part by including a thorough analysis of the Community Input Alternative and responding to all comments that had been received after the close of the public comment period on the DEIR.

M. Although not required by law, the Revised Final EIR was sent to public agencies who responded to the DEIR on November 2022, 2024.

N. The City has complied with all procedural requirements relating to CEQA and other requirements of law. The Revised and Updated Final EIR is adequate and complete and complies with all CEQA requirements.

O. In certifying the Revised and Updated 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 Revised and Updated Final EIR, agenda reports, written reports, public testimony, and other information in the record and reviewed this information prior to acting upon the Project.

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.

B. Despite the findings of the Initial Study, the EIR examined two topics under aesthetics (conflict with applicable zoning and other regulations governing scenic quality and creation of a new source of light or glare), as well as hydrology and water quality with respect to a decrease in groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin (see Impact 4.7-2).

C. The City Council finds that the topics listed in Section 7.0 of the EIR of Effects Found Not to Be Significant did not require any further analysis.

D. The impacts that are analyzed in the EIR are discussed in detail in Sections 4.1 through 4.16 and summarized in Section ES.8 of the Draft EIR and identified therein as less than significant, less than significant after mitigation, and significant even after mitigation. Project Design Features (PDFs) were incorporated into the analysis under the topics of Air Quality, Energy, Greenhouse Gas Emissions, and Transportation. The following is a summary of the mitigation measures and impacts which are all fully described in the EIR.

E. 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 CUL-1, and TCR-1 through TCR-3, 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-2 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. Standard conditions of approval, along with Mitigation Measure GEO-1, 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 requiring 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 and HAZ 2 requiring the installation of an impermeable vapor membrane under the slab areas, along with standard conditions of approval relating to asbestos and lead-based paint, will reduce the impacts to a less than significant level.

4. Under Noise, it was determined that the Project could result in the generation of excessive groundborne vibration or noise levels. Mitigation Measure NOE-3 which requires that large construction equipment be used a minimum of 45 feet away from the house at 16964 Brighton Avenue will mitigate this impact to less than significant.

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5. Under Tribal Cultural Resources, it was determined that the project could potentially result in significant impacts. The City consulted with the Gabrielino Band of Mission Indians – Kizh Nation and in accordance with such consultation is imposing Mitigation Measure TCR-1 through TCR-3, which will mitigate the impacts to a less than significant level.

6. The construction of the utilities associated with the project would have potentially significant impacts under the impact areas described above, as well as construction noise describe below. The mitigation measures listed above and Mitigation Measures NOI-1 and NOI-2 described below will reduce these impacts to less than significant, except for construction noise.

F. 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 power construction equipment to be equipped with state-of-the-art noise shielding and muffling devices and to be properly maintained. Mitigation Measure NOI-2 requires a temporary and impermeable sound barrier of at least 10 feet that reduces noise by at least 12dB(A). Even with these measures, construction noise could be significant and unavoidable.

SECTION 3. Alternatives.

A. In accordance with CEQA, the EIR examined four alternatives to the Project. Three of the Alternatives are discussed in detail in Chapter 6 of the EIR and summarized in Section ES.6. The fourth alternative was analyzed in the Revised and Updated Final EIR.

B. 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 decades-old buildings 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 industrial purposes. This alternative involves the demolition of the existing buildings and construction up to 228,690 square feet of new industrial uses within an industrial business park. Redevelopment of the site in this manner would still cause significant and unavoidable noise impacts and the alternative would not meet any of the Project's objectives.

3. The Reduced Density Alternative would still develop the 75 townhomes along the western and southern borders of the Project site, but would reduce the number of units in the apartment building from 328 to 192 and reduce the height to five stories. This alternative would still have significant and unavoidable noise impacts and would not provide any affordable housing.

4. The Community Input Alternative would also still develop the 75 townhomes along the western and southern borders of the Project site, but there is now increased guest parking that has been added and the driveway access along 170th Street has been realigned so as to avoid any problem with lights shining into the homes across 170th Street. Additionally, the number of apartment buildings has been reduced by 70 units and the height of the project was reduced by 20 feet to a maximum of 70 feet. The overall density is reduced from 77 units per acre to 63 units per acre. This alternative will include seven moderate units for the apartment building. While the number of units is reduced by 70 units, the number of parking spaces is only reduced by 12 spaces and 29 guest parking spaces have been added. There will still be significant and unavoidable construction noise impacts.

C. 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. As demolition of the existing buildings will create a significant and unavoidable noise impact, the only way to avoid this impact would be to reuse the buildings, which is not feasible for a residential development. An alternative site was considered but rejected because the applicant does not have an interest in any alternative site in the City which is not also the subject of a development application.

D. 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. Among the other alternatives, the reduced density alternative is the environmentally superior alternative. However, while construction noise impacts would be reduced, the impact would still be

significant and unavoidable and the developer would not be able to provide any affordable housing.

SECTION 4. 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 help avoid impacts relating to air quality, energy, greenhouse gas emissions, and transportation.

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, noise impacts relating to groundborne vibration, tribal cultural resources to less than significant levels.

C. Mitigation Measures 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 Reduced Density alternative would achieve most of the objectives, but would still have significant construction noise and would eliminate 20 affordable units for lower income families that the project will provide. Social and economic justifications lead the City Council to reject this alternative.

1. The Reduced Density alternative would reduce the amount of housing available in the City. The City 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 was broken down as follows: above-moderate units -2,595; moderate units – 894; low income units – 761; and very low income units – 1,485. The Reduced Density alternative will cause a loss of 136 units, including 20 units for lower income households. Although only a portion of the Project Site was identified as a Housing Inventory Site, the entire Project of 403 was included in the Housing Element as a credit against future needs.

2. The Reduced Density alternative would not bring the same level of economic benefits to the City. A reduction in size would reduce the both the one-time economic impacts as construction time would be reduced and would also reduce the recurring economic impacts from the Project as proposed.

E. The two No Project alternatives would not achieve any of the project objectives or provide the housing and economic benefits of the Project.

F. The Community Input Alternative responds to the objections raised by the community regarding parking, height and density and provides seven moderate income units; this is a housing income-category that has not previously been provided for anywhere in the City.

SECTION 5. 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 and that impact is temporary in nature (construction noise).

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 and 2,246 units allocated to lower income units. This Community Input Alternative Project will satisfy approximately 10 percent of the City's above-moderate allocation and provide seven moderate income units.

B. The Project will help revitalize a site that does not meet current development standards and whose buildings are in a deteriorated condition.

C. The Project will provide the following one-time economic benefits from the construction:

1. The Project will provide numerous construction jobs amounting to the equivalent of 1,580 total job years. As the Project includes a commitment from the developer to implement a local hiring policy, this will benefit lower income individuals and individuals who live in the City. Additionally, there will be an indirect benefit of additional jobs created because of the construction jobs, amounting to approximately another 414 job years; and

2. Construction is expected to create approximately $109 million in total labor income, due to direct, indirect, and induced workers associate with the construction. Of that, $80.9 million is projected to be paid to onsite construction employees, providing individuals with additional income to spend on services and goods in Gardena; and

3. The principles of Developer also own Tasoro, a company which provides quality building materials for apartments and is located in Gardena. Use of these products will provide sales tax revenue to the City. Additionally, the Development Agreement provides for a local buying program for construction goods as well as a local hire program; and

4. Developer has agreed to file a final map for his project, including the condominium units. Developer will therefore pay in-lieu park fees under the Subdivision Map Act of $10,000 per unit on the 75 condominium units; and

5. Developer will provide one-time construction-related revenues totaling over $3 million, including construction fees, development impact fees, and sales tax from construction materials; and

6. Each contractor that does business in the City will be required to obtain and pay for a City business license.

D. The Project will provide the following recurring annual revenues to the City:

1. The creation of approximately 73 jobs per year which includes 47 direct onsite jobs, plus indirect and induced jobs created in the local economy by residential spending; and

2. Economic output associated with operations of approximately $12.6 million per year in the local economy, of which $7.1 million is attributable to the value of direct project operations and household spending; and

3. Over $455,538 in revenues per year, $444,938 larger than the estimated revenues generated by the current use at the Property. This includes sales tax, property tax, utility tax, and other revenues generated from the new residential units.

E. 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 and will therefore help existing businesses and encourage new businesses.

F. The Project will help encourage people to use alternate means of transportation by providing one-month free transit passes to persons who sign a one-year lease.

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G. The Project will provide off-site safety improvements by providing sidewalks along 169th street where there currently are none.

H. The Project will provide safety improvements by upgrading the railway crossing and sidewalks in front of the Project site along Normandie Avenue.

SECTION 6. Certification. Based on the above, the City Council hereby certifies the Final Environmental Impact Report for the Normandie Crossing Specific Plan Project attached hereto has Exhibits A (Draft EIR) and B (Revised Final and Updated EIR) and adopts the Mitigation Monitoring and Reporting Program attached hereto as Exhibit C.

SECTION 7. 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 Greg Tsujiuchi, Community Development Director who can be reached at 310/217-9546 or gtsujiuchi@cityofgardena.org.

SECTION 8. 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 9. Certification. The City Clerk shall certify the passage of this resolution.

SECTION 10. Effective Date. This Resolution shall be effective immediately.

Passed, approved, and adopted this ____ day of _____, 2025.

_____
TASHA CERDA, Mayor

DRAFT

ATTEST:

_____
MINA SEMENZA, City Clerk

APPROVED AS TO FORM:

_____
LISA KRANITZ, Assistant City Attorney

Exhibit A – Draft EIR, dated December 2023
Exhibit B – Final EIR, dated November 2024
Exhibit C – Mitigation Monitoring and Reporting Program

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Exhibit A – Draft EIR, dated December 2023

CLICK HERE to view

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Exhibit B – Final EIR, dated November 2024

CLICK HERE to view

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Exhibit C – Mitigation Monitoring and Reporting Program

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NORMANDIE CROSSING 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, a qualified archaeologist shall be retained to conduct a Pre-construction Worker Training on the types of unanticipated resources that could be encountered during construction, based on the site's history. This archaeologist may also be retained to ensure prompt assessment in the event that unanticipated cultural resources are encountered during construction.	Prior to any Ground Disturbance	Notification to Construction Personnel	General Contractor		
If archaeological resources are exposed during construction, work within 50 feet of the find must stop until a qualified archaeologist can evaluate the significance of the find. Construction activities may continue in other areas. If the discovery proves significant under CEQA (14 CCR 15064.5[f]; PRC 21082), additional work such as testing, or data recovery may be warranted.	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: 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		
HAZARDOUS MATERIALS & WASTES					
MM HAZ-1: Construction Management Plan. Prior to issuance of any demolition permit for the onsite structures, a construction management plan addressing procedures and requirements for responding to disturbance of undocumented contaminated soil shall be prepared and submitted to the City for review and approval.	Prior to Demolition Permit Issuance	Prepare a Construction Management Plan	Community Development Director		
MM HAZ-2: Engineered Vapor Mitigation and Ventilation. Prior to commencement of construction activities, the City of Gardena Building Department shall review the building plans to verify that an engineered vapor measure (such as an impermeable membrane or equivalent) is included in the design of all townhomes and that the apartment parking structures include sufficient ventilation to minimize accumulation of VOCs on the	Prior to Construction Activities	Verification of an engineered vapor measure within the design of all townhomes and apartment parking structures.	Building and Safety Department Chief Building Official		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
Project site. 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 City of Gardena Building Department shall have oversight/sign-off responsibility for the vapor barrier.					
NOISE					
MM NOI-1: Construction Equipment Noise. Prior to issuance of any Demolition or Grading Permit, the Public Works Department shall verify that the Project plans and specifications include provisions that require all power construction equipment (including combustion engines), fixed or mobile to be: 1) equipped with state-of-the-art noise shielding and muffling devices (consistent with manufactures' standards); and 2) properly maintained to ensure that no additional noise, due to worn or improperly maintained parts, would be generated.	Prior to issuance of any demolition or grading permit	Verification of provisions that require all power construction equipment to be equipped with noise shielding and muffling devices and properly maintained	Public Works Director		
MM NOI-2: Construction Noise. A temporary and impermeable sound barrier shall be provided along the Project northern, southern, and western property line. The temporary sound barrier shall be minimum 10-foot high and provide minimum 12 dBA noise reduction, and shall have a minimum Sound Transmission Class rating of STC-25, such as, acoustical barrier blanket (with STC-25 rating) or 3/4" thick exterior grade plywood.	Prior to and During Construction	Provide a Temporary and Impermeable Sound Barrier	Community Development Director		
MM NOI-3: Construction Vibration Impacts. The use of large construction equipment (e.g., large bulldozer greater than 400 horsepower and/or loaded trucks) shall be a minimum of 45 feet away from the off-site residence adjacent to the Project site (receptor R1) (16964 Brighton Ave).	During Construction	Provide a minimum 45-foot buffer away from residences adjacent to the Project site	Community Development 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 Prior to Commencement of Ground-Disturbing Activities. A. The Applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject Project at all Project locations (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground- disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native	Prior to any Ground Disturbance During Construction Phases Involving Ground-Disturbing Activities	Contract a Tribal Monitor/Consultant Copy of executed monitoring agreement 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
American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Applicant/lead agency upon written request to the Tribe. D. On-site tribal monitoring shall conclude upon the latter of the following: (1) written confirmation to the monitor from a designated point of contact for the Applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project site or in connection with the Project are complete; or (2) a determination and written notification by the monitor to the Applicant/lead agency that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact TCRs.					
MM TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects. A. 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 Public Resources Code § 5097.98, are also to be treated according to this statute. B. If human remains and/or grave goods are discovered or recognized on the Project site, then all construction activities shall immediately cease within 200 feet of the discovery. Health and Safety Code § 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the	During Construction, Upon Discovery of any human remains or grave goods	Telephone communication with the Native American Heritage Commission within 24 hours	County Coroner Native American Heritage Commission Qualified Tribal Monitor/Consultant		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
Native American Heritage Commission, and Public Resources Code § 5097.98 shall be followed. C. Human remains and grave/burial goods found with such remains shall be treated alike per California Public Resources Code § 5097.98(d)(1) and (2). D. Construction activities may resume in other parts of the Project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the monitor determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the Project manager express consent of that determination (along with any other mitigation measures the monitor and/or archaeologist deems necessary). (CEQA Guidelines § 15064.5(f).) E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.					
MM TCR-3: Procedures for Burials and Funerary Remains. This mitigation measure shall only apply if the Gabrielino Band of Mission Indians-Kizh Nation is designated the Most Likely Descendant ("MLD") by the NAHC: A. 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. B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created. C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact.	During Construction, if an Unanticipated Discovery, and the Gabrieleno Band of Mission Indians – Kizh Nation is Designated Most Likely Descendant If there are four or more burials	Implement Koo-nas-gna Burial Policy Creation of a cemetery treatment plan	Tribal Monitor/Consultant		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
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. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials. D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will 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 should be posted outside of working hours. The Tribe will 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 will be removed. E. In the event preservation in place is not possible despite good faith efforts by the Applicant/developer and/or landowner, before ground-disturbing activities may resume on the Project site, the landowner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects. F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should 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	If discovered remains cannot be fully documented and recovered on the same day If preservation in place is not possible	Covering of remains with muslin cloth and a steel plate to protect remains -or- 24-hour guard outside working hours Designation of site location within the footprint of the Project for reburial	Gabrielino Band of Mission Indians-Kizh Nation Native American Heritage Council		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
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between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered. G. The Tribe will work closely with the Project's qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall 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.					

RESOLUTION NO. PC 19-24

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF GARDENA, CALIFORNIA RECOMMENDING THE CITY COUNCIL AMEND THE LAND USE PLAN OF THE CITY OF GARDENA GENERAL PLAN BY CHANGING THE LAND USE DESIGNATION OF THE 5.25 ACRE PROPERTY LOCATED AT 16829, 16835, AND 16907 SOUTH NORMANDIE AVENUE TO SPECIFIC PLAN, CHANGING THE LAND USE DESIGNATION OF THE 0.11 ACRE PROPERTY LOCATED AT 16964 BRIGHTON AVENUE TO SINGLE FAMILY RESIDENTIAL, CHANGING THE LAND USE DESIGNATION OF THE 0.43 ACRE PROPERTY LOCATED AT THE EASTERN EDGE OF THE SPECIFIC PLAN AREA TO PUBLIC/INSTITUTIONAL AND MAKING MINOR TEXT CHANGES PRIMARILY RELATING TO SPECIFIC PLANS

WHEREAS, on December 22, 2021, 16911 Normandie Associates, LLC ("Developer"), filed an application for a General Plan Amendment to the Land Use Plan (the "General Plan Amendment"), Specific Plan, Zone Change, Zoning Code Amendment, Vesting Tentative Tract Map, and Site Plan Review to develop a 273 unit apartment building and 76 townhome style units on a total of 5.25 acres located at 16829, 16835, and 16907 South Normandie Avenue (APN ## 6106-030-011, 6106-030-015, 6106-030-016 - 6106-030-017) (the "Property); and

WHEREAS, on December 22, 2022, Developer amended its project to develop a 328 unit apartment building and 75 townhomes on the Property; and

WHEREAS, the City determined that in addition to the residential development and needed entitlements proposed by Developer, the project should also include revisions to the General Plan land use designations and zoning for two adjacent properties on the same block as the Project to match the actual uses of the properties. Specifically, for the property located at 16964 Brighton Avenue (APN # 6106-030-008), change the General Plan Amendment from Industrial to Single Family Residential and change the zoning from General Industrial (M-2) to Single Family Residential (R-1); and for the property just to the east of the Project site owned by the Southern Pacific Railroad (APN # 6106-030-800), change the General Plan land use designation from Industrial to Public/Institutional and change the zoning from General Industrial (M-2) to Official (O); and

WHEREAS, the General Plan Amendments, Specific Plan, Zone Changes, Zoning Code Amendments, Development Agreement, Site Plan Review, and Vesting Tentative Tract Map are collectively referred to as the Project; and

WHEREAS, on March 19, 2024, 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, but did not recommend approval of the Project; and

WHEREAS, on September 30, 2024, Developer submitted revised plans to the City for a new alternative to be considered which consists of 70 fewer units in the apartment building and a reduction in height level from ground floor from seven stories to five stories, with one underground level of parking (hereafter the "Community Input Alternative;" and

WHEREAS, on December 3, 2024, the Planning Commission held a duly noticed public hearing on the Project, at which time it considered all evidence presented, both written and oral.

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF GARDENA DOES HEREBY RESOLVE AS FOLLOWS:

The Planning Commission hereby recommends that the City Council General Plan Amendment #3-21, which includes the changes to the two adjacent properties. For all the reasons set forth in the Draft City Council Resolution attached as Exhibit 1, the Planning Commission believes that these changes represent good land use practices which are required by public necessity, convenience, and the general welfare.

PASSED, APPROVED, AND ADOPTED this 3rd day of December 2024.

DERYL HENDERSON, CHAIR
PLANNING AND ENVIRONMENTAL
QUALITY COMMISSION

ATTEST:

GREG TSUJIUCHI, SECRETARY
PLANNING AND ENVIRONMENTAL QUALITY COMMISSION
STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
CITY OF GARDENA

I, Greg Tsujiuchi, Planning and Environmental Quality Commission Secretary of the City of Gardena, do hereby certify 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 on the 3rd day of December, 2024, by the following vote:

AYES: Kanhan, Henderson and Sherman
NOES: None
ABSENT: Langley
RECUSE: Wright-Scherr

Attachments:

- Exhibit 1 – City Council General Plan Amendment Resolution
    - Exhibit A – General Plan Land Use Change for GPA #3-21
    - Exhibit B – General Plan Land Use Text Change

RESOLUTION NO.

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 5.25 ACRE PROPERTY LOCATED AT 16829, 16835, AND 16907 SOUTH NORMANDIE AVENUE TO SPECIFIC PLAN, CHANGING THE LAND USE DESIGNATION OF THE 0.11 ACRE PROPERTY LOCATED AT 16964 BRIGHTON AVENUE TO SINGLE FAMILY RESIDENTIAL, CHANGING THE LAND USE DESIGNATION OF THE 0.43 ACRE PROPERTY LOCATED AT THE EASTERN EDGE OF THE SPECIFIC PLAN AREA TO PUBLIC/INSTITUTIONAL AND MAKING MINOR TEXT CHANGES TO THE LAND USE PLAN

WHEREAS, on December 22, 2021, 16911 Normandie Associates, LLC ("Developer"), filed an application for a General Plan Amendment to the Land Use Plan (the "General Plan Amendment"), Specific Plan, Zone Change, Zoning Code Amendment, Vesting Tentative Tract Map, and Site Plan Review to develop a 273 unit apartment building and 76 townhome style units on a total of 5.25 acres located at 16829, 16835, and 16907 South Normandie Avenue (APN ## 6106-030-011, 6106-030-015, 6106-030-016 - 6106-030-017) (the "Property); and

WHEREAS, on December 22, 2022, Developer amended its project to develop a 328 unit apartment building and 75 townhomes on the Property; and

WHEREAS, the City determined that in addition to the residential development and needed entitlements proposed by Developer, the project should also include revisions to the General Plan land use designations and zoning for two adjacent properties on the same block as the Project to match the actual uses of the properties. Specifically, for the property located at 16964 Brighton Avenue (APN # 6106-030-008), change the General Plan Amendment from Industrial to Single Family Residential and change the zoning from General Industrial (M-2) to Single Family Residential (R-1); and for the property just to the east of the Project site owned by the Southern Pacific Railroad (APN # 6106-030-800), change the General Plan land use designation from Industrial to Public/Institutional and change the zoning from General Industrial (M-2) to Official (O); and

WHEREAS, the General Plan Amendments, Specific Plan, Zone Changes, Zoning Code Amendments, Development Agreement, Site Plan Review, and Vesting Tentative Tract Map are collectively referred to as the Project; and

WHEREAS, on March 19, 2024, 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, but did not recommend approval of the Project; and

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WHEREAS, on September 30, 2024, Developer submitted revised plans to the City for a new alternative to be considered which consists of 70 fewer units in the apartment building and a reduction in height level from ground floor from seven stories to five stories, with one underground level of parking (hereafter the "Community Input Alternative;" and

WHEREAS, on December 3, 2024, the Planning Commission held a duly noticed public hearing on the Project, including revisions to the Final EIR to address the new Community Input Alternative submitted by the Developer; and

WHEREAS, at the close of the public hearing the Planning Commission recommended that the City Council certify the Revised and Updated Final EIR, make CEQA findings regarding mitigation measures and alternatives, adopt a statement of overriding considerations, and approve all of the requested entitlements for the Community Input Alternative; and

WHEREAS, on January XX, 2025, 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. xxx 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 Amendments changing the land use designation of the 3.9 acre parcel (APN # 6106-030-017) shown on Exhibit A from Industrial to Specific Plan, and changing the land use designation of the 1.36 acre parcels (APN ## 6106-030-015, 6106-030-016, and 6106-030-011) from Industrial with a High Density 30 Overlay to Specific Plan as shown on Exhibit A and amending the text of the Land Use Plan as shown on Exhibit B is in the public interest for the following reasons:

A. The General Plan Amendment will allow the development of a high-density, 333-unit, residential development made up of 75-townhome style units and 258 first-class apartment units which will provide new and needed housing opportunities in the City. These residential units will provide numerous amenities for the occupants.

B. The General Plan Amendment will allow development of housing which will satisfy approximately 10 percent of the City's Regional Housing Needs Assessment (RHNA) allocation for above-moderate housing and provide seven units for moderate income units for the Sixth Cycle Housing Element.

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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 neighboring cities.

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 and improve safety conditions relating to the railway crossing and sidewalk on Normandie Avenue.

E. The General Plan Amendment which will allow residential uses is more compatible with the surrounding neighborhood than the current designation which allows industrial uses adjacent to residential uses. The High Density 30 overlay already allowed residential development of a portion of the project site.

F. The General Plan Amendment will allow development which will provide the following benefits to the City:

1. 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 and 2,246 units allocated to lower income units. This Project will satisfy approximately 10 percent of the City's above-moderate allocation and provide seven moderate income units.

2. The Project will help revitalize a site that does not meet current development standards and whose buildings are in a deteriorated condition.

3. The Project will provide the following one-time economic benefits from the construction:

4.

a. The Project will provide numerous construction jobs amounting to the equivalent of 1,580 total job years. As the Project includes a commitment from the developer to implement a local hiring policy, this will benefit lower income individuals and individuals who live in the City. Additionally, there will be an indirect benefit of additional jobs created because of the construction jobs, amounting to approximately another 414 job years; and.

b. Construction is expected to create approximately $109 million in total labor income, due to direct, indirect, and induced workers associate with the construction. Of that, $80.9 million is projected to be paid to onsite construction employees, providing individuals with additional income to spend on services and goods in Gardena; and

c. The principles of Developer also own Tasoro, a company which provides quality building materials for apartments and is located in Gardena. Use

of these products will provide sales tax revenue to the City. Additionally, the Development Agreement provides for a local buying program for construction goods as well as a local hire program; and

d. Developer has agreed to file a final map for his project, including the condominium units. Developer will therefore pay in-lieu park fees under the Subdivision Map Act of $10,000 per unit on the 75 condominium units; and

e. Developer will provide one-time construction-related revenues totaling over $3 million, including construction fees, development impact fees, and sales tax from construction materials; and

f. Each contractor that does business in the City will be required to obtain and pay for a City business license.

5. The Project will provide the following recurring annual revenues to the City:

a. The creation of approximately 73 jobs per year which includes 47 direct onsite jobs, plus indirect and induced jobs created in the local economy by residential spending; and

b. Economic output associated with operations of approximately $12.6 million per year in the local economy, of which $7.1 million is attributable to the value of direct project operations and household spending; and

c. Over $455,538 in revenues per year, $444,938 larger than the estimated revenues generated by the current use at the Property. This includes sales tax, property tax, utility tax, and other revenues generated from the new residential units.

6. 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 and will therefore help existing businesses and encourage new businesses.

7. The Project will help encourage people to use alternate means of transportation by providing one-month free transit passes to persons who sign a one-year lease.

8. The Project will provide off-site safety improvements by providing sidewalks along 169th street where there currently are none.

9. The Project will provide safety improvements by upgrading the railway crossing and sidewalks in front of the Project site along Normandie Avenue.

G. Approval of the text changes to the Land Use Plan, as shown in Exhibit B, reflect the updates to Table LU-1 to include the Project.

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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. Housing Element Goal 5.0: Promote equal opportunity for all residents to reside in the housing of their choice;

10. Conservation Plan Goal 2: Conserve and protect groundwater supply and water resources;

11. Conservation Plan Goal 3: Reduce the amount of solid waste produced in Gardena;

12. Conservation Plan Goal 4: Conserve energy resources through the use of technology and conservation methods;

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13. Conservation Plan Goal 5: Protect the City's cultural resources;

14. Public Safety Plan Goal 1: Maintain a high level of fire and police protection for residents, businesses and visitors;

15. Public Safety Plan Goal 2: Protect the community from dangers associated with geologic instability, seismic hazards and other natural hazards;

16. Public Safety Plan Goal 4: Increase public awareness of crime and fire prevention, and emergency preparedness and procedures;

17. Noise Plan Goal 2: Incorporate noise considerations into land use planning decisions; and

18. Noise Plan Goal 3: Develop measures to control non-transportation noise impacts.

I. The General Plan Amendment allows the adoption of the Normandie Crossing Specific Plan. Without this change, the development cannot be built.

J. As demonstrated by the EIR which was certified pursuant to Resolution No. XXX, 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 decades-old buildings that are in a state of disrepair.

SECTION 2. The City Council of the City of Gardena does hereby find that the General Plan Amendment changing the land use designation of the 0.11 acre parcel (APN # 6106-030-008) shown on Exhibit A from Industrial to Single Family Residential is in the public interest as it will provide a land use designation that is consistent with the existing use of the property and consistent with the surrounding neighborhood uses which are residential.

SECTION 3. The City Council of the City of Gardena does hereby find that the General Plan Amendment changing the land use designation of the 0.43 acre parcel (APN # 6106-030-800) shown on Exhibit A from Industrial to Single Family Residential is in the public interest as it will provide a land use designation that is consistent with the existing use of the property.

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SECTION 4. The City Council hereby approves the General Plan Amendments changing the General Plan Land Use Designations of the 3.9 acre parcel (APN # 6106-030-017) shown on Exhibit A from Industrial to Specific Plan, changing the land use designation of the 1.36 acre parcels (APN ## 6106-030-015, 6106-030-016, and 6106-030-011) from Industrial with a High Density 30 Overlay to Specific Plan as shown on Exhibit A, changing the land use designation of the 0.11 acre parcel (APN # 6106-030-008) shown on Exhibit A from Industrial to Single Family Residential, and changing the 0.43 acre parcel (APN 6106-030-800) shown on Exhibit A from Industrial to Public/Institutional. Additionally, the City Council approves the text changes to the City's Land Use Plan as shown on Exhibit B.

SECTION 5. 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 6. 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 Greg Tsujiuchi, Community Development Director who can be reached at 310/217-9546 or gtsujiuchi@cityofgardena.org.

SECTION 7. Certification. The City Clerk shall certify the passage of this resolution.

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SECTION 8. 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 ____day of January, 2025.

TASHA CERDA, Mayor

ATTEST:

MINA SEMENZA, City Clerk

APPROVED AS TO FORM:

LISA KRANITZ, Assistant City Attorney

Exhibit A – General Plan Land Use Change for GPA #3-21

Exhibit B – General Plan Land Use Text Change

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Exhibit A

Adopted General Plan Amendment #3-21

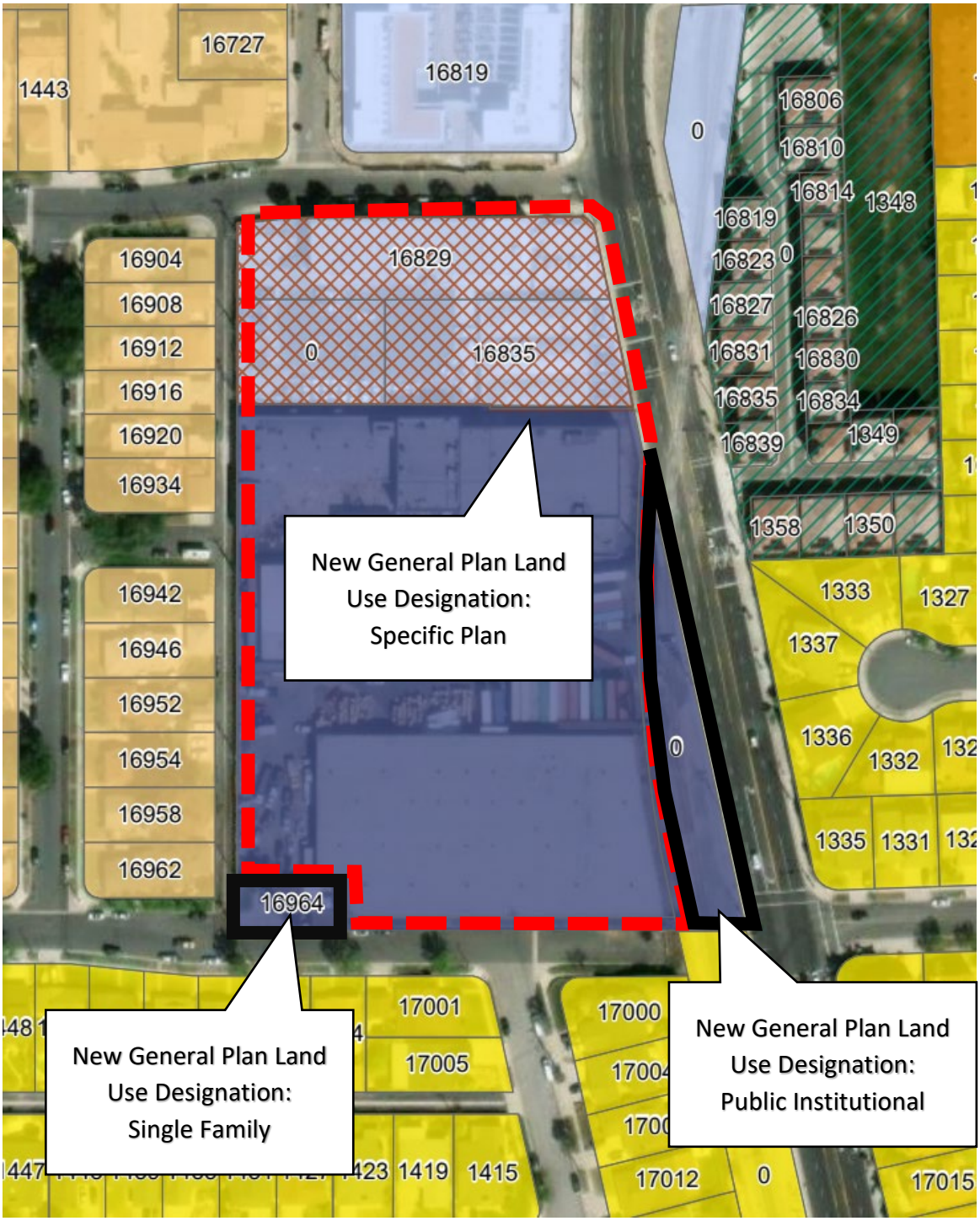

Exhibit B

Table LU-1 – Updated January 2025

Gardena Specific Plans

Specific Plans	Adoption Year	Location	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.
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
1450 Artesia	2023	South east corner of Artesia Blvd. and Normandie Ave.	To be developed with industrial/commercial uses
Normandie Crossing	2025	Southwest corner of Normandie Ave and 169th Street	333 residential unit development

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Resolution No. PC 20-24

A RESOLUTION AN THE PLANNING COMMISSION OF THE CITY OF GARDENA, CALIFORNIA RECOMMENDING THE CITY COUNCIL ADOPT AN ORDINANCE AMENDING SECTION 18.08.010 OF THE GARDENA MUNICIPAL CODE RELATING TO ESTABLISHED ZONES, AMENDING THE GARDENA ZONING MAP BY REZONING THE 5.25 ACRE PROPERTY LOCATED AT 16829, 16835, AND 16907 SOUTH NORMANDIE AVENUE TO NORMANDIE CROSSING SPECIFIC PLAN, REZONING THE 0.11 ACRE PROPERTY LOCATED AT 16964 BRIGHTON AVENUE TO SINGLE FAMILY RESIDENTIAL, REZONING THE 0.43 ACRE PROPERTY LOCATED AT THE EASTERN EDGE OF THE SPECIFIC PLAN AREA TO OFFICIAL, APPROVING THE NORMANDIE CROSSING SPECIFIC PLAN, INCLUDING THE SITE PLAN CONTAINED THEREIN, VESTING TENTATIVE TRACT MAP, APPROVING A DEVELOPMENT AGREEMENT, AND APPROVING AN AFFORDABLE HOUSING AGREEMENT RELATING TO THE NORMANDIE CROSSING SPECIFIC PLAN

WHEREAS, on December 22, 2021 16911 Normandie Associates, LLC ("Developer"), filed an application for a General Plan Amendment to the Land Use Plan (the "General Plan Amendment"), Specific Plan, Zone Change, Zoning Code Amendment, Vesting Tentative Tract Map, and Site Plan Review to develop a 273 unit apartment building and 76 townhome style units on a total of 5.25 acres located at 16829, 16835, and 16907 South Normandie Avenue (APN ## 6106-030-011, 6106-030-015, 6106-030-016 - 6106-030-017) (the "Property); and

WHEREAS, on December 22, 2022, Developer amended its project to develop a 328 unit apartment building and 75 townhomes on the Property; and

WHEREAS, the City determined that in addition to the residential development and needed entitlements proposed by Developer, the project should also include revisions to the General Plan land use designations and zoning for two adjacent properties on the same block as the Project to match the actual uses of the properties. Specifically, for the property located at 16964 Brighton Avenue (APN# 6106-030-008), change the General Plan Amendment from Industrial to Single Family Residential and change the zoning from General Industrial (M-2) to Single Family Residential (R-1); and for the property just to the east of the Project site owned by the Southern Pacific Railroad (APN# 6106-030-800), change the General Plan land use designation from Industrial to Public/Institutional and change the zoning from General Industrial (M-2) to Official (O); and

WHEREAS, the General Plan Amendments, Specific Plan, Zone Changes, Zoning Code Amendment, Development Agreement, Site Plan Review, and Vesting Tentative Tract Map are collectively referred to as the Project; and

WHEREAS, on March 19, 2024, 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, but did not recommend approval of the Project; and

WHEREAS, on September 30, 2024, Developer submitted revised plans to the City for a new alternative to be considered which consists of 70 fewer units in the apartment building and a reduction in height level from ground floor from seven stories to five stories, with one underground level of parking (hereafter the "Community Input Alternative;" and

WHEREAS, on December 3, 2024, the Planning Commission held a duly noticed public hearing on the Project, at which time it considered all evidence presented, both written and oral.

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF GARDENA DOES HEREBY ORDAIN AS FOLLOWS:

SECTION 1.

The Planning Commission hereby recommends that the City Council approve Zone Change #4-21 which includes the changes to the two adjacent properties; Zone Text Amendment #6-21; Specific Plan #1-21; Vesting Tentative Map #4-21; Site Plan Review #11-21; Development Agreement #2-21; and Affordable Housing Agreement for the Project. For all the reasons set forth in the Draft City Council Ordinance and Resolution attached as Exhibit 1 and 2, the Planning Commission believes that these changes represent good land use practices which are required by public necessity, convenience, and the general welfare.

PASSED, APPROVED, AND ADOPTED this 3rd day of December 2024.

DERYL HENDERSON, CHAIR
PLANNING AND ENVIRONMENTAL
QUALITY COMMISSION

ATTEST:

GREG TSUJIUCHI, SECRETARY

PLANNING AND ENVIRONMENTAL QUALITY COMMISSION
STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
CITY OF GARDENA

I, Greg Tsujiuchi, Planning and Environmental Quality Commission Secretary of the City of Gardena, do hereby certify 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 on the 3rd day of December, 2024, by the following vote:

AYES: Kanhan and Henderson
NOES: Sherman
ABSENT: Langley
RECUSE: Wright-Scherr

- Exhibit 1 – City Ordinance for Normandie Crossing Specific Plan Zone Change for ZC #4-21
    - Exhibit A – Normandie Crossing Specific Plan Zone Change for ZC #4-21
    - Exhibit B – Normandie Crossing Specific Plan
    - Exhibit C – Project Plans
    - Exhibit D – Conditions of Approval
    - Exhibit E – Draft Development Agreement
    - Exhibit F – Draft Affordable Housing Agreement

- Exhibit 2 – Draft City Council Resolution for approval of Tentative Tract Map
    - Exhibit A – Vesting Tentative Tract Map No. 83922 (VTM #4-21)
    - Exhibit B – Conditions of Approval

ORDINANCE NO. ____

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 THE GARDENA ZONING MAP BY REZONING THE 5.25 ACRE PROPERTY LOCATED AT 16829, 16835, and 16907 SOUTH NORMANDIE AVENUE TO NORMANDIE CROSSING SPECIFIC PLAN, REZONING THE 0.11 ACRE PROPERTY LOCATED AT 16964 BRIGHTON AVENUE TO SINGLE FAMILY RESIDENTIAL, REZONING THE 0.43 ACRE PROPERTY LOCATED AT THE EASTERN EDGE OF THE SPECIFIC PLAN AREA TO OFFICIAL, APPROVING THE NORMANDIE CROSSING SPECIFIC PLAN, INCLUDING THE SITE PLAN CONTAINED THEREIN, APPROVING A DEVELOPMENT AGREEMENT, AND APPROVING AN AFFORDABLE HOUSING AGREEMENT RELATING TO THE NORMANDIE CROSSING SPECIFIC PLAN

WHEREAS, on December 22, 2021 16911 Normandie Associates, LLC ("Developer"), filed an application for a General Plan Amendment to the Land Use Plan (the "General Plan Amendment"), Specific Plan, Zone Change, Zoning Code Amendment, Vesting Tentative Tract Map, and Site Plan Review to develop a 273 unit apartment building and 76 townhome style units on a total of 5.25 acres located at 16829, 16835, and 16907 South Normandie Avenue (APN ## 6106-030-011, 6106-030-015, 6106-030-016 - 6106-030-017) (the "Property); and

WHEREAS, on December 22, 2022, Developer amended its project to develop a 328 unit apartment building and 75 townhomes on the Property; and

WHEREAS, the City determined that in addition to the residential development and needed entitlements proposed by Developer, the project should also include revisions to the General Plan land use designations and zoning for two adjacent properties on the same block as the Project to match the actual uses of the properties. Specifically, for the property located at 16964 Brighton Avenue (APN# 6106-030-008), change the General Plan Amendment from Industrial to Single Family Residential and change the zoning from General Industrial (M-2) to Single Family Residential (R-1); and for the property just to the east of the Project site owned by the Southern Pacific Railroad (APN# 6106-030-800), change the General Plan land use designation from Industrial to Public/Institutional and change the zoning from General Industrial (M-2) to Official (O); and

WHEREAS, the General Plan Amendments, Specific Plan, Zone Changes, Zoning Code Amendment, Development Agreement, Site Plan Review, and Vesting Tentative Tract Map are collectively referred to as the Project; and

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WHEREAS, on March 19, 2024, 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; and

WHEREAS, on April 2, 2024, the Planning Commission adopted PC Resolution No. 4-24, recommending that the City Council certify the Environmental Impact Report, but did not recommend approval of the Project; and

WHEREAS, after the Planning Commission's actions, Developer attended a community meeting where the project was discussed; and

WHEREAS, on September 30, 2024, Developer submitted revised plans to the City for a new alternative to be considered which consists of 70 fewer units in the apartment building and a reduction in height level from ground floor from seven stories to five stories, with one underground level of parking (hereafter the "Community Input Alternative;" and

WHEREAS, on December 3, 2024, the Planning Commission held a duly noticed public hearing on the Project, including revisions to the Final EIR to address the new Community Input Alternative submitted by the Developer; and

WHEREAS, at the close of the public hearing the Planning Commission recommended that the City Council certify the Revised Final EIR, make CEQA findings regarding mitigation measures and alternatives, adopt a statement of overriding considerations, and approve all of the requested entitlements for the Community Input Alternative; and

WHEREAS, on January __, 2025, the City Council of the City of Gardena held a duly noticed hearing on the Project;

WHEREAS, after the close of the public hearing and prior to adopting this Resolution, the City Council adopted Resolution No. xxx 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;

WHEREAS, after the close of the public hearing and prior to adopting this Ordinance the City Council also adopted Resolution No. XX approving the General Plan Amendment; and

WHEREAS, the Site Plan is incorporated into the Specific Plan and therefore requires approval by the City Council;

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

SECTION 1. Specific Plan Findings.

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A. The Normandie Crossing Specific Plan will act as the zoning for the Property and establishes the permitted uses and development standards that apply to the Project.

B. The Specific Plan contains all of the requirements required by Government Code section 65451.

SECTION 2. Findings – Zoning Entitlements. The City Council of the City of Gardena does hereby find as follows with regard to the Normandie Crossing Specific Plan, associated zone changes for the Specific Plan area, and zoning code amendment (collectively, "Specific Plan Zoning Entitlements"):

A. The Zoning Code Amendment establishes a new zone, the Normandie Crossing Specific Plan zone. Creation of this zone is desirable and necessary to implement the proposed Project as the land use designation of the Specific Plan Property was changed to Specific Plan. Without amending the Gardena Zoning Code, the current zoning would not permit this residential development.

B. The Specific Plan Zoning Entitlements will allow the development of a high-density, 333-unit residential development consisting of a 258 first-class apartment project and 75 townhome style condominium units in the southern portion of Gardena. The apartment building will provide seven affordable units for moderate income households, providing a variety of new and needed housing opportunities in the City. The 258 market rate units satisfies approximately 10 percent of the City's Regional Housing Needs Assessment (RHNA) allocation for above-moderate housing for the Sixth Cycle Housing Element. A majority of the Specific Plan area, 3.9 acres, was not included on the Site Inventory for the City's 6th Cycle Housing Element because the residential development was already being discussed with the City and the project is listed in the Housing Element as a pending project and the 403 units were accounted for in determining the City's remaining RHNA obligation.

C. The Specific Plan Zoning Entitlements will allow a residential development which will provide needed housing to nearby employers in the City of Gardena as well as the neighboring cities.

D. The Specific Plan Zoning Entitlements will allow a development which will help revitalize a site that is rundown and does not meet current development standards and improve safety conditions relating to the railway crossing and sidewalk on Normandie Avenue.

E. A residential development is more compatible with the surrounding properties which are residential on all sides. The existing zoning allows industrial uses.

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F. The Specific Plan Zoning Entitlements will allow development which will provide the following benefits to the City:

1. 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 and 2,246 units allocated to lower income units. This Project will satisfy approximately 10 percent of the City's above-moderate allocation and provide seven moderate income units.

2. The Project will help revitalize a site that does not meet current development standards and whose buildings are in a deteriorated condition.

3. The Project will provide the following one-time economic benefits from the construction:

a. The Project will provide numerous construction jobs amounting to the equivalent of 1,580 total job years. As the Project includes a commitment from the developer to implement a local hiring policy, this will benefit lower income individuals and individuals who live in the City. Additionally, there will be an indirect benefit of additional jobs created because of the construction jobs, amounting to approximately another 414 job years.

b. Construction is expected to create approximately $109 million in total labor income, due to direct, indirect, and induced workers associate with the construction. Of that, $80.9 million is projected to be paid to onsite construction employees, providing individuals with additional income to spend on services and goods in Gardena.

c. The principles of Developer also own Tasoro, a company which provides quality building materials for apartments and is located in Gardena. Use of these products will provide sales tax revenue to the City. Additionally, the Development Agreement provides for a local buying program for construction goods as well as a local hire program.

d. Developer has agreed to file a final map for his project, including the condominium units. Developer will therefore pay in-lieu park fees under the Subdivision Map Act of $10,000 per unit on the 75 condominium units.

e. Developer will provide one-time construction-related revenues totaling over $3 million, including construction fees, development impact fees, and sales tax from construction materials.

f. Each contractor that does business in the City will be required to obtain and pay for a City business license.

4. The Project will provide the following recurring annual revenues to

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the City:

a. The creation of approximately 73 jobs per year which includes 47 direct onsite jobs, plus indirect and induced jobs created in the local economy by residential spending.

b. Economic output associated with operations of approximately $12.6 million per year in the local economy, of which $7.1 million is attributable to the value of direct project operations and household spending.

c. Over $455,538 in revenues per year, $444,938 larger than the estimated revenues generated by the current use at the Property. This includes sales tax, property tax, utility tax, and other revenues generated from the new residential units.

5. 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 and will therefore help existing businesses and encourage new businesses.

6. The Project will help encourage people to use alternate means of transportation by providing one-month free transit passes to persons who sign a one-year lease.

G. Approval of the Specific Plan Zoning Entitlements 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 are consistent with the Land Use Plan.

2. The Zoning Changes implement a number of Goals 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. Land Use Policy 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;

c. Land Use Policy 1.5: Provide adequate residential amenities such as open space, recreation, off-street parking and pedestrian features in multifamily residential developments;

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d. Economic Development Plan Goal 3: Attract desirable businesses to locate in the City;

e. Community Design Plan Goal 1: Enhance the visual environmental and create a positive image of the City;

f. Community Design Plan Goal 2: Enhance the aesthetic quality of the residential neighborhoods in the City;

g. 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;

h. 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;

i. Housing Element Goal 3.0: Minimize the impact of governmental constraints on housing construction and cost;

j. 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;

k. Housing Element Goal 5.0: Promote equal opportunity for all residents to reside in the housing of their choice;

l. Conservation Plan Goal 2: Conserve and protect groundwater supply and water resources;

m. Conservation Plan Goal 3: Reduce the amount of solid waste produced in Gardena;

n. Conservation Plan Goal 4: Conserve energy resources through the use of technology and conservation methods;

o. Conservation Plan Goal 5: Protect the City's cultural resources;

p. Public Safety Plan Goal 1: Maintain a high level of fire and police protection for residents, businesses and visitors;

q. Public Safety Plan Goal 2: Protect the community from dangers associated with geologic instability, seismic hazards and other natural hazards;

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r. Public Safety Plan Goal 4: Increase public awareness of crime and fire prevention, and emergency preparedness and procedures;

s. Noise Plan Goal 2: Incorporate noise considerations into land use planning decisions; and

t. Noise Plan Goal 3: Develop measures to control non-transportation noise impacts.

H. The Zoning Entitlements implement the public convenience, general welfare and good land use practice for the reasons set forth above.

SECTION 3. Additional Zoning Changes.

A. Approval of the zone change for the 0.11 acre parcel located at 16964 Brighton Avenue will bring the zoning into compliance with the use of the property at that location and the zone change will be consistent with the General Plan amendment.

B. Approval of the zone change for the 0.43 acre parcel located on the east side of the Specific Plan area will bring the zoning into compliance with the use of the property at that location and the zone change will be consistent with the General Plan amendment.

SECTION 4. Development Agreement Findings.

In addition to the benefits described above relating to the Specific Plan Zoning Entitlements, the Development Agreement provides the following additional benefits:

A. 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 in exchange for providing valuable development rights of a high-density mixed-use housing project along with a 5 year entitlement with two 5 year extension options.

B. 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 increased sales tax revenues.

C. The Development Agreement will provide for seven moderate income rental units in the City with a guaranteed affordability of 55 years.

SECTION 5. No Net Loss Findings.

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A. The three parcels of land comprising the 1.36 acres on the northern portion of the development (APN 6106-030-015, 6106-030-016, and 6106-030-011) have a high density 30 general plan overlay and a zoning overlay of high density 30 (HO-4). These parcels were identified as inventory sites in the City's 6th Cycle 2021 – 2029 Housing Element and there was to be a total of 31 moderate income units on these sites.

B. Pursuant to Government Code section 65863, the City must make sure development opportunities remain available throughout the planning period to accommodate the City's regional housing needs allocation (RHNA), especially for lower and moderate income households. When the City approves a development on an inventory site with fewer units than shown in the Housing Element, it must make findings that the remaining sites have sufficient capacity to accommodate the remaining unmet RHNA by each income level and the approval is consistent with the adopted General Plan.

1. The City's RHNA allocation for moderate income is 894 units; the 6th Cycle Housing Element identified sites for 1797 moderate income units, leaving a surplus of 913 units. Therefore, there are more than sufficient sites to provide for the fact that no moderate units will be built on the identified sites.

2. Prior to adopting this Ordinance, the City Council adopted Resolution No. XX changing the land use designation to Specific Plan. This project is consistent with the General Plan as amended and the Housing Element which included adequate surplus inventory to account for the situation that not all properties would develop with housing at the assumed income levels.

SECTION 6. 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

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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 Crossing Specific Plan
Normandie Estates Specific Plan
Normandie Place Specific Plan
Redondo Village Specific Plan
Platinum Row Specific Plan

SECTION 7. Legislative Approvals.

Based on the findings set forth above:

A. The City Council hereby approves the zone change of the 3.9 acre parcel of the Specific Plan Area (APN # 6106-030-017) from General Industrial (M-2) to Normandie Crossing Specific Plan as shown in Exhibit A, attached hereto and incorporated herein by reference;

B. The City Council hereby approves the zone change of the 1.36 acre parcels of the Specific Plan Area (APN ## 6106-030-015, 6106-030-016, and 6106-030-011) from Industrial (M-1) with a High Density 30 Overlay (HO-4) to Normandie Crossing Specific Plan as shown in Exhibit A, attached hereto and incorporated herein by reference;

C. The City Council hereby approves the zone change to the 0.11 acre parcel (APN # 6106-030-008) from General Industrial (M-2) to Single-Family Residential (R-1) as shown on Exhibit A, attached hereto and incorporated herein by reference;

C. The City Council hereby approves the zone change to the 0.43 acre parcel located to the east of the Specific Plan area (APN # 6105-030-800) from General Industrial (M-2) to Official (O), as shown in Exhibit A, attached hereto and incorporated herein by reference;

D. The City Council hereby approves the Normandie Crossing Specific Plan, a copy of which is attached hereto as Exhibit B, subject to the conditions of approval

attached hereto as Exhibit D, which exhibits are attached hereto and incorporated herein by reference.

E. The City Council hereby approves the Development Agreement attached hereto as Exhibit E, attached hereto and incorporated herein by reference.

SECTION 8. Site Plan Approval.

The Site Plan for the Project is included as Exhibit A to the Specific Plan and is approved as part of the Specific Plan. The plans being approved are dated November 1, 2024, and attached hereto as Exhibit C. The City Council makes the following findings with regard to the Site Plan:

A. The physical location, size, massing, setbacks, pedestrian orientation, and placement of proposed structures on the site and the location of proposed uses within the project are consistent with the applicable standards:

Analysis: The project is consistent with the applicable standards as the standards are set forth in the Normandie Crossing Specific Plan and the Project implements this Plan.

B. The development is consistent with the intent and general purpose of the general plan and provisions of the Zoning Code:

Analysis: The Land Use Designation for the Property is Specific Plan and the zoning is Normandie Crossing Specific Plan. As the development implements the Specific Plan, it is consistent with both the General Plan land use designation and the zoning. Additionally, the development implements numerous other goals and policies of the Specific Plan as outlined above.

C. The health and safety services (police and fire) and public infrastructure are sufficient to accommodate the new development:

Analysis: The development has been reviewed by the Gardena Police Department and the Los Angeles County Fire Department. Neither Department has raised any issues regarding the ability to provide services. Additionally, the project has received will serve letters from the various utilities.

D. The project is compatible with the surrounding sites and neighborhoods:

Analysis: The project is a high-density residential project located on a major collector street. Property immediately to the north is developed with an SRO project that has density of 90 units/acre. The density of the apartment building, which is along Normandie Avenue, is 120 units/acre. The apartment buildings are buffered from the

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existing residential zones to the west and south by the 3-story townhome units which have a density of 24 units/acre.

E. The project has been determined to be exempt from CEQA or the appropriate environmental document has been completed and required findings have bene made:

Analysis: An EIR has been prepared for the Project in accordance with CEQA and the CEQA Guidelines.

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. Custodian of Record. Each and every one of the findings and determinations in this Ordinance 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 Greg Tsujiuchi, Community Development Director who can be reached at 310/217-9546 or gtsujiuchi@cityofgardena.org.

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 ____ day of _____, 2025.

DRAFT

TASHA CERDA, Mayor

ATTEST:

MINA SEMENZA, City Clerk

APPROVED AS TO FORM:

LISA E. KRANITZ, Assistant City Attorney

on the findings set forth above:

- Exhibit A – Normandie Crossing Specific Plan Zone Change for ZC #4-21
- Exhibit B – Normandie Crossing Specific Plan
- Exhibit C – Project Plans
- Exhibit D – Conditions of Approval
- Exhibit E – Development Agreement
- Exhibit F – Draft Affordable Housing Agreement

DRAFT

Exhibit A

Adopted Zone Change #4-21

CITY OF GARDENA
PLANNING AND ENVIRONMENTAL QUALITY COMMISSION

STAFF REPORT
Environmental Assessment #20-21; General Plan Amendment #3-21; Zone Change #4-21; Zone Text Amendment #6-21; Specific Plan #1-21; Vesting Tentative Map #4-21; Site Plan Review #11-21; Development Agreement #2-21; And Affordable Housing Agreement
AGENDA ITEM #6.B

DATE: December 3, 2024

TO: Chair Henderson and Members of the Planning and Environmental Quality Commission

FROM: Greg Tsujiuchi, Director of Community Development

PREPARED BY: Amanda Acuna, Community Development Manager

APPLICANT: Saiko Investment Corporation (Representative: Fred Shaffer, and Steve Ludwig)

LOCATION: 16829, 16835, 16907, and 16911 S. Normandie Avenue (APNs: 6106-030-011, 015, 016, and 017)

Other Sites: APN: 6106-030-008 and APN: 6106-030-800

REQUEST: The Applicant requests the following entitlements to establish the Normandie Crossing Specific Plan to construct a 333 residential unit development:

NORMANDIE CROSSING SPECIFIC PLAN PROJECT

- **Specific Plan (SP #1-21):** providing for development of a six-story residential apartment building with one level below grade, which would include 258 residential dwelling units, including 7 units for moderate income households, and 75 three-story residential townhomes.
- **General Plan Amendment (GPA #3-21):** changing the land use designation on the General Plan Land Use Map from Industrial and Industrial/High Density 30 Overlay to Specific Plan.
- **Zone Change (ZC #4-21):** changing the zoning from M-1 with HO-4 overlay and M-2 zone to the Normandie Crossing Specific Plan Zone.
- **Zone Text Amendment (ZTA #6-21):** amending the Gardena Municipal Code by adding a new zoning designation of the Normandie Crossing Specific Plan Zone.
- **Site Plan Review (SPR #11-21):** approving the physical design of the development.

- **Vesting Tentative Map (VTM #4-21):** to merge four lots into one with condominiums for the townhomes and one parcel for the apartment building.
- **Development Agreement (DA #2-21)**: 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 community benefits to the City.
- **Affordable Housing Agreement:** between the City and the developer that guarantees 7 units will remain affordable to moderate income households for a 55-year period.

Approval of these items requires certification of an Environmental Impact Report (EA # 20-21; SCH #2023050241), adoption of a Mitigation Monitoring and Reporting Plan, and CEQA required findings, and a Statement of Overriding Considerations.

Additional Zone Change & General Plan Amendments: As part of the overall project, staff is recommending the Zoning map and General Plan Land Use map amendments of two separate parcels, immediately adjacent to the project site, to correspond to the existing land uses within each parcel.

BACKGROUND

On December 22, 2021, a formal application was filed by Saiko Investment Corporations (the "Applicant") for the Normandie Crossing Specific Plan project, a 273-unit, seven-story, apartment building and 76 townhome style units on a total of 5.25 acres project area. The project was later revised to a 328-unit apartment building and 75 townhomes on the property in the same amount of building space. Prior to formal submittal, the Applicant presented a similar project type to the City Council at a special study session in October of 2021.

On March 19, 2024, the Applicant presented to the Planning Commission the Normandie Crossing Specific Plan proposal to allow the construction of 403 mixed residential units, including a commitment to reserve 20 units for lower-income households. During the meeting the Commission and staff received several public comments from members of the public, with some supporting the project, while others expressed concerns about the density and potential impact of this residential use in the area.

After considering all evidence and public comments, the Planning Commission closed the hearing and passed Resolution No. PC 4-24 by a 3-0-2 vote, recommending that the City Council certify the Environmental Impact Report for the Normandie Crossing Specific Plan Project, with two Commissioners abstaining due to conflicts of interest. Immediately thereafter,, a motion to adopt Resolution No. PC 5-24, recommending approval of the General Plan Amendments under GPA #3-21, was made but failed with a 2-1-2 vote. The Planning Commission also directed staff to prepare a resolution recommending denial of the remaining entitlements requested. On April 2, 2034, staff presented Resolution No. PC 6-24, which passed by a 3-0-2 vote, with abstentions due to conflicts of interest.

On April 2, 2024, the Applicant formally announced to the Planning Commission and the public that they would not proceed with the 403-unit development as initially proposed. Instead, they intended to resubmit an alternative project with reduced density.

The Applicant then engaged with local community members to gather additional input for the project design. They met with residents in the surrounding area and conducted one-on-one discussions with business owners. The applicant took the comments from the Planning Commission and the community into a revised project that took into account concerns raised regarding height, density, parking and access from West 170th Street. This revised project is referred to as the "Community Input Alternative."

On September 30, 2024, the Applicant submitted revised project plans with decreased density (hereafter referred to as the "Community Input Alternative), to be brought back to the Planning Commission for further review. This report has been prepared to explain the changes to the project since the March 19, 2024, Planning Commission meeting and to compare it with other similar projects recently approved by the Commission. The Environmental Impact Report has also been updated to show a new Alternative and therefore is being brought back to Commission for consideration.

For additional details regarding the subject property and the original proposal, the staff report prepared for the March 19, 2024, meeting is attached as Attachment A.

REVISED PROJECT OVERVIEW - COMMUNITY INPUT ALTERNATIVE

The Community Input Alternative still proposes the demolition of all existing structures and the construction of a residential development. The Community Input Alternative makes the following changes to the original project:

Table 1 – Project Comparison

Normandie Crossing Specific Plan			
	Previous Proposal	**Community Input Alternative**	**Change**
Total Number of Dwelling Units	403	333	-70
Apartment Bldg.	328	258	-70
Townhome Bldgs.	75	75	Same
Number of Stories for Apartment Bldg.	7-stories above grade	6-stories total 5 above grade 1 subterranean	-1 in total -2 above grade
Height			
Apartment Bldg.	90 feet	70 feet	-20 feet
Townhome Bldg.	40 feet	40 feet	Same
Parking			
Apartments	399 spaces Avg. 1 space/unit	387 spaces Avg. 1.5 space/unit	+0.5 spaces/unit

	No guest parking	29 guest stalls	+29 guest stalls
Townhomes	150 spaces 10 guest stalls	150 spaces 19 guest stalls	Same +9 guest stalls

The other major change in response to community concerns is the realignment of the entry on 170th Street so that it will align with Brighton Way and not shine into the home at directly across the street. Other changes include reconfiguring the apartment building lobby, relocating Elevator 4 closer to the 169th Street corner to facilitate move-ins away from the lobby, making minor adjustments to the common amenity spaces, and converting a portion of the amenity area into additional guest parking.

SETTING

The project area is comprised of four separate parcels that are generally bound by 169th Street to the north, 170th Street to the south, Normandie Avenue to the east, and a public alleyway to the west, known as Brighton Way. For a more detailed discussion of the project area and its surrounding uses, please refer to the staff report presented to the Planning Commission on March 19, 2024, which is attached as Attachment A.

Figure 1: Project Subareas & Offsite Improvements

COMMUNITY INPUT ALTERNATIVE ANALYSIS

The project area will continue to be divided into two subareas, as illustrated in Figure 1 above.

SUBAREA A

Subarea A would be developed with a 244,971-sf apartment building, for 258 units, including 7 affordable units for moderate income households. The apartment building will have parking on one subterranean level and on the first above ground story. There will be four stories above the parking with a maximum height of 70 feet, as measured from the finished floor. The apartment units range in housing types from studio to two-bedroom units. The apartment building would provide 387 unbundled vehicle parking spaces, as required by state law, 50 percent of which may be compact spaces, and 29 guest parking spaces. Additionally, no more than 110 tandem spaces that can be leased as a pair to a single unit. The specific Plan will ensure that none of the parking spaces will be allowed to be leased to non-residents of the apartment building.

As part of the project, the Los Angeles County Fire Department has required that the south side of 169th Street be designated with red curbing to serve as a fire lane. Therefore, the street parking spaces along this section of 169th Street, located between Brighton Way (the alley west of the project) and Normandie Avenue, will no longer be available for public parking. As part of the project, the Applicant has ensured that five parking spaces in Subarea A will remain available to the public. These spaces will be

located outside the apartment building and accessible from Normandie Avenue, designated specifically for public use.

Subarea A will provide 69 on-site bicycle parking spaces for residents (65 secured long-term and 4 short-term spaces). The following amenities will be provided to the residents and guests of the apartment building: a roof deck with seating area; a swimming pool with BBQ and seating areas; a dog park; a fitness room; club house; and a large courtyard with seating area.

SUBAREA B

Subarea B will continue to provide 75 three-story townhome-style units with a maximum height of 40 feet. These units will surround the apartment building on the east and south sides and act as a buffer between the apartment building and surrounding residential uses to the west and south. Each unit will be three or four bedrooms and will include a two-car garage and three levels of living space. In addition to the two-car garage for each unit, 19 guest spaces will be provided within Subarea B. Subarea B will provide the following amenities: a private yard or balcony; a communal swimming pool with BBQ and seating areas; a club house; and a dog park.

OFFSITE IMPROVEMENTS

Approximately 266 linear feet of offsite sidewalk improvements will be provided along the south side of 169th Street, just west of the project area, between Brighton Way and the alley just west of Brighton Avenue. The sidewalk improvements will be constructed pursuant to Municipal Code Section 17.08.170.

Additionally, the project will include various railroad track and roadway improvements along South Normandie Avenue pursuant to current California Public Utilities Commission (CPUC) standards and UPRR guidelines which will improve the safety of the railroad crossing at that location.

PROJECT ENTITLEMENTS

The current General Plan Land Use and Zoning designations of the subject properties do not allow for the proposed project. Therefore, the Applicant is requesting the approval of several entitlements that will allow for an overall residential density of 63 dwelling units per acre (DU/AC). The Applicant's primary request is for the adoption of the Specific Plan; other requests including a General Plan Amendment, Zone Change, and Zone Text Amendment, are needed to establish this plan within the City's corresponding policy documents. The Applicant is also requesting that the City enter into a development agreement which will guarantee the development rights in exchange for benefits the City. These requests are considered legislative actions and require the approval of the City Council.

In addition to the needed legislative approvals, the Applicant is seeking approval of a tentative tract map, site plan review, and affordable housing agreement that guarantees that 7 units will remain affordable to moderate income households for a 55-year period.

The Planning Commission is being asked for its recommendation on the requested entitlements to the City Council.

SECTION 1: SPECIFIC PLAN #1-21

The Normandie Crossing Specific Plan includes information for City staff, the community, and the Planning Commission on how the project site will be developed and how it is consistent with the City of Gardena General Plan. A Specific Plan is a regulatory document prepared pursuant to the provisions of California Government Code sections 65450 through 65457 and provides a framework for development of the project site, including permitted uses and development standards. Upon approval of the legislative actions, the Specific Plan will establish the zoning for the subject property, to prevail over the City's Zoning Ordinance. The following tables provide a summary of the development standards proposed in the Specific Plan for each Subarea. Development standards not covered by the Specific Plan will be regulated by the Gardena Municipal Code.

Table 2a – Development Standards Subarea A (Apartments)

STANDARD	REQUIREMENT
Permitted Uses Residential	Multi-family housing; Short-term corporate housing*; Residential amenities and ancillary uses, including home occupations
Prohibited Uses	Short-term rentals; Home-sharing rentals
Density/Capacity (Based on total Plan Area)	63 DU/AC 258 Apartment Units
Building Height (above grade)	5 stories and 70 feet
Dwelling Unit Size - Minimum	Studio: 450-sf 1 Bedroom: 550-sf 2 Bedrooms: 850-sf (plus 150-sf for additional bedrooms)
Setbacks	Front (Normandie Avenue): 10 feet Side (169th Street): 10 feet
Minimum Open Space Private (50-sf/DU for 60% of the units) Common (Outdoors or Indoors)	 7,750-sf 21,739-sf

Minimum Landscape (Based on total Plan Area)	20,083-sf
Parking	387 spaces; up to 50% compact
Guest Parking	29 spaces
Public Parking	Five parking spaces along Normandie Avenue
Parking Dimensions	Compact: 9' x 16' Standard: 9' x 18'
Bicycle Parking	69 spaces for the residents (65 secured long-term and 4 short-term spaces)
** 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 of less than 30 days.*	

DU= Dwelling Units AC= Acres -sf= Square feet

Table 2b – Development Standards Subarea B (Townhomes)

STANDARD	REQUIREMENT
Permitted Uses Residential	Multi-family housing, including attached and detached townhome style units, and residential amenities and ancillary uses, including home occupations, and any use customarily incidental to a permitted use.
Prohibited Uses	Short-term rentals; Home-sharing rentals
Density/Capacity	63 DU/AC (based on total Plan Area) 75 Townhome Units
Building Height	3 stories and 40 feet
Dwelling Unit Size - Minimum	None
Setbacks	Front (Normandie Avenue): 10 feet Rear (Brighton Way): 10 feet Side (170th Street): 10 feet
Minimum Open Space Private (50-sf/DU) Common (Outdoors or Indoors)	 3,750-sf 7,130-sf
Minimum Landscape (Based on total Plan Area)	20,083-sf
Parking (2 spaces/DU)	150 spaces

Guest Parking	19 spaces
Parking Dimensions	2-car garage: 20’ x 19’ Tandem garage: 10’ x 33’
Bicycle Parking	None

DU= Dwelling Units AC= Acres -sf= Square feet

A. ACCESS/PARKING

Vehicle Access
Vehicular access to the project site would be provided by the following four driveways, and as shown in Figure 2.

- Driveway 1 would serve Subarea A and provide access to the apartment building’s parking garage from 169th Street, west of Normandie Avenue.

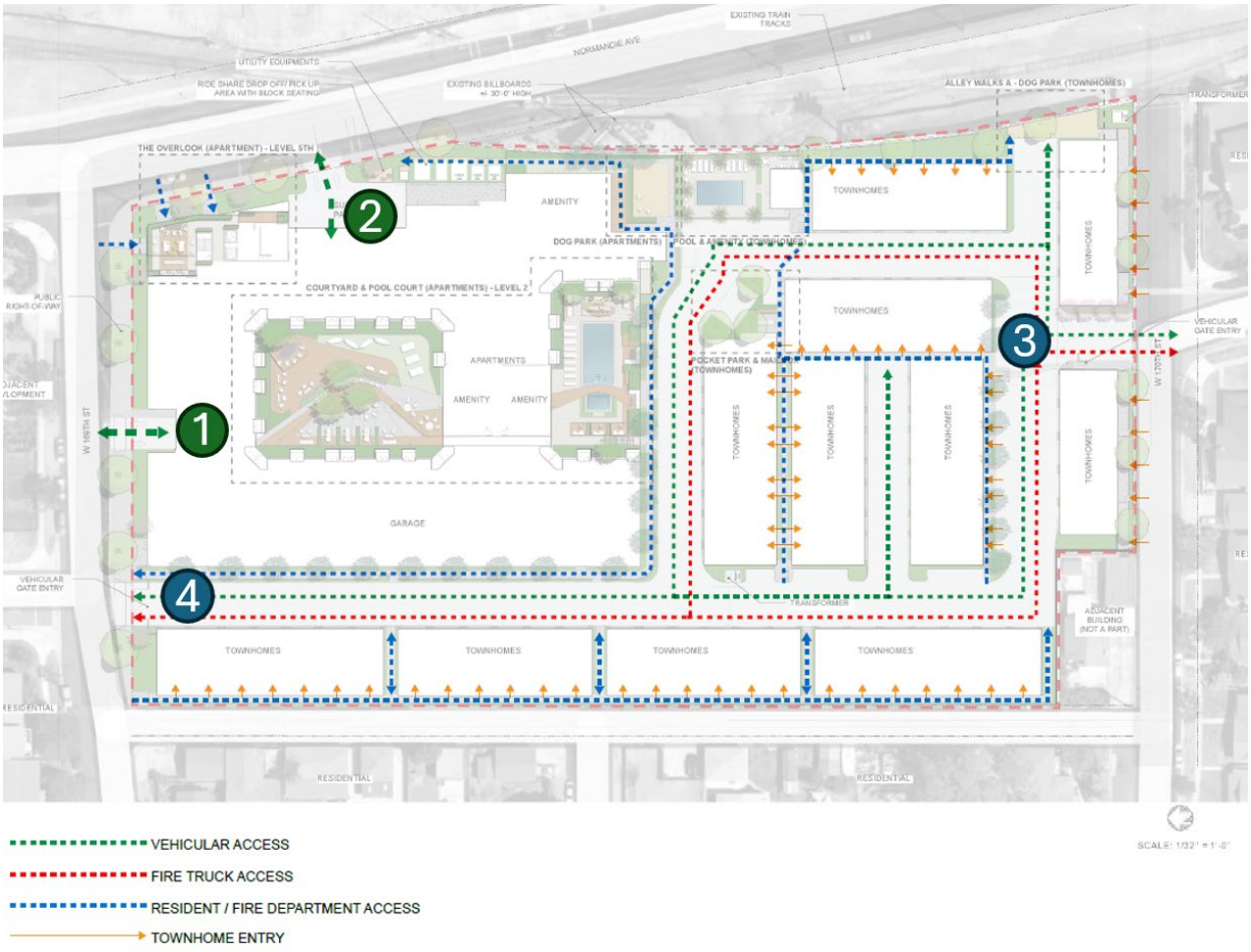
- Driveway 2 would serve Subarea A and provide a right-in/right-out only driveway that would also serve the apartment building’s parking garage from southbound Normandie Avenue.

- Driveway 3 would serve Subarea B and provide access to the townhomes from 170th Street. The driveway approach was redesigned to align with Brighton Way Street at the south end, minimizing the potential for vehicle headlights to shine into any windows. This driveway would still serve as fire truck access for both Subareas A and B.

- Driveway 4 would serve Subarea B and provide access to the townhomes from 169th Street. This driveway would also serve as fire truck access for both Subareas A and B.

For onsite pedestrian access, the project proposes sidewalk improvements along the project frontages (i.e., 169th and 170th Streets, South Normandie Avenue, and Brighton Way).

Figure 2: Driveways



SECTION 2: GENERAL PLAN AMENDMENT (GPA #3-21), ZONE CHANGE (ZC #4-21), AND ZONE TEXT AMENDMENT (ZTA #6-21)

If the Planning Commission recommends and the City Council adopts the Specific Plan, then there must be consistency with the General Plan Land Use Plan and the City's Zoning Code and Map. In order to establish consistency, the following legislative approvals are required:

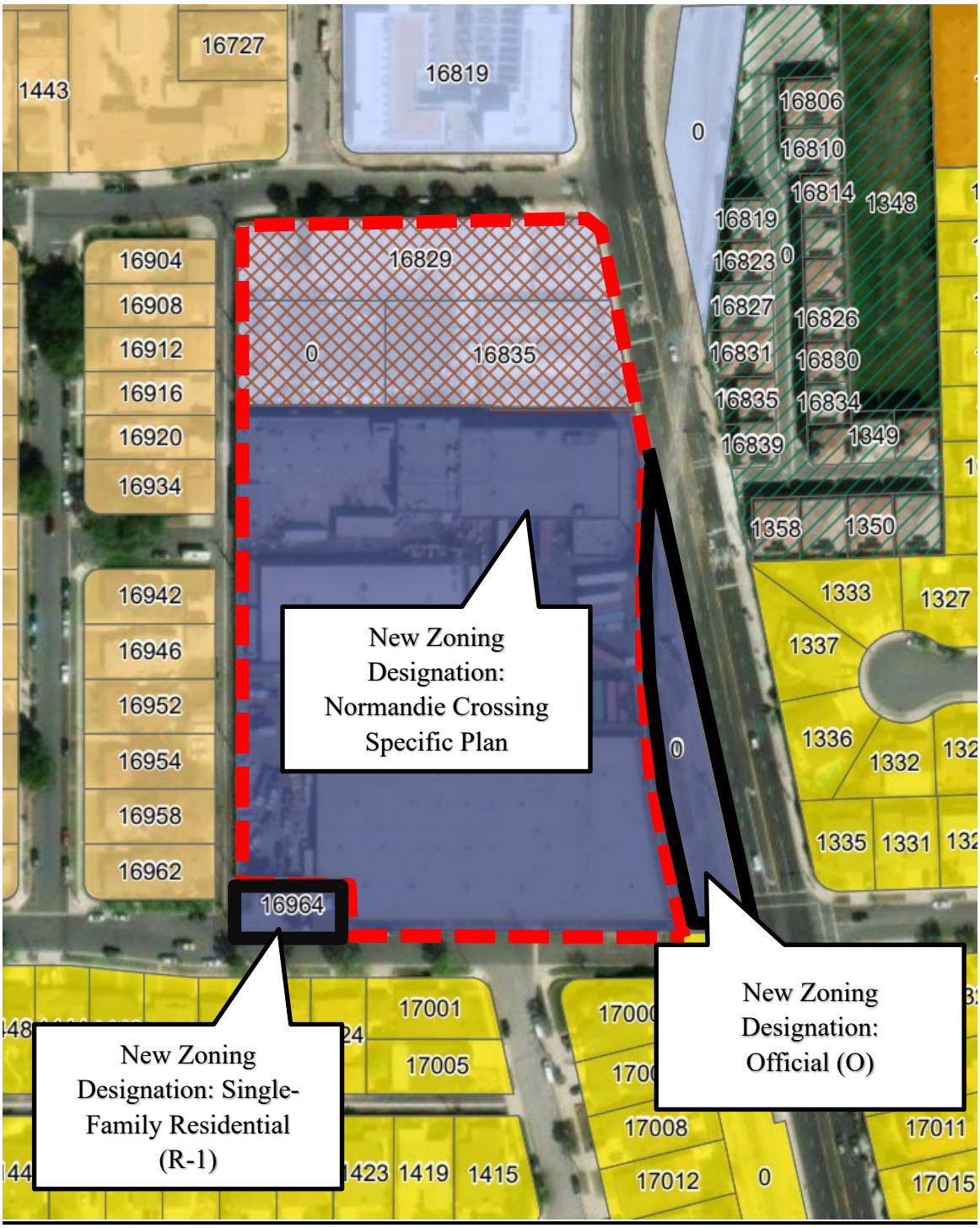
1. General Plan Amendment: changing the land use designation on the General Plan Land Use Map from Industrial and Industrial/High Density 30 Overlay to Specific Plan;
2. Zone Change: changing the zoning from M-1 with HO-4 overlay and M-2 zone to the Normandie Crossing Specific Plan Zone; and
3. Zone Text Amendment: amending the Gardena Municipal Code by adding a new zoning designation of the Normandie Crossing Specific Plan Zone.

These legislative actions would allow the redevelopment of the property to allow for the 333 new residential units. This development would be consistent with the various goals and policies of the Gardena General Plan, as indicated under Chapter 6 of the Normandie Specific Plan. The project proposes to consolidate the identified parcels, in addition to the adjacent 3.9-acre lot in order to develop the project. Additionally, Housing Programs 2.2 and 4.3 of the City's Housing Element plans calls for promoting lot consolidation and housing construction, particularly affordable housing, by facilitating communications between interested property owners and potential developers.

Although not part of the Normandie Crossing Specific Plan, staff is recommending the clean-up of the land use designations and zoning of the two adjacent properties at 16964 Brighton Avenue and the Union Pacific Railroad parcel immediately east of the project site, to correspond to the existing land uses within each parcel as specified below:

Figure 3: General Plan Amendment #3-21

Figure 4: Zone Change #4-21



SECTION 3: SITE PLAN REVIEW #5-21 & VTTM

For a more detailed discussion on the analysis to the request of the Site Plan Review and Tentative Tract Map request for the project, please refer to the staff report presented to the Planning Commission on March 19, 2024, which is attached as Attachment A.

SECTION 4: DEVELOPMENT AGREEMENT

To strengthen the public planning process, encourage private participation in comprehensive planning, and reduce the economic risk of development, the Legislature of the State of California adopted the Development Agreement Statutes which authorizes the City to enter into binding agreements with persons having a legal or equitable interest in real property, to provide for the development of such property and to vest certain development rights therein. In exchange, the City may obtain benefits that it would not otherwise be able to get.

Development Agreement #2-21 is an agreement between the City and developer that guarantees the right to build the development as set forth in the Specific Plan for a period of 5 years with one 5-year extension available at the request of either party. In return, the Applicant has agreed to provide benefits to the City in the way of 7 moderate income housing units and improvements to the right-of-way along West 169th Street. Additionally, the City will receive the benefit of, a local hiring/local buying program for construction, and will offer all new residents who enter into a 12 month lease a one-time free monthly Zone 1 EZ Transit Pass to encourage the use of mass transit.

Under the Development Agreement, the developer may rent, rather than sell, the townhome style condominium units. However, the $750,000 in lieu park fees will be required to be paid regardless.

SECTION 5: AFFORDABLE HOUSING AND NO NET LOSS ANALYSIS

The project includes 7 affordable units, at a moderate-income level, that will have the same high-quality design as the other residential units. This project helps satisfy the City's Regional Housing Needs Allocation (RHNA) of 5,735 units including 894 moderate units. The other 251 apartment units and 75 townhomes will assist the City's in meeting its above moderate allocation of 2,595 units.

Housing Element law requires the City to always maintain an adequate inventory of sites for all income levels and the city is required to track approvals to insure such properties remain available. In determining the number of sites to be made available, the City was able to deduct projects that were in the pipeline. The line for "Credits with ADUs" included credit for the proposed 403 units which were originally proposed, including proposed, including 20 lower income units.

Unfortunately, because the project was amended partway through the housing element, the Housing Element sites inventory still showed 31 moderate income housing units being developed on the northern portion and these units must also be accounted for.

If the Community Input Alternative is approved, the City will still have sufficient surplus to meet its RHNA at all income levels, as shown below:

Figure 3: No Net Loss Calculation*

	Lower Income Units	**Moderate Income Units**	**Above Moderate Income Units**
RHNA	**2,246**	**894**	**2,595**
Credits w/ADUs	131	10	1,108
Remaining RHNA	2,115	884	1,487
Sites Inventory	2,636	1,797	2,153
Surplus at Housing Element Adoption	**+521**	**+913**	**+666**
Adjust for Project - Picerne	-69	-27	+223
Community Input Alternative	**-20**	**-24**	**-57**
New Surplus	**+432**	**+862**	**+832**

* This does not account for any ADU approvals or housing projects of less than 4 units which would increase the surplus.

SECTION 6: BENEFITS

The following is a summary of the benefits the project would bring to the City:

- 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 and 894 units allocated to moderate income units. This Project will satisfy approximately 10 percent of the City's remaining above-moderate allocation and provide 7 moderate income units.

- The Project will help revitalize a site that does not meet current development standards and whose buildings are in a deteriorated condition.

- The Applicant provided an economic analysis for the original project prepared by the RCLOCO (Attachment E) and economic and market research company. An updated analysis was provided (Attachment F) to show the updated estimated revenue generated for the City in the form of fees and taxes from the new development and to evaluate the incremental impact on the local economy during the construction. Based off this memo the Project will provide the following one-time economic benefits from the construction:

- The project will provide numerous construction jobs amounting to the equivalent of 1,580 total job years (up form 1,270). As the Project includes a commitment from the developer to implement a local hiring policy, this will benefit lower income individuals and individuals who live in the City. Additionally, there will be an indirect benefit of additional jobs created because of the construction jobs, amounting to approximately another 414 jobs.

- Construction is expected to create approximately $109 million in total labor income, due to direct, indirect, and induced workers associate with the construction. Of that, $80.9 million is projected to be paid to onsite construction employees, providing individuals with additional income to spend on services and goods in Gardena.

- The principles of Developer also own Tasoro, a company which provides quality building materials for apartments and is located in Gardena. Use of these products will provide sales tax revenue to the City. Additionally, the Development Agreement provides for a local buying program for construction goods as well as a local hire program.

- The Developer has agreed to file a final map for his project, including the condominium units. Developer will therefore pay in-lieu park fees under the Subdivision Map Act of $10,000 per unit on the 75 condominium units

- Developer will provide one-time construction-related revenues totaling over $3 million, including construction fees, development impact fees, and sales tax from construction materials.

- Each contractor that does business in the City will be required to obtain and pay for a City business license.

- The Project will provide recurring annual revenues to the City as follows:
  - The creation of approximately 73 jobs per year which includes 47 direct onsite jobs, plus indirect and induced jobs created in the local economy by residential spending.

  - Economic output associated with operations of approximately $12.6 million per year in the local economy, of which $7.1 million is attributable to the value of direct project operations and household spending.

  - Over $455,538 in revenues per year, $444,938 larger than the estimated revenues generated by the current use at the Property. This includes sales tax, property tax, utility tax, and other revenues generated from the new residential units.

- 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 and will therefore help existing businesses and encourage new businesses.

- The Project will help encourage people to use alternate means of transportation by providing one-month free transit passes to persons who sign a one-year lease.

- The Project will provide off-site safety improvements by providing sidewalks along 169th street where there currently are none.

- The Project will provide upgrades to the Railroad Crossings which will improve safety.

ENVIRONMENTAL CONSIDERATIONS

After Developer submitted plans for the Community Input Alternative, the City's Consultant provided an analysis of this alternative. The analysis showed that there would be no new significant impacts, no increase in the severity of any identified significant impacts, and no new mitigation measures that would be required. Kimley-Horn and Associates prepared a Revised Final EIR dated November 2024. This document amended the previous Final EIR in part by including a thorough analysis of the Community Input Alternative and responding to all comments that had been received after the close of the public comment period on the DEIR. Although not required by law, the Revised Final EIR was sent to those who previously made comments. Justification for approving this Alternative is included in the draft City Council Resolution certifying the EIR.

The Revised Final EIR was independently reviewed by City staff. In making all of the required findings, the Planning Commission is being asked to exercise its independent judgment and analysis and make a recommendation to the City Council on certification of an the Revised Final EIR, adoption of a Mitigation Monitoring and Reporting Plan, making the findings for a Statement of Overriding Considerations.

ADDITIONAL INFORMATION

EIR Certification

Certification of the EIR is an independent action from project approvals. Certification of the EIR is not a vote for or against a project; rather, it is a vote stating that the EIR was prepared in compliance with CEQA and adequately addresses all of the environmental issues. If the Planning Commission feels that the EIR meets the requirements of CEQA, then there should be a recommendation for certification of the EIR. By doing this, the EIR can be used as a base document for other projects to tier off of, even if the project is not approved.

Required Vote

Pursuant to state law, it takes a majority vote of the entire membership to recommend approval of the General Plan amendment. As two of the Commissioners (Langley and Wright-Scheer) are conflicted, this would mean all three remaining members would have to vote in favor of the General Plan amendment for it to be considered a recommendation for approval. The remaining entitlements only require approval by a majority of the quorum, i.e., two of the three members.

NOTICING/PUBLIC COMMENTS

The public hearing notice for the project was published in the Gardena Valley News and mailed first class to owners and occupants within a 300-foot radius of the site on November 21, 2024. A copy of Proof of Publication and Affidavit of Mailing are on file in the office of the Community Development Department, Room 101, City Hall, and are considered part of the administrative record.

Following the Planning Commission meeting on March 19, 2024, the Applicant also met individually with local business owners, lead to obtaining 35 letters of support from these businesses (see Attachment G).

In addition, the Applicant held a community meeting on November 18, 2024, where notices were sent out to all owners and occupants within a 300-foot radius of the site.

RECOMMENDATION

Staff recommends the Planning and Environmental Quality Commission to:

1) Conduct the public hearing;
2) Receive testimony from the public;
3) Recommend to the City Council to certify the FEIR 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;
4) Make a recommendation on the following:
    a) Whether to approve General Plan Amendment #3-21, which includes the changes to the two adjacent properties.

    b) Whether to approve the remaining requested entitlements under the project: Zone Change #4-21 which includes the changes to the two adjacent properties; Zone Text Amendment #6-21; Specific Plan #1-21; Vesting Tentative Map #4-21; Site Plan Review #11-21; Development Agreement #2-21; and Affordable Housing Agreement subject to the attached conditions of approval for the Community Input Alternative which responds to community concerns.

ATTACHMENTS

A – Staff Report Presented at the March 19, 2024, Commission meeting

B – Planning Commission Resolution for EIR Certification (PC No. 18-24)

- Exhibit 1 – City Council CEQA Resolution
    - Exhibit A – Draft EIR, dated December 2023
    - Exhibit B – Final EIR, dated November 2024
    - Exhibit C – Mitigation Monitoring and Reporting Program

C - Draft Planning Commission Resolution for General Plan Amendment (PC No. 19-24)

- Exhibit 1 – Draft City Council General Plan Amendment Resolution
    - Exhibit A – General Plan Land Use Change for GPA #3-21
    - Exhibit B – General Plan Land Use Text Change Excerpts

D – Draft Planning Commission Resolution for– City Council Ordinance Adopting the Specific Plan, Changing the Zoning, Approving the Zoning Code Amendment, Approving the Development Agreement, and Approving the Vesting Tentative Tract Map (PC No. 20-24)

- Exhibit 1 – Draft City Ordinance for Normandie Crossing Specific Plan Zone Change for ZC #4-21
    - Exhibit A – Normandie Crossing Specific Plan Zone Change for ZC #4-21
    - Exhibit B – Normandie Crossing Specific Plan
    - Exhibit C – Project Plans
    - Exhibit D – Conditions of Approval
    - Exhibit E – Draft Development Agreement
    - Exhibit F – Draft Affordable Housing Agreement

- Exhibit 2 – Draft City Council Resolution for approval of Tentative Tract Map
    - Exhibit A – Vesting Tentative Tract Map No. 83922 (VTM #4-21)
    - Exhibit B – Conditions of Approval

E – Original Economic Analysis Report prepared by RCLCO, dated December 2023

F – Revised Economic Analysis Memo prepared by RCLCO, Dated November 2024

G – Letters of Support from Local Businesses

CITY OF GARDENA
PLANNING AND ENVIRONMENTAL QUALITY COMMISSION

STAFF REPORT
Environmental Assessment #20-21; General Plan Amendment #3-21; Zone Change #4-21; Zone Text Amendment #6-21; Specific Plan #1-21; Vesting Tentative Map #4-21; Site Plan Review #11-21; Development Agreement #2-21; And Affordable Housing Agreement
AGENDA ITEM #6.A

DATE: March 19, 2024

TO: Chair Henderson and Members of the Planning and Environmental Quality Commission

FROM: Greg Tsujiuchi, Director of Community Development

PREPARED BY: Amanda Acuna, Community Development Manager

APPLICANT: Saiko Investment Corporation (Representative: Fred Shaffer)

LOCATION: 16829, 16835, 16907, and 16911 S. Normandie Avenue (APNs: 6106-030-011, 015, 016, and 017)

Other Sites: APN: 6106-030-008 and APN: 6106-030-800

REQUEST: The applicant requests the following entitlements to develop a 328 residential unit, seven-story apartment building with related residential amenities and 75 three-story townhomes units, within a 5.25-acre property:

1. General Plan Amendment (GPA #3-21) changing the land use designation on the General Plan Land Use Map from Industrial and Industrial/High Density 30 Overlay to Specific Plan;
2. Zone Change (ZC #4-21) changing the zoning from M-1 with HO-4 overlay and M-2 zone to the Normandie Crossing Specific Plan Zone;
3. Zone Text Amendment (ZTA #6-21) amending the Gardena Municipal Code by adding a new zoning designation of the Normandie Crossing Specific Plan Zone;
4. Specific Plan (SP #1-21) providing for development of a seven-story residential apartment building, which would include 328 residential dwelling units, including 20 units for low income households, and 75 residential detached townhomes;
5. Site Plan Review (SP #11-21) approving the physical design of the development;
6. Vesting Tentative Map (VTM #4-21), to merge four lots into one with condominiums for the townhomes and one parcel for the apartment building.

7. Development Agreement (DA #2-21) 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 community benefits to the City including affordable housing and a monetary payment; and

8. Affordable Housing Agreement between the City and the developer that guarantees 20 units will remain affordable to lower income households for a 55-year period.

As part of the overall project, staff is recommending the Zoning Map and General Plan Land Use map amendments of two separate parcels, immediately adjacent to the project site, to correspond to the existing land uses within each parcel. The first is a change to the residential parcel at 16964 Brighton Avenue, from an Industrial Land Use designation to Single Family Residential and changing the zoning from General Industrial (M-2) designation to Single-Family Residential (R-1). The second is a change to the Union Pacific Railroad parcel immediately adjacent and east of the project site, from an Industrial Land Use designation to Public/Institutional designation and changing the zoning from a General Industrial (M-2) designation to Official (O).

Approval of these items requires certification of an Environmental Impact Report (EA # 20-21), adoption of a Mitigation Monitoring and Reporting Plan, and a Statement of Overriding Considerations.

BACKGROUND/SETTING FOR NORMANDIE CROSSING SPECIFIC PLAN PROJECT

In October 2021, the Gardena City Council held a special study session meeting at which time they were presented with a potential development for a high-density residential development of an area located west of Normandie Avenue between 169th Street and West 170th Street. At the special study session, the following items were raised by the council: proposed railroad improvements, egress and ingress off of Normandie Avenue, providing ample open space for the residents, provided sufficient parking for residents, proposed building massing, traffic concerns to nearby residents; and providing proper lighting and quality landscaping throughout the site.

After the study session, a formal application was filed on December 22, 2021, to develop a 273-unit apartment building and 76 townhome style units on a total of 5.25 acres project area. The development project was later revised to propose a 328-unit apartment building and 75 townhomes on the property in the same amount of building space, which would require the following entitlements: General Plan Amendment, adoption of a Specific Plan, Zone Change, Zone Text Amendment, Development Agreement, Vesting Tentative Tract Map and Site Plan Review. As the project will provide 20 lower income affordable units, the developer will be required to enter into an affordable housing agreement with the City guaranteeing the affordability

The project area is comprised of four separate parcels that are generally bound by 169th Street to the north, 170th Street to the south, Normandie Avenue to the east, and a public

alleyway to the west, known as Brighton Way. The project area does not include the single-family home located at 16964 Brighton Avenue (Figure 1: Project Overview) or the property owned by the Union Pacific Railroad to the east. The properties are currently developed with six industrial buildings totaling 115,424 square feet (-sf). Other existing site conditions include asphalt surface parking lots and other hardscapes throughout with minimal landscaping located along the southern end of the site (Figures 2a-2d: Existing Conditions). The buildings were originally constructed between 1952 and 1876 and were utilized for operations of food production by various companies.

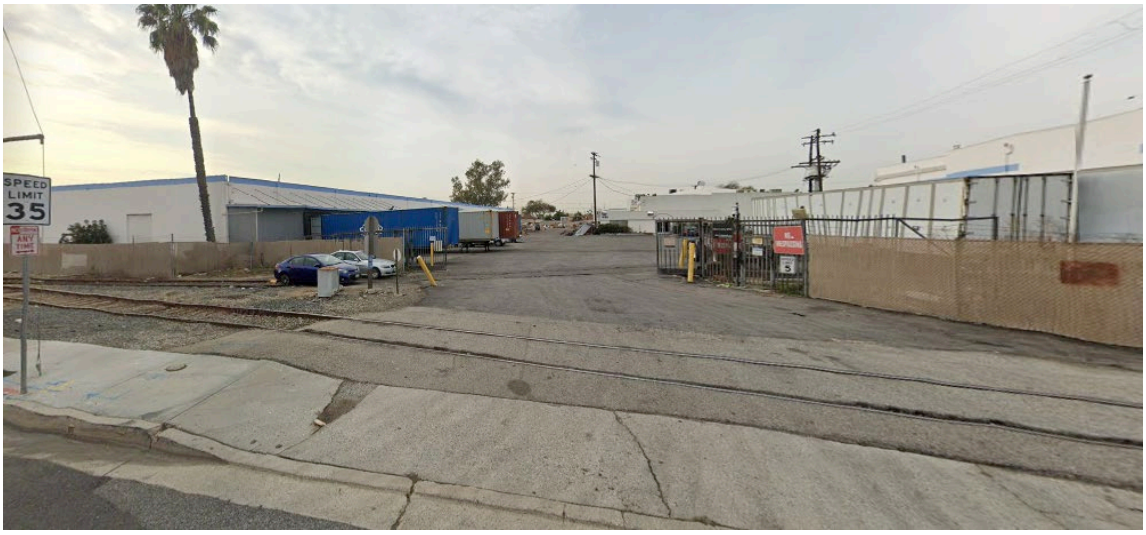
Figure 1: Project Overview

Since the original construction of the buildings only minor building permits for roof repairs, electrical panel upgrades, and perimeter fencing have been issued for the subject properties. Code Enforcement records show the site has been in violation of various City municipal codes relating to property maintenance, such as overgrown vegetation, for the past several years. Additionally, in recent years the Traffic Division of the Gardena Police Department conducted additional traffic enforcement for the parking of semi-trailers and trucks of the industrial businesses within the center median along Normandie Avenue causing the potential for traffic hazards.

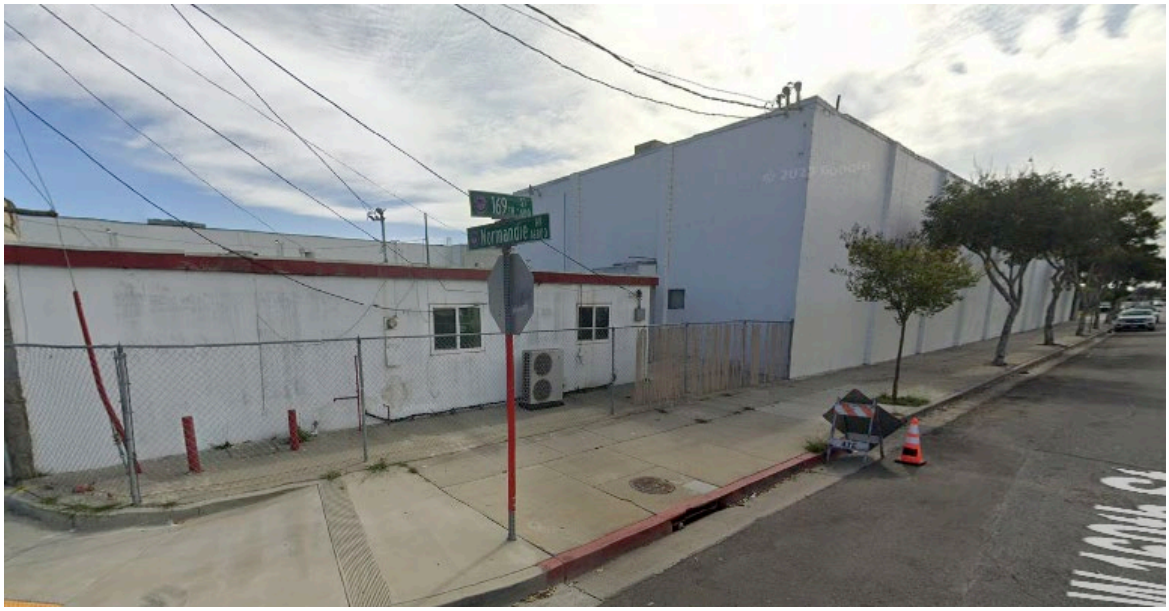
The majority of the project site is zoned General Indistrial (M-2) while approximately 1.36 acres of the northern end has a zoning designation of Industrial (M-1) and a Housing Overlay (HO-4) which allows for up to 30 dwelling units per acre (Figure 3: Zoning Map). Immediate surrounding uses to the subject property include a 63 single room occupancy (SRO) dwelling units to the north across 169th Street, the Union Pacific Railroad (UPRR) railroad tracks and spurs directly east of the site, and a mix of single family and low density multi-family residential dwelling units to the east across Normandie Avenue, to the south across 170th Street and to the west across a public alleyway (Table 1 – Surrounding Uses). As mentioned, there is one single-family residential dwelling unit immediately adjacent and southwest to the project site located at 16964 Brighton Avenue, which is not part of the applicant's project area.

Figure 2: Existing Conditions

2.a - From Normandie Avenue



2.b - from the corner of Normandie Avenue and 169th Street



2.c - From 170th Street

2.d - From the corner of 169th Street and Brighton Way (alleyway)

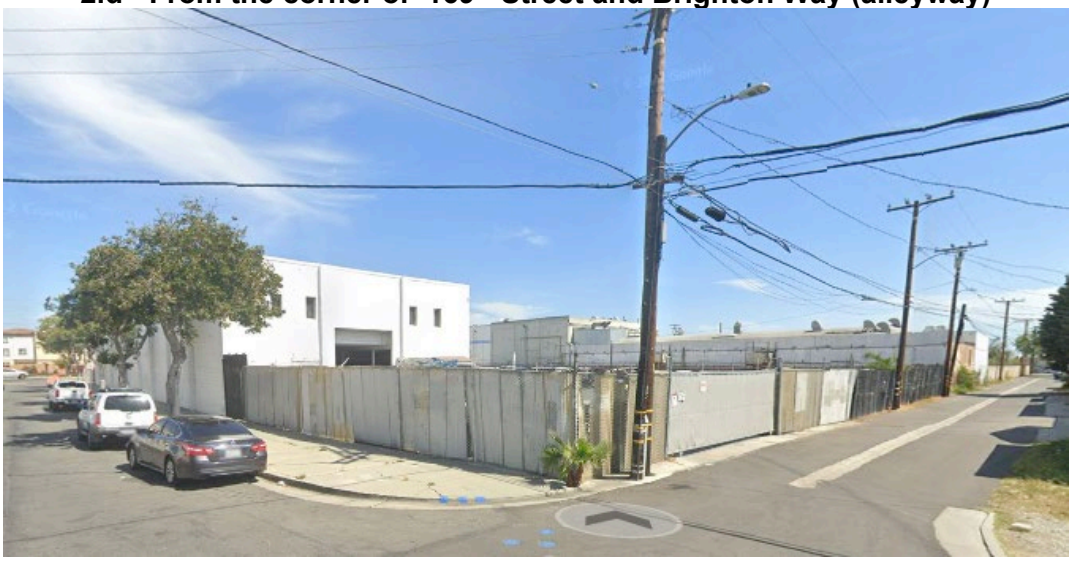
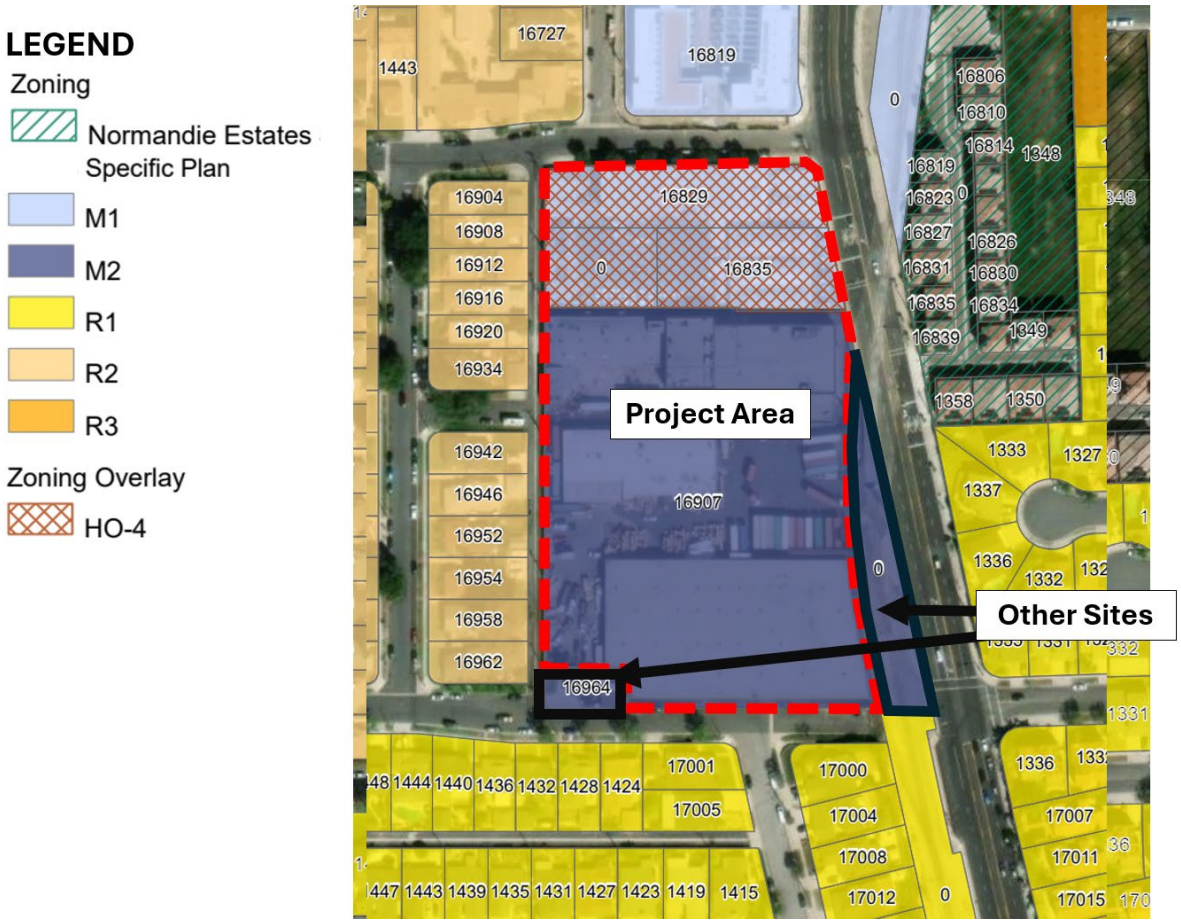


Table 1 – Surrounding Uses

	Zoning Designation	General Plan Land Use Designation	Existing Land Use
Project Site	M-2, and M-1/HO-4	Industrial, and Industrial/Housing Overlay 30	Food Manufacturers
North	M-1 and R-2	Industrial and Low Density Residential	SRO Dwelling Units Multi-Family Residential Homes
South	M-2 and R-1	Industrial and Single Family Residential	Single Family Homes
East	M-1, NESP, and R-1	Industrial, Specific Plan, and Single Family Residential	Single and Multi-family Residential Homes
West	R-2	Low Density Residential	Single and Multi-family Residential Homes

Figure 3: Zoning Map



PROJECT OVERVIEW

The applicant is proposing to demolish all existing structures and to develop a 403 residential unit development that would include various housing types. The project would divide the area into two subareas, as shown in Figure 4. Subarea A would be developed with a 308,308-sf apartment building, for 328 residential units, including 20 affordable units for lower income households. The apartment building will be seven stories with a maximum height of 90 feet. The building will include five residential floors over a two-story parking structure. The apartment units range in housing types from studio to two-bedroom units and in size from 547-sf to 1,112-sf. The apartment building would provide 399 unbundled vehicle parking spaces, 50 percent of which may be compact spaces. Additionally, no more than 90 tandem spaces that can be leased as a pair to a single unit. Five of the parking spaces in Subarea A will be located in a publicly accessible space outside of the apartment building for public use to help make up for the removal parking spaces on 169th Street which is a requirement of the Fire Department.

The apartment building will also provide 173 on-site bicycle parking spaces for residents (157 secured long-term and 16 short-term spaces). Subarea A will provide the following amenities: a roof deck with BBQ and seating area; a swimming pool with BBQ and seating areas; a dog park; a fitness room; club houses; a large courtyard with seating area, and game tables; and co-working spaces.

Subarea B provides 75 three-story townhome-style units with a maximum height of 40 feet. These units will ring the apartment building and act as a buffer between the apartment building and surrounding residential uses to the west and south. Each unit will be three or four bedrooms and will include a two-car garage and three levels of living space. In addition to the two-car garage for each unit, 10 guest spaces will be provided within Subarea B. Subarea B will provide the following amenities: a swimming pool with BBQ and seating areas; a dog park; a club house; and a playground.

Figure 4: Project Subareas & Offsite Improvements

The proposed building design for both subareas will incorporate a modern architectural style. The apartment building will have various architectural features and materials along each side of the buildings, including street facing balconies, step backs of upper floors, and roof top decks that assist in creating visual interest. The 75 townhome units will be located within 10 buildings and each will be three stories in height. The units will have

balconies on the second floors and variations in rooflines and materials throughout all sides.

The project calls for a minimum setback of 10 feet along from all property lines, for all buildings, in addition to a ten-foot radii corner cut-off dedication, at the northwest corner of Brighton Way alleyway and 169th Street. As part of the project, the applicants would also be subject to removing and replacing all sidewalks, streets, curbs and gutters along each street frontage. In addition to the public rights-of-way improvements that front the project area, the applicant's proposal will provide for offsite sidewalk and railroad improvements.

Approximately 266 linear feet of offsite sidewalk improvements will be provided along the south side of 169th Street, just west of the project area, between Brighton Way and the alley just west of Brighton Avenue. The sidewalk improvements will be constructed pursuant to Municipal Code Section 17.08.170. Additionally, the project proposes various railroad track and roadway improvements along South Normandie Avenue pursuant to current California Public Utilities Commission (CPUC) standards and UPRR guidelines which will improve the safety of the railroad crossing at that location.

The current General Plan Land Use and Zoning designations of the subject properties do not allow for the density of the proposed project. Therefore, the applicant is requesting to establish the Normandie Crossing Specific Plan, which will allow for an overall residential density of 77 dwelling units per acre (DU/AC). The applicant's primary request is for the adoption of the Specific Plan, and other requests including a General Plan Amendment, Zone Change, and Zone Text Amendment, are needed to establish this plan within the City's corresponding policy documents. The applicant is also requesting that the City enter into a development agreement which will guarantee the development rights in exchange for benefits the City would not otherwise be able to receive. These requests are considered legislative actions and require the approval of the City Council.

In addition to the needed legislative approvals, the applicant is seeking approval of a tentative tract map, site plan review, and affordable housing agreement that guarantees that 20 units will remain affordable to lower income households for a 55-year period.

PROJECT ENTITLEMENTS

A majority of the project area is currently zoned M-2, while 1.36 acres of the project area on the northern end has a zoning designation of M-1 with a Housing Overlay (HO-4). The HO-4 zone allows for a maximum density of 30 DU/AC, while the M-2 zone allows for a maximum permitted floor area ratio (FAR) for industrial uses of 1.0, except for amenity hotels, which may have a FAR of up to 2.0, and maximum building height of 35 feet when within one hundred feet of a R-1 or R-2 zone. By comparison, the project is proposing a mixed of residential dwelling types that would allow for a density of 77 DU/AC, and a building height of up to seven stories and 90 feet for the apartment building that are situated along Normandie Avenue and three-story townhomes and 40 feet in height along the west and north sides of the project site. In order to allow for the proposed development, the applicant is requesting the adoption of the Normandie Crossing Specific

Plan that has been structured to the specific development design standards of the project. The following sections provide an overview of the all the various entitlements being requested. The Planning Commission is being asked for their recommendation on the following entitlements to the City Council:

- General Plan Amendment (GPA #3-21) changing the land use designation on the General Plan Land Use Map from Industrial and Industrial/High Density 30 Overlay to Specific Plan.
- Zone Change (ZC #4-21) changing the zoning from M-2 and M-1 with HO-4 overlay to the Normandie Crossing Specific Plan Zone.
- Zone Text Amendment (ZTA #6-21) amending the Gardena Municipal Code by adding a new zoning designation of the Normandie Crossing Specific Plan Zone.
- Specific Plan (SP #1-21) providing for development of a seven-story residential apartment building, which would include 328 residential dwelling units, including 20 units for low income households, and 75 residential townhomes within ten three-story buildings.
- Site Plan Review (SP #11-21) approving the physical design of the development.
- Vesting Tentative Map (VTM #4-21), to merge four lots into one with condominiums for the townhomes and one parcel for the apartment building.
- Development Agreement (DA #2-21) 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 community benefits to the City including affordable housing and a monetary payment.
- Affordable Housing Agreement between the City and the developer that guarantees that 20 units will remain affordable to lower income households for a 55-year period.
- Adjacent Sites: Additionally, staff is recommending a General Plan Amendment and zone change for 16964 Brighton Avenue, from Industrial/M-2 to Single-Family Residential/R-1, and the Union Pacific Railroad parcel from an Industrial/M-2 to Public Institutional/O.

As part of the project the City, along with an environmental consultant, prepared an Environmental Impact Report (EIR) in compliance with the California Environmental Quality Act (CEQA). This EIR evaluated the potential environmental impacts associated with planning, constructing, and operating the proposed project. In addition to the recommendation of the project entitlements, the Planning Commission is being asked to consider a separate recommendation on the EIR, Mitigation Monitoring and Reporting Program, and Statement of Overriding Considerations, that has been prepared by staff.

ANALYSIS

SECTION 1: SPECIFIC PLAN #1-21

The Normandie Crossing Specific Plan includes information for City staff, the community, and the Planning Commission on how the project site will be developed and how it is consistent with the City of Gardena General Plan. A Specific Plan is a regulatory document prepared pursuant to the provisions of California Government Code sections 65450 through 65457 and provides a framework for development of the project site, including permitted uses and development standards. Upon approval of the legislative actions, the Specific Plan will establish the zoning for the subject property, to prevail over the City's Zoning Ordinance. The following tables provide a summary of the development standards proposed in the Specific Plan for each Subarea. Development standards not covered by the Specific Plan will be regulated by the Gardena Municipal Code.

Table 2a: Development Standards Subarea A (Apartments)

STANDARD	REQUIREMENT
Permitted Uses Residential	Multi-family housing; Residential amenities and ancillary uses, including home occupations
Prohibited Uses	Short-term rentals; Home-sharing rentals
Density/Capacity (Based on total Plan Area)	77 DU/AC 328 Apartment Units
Building Height	7 stories and 90 feet
Dwelling Unit Size - Minimum	Studio: 450-sf 1 Bedroom: 550-sf 2 Bedrooms: 850-sf
Setbacks (Based on total Plan Area)	Front (Normandie Avenue): 10 feet Rear (Brighton Way): 10 feet Side (169th Street and 170th Street): 10 feet
Minimum Open Space Private (50-sf/DU for 60% of the units) Common (Outdoors or Indoors)	 9,850-sf 22,140-sf
Minimum Landscape (Based on total Plan Area)	20,432-sf
Parking	399 spaces; up to 50% compact
Public Parking	Five parking spaces along Normandie Avenue

Parking Dimensions	Compact: 9’ x 16’ Standard: 9’ x 18’
Bicycle Parking	173 spaces for the residents (157 secured long-term and 16 short-term spaces)

DU= Dwelling Units AC= Acres -sf= Square feet

Table 2b: Development Standards Subarea B (Townhomes)

STANDARD	REQUIREMENT
Permitted Uses Residential	Multi-family housing, including attached and detached townhome style units, and residential amenities and ancillary uses, including home occupations, and any use customarily incidental to a permitted use.
Prohibited Uses	Short-term rentals; Home-sharing rentals
Density/Capacity	77 DU/AC (based on total Plan Area) 75 Townhome Units
Building Height	3 stories and 40 feet
Dwelling Unit Size - Minimum	None
Setbacks (Based on total Plan Area)	Front (Normandie Avenue): 10 feet Rear (Brighton Way): 10 feet Side (169th Street and 170th Street): 10 feet
Minimum Open Space Private (50-sf/DU) Common (Outdoors or Indoors)	 3,750-sf 8,650-sf
Minimum Landscape (Based on total Plan Area)	20,432-sf
Parking (2 spaces/DU)	150 spaces
Guest Parking	10 spaces
Parking Dimensions	2-car garage: 20’ x 19’ Tandem garage: 13’ x 33’
Bicycle Parking	None

DU= Dwelling Units AC= Acres -sf= Square feet

A. SETBACKS

Within the total plan area of the project, the Specific Plan calls for a minimum setback of 10 feet along from all property lines, in addition to a ten-foot radii corner cut-off dedication at the northwest corner of Brighton Way alleyway and 169th Street. Balconies, and non-habitable architectural features, planter boxes, outdoor seating for pedestrians and similar features would be allowed to encroach within setback areas by up to four feet.

B. HEIGHT

The apartment building within Subarea A would not be permitted to exceed a height of seven (7) stories, or 90 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 such as architectural features, elevator shafts mechanical equipment, stairwells, canopies, or shade structures. The proposed apartment building in this area consists of two stories for a parking structure and five stories for residential dwelling units, with a height of 89.5 feet. If the Specific Plan is approved, it would meet the development standard for allowed maximum building height.

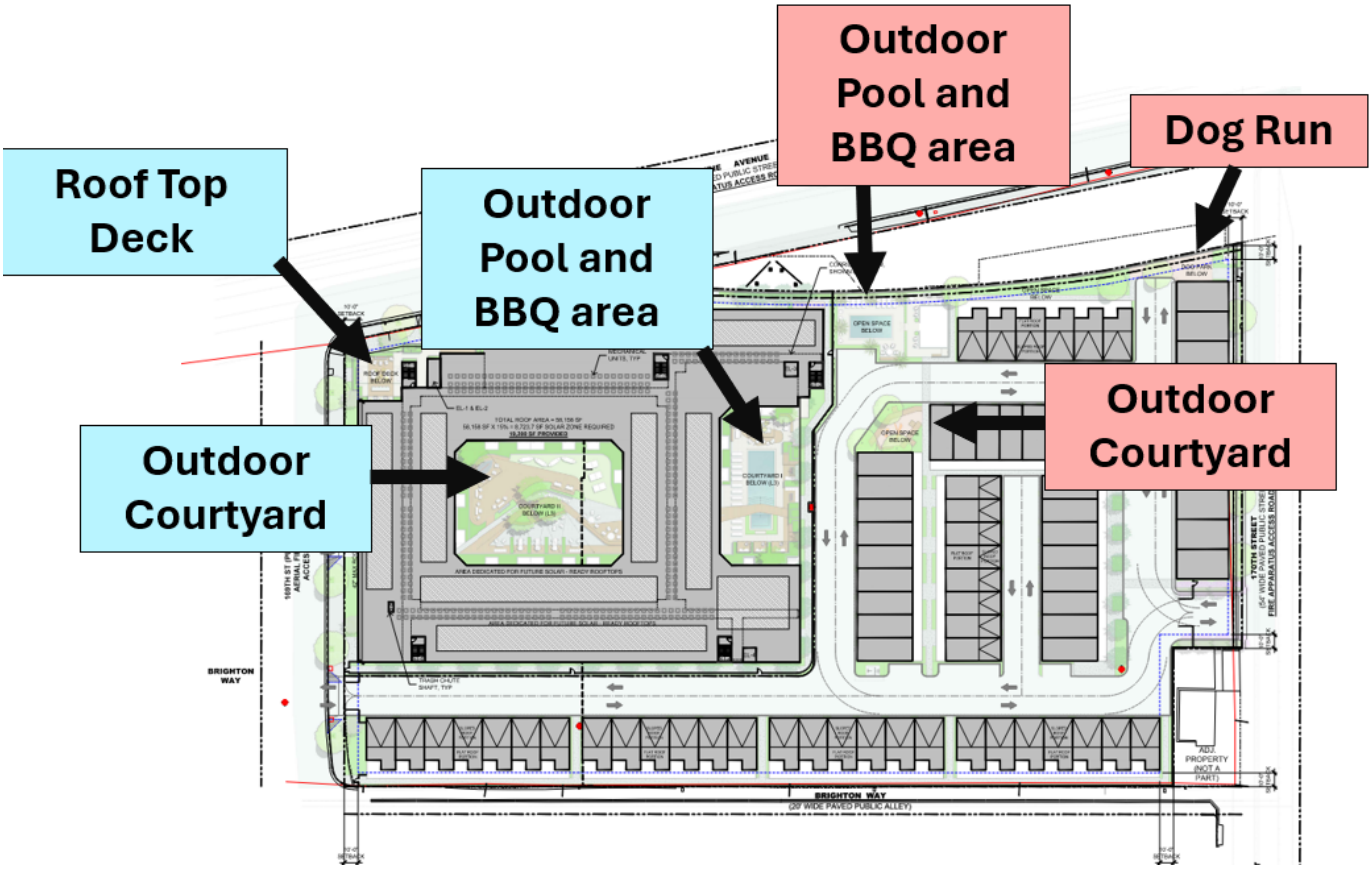
The townhomes within Subarea B will not be permitted to exceed three stories and 40 feet in height as measured from the finished floor (i.e., the level of the finished floor on the ground level) to the highest point on the roof, including non-habitable projections (including, without limitation, architectural features, elevator shafts mechanical equipment, stairwells, canopies, or shade structures). The applicant's project plans show each townhouse building having a maximum height of 36 feet. Therefore, the project would meet the minimum requirements under the proposed Specific Plan, while allowing for flexibility to add additional architectural articulation or other similar features to reach up to 40 feet in height.

C. OPEN SPACE

The Specific Plan will require a minimum of 50-sf per unit of private open space (i.e., balconies) for 60% of the units (197 DU) or 9,850-sf, and approximately 22,140-sf of common open space within Subarea A. The common open spaces and amenities provided within the project would include the following: a roof deck with BBQ and seating area; a swimming pool with BBQ and seating areas; a dog park; a fitness room; club houses; a large courtyard with seating area, game tables; and co-working spaces.

A minimum of 50-sf of private open space (i.e., yards and balconies) per unit will be provided in Subarea B, or 3,750-sf. Additionally, approximately 8,680-sf of indoor and outdoor common open space will be provided within Subarea B, including at a minimum: swimming pool with BBQ and seating areas, a dog park, club house, and playground. (Figure 5: Open Spaces).

Figure 5: Open Spaces



D. LIGHTING AND SECURITY

The Specific Plan calls for specific regulations on lighting within all open spaces and pedestrian areas. Additionally, all exterior fixtures shall be of the same design, material, and color. All lighting fixtures shall be adequately shielded to a point below the light bulb and reflector and unidirectional lighting will be used to avoid light spilling onto adjacent properties. The applicant is also proposing a two-way radio communications enhancement system through the buildings and pole mounted cameras are proposed along the perimeters of the property.

E. ACCESS/PARKING

Vehicle Access
Vehicular access to the project site would be provided by the following four driveways, and as shown in Figure 6.

- Driveway 1 would serve Subarea A and provide access to the apartment building's parking garage from 169th Street, west of Normandie Avenue.

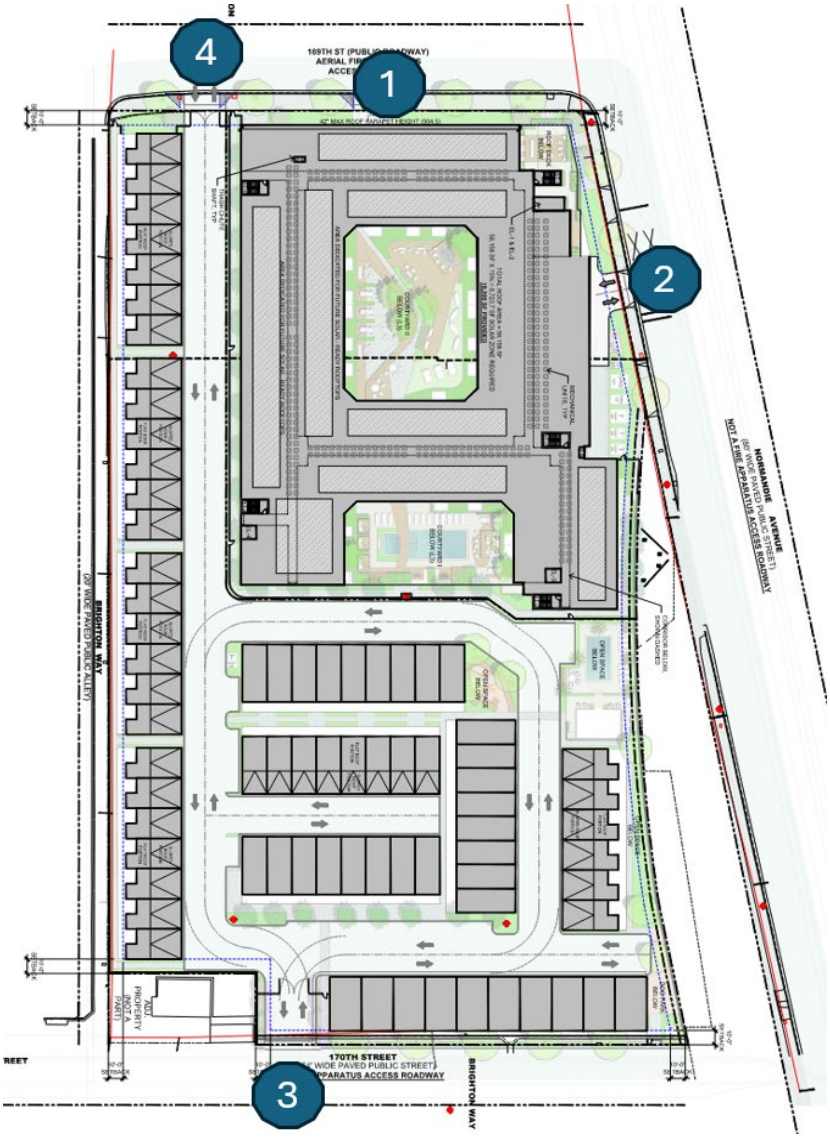
- Driveway 2 would serve Subarea A and provide a right-in/right-out only driveway that would also serve the apartment building's parking garage from southbound Normandie Avenue.

- Driveway 3 would serve Subarea B and provide access to the townhomes from 170th Street. This driveway would also serve as fire truck access for both Subareas A and B.

- Driveway 4 would serve Subarea B and provide access to the townhomes from 169th Street. This driveway would also serve as fire truck access for both Subareas A and B.

For onsite pedestrian access, the project proposes sidewalk improvements along the project frontages (i.e., 169th and 170th Streets, South Normandie Avenue, and Brighton Way).

Figure 6: Driveways



Vehicle Parking

Subarea A will provide 399 vehicle parking spaces that will be unbundled, meaning that parking spaces are not included in the rent for the apartment unit as required by state law. Five of the 399 vehicle parking spaces in Subarea A will be available for public use to replace the five removed on-street parking spaces on the south side of 169th Street along the plan area frontage. Up to 50 percent of the required parking spaces within Subarea A may be compact spaces. The Specific Plan calls for Subarea A to be allowed to provide a maximum of 90 tandem spaces that can be leased only as a pair to a single unit. The project plans currently show a total of 66 tandem parking spaces. If approved the, the Specific Plan will allow for this flexibility for the parking of the apartment units.

Each of the townhomes in Subarea B will provide two spaces (150 spaces), some of which will be tandem, in addition to 10 guest spaces. The minimum width of the drive aisles within Subarea B will be 26 feet.

SECTION 2: GENERAL PLAN AMENDMENT (GPA #3-21), ZONE CHANGE (ZC #4-21), AND ZONE TEXT AMENDMENT (ZTA #6-21)

If the Planning Commission recommends and the City Council adopts the Specific Plan, then there must be consistency with the General Plan Land Use Plan and the City's Zoning Code and Map. In order to develop the project, the following legislative approvals are required:

1. General Plan Amendment: changing the land use designation on the General Plan Land Use Map from Industrial and Industrial/High Density 30 Overlay to Specific Plan;
2. Zone Change: changing the zoning from M-1 with HO-4 overlay and M-2 zone to the Normandie Crossing Specific Plan Zone; and
3. Zone Text Amendment: amending the Gardena Municipal Code by adding a new zoning designation of the Normandie Crossing Specific Plan Zone.

These legislative actions would allow the redevelopment of the property to allow for a seven-story apartment building and 75 new townhome units within 10 buildings, that will bring in total of 403 new residential units, including 20 affordable units. This development would be consistent with the various goals and policies of the Gardena General Plan, as indicated under Chapter 6 of the Normandie Specific Plan. The project does propose to consolidate the identified parcels, in addition to the adjacent 3.9-acre lot in order to development a 403 new residential unit project. Additionally, Housing Programs 2.2 and 4.3, the City's Housing Element plans calls for promoting lot consolidation and housing construction, particularly affordable housing, by facilitating communications between interested property owners and potential developers.

Although not part of the Normandie Crossing Specific Plan, staff is recommending the clean-up of the land use designations and zoning of the two adjacent properties at 16964 Brighton Avenue and the Union Pacific Railroad parcel immediately east of the project site, to correspond to the existing land uses within each parcel as specified above.

SECTION 3: SITE PLAN REVIEW #5-21

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 consider the approval of the Site Plan Review along with the Specific Plan, with a recommendation from the Planning Commission. Site plan review approval requires the

following findings to be made after considering all of the various factors relating to the site plan:

1. *The physical location, size, massing, setbacks, pedestrian orientation, and placement of proposed structures on the site and the location of proposed uses within the project are consistent with applicable standards;*

The project maximizes the buildable area within the project site. The building will be setback ten feet along each street frontage, in addition to the street dedication and street improvements. The proposed Specific Plan incorporates design standards that include minimum requirements for form and massing, façade articulations along street frontages; siding materials; colors; landscaping; and lighting. These design standards assist in the massing of the building while providing visual interest. Pedestrian access to Subarea A will be provided on the ground floor with primary pedestrian access located at the building lobby located on the northeastern portion of the site at Normandie Avenue and 169th Street. Additional restricted pedestrian access will also be provided around the perimeter of the Apartment Building connecting 169th Street and Normandie Avenue, and via the parking garage. Pedestrian access to Subarea B will be provided on 169th Street and 170th Street. On-site pedestrian circulation within Subarea B will consist of a network of pathway connections between residential units and common areas.

2. *The development is consistent with the intent and general purpose of the general plan and provisions of this code;*

GPA #3-21 will change the land use designation on the General Plan Land Use Map from Industrial and Industrial with a Housing Overlay 30 to Specific Plan for the entire project site and amend the Land Use Plan text and Land Use Plan Table LU-3 to allow the high density residential development specified in this Specific Plan. State law requires that any specific plan be consistent with the City's General Plan. As shown within the Specific Plan t and section 4.8.4 of the DEIR, which are incorporated by reference the project is consistent with the several goals and policies of the Gardena General Plan.

3. *The health and safety services (police and fire) and public infrastructure are sufficient to accommodate the new development;*

The Los Angeles County Fire Department (LACFD) provides fire protection services and emergency medical service to the City. The closest facility to the project area, located 0.9 miles to the Plan Area and a 3-minute driving distance, is Fire Station 158 at 1650 W 162nd Street, Gardena, CA 90247. The provision of water for fire suppression is available from existing water lines via adjacent hydrants.

It is also noted, the Project would be constructed with fire safety features in compliance with applicable provisions of the adopted Los Angeles County Fire Code, ordinances, and standard conditions regarding fire prevention and suppression measures related to water improvement plans, fire hydrants, fire access, and water availability. Project development

would also be subject to compliance with LACFD requirements for emergency access, fire-flow, fire protection standards, fire lanes, and other site design/building standards.

The Project building plans have undergone LACFD review and revisions have been made to ensure the Project incorporates all applicable fire safety features.

The Gardena Police Department (Gardena PD) provides police protection services to the City. The project area is approximately 0.5 miles from the police station located at 1718 W 162nd Street, Gardena, CA 90247. The Gardena PD divides the City into three districts, each with its own District Policing Team. The Plan Area is located within District 3.

The Project's forecast population growth would incrementally increase the demand for police protection services to the Project site. However, because the Project site is currently served by police protection services and is located in a suburban setting where police protection services and equipment/infrastructure are already in place, the Project does not propose and would not require new or physically altered police protection facilities to maintain service objectives.

4. *The project is compatible with the surrounding sites and neighborhoods; and*

The applicant is proposing to construct a multi-family housing development which will replace a large underutilized industrial lot creating a more compatible development with the surrounding residential neighborhoods and resident-serving commercial uses than the existing non-conforming industrial uses. The Specific Plan was designed with the intent to allow for a compatible development to the adjacent and anticipated land uses in the surrounding areas, including the surrounding multi-family residential neighborhoods. The Specific Plan regulates buildout of the property in a manner that is consistent with applicable State law. The site plan creates a buffer between the existing surrounding residential community to the west and south and the apartment building by placing the condominium units along those boundaries.

5. *The project has been determined to be exempt from the California Environmental Quality Act or the appropriate environmental document has been completed and required findings have been made.*

An Environmental Impact Report (EIR) was prepared by the City's environmental consultants in compliance with the California Environmental Quality Act. This EIR evaluated the potential environmental impacts associated with planning, constructing, and operating the proposed Normandie Crossing Specific Plan project. The findings within the EIR are discussed below.

SECTION 4: VESTING TENTATIVE TRACT MAP (VTM #4-21)

The purpose of a tentative map review is to identify conditions that should be applied to ensure that each parcel is designed so as to comply with the State Subdivision Map Act and good design practice. A vesting tentative map confers a vested right to proceed with

development in substantial compliance with the ordinances, policies, and standards in effect at the time the vesting map is deemed complete. The applicant is proposing a vesting tentative map to merge four lots into one with condominiums for the townhomes and one parcel for the apartment building.

In accordance with the City of Gardena General Plan, including the Open Space Plan, and in accordance with the Subdivision Map Act, specifically Government Code Section 66477, the City of Gardena requires either the dedication of land, the payment of in-lieu fees, or a combination of both for the park or recreational purposes as a condition of the approval of a tentative or parcel map for residential subdivisions. In accordance with Resolution No. 6433, the applicant will be required to pay a total of $10,000 per unit. Total in lieu park fee for this project is $750,000. Payment will be paid in full to the City prior to final map being recorded.

SECTION 5: DEVELOPMENT AGREEMENT

To strengthen the public planning process, encourage private participation in comprehensive planning, and reduce the economic risk of development, the Legislature of the State of California adopted the Development Agreement Statutes which authorizes the City to enter into binding agreements with persons having a legal or equitable interest in real property, to provide for the development of such property and to vest certain development rights therein. In exchange, the City may obtain benefits that it would not otherwise be able to get.

Development Agreement #2-21, attached as Exhibit 3, is an agreement between the City and developer that guarantees the right to build the development as set forth in the Specific Plan for a period of 5 years with one 5-year extension available at the request of either party. In return, the applicant has agreed to provide benefits to the City in the way of 20 lower income housing units and providing a monetary contribution to the City over and above what it would normally be able to receive. This amount is currently $219,230, but is still being negotiated with the City. Additionally, the City will receive the benefit of, a local hiring/local buying program for construction, and will offer all new residents who enter into a 12 month lease a one-time free monthly Zone 1 EZ Transit Pass.

Under the Development Agreement, the developer may rent, rather than sell, the townhome style condominium units. However, the $750,000 in lieu park fees will be required to be paid regardless.

SECTION 6: AFFORDABLE HOUSING AND NO NET LOSS ANALYSIS

The project includes 20 affordable units, at a lower-income level, that will have the same high-quality design as the other residential units. This project helps satisfy the City's Regional Housing Needs Allocation (RHNA) of 5,735 units including 2,246 for lower units. The affordable housing units will be evenly distributed throughout the building. As shown in Table 3, the applicant is providing a range of unit sizes for the affordable units that is

roughly proportional to the market-rate units. The other 208 apartment units and 75 townhomes will assist the City's in meeting its above moderate allocation of 2,595 units.

Table 3 – Range of Unit Types

Housing Type	Market Rate Units	Percentage*	Affordable Units	Percentage	Total
Studio	64	20%	4	20%	68
One-bedroom	182	55%	12	60%	194
Two-bedroom	62	19%	4	20%	66
		Totals	20		**328**

**Total does not equate to 100, due to rounding*

Three of the four lots are identified in the 2021-2029 Housing Element as suitable sites for consolidation and redevelopment. The Housing Element identified the site as being suitable to accommodate 31 moderate income housing units on a consolidated 1.4 acre site. While the project is proposing the consolidation of the identified sites to construct new affordable units, it is not at the listed number of units, or the income level identified in the City's housing plan. The project does propose to consolidate the identified parcels, in addition to the adjacent 3.9-acre lot in order to development a 403 new residential unit project. Under Housing Programs 2.2 and 4.3, the City plans to promote lot consolidation and housing construction, particularly affordable housing, by facilitating communications between interested property owners and potential developers.

The 2021-2029 Housing Element provided a buffer in identifying sites for the various income levels in order to address the No Net Loss (SB 166) requirement of maintaining an inventory of sites adequate to accommodate the City's remaining RHNA throughout the planning period as development occurs on the selected sites that may result in fewer units than assumed in this inventory. Within the 2021 and 2022 reporting periods reports, the City issued building permits for the construction of 359 new above moderate units. This project will assist the City in continuing to meet its RHNA allocation for the lower and above moderate income levels while still providing adequate sites for the moderate income housing.

Table 4 – No Net Loss Calculation

	Very Low/Low	Moderate	Above Moderate
Allocation	2,246	894	2,595
Number of Housing Units in 2021-2029 HE	2,767	1,807	3,261

Buffer	521	913	666
Reported Progress	-	-	359
Subject Sites Identified Income Levels	-	31	-
Proposed Project	***20***		***383***
Remaining Allocation	2,226	894	1,853

SECTION 7: BENEFITS

The applicant has provided an economic analysis report prepared by RCLCO (Attachment D), a real estate economics and market research consultant. The following is a summary of the overall positive benefits the project would bring to the City:

- 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 and 2,246 units allocated to lower income units. This Project will satisfy approximately 15 percent of the City's above-moderate allocation and provide 20 lower income units.

- The Project will help revitalize a site that does not meet current development standards and whose buildings are in a deteriorated condition.

- The Project will provide one-time economic benefits from the construction. These benefits include:

    - The project will provide numerous construction jobs amounting to the equivalent of 1,270 total job years. As the Project includes a commitment from the developer to implement a local hiring policy, this will benefit lower income individuals and individuals who live in the City. Additionally, there will be an indirect benefit of additional jobs created because of the construction jobs, amounting to approximately another 470 job years.

    - Construction is expected to create approximately $129 million in total labor income, due to direct, indirect, and induced workers associate with the construction. Of that, $95.5 million is projected to be paid to onsite construction employees, providing individuals with additional income to spend on services and goods in Gardena.

    - The principles of Developer also own Tasoro, a company which provides quality building materials for apartments and is located in Gardena. Use of these products will provide sales tax revenue to the City. Additionally, the

Development Agreement provides for a local buying program for construction goods as well as a local hire program.

- Developer has agreed to pay fees over and above what would be required under the City's Municipal Code:
    - Developer has agreed to file a final map for his project, including the condominium units, even if these units are rented rather than sold. Developer will therefore pay Quimby fees of $10,000 per unit on the 75 condominium units.
    - Developer has agreed to pay the equivalent of the City's $1,000 per unit impact fee, for the 20 affordable units that would be exempt from the fee, providing a bonus of $20,000 for the City.
    - Developer will make a payment of $100,000 to the City that can be used for whatever purpose the City desires.
- Developer will pay construction fees in the approximate amount of $2,180,892, as well as an estimated sales tax that will be a minimum of $56,900 from construction materials.
- Each contractor that does business in the City will be required to obtain and pay for a City business license.

- The Project will provide recurring annual revenues to the City as follows:
    - The creation of approximately 92 jobs per year which includes 62 direct onsite jobs, plus indirect and induced jobs created in the local economy by residential spending.
    - Economic output associated with operations of approximately $14.8 million per year in the local economy, of which $8.3 million is attributable to the value of direct project operations and household spending.
    - Sales tax from the residents will provide approximately $44,000 per year.
    - Real Property Tax revenues will go from $6,000 per year to $203,400 per year.
    - Property Tax in Lieu of Vehicle License Fees will go from $5,300 per year to $178,700 per year.
    - Utility user taxes will increase to approximately $40,200 per year.
- 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 and will therefore help existing businesses and encourage new businesses.

- The Project will help encourage people to use alternate means of transportation by providing one-month free transit passes to persons who sign a one-year lease.

ENVIRONMENTAL CONSIDERATIONS

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 City retained the consulting firm of Kimley-Horn and Associates to prepare the required Environmental Impact Report (EIR) and to provide peer review of applicant provided studies.

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 period ran from May 10, 2023 through June 9, 2023. On May 18, 2023, the City held a scoping meeting on the project.

Once the Draft EIR (DEIR) is completed, a Notice of Availability is prepared and the DEIR is circulated for a 30 or 45-day public review period. The DEIR was made available for a 45-day public review period from December 4, 2023 through January 20, 2024.

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 EIR identifies the below topic areas as significant, but able to be mitigated below a level of significance:

- 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: CUL-1, and TCR-1 through TCR-3, 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-2 would reduce this impact to less than significant as well.

- Under Geology, Soils, and Paleontological Resources it was determined that the project could destroy a unique paleontological resource, site, or unique geologic feature. Standard conditions of approval, along with

  Mitigation Measure: GEO-1, 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.

- 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 requiring 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 and HAZ 2 requiring the installation of an impermeable vapor membrane under the slab areas, along with standard conditions of approval relating to asbestos and lead-based paint, will reduce the impacts to a less than significant level.

- Under Noise, it was determined that the project could result in the generation of excessive groundborne vibration or noise levels.

  Mitigation Measure: NOE-3 which requires that large construction equipment be used a minimum of 45 feet away from the house at 16964 169th Street will mitigate this impact to less than significant.

- Under Tribal Cultural Resources, it was determined that the project could potentially result in significant impacts. The City consulted with the Gabrielino Band of Mission Indians – Kizh Nation and in accordance with such consultation is imposing…

  Mitigation Measure: TCR-1 through TCR-3, which will mitigate the impacts to a less than significant level.

- The construction of the utilities associated with the project would have potentially significant impacts under the impact areas described above, as well as construction noise describe below.

  Mitigation Measures: NOI-1 and NOI-2, also listed above, described below will reduce these impacts to less than significant, except for construction noise.

The only impact which cannot be mitigated below a level of significance is the construction noise associated with the project. However, the EIR does identify that the project should still be subject to meet the following mitigation measure:

Mitigation Measure: NOI-1 requires power construction equipment to be equipped with state-of-the-art noise shielding and muffling devices and to be properly maintained. Mitigation Measure NOI-2 requires a temporary and impermeable sound barrier of at least 10 feet that reduces noise by at least 12dB(A). Even with these measures, construction noise could be significant and unavoidable.

In accordance with CEQA, the EIR examined three 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. Three project alternatives were identified and analyzed in the EIR for relative impacts as compared to the proposed project:

- "No Project/No Construction" Alternative;
- "No Project/Existing Land Use Designation" Alternative; and
- "Reduced Density" Alternative.

The No Project/No Construction Alternative would retain the project site in its current condition with decades-old buildings on site which does not conform to current development standards. 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 industrial purposes. This alternative involves the demolition of the existing buildings and construction up to 228,690 square feet of new industrial uses within an industrial business park. Redevelopment of the site in this manner would still cause significant and unavoidable noise impacts and the alternative would not meet any of the project's objectives. The Reduced Density Alternative would still develop the 75 townhomes along the western and southern border of the project site, but would reduce the number of units in the apartment building from 328 to 192 and reduce the height to five stories. This alternative would still have significant and unavoidable noise impacts and would not provide any affordable housing.

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. The City received and reviewed comments on the DEIR and prepared responses to those comments which are incorporated into the Final EIR (FEIR). The Final EIR consists of the Draft EIR and all Appendices thereto and that separate document, incorporating the written comments and responses thereto, as well as the changes to the DEIR.

Prior to releasing the Final EIR, the applicant submitted changes to the project plans that were primarily required by the Los Angeles County Fire Department and Southern California Edison. The changes do not modify the total number of units or impacts associated with the project. Instead, the changes primarily have to do with reductions in open space and landscaped area, size of the townhome units, and layout of the amenity space in the townhome area. None of the comments received or the changes submitted resulted in any changes that would necessitate recirculation of the DEIR.

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: revitalization of a site that does not meet current property development standards; increased property and utility user taxes; a one-time residential impact fee of $383,000 to the City; in lieu park fees of $750,000; additional monetary payment of at least $120,000; satisfaction of approximately 15 percent of the City's above-moderate housing allocation for the 2021-

2029 Housing Cycle, the provision of 20 lower income units, and recurring annual revenues which will help not only the City, but create additional spending in the City which will be a benefit to local businesses.

The EIR was independently reviewed by City staff. In making all of the required findings, the Planning Commission is being asked to exercise its independent judgment and analysis and make a recommendation to the City Council on certification of an the EIR, adoption of a Mitigation Monitoring and Reporting Plan, making the findings for a Statement of Overriding Considerations.

ADDITIONAL INFORMATION

EIR Certification

Certification of the EIR is an independent action from project approvals. Certification of the EIR is not a vote for or against a project; rather, it is a vote stating that the EIR was prepared in compliance with CEQA and adequately addresses all of the environmental issues. If the Planning Commission feels that the EIR meets the requirements of CEQA, then there should be a recommendation for certification of the EIR. By doing this, the EIR can be used as a base document for other projects to tier off of, even if the project is not approved.

Required Vote

Pursuant to state law, it takes a majority vote of the entire membership to recommend approval of the General Plan amendment. As two of the Commissioners (Langley and Wright-Scheer) are conflicted, this would mean all three remaining members would have to vote in favor of the General Plan amendment for it to be considered a recommendation for approval. The remaining entitlements only require approval by a majority of the quorum, i.e., two of the three members.

NOTICING

The public hearing notice for the project was published in the Gardena Valley News and mailed first class to owners and occupants within a 300-foot radius of the site on March 7, 2024. A copy of Proof of Publication and Affidavit of Mailing are on file in the office of the Community Development Department, Room 101, City Hall, and are considered part of the administrative record.

In addition, the applicant held a community meeting on January 21, 2024, where notices were sent out to all owners and occupants within a 300-foot radius of the site.

Two public comments were received after the responses to comments of the EIR were released. These comments are attached hereto.

RECOMMENDATION

Staff recommends the Planning and Environmental Quality Commission to:

1) Conduct the public hearing;
2) Receive testimony from the public;
3) Recommend to the City Council to certify the FEIR 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;
4) Make a recommendation on the following:
    a) Whether to approve General Plan Amendment #3-21, which includes the changes to the two adjacent properties .

    b) Whether to approve the remaining requested entitlements under the project: Zone Change #4-21 which includes the changes to the two adjacent properties; Zone Text Amendment #6-21; Specific Plan #1-21; Vesting Tentative Map #4-21; Site Plan Review #11-21; Development Agreement #2-21; and Affordable Housing Agreement subject to the attached conditions of approval.

ATTACHMENTS

A – Draft Planning Commission Resolution for EIR Certification

- Exhibit 1 – City Council CEQA Resolution
    - Exhibit A – Draft EIR
    - Exhibit B – Final EIR
    - Exhibit C – Mitigation Monitoring and Reporting Program

B – Draft Planning Commission Resolution for General Plan Amendment

- Exhibit 1 – City Council General Plan Amendment Resolution
    - Exhibit A – General Plan Land Use Change for GPA #3-21
    - Exhibit B – General Plan Land Use Text Change Excerpts

C – Draft Planning Commission Resolution for– City Council Ordinance Adopting the Specific Plan, Changing the Zoning, Approving the Zoning Code Amendment, Approving the Development Agreement, and Approving the Vesting Tentative Tract Map

- Exhibit A – City Ordinance for Normandie Crossing Specific Plan Zone Change for ZC #4-21
- Exhibit B – City Council Resolution for approval of Tentative Tract Map
- Exhibit C – Normandie Crossing Specific Plan
- Exhibit D – Conditions of Approval
- Exhibit E – Development Agreement
- Exhibit F – Draft Affordable Housing Agreement

D – Economic Analysis Report prepared by RCLCO

F – Public Comments

G – Project Plans

RCLCO
REAL ESTATE CONSULTING

ECONOMIC ANALYSIS FOR PROPOSED APARTMENT DEVELOPMENT

16911 S NORMANDIE AVENUE
GARDENA, CALIFORNIA

16911 Normandie Associates, LLC
December 11, 2023

ABOUT RCLCO

Since 1967, RCLCO has been the "first call" for real estate developers, investors, the public sector, and non-real estate companies and organizations seeking strategic and tactical advice regarding property investment, planning, and development.

RCLCO leverages quantitative analytics and a strategic planning framework to provide end-to-end business planning and implementation solutions at an entity, portfolio, or project level. With the insights and experience gained over 50 years and thousands of projects–touching over $5B of real estate activity each year–RCLCO brings success to all product types across the United States and around the world.

Learn more about RCLCO at www.RCLCO.com.

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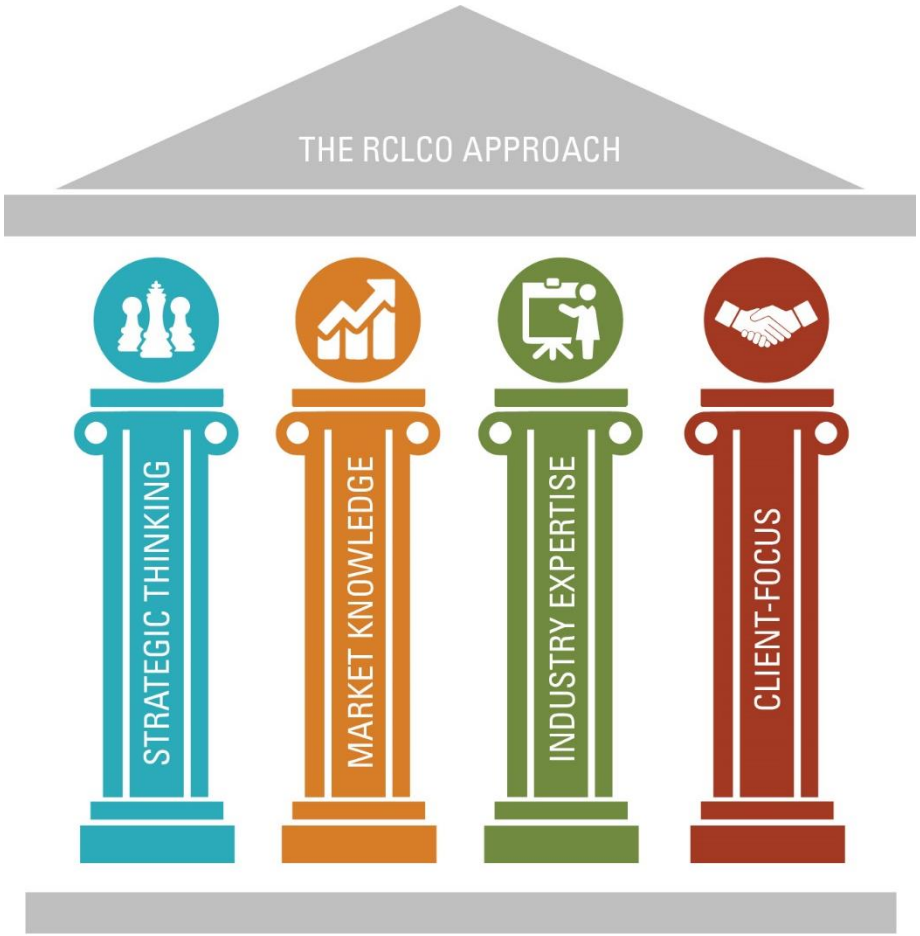

CONTENTS & OBJECTIVES

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OBJECTIVES

16911 Normandie Associates, LLC ("Client") is planning a new apartment development at 16911 S Normandie Avenue in the City of Gardena. The proposed development comprises 328 apartments and 75 townhomes. The property is currently zoned commercial/industrial. Client is planning a zone change / Specific Plan process.

To support this effort, Client engaged RCLCO to complete an economic analysis related to the following:

- ***Development Impact Fees***: Complete a financial analysis demonstrating the effect Development Impact Fees have on the financial feasibility of the project
- ***Fiscal Impacts***: Estimate the incremental revenues generated for the City of Gardena in the form of fees and taxes from the new development.
- ***Economic Impacts***: Evaluate and quantify the incremental impact on the local economy during the construction and operational (build-out) phases of the proposed development. This analysis has two components covering the one-time construction and operations phases. In each analysis, the estimates include the "direct" impacts (investment during the project's construction, and retail and business sales and local household spending that recur at build-out) and the "multiplier" effects (the circulation of these direct effects within the local economy).

SUMMARY AND KEY FINDINGS

RCLCO
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DEVELOPMENT IMPACT FEE

The maximum development impact fee that allows for a financially feasible development at the Subject Site is estimated to be **$1,250,966**. This includes the existing Base Impact Fee of $1,000 per unit in the City of Gardena (total of **$403,000**) as well as the $10,000 Quimby fee for each townhome (total of **$750,000**) and leaves **$97,966** ($243 per unit) as the appropriate additional impact fee that the developer could pay to the City and still have a financially viable development project.

FISCAL REVENUE IMPACT

The Clients' proposed development is anticipated to generate over **$548,708 in revenues** for the City's General Fund per year. This represents a figure **$537,408 larger** than the estimated revenues generated by the current use at the Subject Site. This includes sales tax, property tax, utility tax, and other revenues generated from the new residential units at 16911 S Normandie Avenue.

The development of the proposed project also yields **one-time construction-related revenues totaling almost $3.5 million**, including construction fees, development impact fees, and sales tax from construction materials.

ONE-TIME ECONOMIC IMPACT FROM CONSTRUCTION

RCLCO estimated the following one-time construction-related economic impacts using the IMPLAN input-output model and estimated construction costs:

- **1,744 total job-years** (including direct onsite jobs plus the "multiplier effect" of indirect and induced jobs), with 1,270 of these job-years estimated to be construction job-years located directly onsite.
- **$128.8 million in total labor income** (wages, salaries, and benefits paid to direct, indirect, and induced workers associated with construction), of which $95.5 million is projected to be paid to onsite construction employees.
- A total economic output associated with construction of **$249.8 million** in the local economy, of which $156.5 million reflects the value of direct project construction.

RECURRING (ANNUAL) ECONOMIC IMPACTS FROM OPERATIONS

RCLCO estimated the following recurring annual economic impact from the operations of the onsite uses at the project at build-out, relying on Client inputs and RCLCO estimates for real estate performance metrics and household spending:

- **111 total jobs per year** (including direct onsite jobs plus the "multiplier effect" of indirect and induced jobs). Of these jobs, 71 are estimated to be directly created onsite by businesses or in the local economy by residential spending.
- **$7.0 million in total labor income per year** (wages, salaries, and benefits paid to direct, indirect, and induced workers associated with onsite businesses and household spending). Of this compensation, $3.9 million is projected to be directly generated onsite by businesses or throughout the local economy by residential spending.
- A total economic output associated with operations of **$19.1 million per year** in the local economy, of which $10.5 million reflects the value of direct project operations and household spending.

Source: Client; IMPLAN; RCLCO

DEVELOPMENT IMPACT FEE ANALYSIS

DEVELOPMENT IMPACT FEE

RCLCO REAL ESTATE CONSULTING

BASED ON RCLCO'S ANALYSIS OF THE FINANCIAL FEASIBILITY OF THE PROPOSED PROJECT, THE MAXIMUM DEVELOPMENT IMPACT FEE THAT STILL RESULTS IN A FINANCIALLY VIABLE PROJECT IS $1,250,966 OR APPROXIMATELY $3,104 PER UNIT

- This development impact fee represents the cost that allows the project to maintain a target return on development cost of 6%.
  - RCLCO selected this financial feasibility threshold because it represents typical benchmark that investors and lenders would expect for a typical multifamily development.
  - Return on total development cost, which is calculated as net operating income ("NOI", i.e., gross income less an allowance for vacancy and operating expenses) divided by total development cost (i.e., land costs, hard costs, soft costs, and financing costs), is frequently used by the real estate industry as an initial project feasibility screening measure.
  - The minimum threshold for return on development cost, which we assumed as 6%, reflects a spread above the typical market capitalization (or "cap") rate for new development and accounts for entitlement and construction risk on the part of the developer and is typically the return that a developer would be expected to show in order to attract outside capital to the project.
- The maximum development impact fee of $1,250,966 includes the existing Base Impact Fee of $1,000 per unit in the City of Gardena (total of $403,000). The estimate also includes a $10,000 Quimby Fee of $10,000 per townhome unit which totals $750,000. This leaves $97,966 ($243 per unit) as the appropriate additional impact fee that the developer could pay to the City and still have a financially viable development project.

Potential Development Impact Fee
16911 S Normandie Avenue

	PER UNIT	TOTAL
Base Impact Fee	$1,000	$403,000
Quimby Fee	$1,861	$750,000
Additional Impact Fee	$243	$97,996
Total	**$3,104**	**$1,250,996**

Source: Client; RCLCO

RETURN ON COST

- Net Operating Income: The project is projected to achieve an untrended stabilized NOI of approximately $10,935,000. This includes the assumed rental rates for market-rate and affordable apartment units and market-rate townhome units, less expected vacancy and operating expenses.
- Maximum Cost Threshold for Investment: Based on this projected NOI, RCLCO applied a return on cost of 6% to estimate a maximum cost threshold for investment of approximately $182.3 million. This figure represents the highest possible costs the developer could pay that results in a financially viable project relative to the expected NOI.
- Development Costs: Estimated costs for construction (including land cost, hard costs, soft costs, financing costs, and other fees) amount to a total of about $181.0 million.
- Remaining Costs for Development Impact Fee: The difference between the Maximum Cost Threshold for Investment and the Development Costs represents the available costs that could be allocated to the development impact fee. This amounts to a total of $1,250,966, or $3,104 per unit.
  - Included in this estimate is the City of Gardena's Base Impact Fee of $1,000 per unit which totals $403,000. The estimate also includes a $10,000 Quimby Fee of $10,000 per townhome unit which totals $750,000.

Feasibility Analysis
16911 S Normandie Avenue

	PER UNIT	TOTAL
OPERATIONS		
Revenue		$15,360,745
Expenses		$4,424,805
NET OPERATING INCOME	**$27,136**	**$10,935,940**
FEASIBILITY		
Target Yield on Cost		6.00%
Maximum Threshold for Investment	$555,688	$182,265,662
Less: Land Cost	$48,804	$19,668,000
Less: Hard Cost	$313,917	$126,508,363
Less: Other Soft Costs	$47,493	$19,139,508
Less: Financing Costs	$26,864	$10,826,088
Less: City One-Time Construction Fees	$5,412	$2,180,892
Less: Other Fees (School, Utilities, etc.)	$6,679	$2,691,815
Available Costs for Development Impact Fee	$3,104	$1,250,996
Less: Base Impact Fee	$1,000	$403,000
Less: Quimby Fee	$1,861	$750,000
Additional Impact Fee	**$243**	**$97,996**

Source: Client; RCLCO

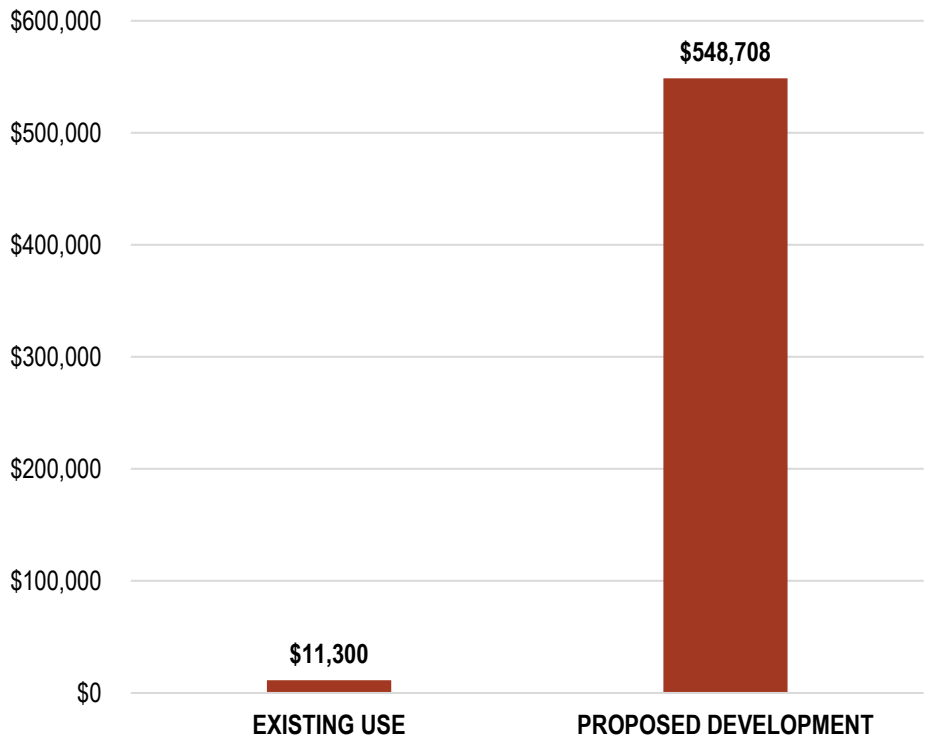
FISCAL IMPACT ANALYSIS

FISCAL REVENUE SUMMARY

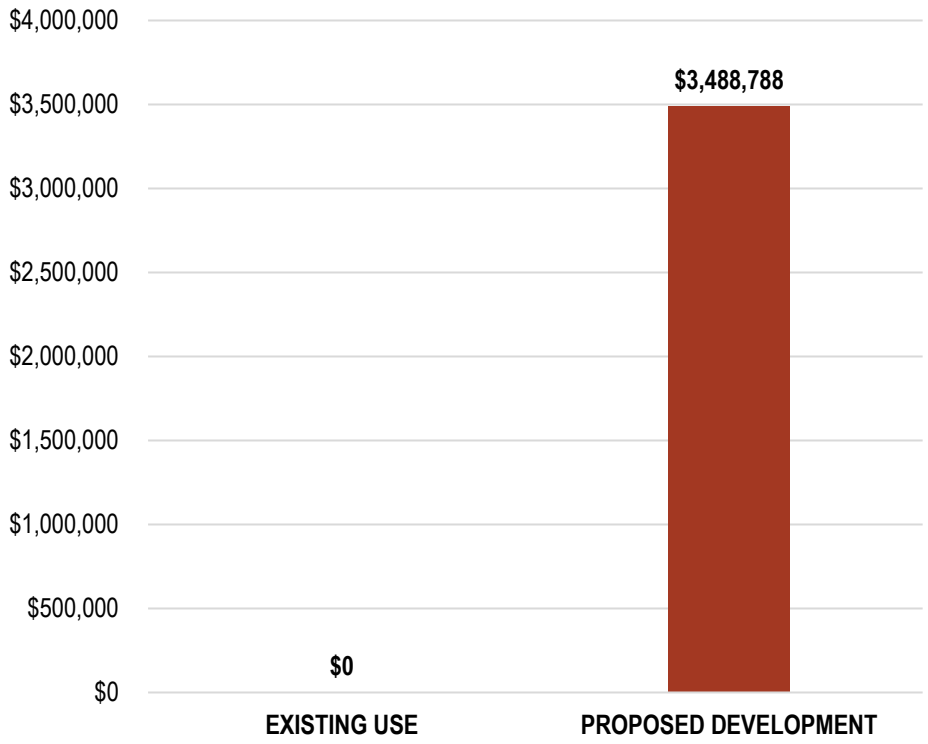
THE CLIENT'S PROPOSED DEVELOPMENT RESULTS IN ABOUT $549K ANNUAL RECURRING FISCAL REVENUES TO THE CITY OF GARDENA AND NEARLY $4.8M IN ONE-TIME CONSTRUCTION-RELATED REVENUES

- The Clients' proposed development is anticipated to generate over $548,000 in new revenues for the City's General Fund per year. This represents a figure $537,408 larger than the current use at the Subject Site. This includes sales tax, property tax, utility tax, and other revenues generated from the new residential units at 16911 S Normandie Avenue.
- The development of the proposed project also yields one-time construction-related revenues totaling almost $3.5 million, including construction fees, development impact fees, and sales tax from construction materials.

Stabilized Annual Fiscal Revenues (2023 $)
16911 S Normandie Avenue



Stabilized One Time Fiscal Revenues (2023 $)
16911 S Normandie Avenue



Source: RCLCO

DETAILED FISCAL REVENUES

RCLCO REAL ESTATE CONSULTING

REVENUES FROM SALES TAX AND PROPERTY TAX ACCOUNT FOR THE LARGEST SOURCES OF ANNUAL REVENUES TO THE CITY OF GARDENA'S GENERAL FUND

Stabilized Annual and One-Time Fiscal Revenues (2023 $)
16911 S Normandie Avenue

	EXISTING USE	PROPOSED DEVELOPMENT
PROGRAM		
Residential Units	-	403
Free Standing Commercial SF	106,100	-
RECURRING ANNUAL REVENUES		
Sales Tax (Occupied Residents)	$0	$43,744
Real Property Tax Revenue	$6,000	$203,400
Property Tax in Lieu of VLF	$5,300	$178,700
Property Owner Utilities Tax	$0	$27,576
Tenant Utilities Tax	$0	$13,788
Other Revenues	$0	$81,500
Total General Fund Revenues	**$11,300**	**$548,708**
ONE-TIME REVENUES		
City One-Time Construction Fees	$0	$2,180,892
Development Impact Fee	$0	$1,250,996
Sales Tax From Construction Materials	$0	$56,900
Total General Fund Revenues	**$0**	**$3,488,788**

Source: Client; RCLCO

GENERAL FUND ANALYSIS

RCLCO
REAL ESTATE CONSULTING

SALES TAX

- The State of California levies a sales tax on all gross receipts from the sale of tangible property other than property sold for resale. Sales tax is payable by retailers, both at retail establishments as well as restaurants and fitness and health clubs where tangible products are sold. The City of Gardena receives sales tax revenue equal to 0.75% of all taxable sales within City limits. Los Angeles County and the State of California receive the balance of the tax.
  - This includes the sales tax generated by additional retail spending that would take place throughout the city from the increased residential units and households at the Subject Site.

PROPERTY TAX

- **Direct Property Tax**: As mandated by California state law, Los Angeles County levies a 1% annual tax on a given property's total assessed valuation. This tax is collected by the County and is subsequently remitted to cities and other local agencies based on apportionment factors unique to the local tax rate area.
  - The City of Gardena receives 11.16% of these property tax revenues.
- **Property Tax in lieu of VLF**: The Vehicle License Fee changed pursuant to State legislation in 2004. Most of the funds previously received by municipalities were swapped for additional property tax, now referred to as "Property Tax in Lieu of VLF." Property Tax in Lieu of VLF is a constitutionally protected revenue source provided to cities and counties in place of a backfill from the State General Fund on the VLF tax rate. RCLCO calculated the relationship of property tax in lieu of VLF revenues to the total assessed value of property in the City of Gardena and applied this relationship to the total development value of the proposed development to calculate the estimated Property Tax in Lieu of VLF revenue resulting from the incremental increase in the City's total value of all assessed property.

UTILITY TAX

- The City of Gardena levies a 5% annual tax on every dollar spent on utilities for water, gas, electricity, and internet spending which includes utilities paid by both the owner of the property and the tenants.

OTHER REVENUES & EXPENDITURES

- There are a handful of other revenue categories as well as expenditure categories which would be impacted by the residents and resident-equivalents at the proposed development, but that cannot be directly quantified in the same way as other revenues such as property tax or sales tax revenue. Thus, to determine the development's impact on these other General Fund revenue and expenditure categories, RCLCO employed the average cost approach, which assumes that the City of Gardena would receive additional revenue and incur additional expenditures for each respective category that is equivalent to the current value per city resident or resident-equivalent. Note that resident-equivalents denote the sum of all residents and a share of all employees.

ECONOMIC IMPACT ANALYSIS

DETERMINATION OF ECONOMIC IMPACT

Employment counts, labor income, and economic output related to the construction of the project and its annual operation once completed were estimated using the IMPLAN model, using data specific to the local economy. The model enables analysis of the specific sectors of an area's economy that are impacted when a new investment or new employment, or other measure, is added to a particular sector or sectors. These inter-industry relationships can be expressed in terms of dollar impacts or employment impacts. The results are shown in their report as "employment", "labor income", and "economic output." Separate calculations are provided for two categories of benefits: temporary (construction phase) benefits; and permanent or recurring benefits associated with the ongoing operation of new businesses within the project.

IMPLAN

RCLCO's analysis considers the direct (i.e., onsite) impacts associated with the proposed development, as well as "multiplier" impacts within the local economy (these "indirect" and "induced" impacts are both calculated for the relevant county). These multiplier impacts have been projected using the IMPLAN model. IMPLAN was created in 1979 by the U.S. Forest Service to assist the Forest Service in land and resource planning management. In 1992, IMPLAN was transferred under a technology transfer agreement to the Minnesota IMPLAN Group, Inc, which is run by former researchers from the University of Minnesota (the university worked on the original program and subsequently developed the current modeling system). Minnesota IMPLAN Group is privately held and sells a suite of products and consulting services that involve the IMPLAN software.

The IMPLAN model can be used to generate estimates of direct, indirect and induced effects of a change in the local or regional economy.

- **Direct Effects** are the set of expenditures applied to the predictive model for impact analysis. These include the investment in project construction and operations of the onsite commercial land uses. The income and resulting employment of the new jobs that are employed at the project are also considered direct effects.
- **Indirect Effects** are impacts resulting from purchases of goods and services to support project construction and businesses selling goods and services to a project, specifically the retail, office, hotel uses, and new households.
- **Induced Effects** result when direct and indirect employees spend their compensation on different goods and services within the economy. The indirect and induced effects are together referred to as the "multiplier effect" of the direct expenditures associated with the development of a project.

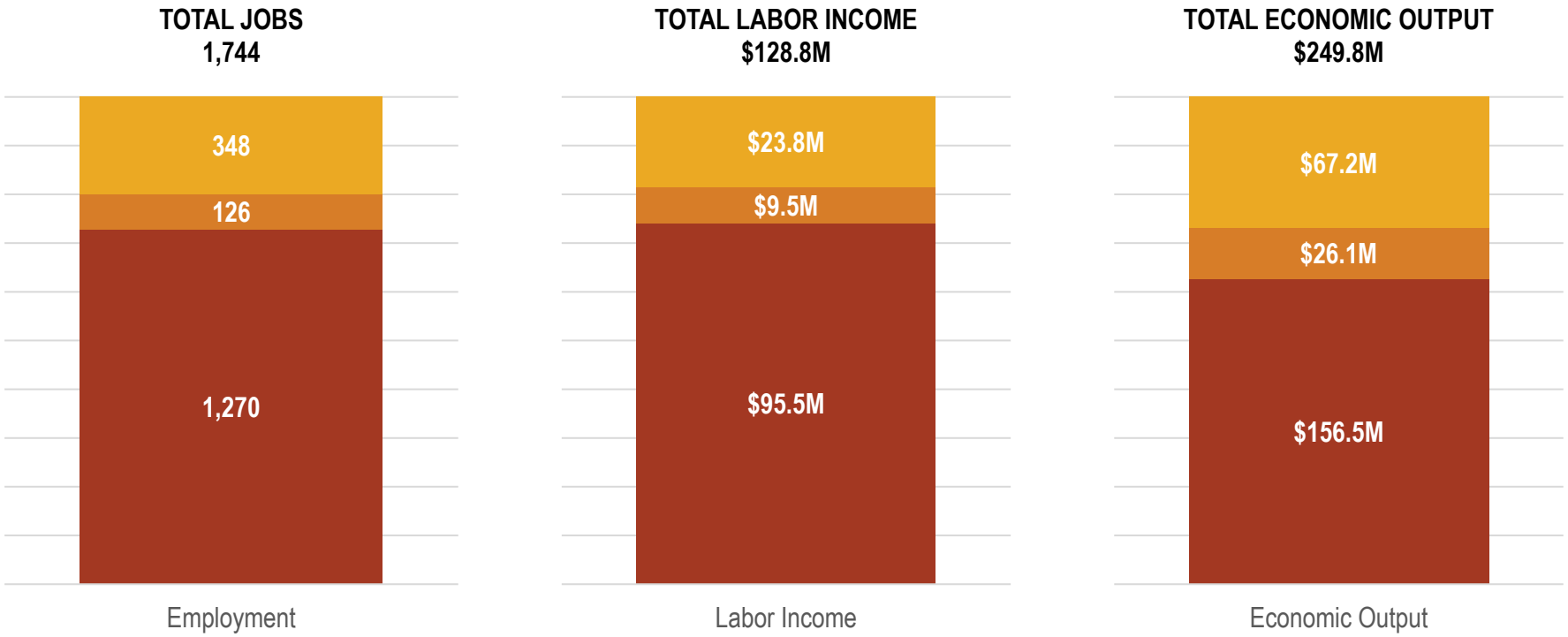
The analysis quantifies the above benefits in terms of the following measures

- **Employment** – New full-time and part-time jobs, reflecting the number of jobs/workers employed in any given year.
- **Labor Income** – Payroll and benefits associated with the created jobs, along with additional proprietor income (payments received by self-employed individuals and unincorporated business owners)
- **Economic Output** – Increase in gross industry receipts, representing the total economic activity generated by the project.

ONE-TIME IMPACTS FROM CONSTRUCTION

RCLCO REAL ESTATE CONSULTING

ONE-TIME IMPACTS YIELD 1,744 TOTAL JOB-YEARS, TOTAL LABOR INCOME OF $128.8M, AND A TOTAL ECONOMIC OUTPUT OF $249.8M

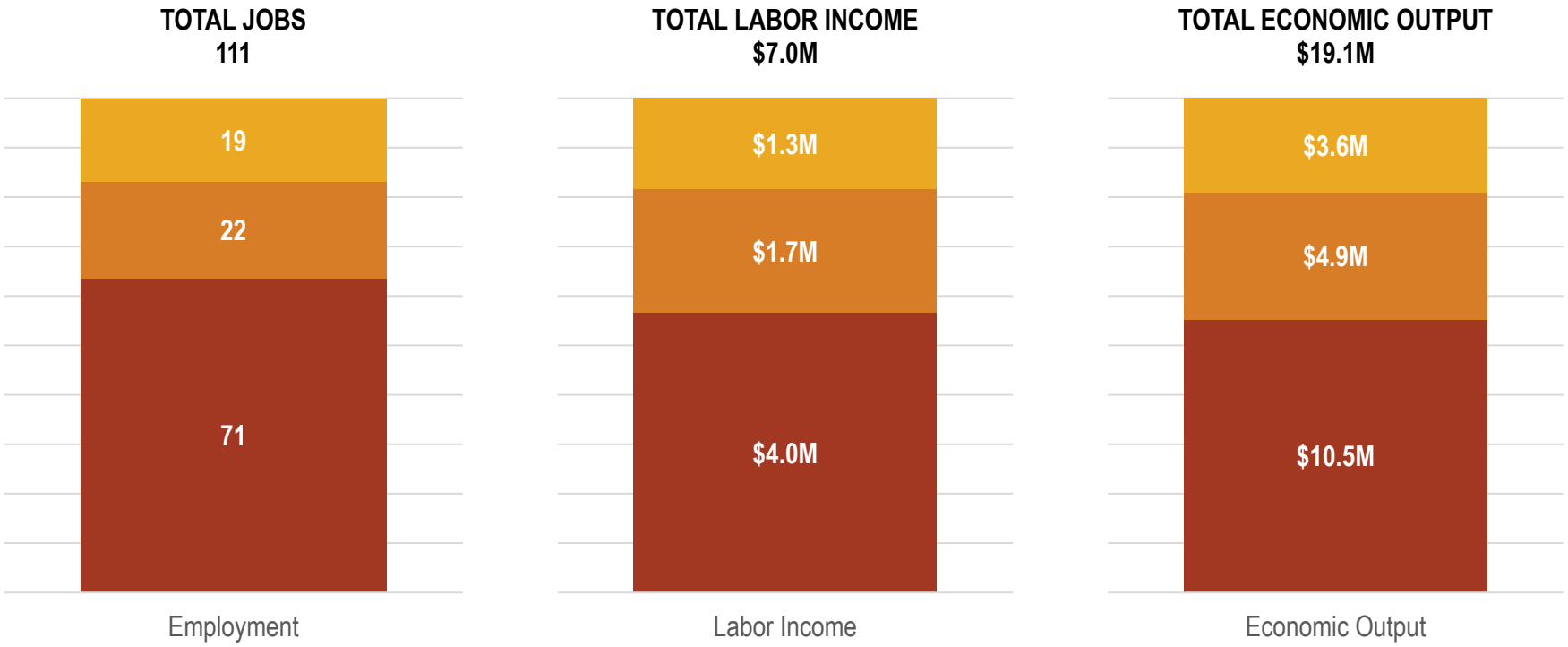


	EMPLOYMENT	LABOR INCOME	ECONOMIC OUTPUT
Direct	1,270	$95,475,531	$156,473,959
Indirect	126	$9,466,221	$26,081,491
Induced	348	$23,842,975	$67,210,269
Total Effect	**1,744**	**$128,784,726**	**$249,765,719**
Multiplier	**1.37**	**1.35**	**1.60**

Note: Economic impact values expressed in constant 2023 dollars (no inflation). Employment expressed as total full-time and part-time jobs. Construction employment is expressed in job-years, i.e. one employee who works for three years would be three job-years.
Source: Client; IMPLAN; RCLCO

RECURRING IMPACTS FROM OPERATIONS

RECURRING IMPACTS YIELD 111 JOBS, TOTAL LABOR INCOME OF $7.0M, AND A TOTAL ECONOMIC OUTPUT OF $19.1M PER YEAR



	EMPLOYMENT	LABOR INCOME	ECONOMIC OUTPUT
Direct	71	$3,962,325	$10,529,960
Indirect	22	$1,743,906	$4,896,018
Induced	19	$1,286,889	$3,628,479
Total Effect	**111**	**$6,993,120**	**$19,054,457**
Multiplier	**1.57**	**1.76**	**1.81**

Note: Economic impact values expressed in constant 2023 dollars (no inflation). Employment expressed as total full-time and part-time jobs. Construction employment is expressed in job-years, i.e. one employee who works for three years would be three job-years.
Source: Client; IMPLAN; RCLCO

ONE-TIME CONSTRUCTION IMPACTS FROM CONSTRUCTION

To assess the one-time economic impact resulting from the development of the Subject Site, RCLCO inputted the cost of each land use into IMPLAN. RCLCO relied on Client-provided information and industry standards to inform the total cost associated with construction.

ANNUAL RECURRING IMPACTS: REVENUE FROM OPERATIONS

To assess the economic impact resulting from onsite operations at the Subject Site at build-out, RCLCO undertook the following approach:

- **Market-Rate Apartments, Affordable Apartments, and Market-Rate Townhomes** – To measure the impact of rental operations, RCLCO estimated the annual operating expenses associated the rental apartments and townhomes, relying on expected achievable rents and AMI levels from Client-provided information.

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DISCLAIMERS

CRITICAL ASSUMPTIONS

Our conclusions are based on our analysis of the information available from our own sources and from the client as of the date of this report. We assume that the information is correct, complete, and reliable.

We made certain assumptions about the future performance of the global, national, and local economy and real estate market, and on other factors similarly outside either our control or that of the client. We analyzed trends and the information available to us in drawing these conclusions. However, given the fluid and dynamic nature of the economy and real estate markets, as well as the uncertainty surrounding particularly the near-term future, it is critical to monitor the economy and markets continuously and to revisit the aforementioned conclusions periodically to ensure that they are reflective of changing market conditions.

We assume that the economy and real estate markets will experience a period of slower growth in the next 12 to 24 months, and then return to a stable and moderate rate in 2024 and beyond. However, stable and moderate growth patterns are historically not sustainable over extended periods of time, the economy is cyclical, and real estate markets are typically highly sensitive to business cycles. Further, it is very difficult to predict when inflection points in economic and real cycles will occur.

With the above in mind, we assume that the long-term average absorption rates and price changes will be as projected, realizing that most of the time performance will be either above or below said average rates.

Our analysis does not consider the potential impact of future economic shocks on the national and/or local economy, and does not consider the potential benefits from major "booms" that may occur. Similarly, the analysis does not reflect the residual impact on the real estate market and the competitive environment of such a shock or boom. Also, it is important to note that it is difficult to predict changing consumer and market psychology.

As such, we recommend the close monitoring of the economy and the marketplace, and updating this analysis as appropriate.

Further, the project and investment economics should be “stress tested” to ensure that potential fluctuations in revenue and cost assumptions resulting from alternative scenarios regarding the economy and real estate market conditions will not cause failure.

In addition, we assume that the following will occur in accordance with current expectations:

- Economic, employment, and household growth
- Other forecasts of trends and demographic and economic patterns, including consumer confidence levels
- The cost of development and construction
- Tax laws (i.e., property and income tax rates, deductibility of mortgage interest, and so forth)
- Availability and cost of capital and mortgage financing for real estate developers, owners and buyers
- Competitive projects will be developed as planned (active and future) and that a reasonable stream of supply offerings will satisfy real estate demand
- Major public works projects occur and are completed as planned

Should any of the above change, this analysis should be updated, with the conclusions reviewed accordingly (and possibly revised).

GENERAL LIMITING CONDITIONS

Reasonable efforts have been made to ensure that the data contained in this study reflect accurate and timely information and are believed to be reliable. This study is based on estimates, assumptions, and other information developed by RCLCO from its independent research effort, general knowledge of the industry, and consultations with the client and its representatives. No responsibility is assumed for inaccuracies in reporting by the client, its agent, and representatives or in any other data source used in preparing or presenting this study. This report is based on information that to our knowledge was current as of the date of this report, and RCLCO has not undertaken any update of its research effort since such date.

Our report may contain prospective financial information, estimates, or opinions that represent our view of reasonable expectations at a particular time, but such information, estimates, or opinions are not offered as predictions or assurances that a particular level of income or profit will be achieved, that particular events will occur, or that a particular price will be offered or accepted. Actual results achieved during the period covered by our prospective financial analysis may vary from those described in our report, and the variations may be material. Therefore, no warranty or representation is made by RCLCO that any of the projected values or results contained in this study will be achieved.

Possession of this study does not carry with it the right of publication thereof or to use the name of "Robert Charles Lesser & Co." or "RCLCO" in any manner without first obtaining the prior written consent of RCLCO. No abstracting, excerpting, or summarization of this study may be made without first obtaining the prior written consent of RCLCO. This report is not to be used in conjunction with any public or private offering of securities or other similar purpose where it may be relied upon to any degree by any person other than the client without first obtaining the prior written consent of RCLCO. This study may not be used for any purpose other than that for which it is prepared or for which prior written consent has first been obtained from RCLCO.

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Exhibit II-2B General Fund Impact Analysis - Stabilized Utility Tax Revenue (2023 $); Gardena, California; December 2023

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Exhibit III-2 One-Time Economic Impacts from Construction; 16911 Normandie; Gardena, California; December 2023

Exhibit III-3A Inputs to Economic Impact Analysis; One-Time Impacts From Construction; 16911 Normandie; Gardena, California

Exhibit III-3B Inputs to Economic Impact Analysis; Recurring Impacts From Onsite Real Estate Operations; 16911 Normandie; Gardena, California; December 2023

Exhibit III-3C Inputs to Economic Impact Analysis; Recurring Impacts From Offsite Retail Spending - Residential For-Rent Households; 16911 Normandie; Gardena, California; December 2023

I. DEVELOPMENT IMPACT FEE ANALYSIS

Exhibit I-1

Financial Feasibility Analysis
Gardena, California
December 2023

	PER UNIT	TOTAL
OPERATIONS		
Revenue		$15,360,745
Expenses		$4,424,805
NET OPERATING INCOME	**$27,136**	**$10,935,940**
FEASIBILITY		
Target Yield on Cost		6.00%
Maximum Threshold for Investment	$555,688	$182,265,662
Less: Land Cost	$48,804	$19,668,000
Less: Hard Cost	$313,917	$126,508,363
Less: Other Soft Costs	$47,493	$19,139,508
Less: Financing Costs	$26,864	$10,826,088
Less: City One-Time Construction Fees	$5,412	$2,180,892
Less: Other Fees (School, Utilities, etc.)	$6,679	$2,691,815
Available Costs for Development Impact Fee	$3,104	$1,250,996
Less: Base Impact Fee	$1,000	$403,000
Less: Quimby Fee	$1,861	$750,000
Additional Impact Fee	**$243**	**$97,996**

Note: All values in unescalated 2023 dollars.

Source: RCLCO

II. FISCAL IMPACT ANALYSIS

Exhibit II-1

Summary of General Fund Revenue Analysis - Stabilized Revenue Analysis (2023 $)
Gardena, California
December 2023

	EXISTING USE	PROPOSED DEVELOPMENT
PROGRAM		
Residential Units	-	403
Free Standing Commercial SF	106,100	-
RECURRING ANNUAL REVENUES		
Sales Tax (Occupied Residents)	$0	$43,744
Real Property Tax Revenue	$6,000	$203,400
Property Tax in Lieu of VLF	$5,300	$178,700
Property Owner Utilities Tax	$0	$27,576
Tenant Utilities Tax	$0	$13,788
Other Revenues	$0	$81,500
Total General Fund Revenues	**$11,300**	**$548,708**
ONE-TIME REVENUES		
City One-Time Construction Fees	$0	$2,180,892
Development Impact Fee	$0	$1,250,996
Sales Tax From Construction Materials	$0	$56,900
Total General Fund Revenues	**$0**	**$3,488,788**

Note: All values in unescalated 2023 dollars.

Source: RCLCO

Exhibit II-2A

General Fund Impact Analysis - Stabilized Transient Sales Tax Revenue (2023 $)
Gardena, California
December 2023

	EXISTING USE	PROPOSED DEVELOPMENT
Average Rent [1]	N/A	$3,174
Percent of Income [2]	30%	30%
Average Household Income	N/A	$126,955
Number of Units	0	403
Occupancy Rate [3]	95%	95%
Percent Spent on Retail [4]	30%	30%
Total Retail Spending	$0	$14,581,387
% Taxable Retail Sales in City of Gardena [5]	40%	40%
Taxable Retail Sales in City of Gardena	$0	$5,832,555
City Sales Tax	0.75%	0.75%
City of Gardena Occupied Unit Sales Tax Revenue	**$0**	**$43,744**

[1] Assumes development scenario rents provided by 16911 Normandie Associates.
[2] Per RCLCO assumptions.
[3] Assumes stabilized occupancy of 95%.
[4] Per BLS Consumer Expenditure Report
[5] Asuming 80% of sales are taxable and 50% of taxable sales are in Gardena.

Exhibit II-2B

General Fund Impact Analysis - Stabilized Utility Tax Revenue (2023 $)
Gardena, California
December 2023

	EXISTING USE	PROPOSED DEVELOPMENT
Number of Units	0	403
Occupancy Rate	95%	95%
Occupied Units	0	383
PROPERTY OWNER UTILITY TAX REVENUE		
Owner Utility Cost/Month Per Unit [1]	$0.00	$120.00
Total Owner Utility Spending	N/A	$551,520
City of Gardena Utility Tax Rate	5%	5%
Total Property Owner Utility Tax Revenue	$0	$27,576
TENANT UTILITY TAX REVENUE		
Tenant Utility Cost/Month Per Unit [2]	$0.00	$60.00
Total Tenant Utility Spending	N/A	$275,760
% Taxable Retail Sales in City of Gardena	5%	5%
Taxable Retail Sales in City of Gardena	$0	$13,788

[1] Assumes owner accounts for electricity and water spending.
[2] Assumes tenant accounts for internet spending.

Note: All values in unescalated 2023 dollars.

Source: Client; City of Gardena; RCLCO

Exhibit II-2C

General Fund Impact Analysis - Stabilized Property Tax Revenue (2023 $)
Gardena, California
December 2023

	EXISTING USE	PROPOSED DEVELOPMENT
Land (Current Assessed Value) [1]	$3,560,000	$19,300,000
Improvements (Construction Costs) [2]	$1,800,000	$162,965,662
Total Assessed Value	$5,360,000	$182,265,662
REAL PROPERTY TAX REVENUE		
Real Property Tax Rate	1%	1%
Total Real Property Tax Revenue	$53,600	$1,822,657
City of Gardena Share of Real Property Tax Revenue [3]	11.16%	11.16%
City of Gardena Real Property Tax Revenue	**$6,000**	**$203,400**
PROPERTY TAX IN LIEU OF VLF		
City of Gardena Total Assessed Value [4]	$7,508,295,733	$7,508,295,733
Property Tax in Lieu of VLF Revenue (Estimate) [5]	$7,362,472	$7,362,472
% Increase in City of Gardena Total Assessed Value from 16911 Normandie	0.1%	2.4%
Increase in City of Gardena VLF Revenue	**$5,300**	**$178,700**
TOTAL ANNUAL PROPERTY TAX REVENUE	**$11,300**	**$382,100**

[1] Based on latest assessed value as provided by the LA County Assessor's Office.
[2] For existing use, based on latest assessed improvements as provided by the LA County Assessor's Office. For redevelopment scenarios based on total development cost.
[3] Based on tax information for Tax Rate Area 00576.
[4] Based on information published in the 2022 LA County Assessor's Annual Report.
[5] Based on the information published by the California State Controller's Office for Gardena General Revenues for 2022.

Note: All values in unescalated 2023 dollars.
Source: Client; City of Gardena; Los Angeles County Assessor's Office; RCLCO

Exhibit II-2D

Stabilized One-Time Fiscal Revenues from Construction (2022 $)
Gardena, California
December 2023

	EXISTING USE	PROPOSED DEVELOPMENT
Total Costs	$0	$182,265,662
SALES TAX REVENUES		
Hard Costs	$0	$126,508,363
Materials (% of Hard Costs)	60%	60%
Materials Cost	$0	$75,905,018
% Taxable and Purchased in City of Gardena	10%	10%
Materials Purchased in City of Gardena	$0	$7,590,502
City of Gardena Sales Tax Rate	0.75%	0.75%
City of Gardena Sales Tax Revenue	**$0**	**$56,900**

Note: All values in unescalated 2023 dollars.

Source: Client; RCLCO

Exhibit II-3A

Recurring Revenues by Residents and Resident Equivalents
16911 Normandie
Gardena, California
December 2023

POPULATION CHARACHTERISTICS	TOTAL RELEVANT GENERAL FUND REVENUES [2]	REVENUE PROJECTION BASIS	REVENUE PROJECTION FACTOR	EXISTING USE	PROPOSED DEVELOPMENT
Projected Residents [1]			100%	0	622
Projected Employees [1]			50%	0	20
Resident-Equivalent Population				**0**	**642**
REVENUES - AVERAGE COST APPROACH					
Business License Tax	$2,811,375	Resident-Equivalent Population	$37.91	$0	$24,300
Franchise and Other Taxes	$4,879,429	Resident-Equivalent Population	$65.79	$0	$42,200
Fines and Forfeitures	$1,220,929	Resident-Equivalent Population	$16.46	$0	$10,600
Other Revenue	$512,036	Resident-Equivalent Population	$6.90	$0	$4,400
Total Revenues				**$0**	**$81,500**

RESIDENT EQUIVALENT POPULATION, CITY OF GARDENA	
Resident Population	61,543
Employment	25,239
Employment in Res. Equivalents @ 50%	12,620
Total Resident Equivalent Population	**74,163**

[1] Assumes an average household size of approximately 1.30. Assumes 0.05 employees per unit.
[2] Reflects other revenue categories from the City of Gardena General Fund that are evaluated using the average cost approach. Note that these include only certain categories and do not sum to total General Fund Revenues.

Source: Esri; City of Gardena; RCLCO

Exhibit II-3B

Summary of General Fund Revenues
City of Gardena
Fiscal Year 2023-2024

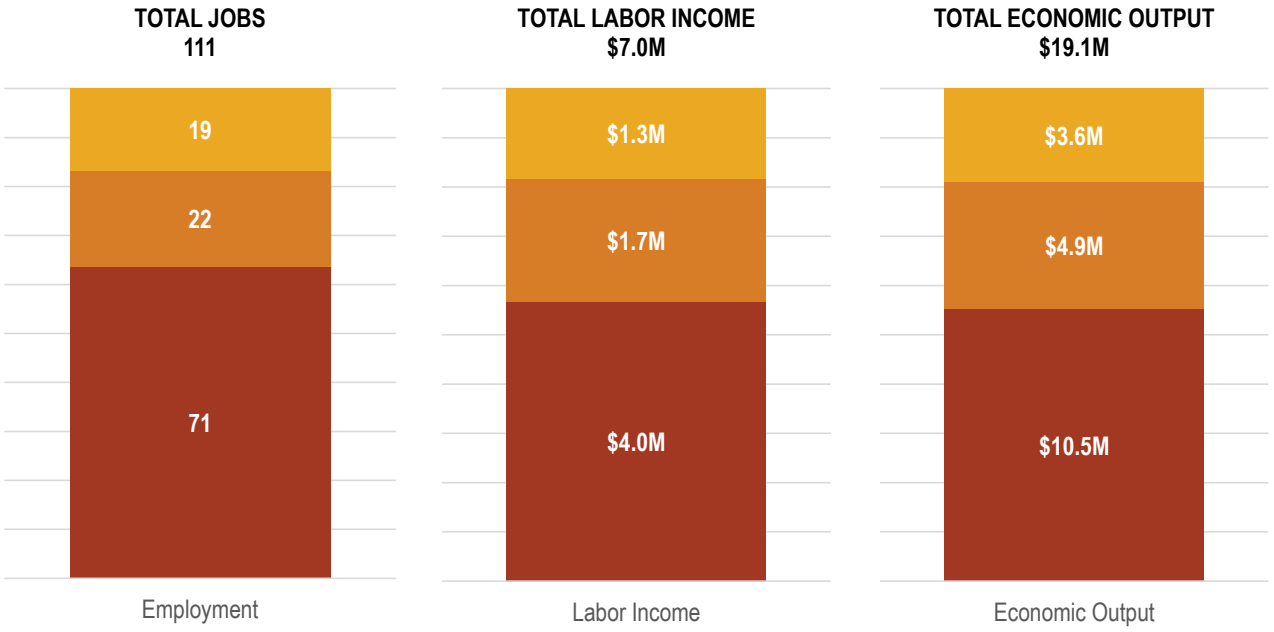
	2022-2023 ADOPTED BUDGET	% OF GENERAL FUND REVENUES
Sales and Use Tax	$27,151,875	33.1%
Card Club Gross Revenue Fees	$9,193,600	11.2%
Property Tax	$9,945,583	12.1%
Vehicle License Fees	$7,962,464	9.7%
Utility Users Tax	$5,962,277	7.3%
Business License Tax	$2,811,375	3.4%
Franchise and Other Taxes	$4,879,429	6.0%
License and Permits	$1,968,790	2.4%
Fines and Forfeitures	$1,220,929	1.5%
Investment Income	$355,000	0.4%
Intergovernmental	$537,500	0.7%
Current Service Charge	$2,556,467	3.1%
Other Revenue	$512,036	0.6%
Transfer In	$4,242,486	5.2%
Charges to Other Funds	$2,702,388	3.3%
TOTAL	**$82,002,199**	**100.0%**

Source: City of Gardena

III. ECONOMIC IMPACT ANALYSIS

Exhibit III-1

Annual Economic Impacts from Project Operations at Stabilization
16911 Normandie
Gardena, California
December 2023



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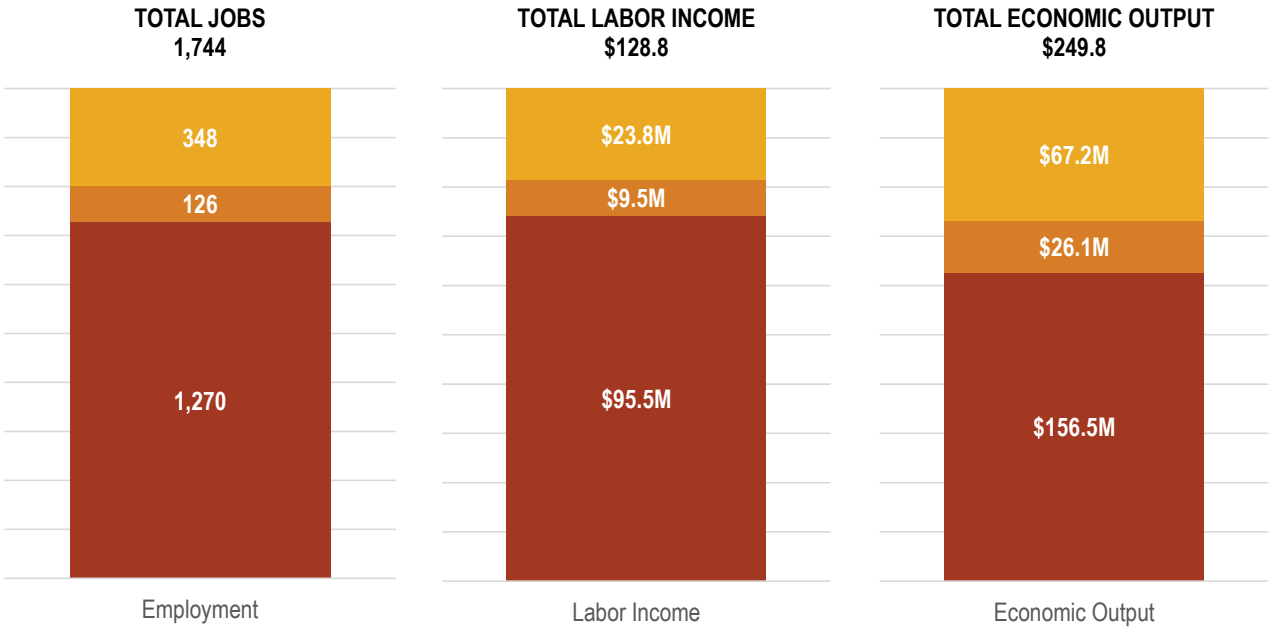
Total Effect	**111**	**$6,993,120**	**$19,054,457**
Multiplier	**1.57**	**1.76**	**1.81**

Note: All values expressed in constant 2023 dollars. Employment expressed as total part-time and full-time jobs.

Source: Client; IMPLAN; RCLCO

Exhibit III-2

One-Time Economic Impacts from Construction
16911 Normandie
Gardena, California
December 2023



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Indirect	126	$9,466,221	$26,081,491
Induced	348	$23,842,975	$67,210,269
Total Effect	**1,744**	**$128,784,726**	**$249,765,719**
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Note: All values expressed in constant 2023 dollars. Employment expressed as total part-time and full-time job-years (one person working for three years would be three job years).

Source: Client; IMPLAN; RCLCO

Exhibit III-3A

Inputs to Economic Impact Analysis
One-Time Impacts From Construction
16911 Normandie
Gardena, California
December 2023

CONSTRUCTION COSTS			
	INPUT: TOTAL CONSTRUCTION	IMPLAN SECTOR	
LAND USE	COSTS + TI (2023$)[1]	SECTOR CODE	IMPLAN DESCRIPTION
Residential For-Rent	$156,473,959	58	Construction of new multifamily residential structures

[1] Based on estimated hard cost and TI figures provided by RCLCO and the Client.

Note: All values expressed in constant 2023 dollars.

Source: Client; RLB; IMPLAN; RCLCO

Exhibit III-3B

Inputs to Economic Impact Analysis
Recurring Impacts From Onsite Real Estate Operations
16911 Normandie
Gardena, California
December 2023

REAL ESTATE OPERATIONS			
		IMPLAN SECTOR	
LAND USE	TOTAL OPERATING EXPENSES [1]	CODE	DESCRIPTION
Residential For-Rent	$4,497,883	447	Other real estate

Note: All values expressed in constant 2023 dollars.

Source: IMPLAN; Client; RCLCO

Exhibit III-3C

Inputs to Economic Impact Analysis
Recurring Impacts From Offsite Retail Spending - Residential For-Rent Households
16911 Normandie
Gardena, California
December 2023

ANNUAL RESIDENT RETAIL EXPENDITURES			
	UNITS	AVG. INCOME [1]	RETAIL EXP. [2]
Residential For-Rent Households	403	$126,955	$36,182

	RESIDENTIAL SPENDING		OFFSITE RETAIL EXPENDITURES	IMPLAN SECTOR	
CATEGORY	DISTRIBUTION OF SPENDING [3]	% SPENT ONSITE [4]	RESIDENTIAL FOR-RENT HOUSEHOLDS	CODE	IMPLAN DESCRIPTION
Motor vehicle and parts dealers	18.5%	0%	$2,700,941	402	Retail - Motor vehicle and parts dealers
Furniture and home furnishings stores	2.7%	0%	$391,584	403	Retail - Furniture and home furnishings stores
Electronics and appliance stores	1.9%	0%	$282,754	404	Retail - Electronics and appliance stores
Building material and garden equipment and supplies stores	5.8%	0%	$838,456	405	Retail - Building material and garden equipment and supplies stores
Food and beverage stores	11.8%	0%	$1,716,500	406	Retail - Food and beverage stores
Health and personal care stores	8.3%	0%	$1,206,086	407	Retail - Health and personal care stores
Gasoline stores	8.5%	0%	$1,238,648	408	Retail - Gasoline stores
Clothing and clothing accessories stores	7.6%	0%	$1,105,398	409	Retail - Clothing and clothing accessories stores
Sporting goods, hobby, musical instrument and book stores	2.4%	0%	$345,164	410	Retail - Sporting goods, hobby, musical instrument and book stores
General merchandise stores	17.3%	0%	$2,523,239	411	Retail - General merchandise stores
Miscellaneous store retailers	3.8%	0%	$561,105	412	Retail - Miscellaneous store retailers
Nonstore retailers	1.6%	0%	$239,959	413	Retail - Nonstore retailers
Food Services & Drinking Places	9.8%	0%	$1,431,553	509 & 510	Retail - Full Service Restaurants, Limited-Service Restaurants, All Over Food and Drinking Places

[1] Multifamily household annual income is estimated to be 30.0% of annual rental payment.
[2] Assumes 30% of annual income spent on retail.
[3] Based on CES data.
[4] RCLCO assumption of sales likely to occur at onsite retail outlets, to avoid double-counting.

Note: All values expressed in constant 2023 dollars.
Source: IMPLAN; CES; RCLCO

RCLCO
REAL ESTATE CONSULTING

AUSTIN

501 Congress Ave, Suite 150
Austin, TX 78701

LOS ANGELES

11601 Wilshire Boulevard, Suite 1650
Los Angeles, CA 90025

ORLANDO

964 Lake Baldwin Lane, Suite 100
Orlando, FL 32814

WASHINGTON, DC

7200 Wisconsin Avenue, Suite 1110
Bethesda, MD 20814

RCLCO
REAL ESTATE CONSULTING

MEMORANDUM

DATE: November 24, 2024

TO: 16911 Normandie Associates, LLC

FROM: RCLCO: Derek Wyatt and Jordan LaMarche

SUBJECT: Updated Economic Analysis for Proposed Apartment Development; Gardena, California

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PROJECT BACKGROUND

PROPOSED DEVELOPMENT

16911 Normandie Associates, LLC ("Client") is planning a new apartment development at 16911 S Normandie Avenue in the City of Gardena. The current proposed development comprises 258 apartments and 75 townhomes. The property is currently zoned industrial with housing overlay that covers a portion of the site. Client is planning a zone change / Specific Plan process.

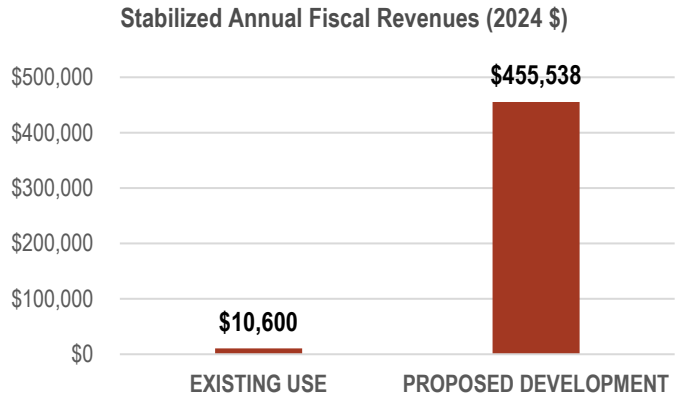
PURPOSE OF STUDY

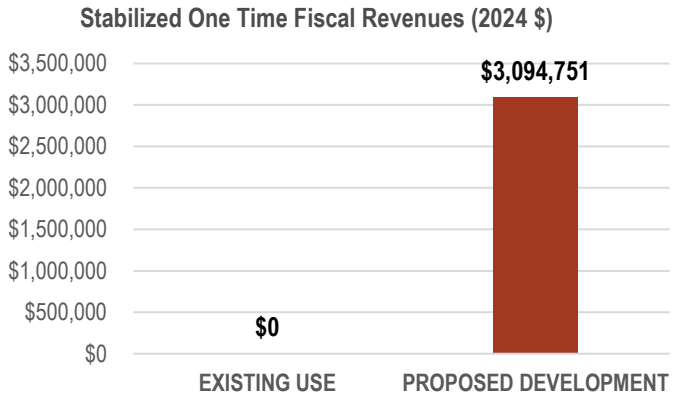
Client engaged RCLCO to estimate the incremental revenues generated for the City of Gardena in the form of fees and taxes from the new development and to evaluate and quantify the incremental impact on the local economy during the construction and operational (build-out) phases of the proposed development. This analysis has two components covering the one-time construction and operations phases. In each analysis, the estimates include the "direct" impacts (investment during the project's construction, and retail and business sales and local household spending that recur at build-out) and the "multiplier" effects (the circulation of these direct effects within the local economy). Client originally engaged RCLCO in 2023 and submitted a report at that time to the City of Gardena. Since then, plans for the development have been revised resulting in a reduction in apartment units and reduced building heights. This memorandum follows the same methodology and approach as our prior analysis and applies this to the current development program.

FISCAL REVENUE IMPACT

The Clients' revised development is anticipated to generate over **$455,538 in revenues** for the City's General Fund per year. This represents a figure **$444,938 larger** than the estimated revenues generated by the current use at the Subject Site. This includes sales tax, property tax, utility tax, and other revenues generated from the new residential units at 16911 S Normandie Avenue.

The development of the proposed project also yields one-time construction-related revenues totaling **over $3 million**, including construction fees, development impact fees, and sales tax from construction materials.





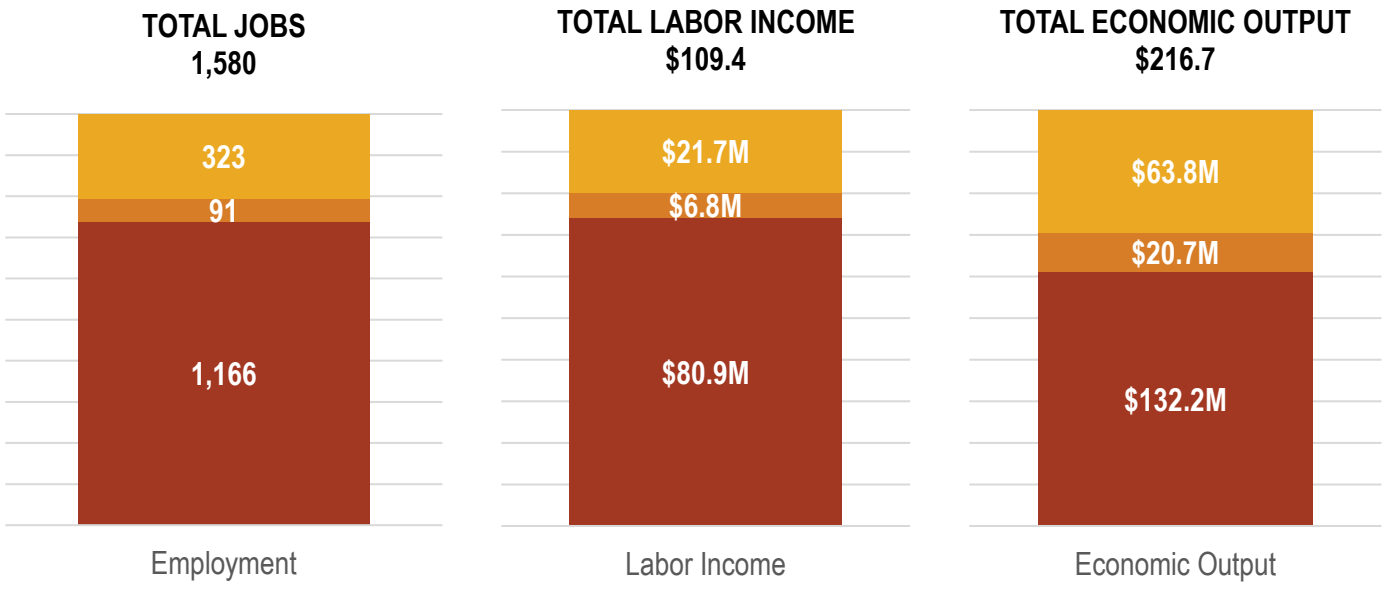
RCLCO
REAL ESTATE CONSULTING

ONE-TIME ECONOMIC IMPACT FROM CONSTRUCTION

RCLCO estimated the following one-time construction-related economic impacts using the IMPLAN input-output model and estimated construction costs:

- **1,580 total job-years** (including direct onsite jobs plus the "multiplier effect" of indirect and induced jobs), with 1,166 of these job-years estimated to be construction job-years located directly onsite.
- **$109.4 million in total labor income** (wages, salaries, and benefits paid to direct, indirect, and induced workers associated with construction), of which $80.9 million is projected to be paid to onsite construction employees.
- A total economic output associated with construction of **$216.7 million in the local economy**, of which $132.2 million reflects the value of direct project construction.

ONE-TIME IMPACTS FROM CONSTRUCTION



	EMPLOYMENT	LABOR INCOME	ECONOMIC OUTPUT
Direct	1,166	$80,889,951	$132,160,535
Indirect	91	$6,764,174	$20,723,457
Induced	323	$21,734,630	$63,766,026
Total Effect	**1,580**	**$109,388,755**	**$216,650,019**
Multiplier	**1.35**	**1.35**	**1.64**

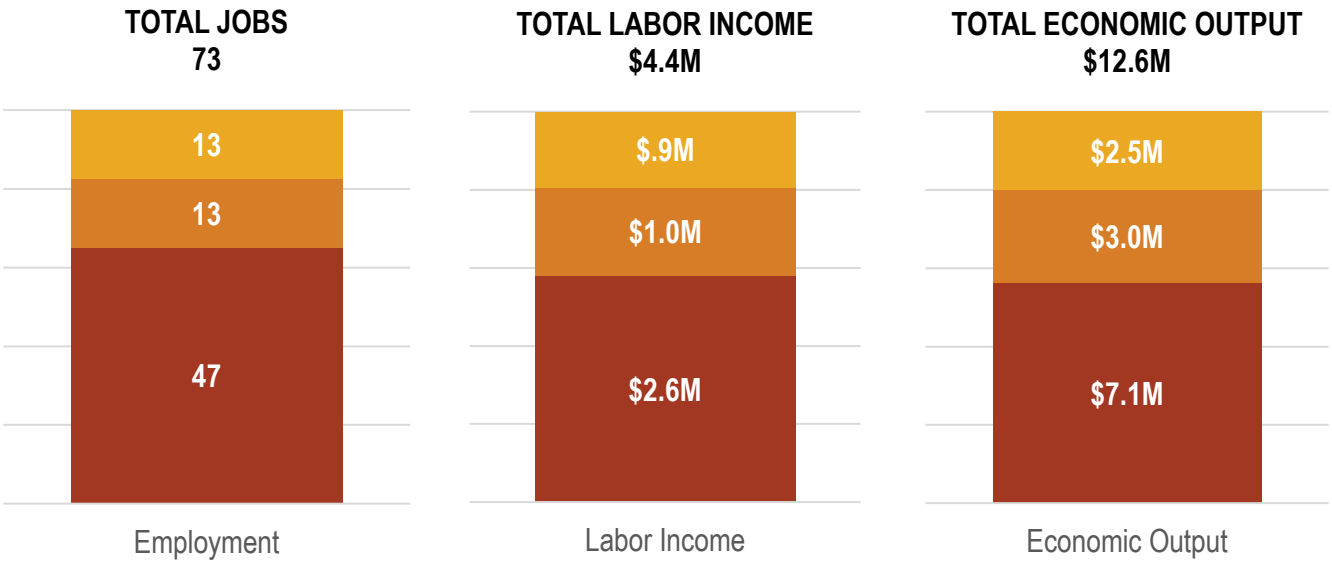
RECURRING (ANNUAL) ECONOMIC IMPACTS FROM OPERATIONS

RCLCO estimated the following recurring annual economic impact from the operations of the onsite uses at the project at build-out, relying on Client inputs and RCLCO estimates for real estate performance metrics and household spending:

- **73 total jobs per year** (including direct onsite jobs plus the "multiplier effect" of indirect and induced jobs). Of these jobs, 47 are estimated to be directly created onsite by businesses or in the local economy by residential spending.
- **$4.4 million in total labor income per year** (wages, salaries, and benefits paid to direct, indirect, and induced workers associated with onsite businesses and household spending). Of this compensation, $2.6 million is projected to be directly generated onsite by businesses or throughout the local economy by residential spending.
- A total economic output associated with operations of **$12.6 million per year** in the local economy, of which $7.1 million reflects the value of direct project operations and household spending.

RCLCO
REAL ESTATE CONSULTING

RECURRING IMPACTS FROM OPERATIONS



	EMPLOYMENT	LABOR INCOME	ECONOMIC OUTPUT
Direct	47	$2,555,476	$7,066,397
Indirect	13	$1,003,374	$2,981,083
Induced	13	$854,679	$2,508,799
Total Effect	**73**	**$4,413,530**	**$12,556,279**
Multiplier	**1.54**	**1.73**	**1.78**

From: Rosie Sato
To: Public Comment
Subject: City Council Comment - Normandie Crossing
Date: Friday, January 3, 2025 8:57:58 PM

Caution! This message was sent from outside your organization.

Dear Sir,

I am writing to voice my strong opposition of the Normandie Crossing project!
This massive five story building (plus rooftop amenities which will slow tenants to look into our back yards) is simply **too big for the area**!

We are concerned about the horrible traffic congestion it will bring to all surrounding residential neighborhoods and the increase in crime that will strain the GPD & GFD !

We want safe neighborhoods!

A project this dense is not suitable for this property as it is surrounded by hundreds of multi-unit dwellings! Not to mention the Cocoon is directly across the street and street parking is already highly congested!

Please do the right thing for Gardena and put the 5 story complex in a suitable location that will be less detrimental.

Thank you,
Rose Sato

Sent from my iPhone

From: Michael Hall
To: Public Comment
Subject: Normandie Crossing Project
Date: Saturday, January 4, 2025 3:28:37 PM

Caution! This message was sent from outside your organization.

I regards to this Normandie Crossing Project I am strongly voicing my opposition to this 5 story project. It is way to humongous for the purpose area.
My biggest concern is when you take into consideration the total numbers of Townhomes ,apartments and cars there will not be adequate parking spaces in the area which will lead to people parking there cars on our neighborhood streets. Plus this will increase traffic concerns in our areas.
I live in a neighborhood where citizens feel safe walking and I think a Project this size would be more suitable somewhere else where it is not surrounded by so many near by homes.

Thank you for your consideration

Sent from my iPhone

From: Kathryn Everson
To: Public Comment
Subject: CITY COUNSEL COMMENT
Date: Saturday, January 4, 2025 3:43:33 PM

Caution! This message was sent from outside your organization.

I'm voicing my opposition to the Normandie Crossing project. Gardena traffic and population cannot withstand the addition of 300 or more units. I can speak from experience. San Pedro has done the same thing with HUNDREDS of homes recently built on Western. Traffic is a daily, unbearable situation with ill-timed lights, as well as everyday crowds in grocery stores and pharmacies. Rents/housing prices have soared. Please think of the CURRENT residents before plowing ahead in asking them to support housing, so that local government can appease landlords and builders.

From: Raymond GONZALEZ
To: Public Comment
Subject: City council comment
Date: Saturday, January 4, 2025 4:22:15 PM

Caution! This message was sent from outside your organization.

I oppose the development of a massive 5-story apartment complex that is directly adjacent to the Merit homes track. This project is too dense and big for the area and will have a negative impact on the residents and visitors of the area. Traffic is bad enough already and this project will only make it worse. So what the fuck is wrong with you people?
Regards
Power to the People
Sent from my iPhone

From: Hyunah Suh
To: Public Comment
Subject: Opposition to Normandie Crossing Project at 16911 S. Normandie Ave., Gardena
Date: Sunday, January 5, 2025 1:47:38 PM

Caution! This message was sent from outside your organization.

To the Gardena City Council:

I am a homeowner at 1436 W 170th Street, Gardena, CA. I am opposed to this project as is, being built in my neighborhood. This is unacceptable because it will dramatically change the area which is low density into a high density area thereby affecting the property value and the quality of life specifically for all the residents living on 170th Street as well as the surrounding streets. A key detail in the architectural renderings raised great concerns in that the entrance and exit points will be on 169th Street and 170th Street. This creates a significant amount of traffic into a an area that has minimal traffic. It is an area that doesn't see much traffic which is why you have so many residents taking walks on the actual street rather than the sidewalks. Additionally, this project is being proposed on property that is not zoned for residential housing. I am very much opposed to this project and will encourage all my neighbors to express their disapproval as well.

Hyunah Suh
1436 W 170th Street
Gardena CA 90247
310-283-5268

From: Ronald Alcaraz
To: Public Comment
Subject: Normandie & 170th St. Housing Project
Date: Sunday, January 5, 2025 5:49:12 PM

Caution! This message was sent from outside your organization.

To whom it may concern:
I Ron Alcaraz property homeowner on 166th and Normanindie strongly oppose the propose construction of a 5 - story mutli units apartment complex. The area is already saturated with apartment buildings, and 6-900 more people will only bring hundreds of more cars into our area. Just a block away on 166th St. its almost imposible to find a vistor parking space in the street.

Shopping stores in our area are already filled to capacity, and hundreds more will only make it harder for we the people to live a normaly way of life. With more poeple comes more crime as well. I ask the city consul to oppose this project and reject the new housing development.

Regards,
Ron Alcaraz

From: Carrie Lew
To: Public Comment
Subject: Oppose: Merit Homes track (Normandie & 170th)
Date: Monday, January 6, 2025 6:16:20 AM

Caution! This message was sent from outside your organization.

City of Gardena, City Council

I am in opposition of the 5-story apartment complex Merit Homes track (Normandie & 170th) because it is too big and too dense for the area. It will create a traffic nightmare on all residential streets within a one mile radius as 800-900 new tenants race through the neighborhood in an effort to avoid the already congested streets of Normandie, Artesia, Western and Vermont!

Additionally there will be safety and privacy concerns, increased crime and a strain on emergency services.

The bottom line: this project will have a negative effect on our quality of life!

Please do not move forward with this nightmare of a project!

Regards,
Carrie

~ ~ ~ ~ ~

Carrie A. Lew, EdD, LCSW

From: methane.annoy-5f@icloud.com
To: Public Comment
Subject: City Council Comment Normandie
Date: Monday, January 6, 2025 2:54:40 PM

Caution! This message was sent from outside your organization.

Gardena City Council,

I'm writing in opposition to the Normandie Crossing Project as proposed. I'm open to a smaller development of half to a third the size.
A compromise will provide housing needs with a less negative impact.. Would you want to live next to this?
Let that guide your vote.

Best regards,

Randy Tanaka

From: Denise Okabe
To: Public Comment
Subject: New housing
Date: Monday, January 6, 2025 5:40:28 PM

Caution! This message was sent from outside your organization.

City of Gardena,

I am opposed to the Normandie Crossing Project because traffic will be horrendous. Artesia is already inundated with cars as it is. It will affect the current residents and well as businesses nearby !
Please reconsider this project .

Thank you,
Denise K. Okabe
Sent from my iPad

From: Janet Taga
To: Public Comment
Subject: City Council Comment
Date: Tuesday, January 7, 2025 6:17:48 AM

Caution! This message was sent from outside your organization.

Re: Normandie Crossing Project

I frequently shop and attend various programs and activities in the City of Gardena . As it is now, the traffic and availability of parking is challenging. The addition of a housing project of that magnitude would severely impact existing conditions. Please reject this project!

Janet Taga

From: AT&T COMMUNICATIONS
To: Public Comment
Cc: Tasha Cerda; Rodney Tanaka; Mark Henderson; Paulette Francis; wkive@cityofgardena.org
Subject: CITY COUNCIL COMMENT REGARDING NORMANDIE CROSSING (SP #1-21)
Date: Tuesday, January 7, 2025 4:50:02 PM

Caution! This message was sent from outside your organization.

At least twice now, Saiko Investment Corporation and its representatives Fred Shaffer and Steve Ludwig have put forth their project imposing on the surrounding community a monstrosity of an apartment building in addition to the single dwelling 3 story townhomes all within a 5.3 acre parcel that is currently not zoned for RESIDENTIAL USAGE.

Before I pen my perspectives, as well as those of my fellow neighbors, on the impact it will most definitely cause, can we please address the elephant in the room? Who within your staff or on the City of Gardena Planning Commission is actually in these guys back pockets? How many times is this monstrosity of an idea proposing 333 dwellings (combination 75 Townhouses, this number not reduced and now 6 STORIES, reduced from 7, apartment building - 258 units) to the commission and now the City Council going to be even considered and why? One can only imagine that after the first Planning Commission meeting back in March 2024, where the RESIDENTS within the surrounding area as well as LOCAL CONTRACTORS voiced very CLEARLY and loudly that they DID NOT WANT this type of development, that someone surely is in cahoots with Saiko, Shaffer and Ludwig and his spin off company which manages apartment buildings claiming affordable living while charging a home mortgage price for 2 bedroom apartments! LOOK IT UP!

On top of that they are utilizing an Architecture firm that seems to be stuck in every concept of new building to make them look like BOXES stacked on top of each other with minimum balconies or patio space similar to the commercial of the little girl on the swing in her back yard hitting the wall each time she tries to move! Come on people you can do better and should do better for your constituents that live, work, spend money and VOTE!

With that said, let's get down to some of the specifics, OK? This 'development' will encompass 5.3 acres, a railroad line abuts the property, and I shall presume that the railway will still be active in the next 10 years? That particular line causes traffic delays as train cars move from the south towards the east crossing over on Normandie on numerous occasions. When this happens, the surrounding area is impacted especially at the signal light near Diana's on 166th, not to mention 169th Street and Normandie itself. Adding 333 dwellings to this area is not going to make matters any better! It is bad enough when the rail line used to deliver lumber and supplies to Crenshaw Lumber causes delays on Western Avenue and 166th not to mention 169th Place and Western. I can always tell when the rail line is delivering or leaving the lumber yard because the amount of traffic that we get on 169th Place or even Denker Avenue (I live at the corner of 169th and Denker) sometimes quadruples with cars trying to find a way around the obstruction and delay.

Now, let's move on to the impact alone that Cocoon 63 has caused with their smaller development, shall we? When it was proposed and subsequently approved the developer stated that most of the residents would be utilizing the stacking car garage that thankfully they placed on Normandie Avenue and away from residential housing. However, in the past few years there has been a tremendous INCREASE in the number of cars that are parked ON 169th STREET as well as Brighton. You must also take into consideration the safety issues when an Amazon, FedEx or UPS vehicle is DOUBLE PARKED while making a delivery to Cocoon 63 residents because if one is making a right hand turn on 169th Street from Normandie (going in the south direction), Cocoon 63 obstructs a drivers view onto 169th Street. A driver turning to go west on 169th Street will have no idea if another driver is moving east on 169th Street. Let's fast forward to 2 years from now and the monstrosity of an apartment building is on the opposite side of the street and cars are exiting the underground parking structure. You turn right, have to navigate around a delivery truck they turn left to exit structure and boom! Yeah, quality of life is really upgraded right? Look that area is already bad enough! Why do you want to make it worse? Do any of you on the Council live in this neighborhood? If so, do you not see the parking problem that already exists? The apartment plans call for 1.5 parking spaces per unit, so I'm asking what is a half a car? Can anyone answer that? They have also proposed 50 guest parking spaces for 258 units, huh?

I also remember last time that representatives from the Local Construction union were in force at the meeting in March 2024 and they too voiced their disapproval because we all know that these 'developers' would not be utilizing any of the members but bring in their own construction crews and contractors. How does this in any way shape or form help these guys who live and try to work in their own community? Here's the answer ... IT DOESN'T!

Can we also THINK about the impact that this monstrosity will have on the quality of life for those residents who live on 170th, Brighton and have their backyards abutting Brighton Way? How can you say that the noise of construction for at least 3 years, amount of truck traffic, disruption of street access to their homes, possible water outages as lines are interconnected to the new units, possible gas & electric outages as well is something that they should endure for what? Progress? There are already plans approved for another vast number of units on Artesia Blvd where the Gardena Car Wash and Automotive Center used to be. How many more box like monstrosities does Gardena plan to approve? The impact of traffic on Artesia is already at its limits and the number of times I hear sirens heading in either the direction of Artesia near Denker or Artesia near Western is at least 5 or more a week. Adding this particular development to the mix is really going to impact the ENTIRE neighborhood that borders Artesia to the south, Western Avenue to the west, 166th to the north and Normandie to the East. My suggestion for the 5.3 acres is to keep the 3 story units, DUMP THE

MONSTROSITY OF AN APARTMENT BUILDING and give the surrounding area a boost in the quality of life in a gated townhome community similar to the one on Artesia near the Albertsons Shopping Center.

Finally, if they propose an Environmental Impact study that says it will not impact the neighborhood, well then, they are pulling the wool over EVERYONE'S EYES and really shoveling some serious cow manure! ASK the RESIDENTS in this older and established area of Gardena whether a 6 STORY APARTMENT BUILDING or 75 - 3 STORY TOWNHOMES are something that would add value to their existing neighborhood. I know the answer would be oh hell no! PLEASE THINK AGAIN about this - the highest building in Gardena is the Gardena Hospital, OK? This 6 STORY APARTMENT BUILDING at the beginning of a residential area will be just as high! How is this going to improve an established neighborhood where its residents have lived for at least 20 years or more as I and my husband have? Really?

I know the City Council can do better; I know for a fact that the residents in the surrounding area DESERVE BETTER! The City of Gardena is not and should not try to compete with the likes of Carson (and the concrete corridor they have made along Carson & Avalon, as well as the horrible dwellings that are completing construction across from Harbor General Hospital). Nor should the City of Gardena go the route of Santa Monica where every single building along 3rd and 4th is at least 4+ stories, and the street gets little sunlight anymore. Those cities have developed SARDINE CANS!

As I said, the development on Artesia where the Gardena Car Wash and Automotive Center once did business will be a disruptive process for the surrounding area for quite some time and continue to make our beloved residential area more BOXED IN than I'm sure our original city planners had intended. Progress is necessary, I get it. But progress that IMPROVES A NEIGHBORHOOD rather than DISTRACTS FROM IT is the very definition of progress. 3 story townhouses will be large enough for the small area and may cause some in the surrounding area a breach of privacy, just as the units built on Western south of 169th Place have done to our neighbors on S. Harvard, but allowing a 6 STORY MONSTROSITY to be constructed at the corner and in a neighborhood where most apartment buildings are two story or the majority of dwellings are SINGLE FAMILY, is not progress. It is the City Council and the Planning Commission telling the residents to (because I am nice, I will not say what I want and simply say) take a hike!

I realize this email is long; however, I know that the words I've written is indeed the sentiment of most if not all the residents within the surrounding community. Those same residents VOTE and are quite involved in various causes within our community. It is hard enough nowadays to trust elected officials and I know that those who decide to give their approval to this project will have quite a few VOTERS in the area questioning motives in the next election. As I said YOU ALL CAN DO BETTER and this project is NOT THE ANSWER.

Sincerely,

Donnetta Jalomo resident of Gardena for 30 years.

From: Erwin Canlas
To: Amanda Acuna
Subject: Normandie Crossing Residential Project
Date: Tuesday, January 7, 2025 6:04:40 PM

Caution! This message was sent from outside your organization.

Ms. Acuna,

07JAN2025

As a homeowner on West 173rd St. 90247, I am opposed to the proposed residential project known as Normandie Crossing. I understand the need for housing. However, this project not a good fit for the surrounding neighborhood due to the high-density aspect of the project.

While I am not opposed to development for the city, having a mix of townhomes and apartments within 5.25 acres with 333 units in total is impractical. Coupled with an average of two vehicles per unit for an estimated total of over 666 vehicles, not including their guests, would result in heavier traffic, congestion and the inevitable spillover of street parking due to limited on-site parking. A prime example is the existing Cocoon apartments, a significantly smaller development, directly across the street from the project. Often, its residents and their guest park their vehicles along 169th St., Brighton Ave. and Brighton Way and several adjacent streets.

In addition, the adjacent community surrounding the project has a large population of elderly retirees and families who frequently walk the streets daily, not to mention students attending the nearby schools. The expected high amount of traffic coming to and from Normandie Crossing is worrisome for their safety.

I strongly implore the City of Gardena Planning Commission to reconsider the high-density aspects of Normandie Crossing and to substantially reduce the number of units to be built.

Regards,

Erwin Canlas

From: AT&T COMMUNICATIONS
To: Public Comment
Cc: Tasha Cerda; Rodney Tanaka; Mark Henderson; Paulette Francis; Wanda Love
Subject: COUNCIL MEETING COMMENT REGARDING THE NORMANDIE CROSSING PROJECT
Date: Wednesday, January 8, 2025 2:32:32 PM

Caution! This message was sent from outside your organization.

Yesterday, January 7, 2025 I sent an email to all of you regarding the proposed building project put forth by the Saiko Investment Corporation. In that email, I mentioned that the impact of this project would be burdensome to the surrounding neighborhood. What I didn't mention is a very simple thought which I am imploring all of you to think about and that is would this proposed project give the area a "Sense of Community". I am not writing about the potential sense within the proposed project but rather the larger picture of the surrounding area and the community that we all have presently.

While most of us know each other as the neighbors down the street, there is a sense of belonging within the blocks of Normandie to the east, Western Ave to the west, 166th to the north, and Artesia to the south. These blocks of homes, condos, recently built townhomes and apartment buildings (which I might add are no larger than 3 stories) and their residents have endured enough compaction and loss of privacy in their yards, but what they haven't lost is that "Sense of Community". It is what makes this area special in Gardena!

As I write this, Los Angeles County is experiencing devastating fires in the Palisades as well as Sylmar and Altadena. One of the real problems that comes to mind about these fires is the compact area in which builders have placed dwellings and as I mentioned yesterday, those areas are like a sardine cans.

This project imposes upon our current community 333 living units on just 5.3 acres of land. If that is not compaction then I don't understand what is. Yes, the fires in the Palisades were fueled by unprecedented winds but compaction of the area led to more buildings being leveled by the flames and deterred the efforts of the firefighters and first responders. Thank God that more people were not lost although we know that there were some injured and burnt. It makes me wonder just what would happen to those dwellings south of Artesia, the single-family homes built just north of Artesia between Denker and the shopping center, the new Townhomes built on Western off 169th Place, Cocoon 63 apartments or even the new project that was approved on the area where the former Gardena Car Wash was located (I understand that is a proposed 300 units, again on a compacted area) were a fire that could be fueled by winds happen in those areas causing a devasting catastrophe to our community. If you think that it could never happen then you are burying your heads in the sand as I am sure those in the Palisades thought the same thing!

Therefore, I am again going to ask all of you to please think this project through with very open minds and listen to what the residents are saying to you. This project is not the answer for those 5.3 acres no matter how much Saiko Investment Corporation is trying to blow that smoke up your tushes. 75 Townhomes and a 258-unit 6 story apartment building on such a small parcel is not the answer and I believe that you all know it's not.

I do want progress for our city, but I also want that "Sense of Community" and this project will not accomplish that.

Thank you for hopefully listening to the current residents of the area as well as myself and tell Saiko Investment Corporation that this is NOT what the residents and voters of Gardena are willing to accept.

Donnetta Jalomo (30-year Gardena resident)

From: Keren Hwang
To: Public Comment
Subject: CITY COUNCIL COMMENT
Date: Thursday, January 9, 2025 4:51:42 PM

Caution! This message was sent from outside your organization.

Dear City Council,
I am writing to you with my opinions regarding the building project for Normandie Avenue in Gardena.

I am concerned about the development of the complexes on 16911 Normandie in Gardena. I understand we need housing. However, I don't understand why the buildings need to exceed over three stories high. I don't see buildings taller nearby or in Gardena and building such a gigantic structure would be such an eyesore. And the size of the buildings, or with the capacity to fit so many homes, would create so much more traffic than is already occurring on Normandie Avenue. And let's not forget that earthquakes are still very prevalent in CA. And with the fires this week, it really reminds us of having plans, evacuation or otherwise, for catastrophes that might occur in this neighborhood. We really should be more mindful on how we build our city.

I oppose building something so gigantic in Gardena.

Thank you.

Keren Hwang

Home Owner in Gardena, CA.

From: Michael Walter
To: Public Comment
Subject: City Council comment Normandie
Date: Thursday, January 9, 2025 7:33:41 PM

Caution! This message was sent from outside your organization.

I am writing to state the opposition of me and my wife to the proposed Normandie Crossing Project.

We often walk through the area of the proposed project. It is densely populated, abutting residential homes to the east on 168th and the west on 169th. I can honestly say, from hundreds of walks by the Cocoon at that same address, on the NW corner of 169th and Normandie, that the builders of that set of mini-studio apartments completely failed to provide adequate parking for their tenants. True, they installed a very up-to-date mechanical parking garage, but it is hardly used by the tenants, most of whom park on 169th Street, and on Brighton to the West. Many mornings when I walk by there is *no parking available* along 169th for two blocks going west into residential areas.

So, where are the people living in the proposed units going to park? It's great if the builders say that they have provided 1 ½ cars per unit, but who is going to see that tenants park in those spaces when it is more convenient to park on the street, perhaps even several blocks away in the residential neighborhood.

Also, since the Cocoon is under-occupied now, and has been since being opened, why add more apartments that are likely to remain empty? Two points here: the population in California is decreasing right now, and this is only going to continue, and increase, for the foreseeable future. Second, Gardena hardly has a thriving economy, and people don't seem to be fighting for living spaces or to move into Gardena even temporarily. Many houses are still selling quickly, but it is a different economy for young people with low-paying jobs who are asked to pay a lot for a cubbyhole such as the Cocoon.

I predict that, if this six-story building is constructed, it will barely make money, it will be sold back and forth, costs for individual apartments will rise in response, and eventually it will be a failure, with few residents.

Parking issues and neighborhood quality of life are certainly valid reasons to vote against this proposal, but I would add that it is not an economically sound proposal, and will end up costing the city more in the future (or perhaps even from the beginning) than it will from taxes. BTW, I have been by the Kaya apartments at Crenshaw & Lomita often at night, and if room lights are any indication of rate of occupancy, it is not doing well. To top it all off, rate of occupancy of apartment units all over California is dropping.

If this project were addressing a pressing need, I would be all for it, despite the obvious inconveniences and even safety issues. However, there is no need to address here.

Please vote against this project!

Thank you for taking the time to read this statement.

Sincerely,

Michael Walter
17020 S Raymond Place
Gardena

PETITION TO: STOP the NORMANDIE CROSSING PROJECT.

We, the undersigned, do hereby ~~the~~ petition the Gardena City ~~Couns~~ Counsil ~~for~~/to halt the Normandie Crossing Project.

Name	Contact	Signature
Jane Pak	213-905-8960	Jane Pak
Sangcho Shin	213-905-8958	[illegible]
David Kajiuto	310-5324786	David Kajiuto
Moses M. Park	213-369-0053	Moses Park
Atsumi Ito	310 920 8916	[illegible]
Valerie Ota	310-994-8563	Valerie Ota
Kenneth Ota	520-609-1099	Kenneth Ota
Shirley Okazaki	310-352-1134	Shirley Okazaki
Janette Turner	310 515-0994	Janet Turner
Yumiko Omatsu	310-951-4595	Yumiko Omatsu
Lyn Yamasaki	310 200 5651	Lyn Yam
CARL SEMENZA	310-869-5987	[illegible]
MARISA CASTELLICCI	310-324-1029	Marisa Castellicci
CRISTINA CASTELLICCI	310-217-1320	Cristina Castellicci
JR. HOSKINS	310-515-6929	Jr. Hoskins
HONA Uchiyama	310-527-0069	Hona Uchiyama
mina Semenza	310-515-1039	Mina Semenza
Audrey Yoshiyama	310-515-6736	Audrey Yoshiyama
Rene Soto	310-515-2730	Rene Soto
STEVE LEE	310-498-6310	Steve Lee

PETITION TO: STOP THE NORMANDIE CROSSING PROJECT

We, the undersigned, do hereby ~~the~~ petition the Gardena City Council **~~for~~/to** halt the Normandie Crossing Project.

Name	Contact	Signature
Mariano Reyes	(310) 532-1010	[illegible]
[illegible]	714 293-3403	[illegible]
Rose SATO	562-310-1949	[illegible]
[illegible]	[illegible] 3	10 963 3085 [illegible]
Denise Okabe	(310) 971-7970	[illegible]
Naomi Goshida	310) 634-4537	Naomi Goshida
TIM TOYAMA	310-848-9890	Tim Toyama
Tiffany JOHNSON	562-533-1176	Tiffany John
CORY SHIOZAKI	310-729-6541	[illegible]
LOU CASTELLANO	626-705-0080	Lou Castellano
RUTH CASTELLANO	626-705-0057	Ruth Castellano
Shelly Brown	310-480-0004	Shelly Brown
Carol Suzuki	562) 547-1590	Carol Suzuki
Denise Aumiller	714 904 3364	[illegible]
[illegible]	714/2093142	[illegible]
Alejandro Renteria	% Gardena Bowl	[illegible]
[illegible]	" "	(310) 532-8623
Terry Tekawa	310 515 5693	[illegible]
Alberta Gaines	323-299-9389	Alberta Gaines
Diane Kaneshiro	310.977-5017	[illegible]

PETITION TO: STOP the NORMANDIE CROSSING PROJECT.

We, the undersigned, do hereby ~~the~~ petition the Gardena City ~~Counsil~~ Council **~~for~~/to** Halt the Normandie Crossing Project.

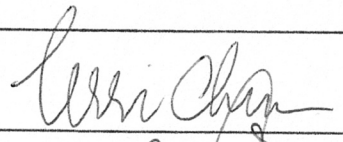
Name	Contact	Signature
DANIELLE LONG	310 514-7806	
JAMES WILSON	424 208-4007	
PAUL YUN	213-210-1357	
Leonard Mangham	310429-3376	
Donald Nunez	3107832000	
MICHAEL HALL	3104860265	Michael Hall
SETSUKO DONHAM	714-856-8066	
Darrin Hall	562-209-0299	
Eugene Hall	562-926-8985	Eugene Hall
Hana Hall	213-309-3565	
JIM JOHNSON	562-260-0830	
Thornton Hall, Jr	702-994-4728	Thort Hall Jr.
ERIC HALL	562-505-7494	
ERIC NUÑO	310 502-6321	
Sandra Nunez	310-502 9280	
EDWARD NOUCHI	310 502 9281	
Devin Huynh	310 999 7499	
Jule C Smith	310-528-6839	
MARK HORI	310 418-7449	Mark Hori
ADELINE WATANABE	310 218-7633	

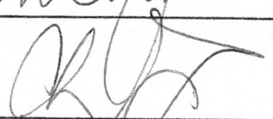
PETITION TO: STOP THE NORMANDIE CROSSING

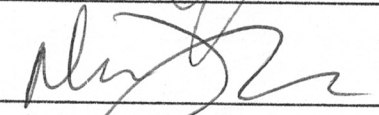
WE, THE UNDERSIGNED, DO HEREBY PETITION THE GARDENA CITY COUNCIL TO HALT THE NORMANDIE CROSSING PROJECT

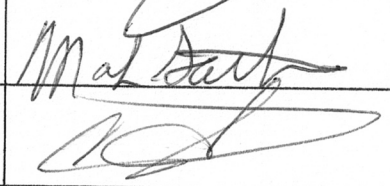
NAME	CONTACT	SIGNATURE
Joni Iwasaki	310 2512962	J Iwasaki
Chanin Saiki	562.833.8407	Chanin Saiki
MIKE SAIKI	562-896-0993	Mike Saiki

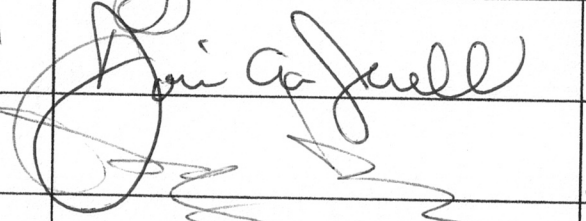
NORMANDIE CROSSING PROJECT



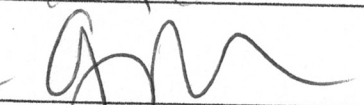


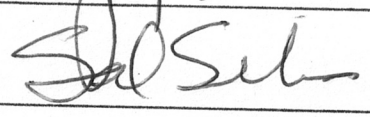






NAME	SIGNATURE	ADDRESS	EMAIL
TERRI CHUN	Terri Chun	1452 W. 171ST Street gardena	
CHRIS TANKERSLEY	[illegible]	1451 W. 171ST ST. GARDENA	
DAWN Tankersley	[illegible]	1451 W. 171st St Gardena, CA	
Mark Sather	Mark Sather	1428 W171st St	
★CARRIE ISHITANI	[illegible]	17001 BRIGHTON WAY	★ 824 car @ gmail.com
★ED AZZAM	[illegible]	1419 W. 171 ST GARDENA, CA. 90247	
TORI Ann Jewell	Tori Ann Jewell	16836 S Budlong Ave Gardena CA 90247	TORICat@gmail.com
ANNELIN LANUZA	[illegible]	16910 S. BUDLONG AVE GARDENA CA 90247	
Veea L Knight ~~Veea L Knight~~	Veea L Knight	1211 W 170th St	
Lucy Olivera	Lucy Olivera	16914 S. Raymond Ave Gardena Ca 90247	
Gina Isaacson	[illegible]	1439 W171 St Gardena Ca 90247	Kdash515@gmail.com
Sal Silva SAL SILVA	Sal Silva	16115 Halldale Ave Gardena Ca 90247	SSILVAFAIBOY@yahoo.com





NORMANDIE CROSSING PROJECT

NAME	SIGNATURE	ADDRESS	EMAIL
SUMIO TANAKA		16931 S. HOBART BLVD Gardena CA 90247	
Rosa Santiago		1738 West 169th Place Gardena	
Jose Santiago		1738 West 169th Place Gardena	
RAMONA RIVERA		16957 S. HARVARD GARDENA	
Brandon Chai		16726 S Harvard Blvd Gardena, CA 90247	
Lorraine Nicole Chai		16926 S Harrard Blvd Gardena, CA 90247	
Olivia Fummo		1628 169th w Gardena CA 90247	
Sitsua Shishido		1620W. 169th. Pl. Gardena, ca. 90247	
Hector C. Salon		16939 Denker Av Gardena CA 90247	
Peter Ishikawa		16925 S. DENKER AVE Gardena Ca 90247	
LISA MIZUTANI		17101 S. DENKER AVE GARDENA, CA 90247	
Mary Maeda		17129 Denker Ave Gardena. CA. 90247	

NORMANDIE CROSSING PROJECT

NAME (424) 373.9107	SIGNATURE	ADDRESS	EMAIL
ANA MARTIN	Ana Martin	16818 La Salle Ave	Ana.RNN2016@gmail.com
NOE RUBIO		16828 LA SALLE AVE	RUBIO4209@MSN.COM
Kelley Bladl	Kelley Bladl	16902 LA Salle Ave	kittykitty18@aol.com
James Newton		1640 W. 169th Pl.	jamesnewtoniii@yahoo.com
MARIA BRICK	Maria Brick	16922 LA SALLE	AVE
WABIE VELASQUEZ		16931 S HARVARD BLVD	WABIEVELASQUEZ@GMAIL
NORA B. FREY	NBFrey	16911 S. Harvard Blvd	Ralinaf@aol.com
Isabel Gomez		1624 W. 169th Pl Gardena, Ca	
Joel Braun		16941 Denker Av.	
Elizabeth Braun	Elizabeth Braun	16941 Denker Ave	
Guadalupe Vasquez		17025 S Denker Ave	
Traci Jarrett		17125 S. Denker A Gardena	missstrj1@gmail.com

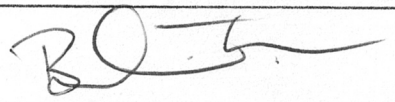
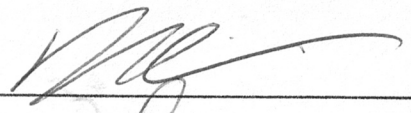
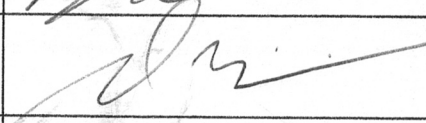
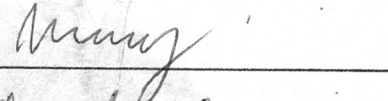
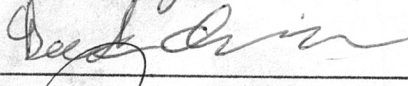
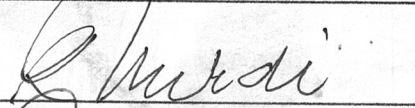
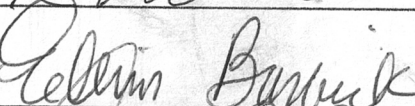
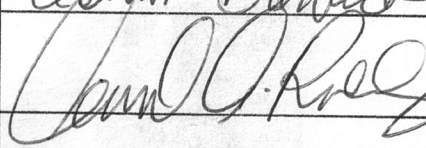
NORMANDIE CROSSING PROJECT

NAME	SIGNATURE	ADDRESS	EMAIL
Rebeca J. Valerio		1455 w. 171	Jrebeca50@gmail
Hyunah Suh		1436 W 178th St.	hyunahsuh@yahoo.com
Jason Mun		1448 W. 170th St	jsmun4@gmail.com
Stephen Hunt		1464 W. 170th	IM STEVEHunt@Gmail.com
Ruby Hunt		1464 W 170th	rubymarie.hunt@gmail.com
Adrian Mier		1464 W 170th	adrianmier04@gmail.com
Sherri Salatino		1444 W. 170th St.	Sherri.salatino@icloud.com
DANA COTTER		16808 HALLDALE AVE.	COTTER, D@TWC.COM
Virginia Almaraz			
Long Truong		1520 W. 170th st Apt. B	foxone64@hotmail.com
Hien Truong		1520 w 170th St, #B Gardena, 90247	smiley-oichie@yahoo.com

NORMANDIE CROSSING PROJECT

NAME	SIGNATURE	ADDRESS	EMAIL
Darleine Kaneko	Darleine Kaneko	1350 W. CASSIDY ST GARDENA, 90248	DKKANEKO@Gmail.com
[illegible]	[illegible]	17517 VALMEYER AVE Gardena CA 90248	
Janet Tyson	Janet Tyson	17513 Valmeyer Ave Gardena CA	Janeve@ICLOUD.com
Patrice Hearns	Patrice Hearns	846 Florecita WY	forlife626808@Yahoo.com
Willis Webb	Willis J. Webb	17513 Valmeyer Ave Gardena, CA 90248	auditcentral@gmail.com
MAE NAKAKIHARA	Mae Nakakihara	17507 Valmeyer	JMNAKS@GMAIL.com
RUTH KISE	Ruth Kise	17512 Valmeyer	
HARU WATANABE	Haru Watanabe	1170 CASSIDY ST	hwatanabe22@

NORMANDIE CROSSING PROJECT

NAME	SIGNATURE	ADDRESS	EMAIL
BRANDON TANORI		1443 W. 172nd St GARDENA CA 90247	
Danielle Weaver		16123 Halldale Ave 90247	
Ralph Barboa.		17031 S. Raymond Pl. Gardena. CA 90247	
Maria Garcia		16904 Brighton Ave Gardena CA 90247	
DEREK ISAACSON		1439 W 171st Gardena. CA 90247	
RUBY MURAI		1459 W 172nd Gardena CA 90247	
Elinor Barbick		1411 W. 173rd St. Gardena, Ca.	
Carol Boddy		15817½ Halldale Ave Gardena, Ca.	

NORMANDIE CROSSING PROJECT

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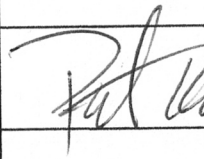
Pham	Ngu Pham	17314 S. Denker Ave	phuga@yahoo.com
Sambang	[illegible]	17230 S Denker Ave	SambangNec@gmail.com
Cindy Kang	Cindy Kang	17230 S Denker Ave	cindyks120[illegible]@gmail.com
Simon Kang	[illegible]	17230 S. Denker Av Gardena CA 90247	kang.simon4@gmail.com
[illegible]	[illegible]	[illegible]	
DAVID NISHIOKA	David Nishioka	17204 S. DENKER AVE. GARDENA	wiseeating4life@gmail.com

NORMANDIE CROSSING PROJECT

NAME	SIGNATURE	ADDRESS	EMAIL
Mariela Gutierrez		17320 S. Denker Ave Gardena CA 90247	

NORMANDIE CROSSING PROJECT

NAME	SIGNATURE	ADDRESS	EMAIL
Peter KIM		17508 S Berendo Ave Gardena CA 90248	Peter.KIM60@ Gmail.com

From: D.
To: Amanda Acuna; Public Comment
Subject: Public Comment - Normandie Crossing Specific Plan Project
Date: Sunday, December 1, 2024 8:55:15 AM

Caution! This message was sent from outside your organization.

To Members of the City of Gardena Planning Commission:
With regards to the proposed Normandie Crossing Specific Plan Project, the new height and density of the proposed apartment complex and townhomes is still out of character and inconsistent with existing single-family homes, condominiums/townhomes, and apartments in the surrounding area. Furthermore, I would like to bring to your attention an often overlooked, but critically important environmental impact issue that has **NOT** been addressed in the original and final versions of the Environmental Impact Report (EIR) for this project.

I am particularly concerned about possibly living within the shadow of such tall buildings situated so close to my single-story residence as to block my direct, line-of-sight access to TV and radio signals broadcasted from the over-the-air transmitters located on Mt. Wilson. I request that the EIR include an impact study on the potential for **communications interference** for the affected residents around (and even within) the proposed development site. It should address all forms of electronic transmissions and communications channels that could be disrupted: TV, radio, cellular, microwave, satellite, shortwave RF, etc. In addition to preserving the signal quality for affected residents and businesses, it is vital that police, fire, medical, and disaster relief teams are able to maintain clear access to their communications links around and within the project site area as well.

Here are just a few examples of articles available online regarding this environmental impact issue:
https://www.pagerpower.com/news/building-development-terrestrial-satellite-television-reception-interference/
https://support.tablotv.com/hc/en-us/articles/13986352427028-Sources-of-Obstructions-and-Interference-for-Antenna-TV
https://www.ofcom.org.uk/siteassets/resources/documents/manage-your-licence/fixed-links/tall_structures.pdf?v=333938
https://www.saferbuildings.org/public-safety-primer

TV reception assessments:
https://www.pagerpower.com/news/happens-television-reception-survey/
https://bregroup.com/services/testing-inspection-certification/outdoor-environment/tv-reception

In conclusion, I am strongly opposed to the Normandie Crossing Specific Plan as currently drafted and urge you to consider a recommendation for the developer to further scale down the height and density of this new construction to be more aligned with existing residential structures in the neighboring area and to eliminate any issues regarding communications interference.
Thank you,
D. Iwamasa

From: AT&T COMMUNICATIONS
To: Public Comment
Subject: PLANNING COMMISSION COMMENT
Date: Sunday, December 1, 2024 3:30:59 PM

Caution! This message was sent from outside your organization.

This email comment is in reference to the Project put forth to the Planning Commission (once again) by Saiko Investment Corporation and its representatives Fred Shaffer and Steve Ludwig.

Before I get into my perspectives of this project and the impact it will most definitely cause in the surrounding neighborhoods, can we please address the elephant in the room? Who within your staff or even on the commission is actually in these guys back pockets? This is the second time they have brought up a monstrosity of an idea proposing 333 dwellings (combination 75 Townhouses, this number not reduced and now 6 STORIES, reduced from 7, apartment building - 258 units) to the commission and why? One can only imagine that after the first meeting back in March 2024, where the RESIDENTS within the surrounding area as well as LOCAL CONTRACTORS voiced very CLEARLY and loudly that they DID NOT WANT this type of development, that someone surely is in cahoots with Saiko, Shaffer and Ludwig and his spin off, which manages apartment buildings where their mission statement is affordable all while charging a home mortgage price for 2 bedroom apartments. LOOK IT UP!

On top of that they are utilizing an Architecture

firm that seems to be stuck in every concept of new building to make them look like BOXES stacked on top of each other with minimum balconies or patio space similar to the commercial of the little girl on the swing in her back yard hitting the wall each time she tries to move! Come on people you can do better and should do better for your constituents that live, work, spend money and VOTE!

With that said, let's get down to some of the specifics, OK? This 'development' is on approximately 5 acres, a railroad line abuts the property, and I shall presume that the railway will still be active in the next 10 years? That particular line causes traffic delays as train cars move from the south towards the east crossing over on Normandie on numerous occasions. When this happens, the surrounding area is impacted especially at the signal light near Diana's on 166th, not to mention 169th Street and Normandie itself. Adding 333 dwellings to this area is not going to make matters any better! It is bad enough when the rail line used to deliver lumber and supplies to Crenshaw Lumber causes delays on Western Avenue and 166th not to mention 169th Place and Western. I can always tell when the rail line is delivering or leaving the lumber yard because the amount of traffic that we get on 169th Place or even Denker Avenue (I live at the corner of 169th and Denker) sometimes quadruples with cars trying to find a way around the obstruction and delay.

Now, let's move on to the impact alone that Cocoon 63 has caused with their smaller development shall we? When it was proposed and subsequently approved the developer stated that most of the residents would be utilizing the stacking car garage that thankfully they placed on Normandie Avenue and away from residential housing. However, in the past few years there has been a tremendous INCREASE in the number of cars that are parked ON 169th STREET as well as Brighton. As I said in my comment back in March 2024, it is extremely unsafe to make a right hand turn on 169th Street from Normandie (going in the south direction) because the Cocoon 63 building obstructs the turn onto 169th Street and there have been many times when Amazon, FedEx or UPS has been double parked and delivering packages to the residents. You have no idea if another car is moving east on 169th Street as you are turning right. Let's fast forward to 2 years from now and the monstrosity of an apartment building is on the opposite side of the street and cars are exiting the underground parking structure. You turn right, have to navigate around a delivery truck they turn left to exit structure and boom! Yeah, quality of life is really upgraded right? Look that area is already bad enough! Why do you want to make it worse?

I also remember last time that representatives from the Local Construction union were in force at the meeting in March 2024 and they too voiced their disapproval because we all know that these 'developers' would not

be utilizing any of the members but bring in their own construction crews and contractors. How does this in any way shape or form help these guys who live and try to work in their own community? Here's the answer ... IT DOESN'T!

Can we also THINK about the impact that this monstrosity will have on the quality of life for those residents who live on 170th, Brighton and have their backyards abutting Brighton Way? How can you say that the noise of construction for at least 3 years, amount of truck traffic, disruption of street access to their homes, possible water outages as lines are interconnected to the new units, possible gas & electric outages as well is something that they should endure for what? Progress? There are already plans approved for another vast number of units on Artesia Blvd where the Gardena Car Wash and Automotive Center used to be. How many more box like monstrosities does Gardena plan to approve? The impact of traffic on Artesia is already at its limits and the number of times I hear sirens heading in either the direction of Artesia near Denker or Artesia near Western is at least 5 or more a week. Adding this particular development to the mix is really going to impact the ENTIRE neighborhood that borders Artesia to the south, Western Avenue to the west, 166th to the north and Normandie to the East. Can't something else be planned for this parcel that will not take away from its resident's quality of life?

Finally, if they propose an Environmental Impact study

that says it will not impact the neighborhood, well then, they are truly pulling the wool over the Planning Commission's eyes. Why not ask the RESIDENTS whether a 6 STORY APARTMENT BUILDING or 75 - 3 STORY TOWNHOMES are something that would add value to their existing neighborhood. I know the answer would be you kidding? PLEASE THINK AGAIN about this - the highest building in Gardena is the Gardena Hospital, OK? Now you want to approve a 6 STORY APARTMENT BUILDING at the beginning of a residential area? Really?

I know the commission can do better, I know the aides in your offices can do better and I know for a fact that the residents in the surrounding area DESERVE BETTER! The City of Gardena is not and should not try to compete with the likes of Carson (and the concrete corridor they have made along Carson & Avalon). Nor should the City of Gardena go the route of Santa Monica where every single building along 3rd and 4th is at least 4+ stories, and the street gets little sunlight anymore. The places look like SARDINE CANS!

As I said, the development on Artesia where the Gardena Car Wash and Automotive Center once did business will be a disruptive process for the surrounding area for quite some time and continue to make our beloved residential area more BOXED IN than I'm sure our original city planners had intended. Progress is necessary, I get it. But progress that IMPROVES A NEIGHBORHOOD rather than DISTRACTS FROM IT is

the very definition of progress. 3 story townhouses will be large enough for the small area and may cause some in the surrounding area a breach of privacy but allowing a 6 STORY MONSTROSITY to be constructed at the corner and in a neighborhood where most apartment building are two story or the majority of dwellings are SINGLE FAMILY, is not progress. It is the Planning Commission telling the residents to (because I am nice, I will not say what I want and simply say) take a hike!

I realize this email is long; however, I do believe it is the sentiment of most if not all the residents within the surrounding community.

Sincerely,

Donnetta Jalomo resident of Gardena for 30 years.

From: farjad mohammadi
To: Public Comment
Subject: Environmental Impact Report (Assessment #20-21)
Date: Monday, December 2, 2024 8:26:27 PM

Caution! This message was sent from outside your organization.

Item 6B on the agenda for 12-3-2024:

The planned development of a combined dwelling unit of townhomes and apartments has a total number of 333 units. The bare minimum LABC is 1% of occupancy shall have designated guest parking spaces.

The proposed development doesn't even accomplish LABC bare minimum code requirement. The developer is seeking to maximize their development's revenue generating potential without meeting code bare minimums.

The action should be deferred until sufficient on-site parking can be provided without burdening the neighborhood streets surrounding the development. Gardena does not need to further crowd its rampant over parking on public streets.

Thank you,
Concerned Gardena Resident

LOZEAU DRURY LLP
T 510.836.4200
F 510.836.4205
1939 Harrison Street, Ste. 150
Oakland, CA 94612
www.lozeaudrury.com
brian@lozeaudrury.com

Via Email

December 3, 2024

Planning and Envtl. Quality Commission
c/o Deryl Henderson, Chair
City of Gardena
1700 W. 162nd Street
Gardena, CA 90247
publiccomment@cityofgardena.org

Amanda Acuna
Community Development Department
City of Gardena
1700 W. 162nd Street, Room 101
Gardena, CA 90247
AAcuna@cityofgardena.org

Re: Comment on Normandie Crossing Specific Plan FEIR
EA 20-21; GPA 3-21; ZC 4-21; ZTA 6-21; SP 1-21; SPR 11-21; VTM 4-21; DA 2-21
AGENDA ITEM 6B (Dec. 3, 2024)

To Chair Henderson,, Honorable Commissioners, and Ms. Acuna,

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") and its members living in/near the City of Gardena regarding the Normandie Crossing Specific Plan Project (EA 20-21; GPA 3-21; ZC 4-21; ZTA 6-21; SP 1-21; SPR 11-21; VTM 4-21; DA 2-21) ("Project") to be heard as Agenda Item 6B at the Commission's December 3, 2024 meeting.

The Project initially proposed the demolition of 115,424 square feet of industrial uses and construction of 403 multi-family dwelling units, including 328 apartment units in one building and 75 townhome units in nine buildings, located at 16829, 16835, and 16907 South Normandie Avenue. The City prepared a Final Environmental Impact Report ("FEIR") for that Project and SAFER submitted a comment in opposition (attached hereto as Attachment 1).

The applicant has now re-designed the Project, removing 70 residential units in the apartment building (328 units to 258 units), reducing the stories from 7 to 5, and adding one level of subterranean parking ("Revised Project"). The City has prepared a Revised FEIR, adding the Revised Project as an alternative.

SAFER is concerned that the Revised FEIR, like the original FEIR, fails to comply with the requirements of the California Environmental Quality Act ("CEQA") because it fails to adequately disclose and evaluate the Revised Project's impacts and fails to impose all

feasible mitigation measures to reduce the Project's impacts. SAFER also joins in all other comments submitted in opposition to the Project and EIR, including comments submitted by the County of Los Angeles Fire Department, the California Department of Transportation, and the Western States Regional Council of Carpenters. SAFER reserves the right to further supplement this comment during the administrative process. (*Galante Vineyards v. Monterey Peninsula Water Management Dist*., 60 Cal. App. 4th 1109, 1121 (1997).)

SAFER respectfully requests that the Commission refrain from recommending approval of the Project to the City Council until the EIR's deficiencies are remedied and a revised EIR is circulated for public review and comment.

Sincerely,

Brian B. Flynn
Lozeau Drury LLP

ATTACHMENT 1

LOZEAU DRURY LLP
T 510.836.4200
F 510.836.4205
1939 Harrison Street, Ste. 150
Oakland, CA 94612
www.lozeaudrury.com
brian@lozeaudrury.com

Via Email

March 27, 2024

Deryl Henderson, Chair
Stephen P. Langley, Vice-Chair
Jules Kanhan
Steve Sherman
Ronald Wright-Scherr
Planning and Envtl. Quality Commission
City of Gardena
1700 W. 162nd Street
Gardena, CA 90247
publiccomment@cityofgardena.org

Amanda Acuna, Planner
Community Development Department
City of Gardena
1700 W. 162nd Street, Room 101
Gardena, CA 90247
AAcuna@cityofgardena.org

Re: Comment on Normandie Crossing Specific Plan Project EIR
EA 20-21; GPA 3-21; ZC 4-21; ZTA 6-21; SP 1-21; SPR 11-21; VTM 4-21; DA 2-21
Hearing Date: April 2, 2024

To Chair Henderson, Vice-Chair Langley, Honorable Commissioners, and Ms. Acuna,

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") and its members living in/near the City of Gardena regarding the Normandie Crossing Specific Plan Project (EA 20-21; GPA 3-21; ZC 4-21; ZTA 6-21; SP 1-21; SPR 11-21; VTM 4-21; DA 2-21) ("Project") to be heard at the Commission's April 2, 2024 meeting.

The Project proposes the demolition of 115,424 square feet of industrial uses and construction of 403 multi-family dwelling units, including 328 apartment units in one building and 75 townhome units in nine buildings, located at 16829, 16835, and 16907 South Normandie Avenue.

SAFER is concerned that the Draft Environmental Impact Report ("DEIR") and Final Environmental Impact Report ("FEIR") (collectively, "EIR") fail to comply with the requirements of the California Environmental Quality Act ("CEQA"). SAFER respectfully requests that the Commission refrain from recommending approval of the Project until the EIR's deficiencies are remedied and a revised EIR is circulated for public review and comment.

DISCUSSION

I. The EIR Relies on Improperly Deferred Mitigation.

An agency's adoption of a mitigation measure for a significant environmental effect that merely states a "generalized goal" to mitigate a significant effect without committing to any specific criteria or standard of performance violates CEQA by improperly deferring the formulation and adoption of enforceable mitigation measures. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 670.) Here, the City is improperly relying on deferred mitigation for the Project's impacts from asbestos and soil contamination and, as a result, the EIR does not comply with CEQA.

According to the DEIR, the potential impacts from asbestos exposure during demolition will be mitigated by COA HAZ-1:

> **Asbestos Survey**. Prior to demolition activities, an Asbestos Hazard Emergency Response Act (AHERA) and California Division of Occupational Safety and Health (Cal/OSHA) certified inspector shall conduct an Asbestos Survey to determine the presence or absence of asbestos containing-materials (ACMs) pursuant to South Coast Air Quality Management District (SCAQMD) regulations.

(DEIR, p. 4.6-22.) COA HAZ-1 only requires a future survey to determine the presence or absence of asbestos. There are no specific criteria or standards of performance in COA HAZ-1 to address how the impacts of asbestos will be mitigated in the event that asbestos is detected prior to demolition. Without any such criteria or standards of performance, the City cannot rely on COA HAZ-1 to mitigate the Project's asbestos impacts.

MM HAZ-1 similarly requires a future "Construction Management Plan" with *no* specific criteria or performance standards:

> **MM HAZ-1.** Prior to issuance of any demolition permit for the onsite structures, a construction management plan addressing procedures and requirements for responding to disturbance of undocumented contaminated soil shall be prepared and submitted to the City for review and approval.

(DEIR, p. 4.6-23.) MM HAZ-1 is improperly vague and only requires that a plan be submitted prior to demolition. MM HAZ-1 does not provide any criteria or performance standards for the plan. Instead, MM HAZ-1 only requires a future plan that will discuss the "procedures and requirements for responding to a disturbance of undocumented contaminated soil."

CEQA is clear that the City may only defer the formulation of mitigation measures when it "recognizes the significance of the potential environmental effect, commits itself to mitigating its impact, and articulates specific performance criteria for the future mitigation." (*Gentry v. City of Murietta* (1995) 36 Cal.App.4th 1359, 1411.) Because COA HAZ-1 and MM HAZ-1 do not contain any specific performance criteria, those measures amount to improperly deferred mitigation. As a result, the EIR must be revised to include specific performance criteria for hazards.

II. The EIR Fails to Sufficiently Justify a Statement of Overriding Considerations.

As the City concedes, the Project would result in *significant and unavoidable impacts* due to construction noise. Under CEQA, when an agency approves a project with significant environmental impacts that will not be fully mitigated, it must adopt a "statement of overriding considerations" finding that, because of the project's overriding benefits, it is approving the project despite its environmental harm. (14 CCR § 15043; PRC § 21081(B); *Sierra Club v. Contra Costa Cnty.* (1992) 10 Cal.App.4th 1212, 1222). A statement of overriding considerations expresses the "larger, more general reasons for approving the project, such as the need to create new jobs, provide housing, generate taxes and the like." (*Concerned Citizens of South Central LA v. Los Angeles Unif. Sch. Dist*. (1994) 24 Cal.App.4th 826, 847).

A statement of overriding considerations must be supported by substantial evidence in the record. (14 CCR § 15093(b); *Sierra Club v. Contra Costa Co*. (1992) 10 Cal.App.4th 1212, 1223.) The agency must make "a fully informed and publicly disclosed" decision that "specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project." (14 CCR § 15043(b)). As with all findings, the agency must present an explanation to supply the logical steps between the ultimate finding and the facts in the record. (*Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515). Key among the findings that the lead agency must make is that:

> "Specific economic, legal, social, technological, or other considerations, including the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report…[and that those] benefits of the project outweigh the significant effects on the environment."

(PRC § 21081(a)(3), (b).) The City must make specific findings, supported by substantial evidence, concerning both the environmental impacts of the Project, and the economic benefits including "the provision of employment opportunities for highly trained workers" created. However, the City fails to include any mention of the Project's use of highly trained workers in the EIR or Staff Report.

In short, the City cannot support its conclusion that the economic benefits of the Project outweigh the environmental costs if it does not know what the economic benefits will be. A revised EIR, Fiscal Analysis and Statement of Overriding Considerations is required to provide this information. The analysis must analyze whether the Project will provide employment opportunities for highly trained workers during construction and operation, or whether employment opportunities will be only for low-paid, unskilled workers.

CONCLUSION

Due to improperly deferred mitigation for the impacts of hazards and hazardous materials and the failure to justify a statement of overriding considerations for the significant and unavoidable noise impacts, SAFER respectfully requests that the Commission refrain from recommending certification of the EIR. Instead, a revised EIR should be prepared and circulated for public review and comment prior to further consideration of the Project. SAFER reserves the right to further supplement this comment during the administrative process. (*Galante Vineyards v. Monterey Peninsula Water Management Dist*., 60 Cal. App. 4th 1109, 1121 (1997).)

Sincerely,

Brian B. Flynn
Lozeau Drury LLP

SOUTH BAY FORWARD

Chair Deryl Henderson and Commissioners
Planning & Environmental Quality Commission
City of Gardena, Council Chamber at City Hall
1700 W. 162nd Street
Gardena, California 90247

TO: publiccomment@cityofgardena.org, cityclerk@cityofgardena.org

DATE: 12/3/2024

SUBJECT: Comment Letter for Gardena PEQC on Normandie Ave Project

Dear Chair Henderson, Gardena Planning & Environmental Quality Commission, and City Staff,

South Bay Forward is a volunteer-run advocacy organization that seeks to move the South Bay region forward on housing, transit, and active mobility. We are a local chapter of Abundant Housing LA, a grassroots nonprofit organization working to solve Southern California's housing crisis. We envision a South Bay with abundant and affordable housing near good jobs with convenient, sustainable transportation.

We advocate for more housing of all types and for all income levels in the South Bay for a more inclusive, equitable, affordable, and sustainable community. We are actively monitoring housing proposals and tracking RHNA progress in our priority member cities of Torrance, Gardena, Redondo Beach, and Hermosa Beach and submitting letters accordingly. We mobilize support on a grassroots level and in coordination with pro-housing organizations working to address the local and statewide housing crisis. Locally, we remind you that the South Bay is the 3rd largest jobs center in LA County and suffers from a severe jobs-housing imbalance with the number of jobs far outweighing the availability of housing units. In high-opportunity and high cost-of-living areas like the South Bay, a greater supply of housing can bring down the cost of housing, as seen consistently in economic data and studies on the housing market.[1]

Together with our active members and steering committee members based in Gardena, we are writing this letter to strongly urge you to approve the proposed project at 16831-16911 South Normandie Avenue ("Normandie Crossing") without further delay. We remind the City that it is obligated to follow state law in processing housing applications which are consistent with applicable objective general plan, zoning, and subdivision standards. The denial in April stated in part, "the Normandie Crossing Specific Plan project is out of character with the community."[2] We note that the "community character" of this land parcel at the present moment includes, in the City's own description, a warehouse showing "extensive and/or severe physical blighting conditions that … [impair] the value of the existing use" of the site.[3] The proposed housing

[1] https://furmancenter.org/thestoop/entry/supply-skepticism-revisited-research-supply-affordability
[2] City of Gardena Resolution No. PC 6-24, 2 April 2024
[3] City of Gardena Housing Element, 2021-2029, Readopted February 15, 2023, pg. 73

project continues to comply with all relevant building standards and addresses all comments raised by local regulatory agencies, and will revitalize these parcels of land.

The project provides much-needed infill housing units for over 300 households on a blighted industrial parcel with no residential displacements. The housing crisis facing our region is caused by a shortage in the supply of housing at all income levels. Our region is over a quarter million housing units short of the amount needed to meet the current demand.[4] In a jobs- and resources-rich community like Gardena this housing project will provide much-needed options for people who live and work in the South Bay. This project includes a mix of studio, one- and two-bedroom apartments, as well as for-sale townhomes supplying different options for people in a wide range of life, income and family situations. Through the filtering effect, we know that those who move into new housing units usually reside within the same community, and that new units free up older housing stock in the community, allowing rents to stabilize or lower.[5] This phenomenon is well-documented in places that have actively built new housing such as Austin and Minneapolis.[6]

As residents and advocates, we support new housing in our community for multiple reasons. This development will positively impact property and sales tax revenues in Gardena, providing additional revenue to the City for infrastructure and community improvements. Such improvements could include nearby Gardena Boulevard, which the City Council has expressed a desire to reinvigorate. Residents will frequent local businesses, especially those along Gardena and Artesia Boulevards, and add to deeper community ties in Gardena. Many of these business owners have already identified the new residents as being beneficial to their businesses and written in support of Normandie Crossing. The project includes secure bicycle parking for residents and pedestrian mobility enhancements on the sidewalks adjoining the site, allowing future residents the ability to safely walk to nearby restaurants like California Fish Grill, Aunties Cafe, or The Pan, or to pick up groceries at Sam's Club by bike or cargo bicycle. The Planning Commission should look to enhance safe pedestrian and non-car mobility on Normandie Ave and Gardena Blvd to enhance mobility around the City as areas are redeveloped or streets repaved. We suggest requiring new development to include street improvements such as Class IV protected bike lanes, as seen with new mixed-use and housing development in Long Beach. This can alleviate traffic concerns and create a citywide network of safe mobility lanes.

We also want to express our disappointment in the down-scoping of the original plan. The current Normandie Crossing plan before you has been reduced by 70 apartment units from the original 403-unit plan presented to the Planning Commission in March 2024. This number represents 70 fewer households that can live closer to their employer, in a safer neighborhood, or in a larger space than their current housing situation. The original plan also set aside 5% of the apartment units for lower-income residents, but this number has been reduced to less than half this amount in the amended plan, and now 13 fewer low-income families will have an option to rent a home in Gardena. By delaying the project by almost a full year, reducing the scope and

[4] https://theangelenoproject.org/the-hard-facts/
[5] https://www.huduser.gov/portal/pdredge/pdr-edge-featd-article-061520.html
[6] https://www.nbcnews.com/business/real-estate/high-housing-costs-minneapolis-solution-rcna170857

compelling the developer to add costs with a subterranean parking garage as a result of the initial denial, the City has all but guaranteed the final rent prices of the apartment units and sale prices of the townhomes will be more expensive than under the original plan.

We also wish to remind you that the original project and 403 units was included in the City's approved Housing Element as part of its future sites inventory. With the decreased number of units in the updated plan, the City will now have less of a buffer to meet its RHNA requirements and the upcoming mid-cycle review. Your role in the Planning Commission is to adequately plan for future housing and use opportunities such as this one to improve the vitality and fabric of the City. Every large development such as Normandie Crossing adds to our sorely needed housing stock and helps alleviate rising prices caused by the imbalance of housing supply and demand. Every long delay, enforced downsizing, and increase in construction cost only serves to increase final market rents. For the benefit of its residents, current and future, the City of Gardena must approve this rezoning and development application and we ask that you recommend its approval to the City Council and consider mobility enhancements as described above.

South Bay Forward is a chapter of Abundant Housing L.A., a 501(c)(4) nonprofit organization. You may read more about our mission at www.southbayforward.org. Thank you for your time and consideration.

Sincerely,
South Bay Forward Steering Committee & Gardena Residents

Brandon Smith, Gardena City Lead, Gardena Resident
Irvin Samuel, Gardena Resident
Chester Li, Gardena Resident
Hope Furukawa, Gardena Resident
Courtney Alicia Miles, Field Organizer, Gardena Resident
Brianna Egan, Co-Chapter Lead, South Bay Forward
Matthew Lawrence, Co-Chapter Lead, South Bay Forward

From: Graham W. Jenkins
To: Public Comment
Subject: Public Comment: 16911 Normandie
Date: Tuesday, December 3, 2024 4:19:45 PM

Caution! This message was sent from outside your organization.

Dear Councilmembers,

I write to you today to express my firm support for the proposed development on Normandie Avenue between 168th and 170th Streets. I am a homeowner in the 1600 at Artesia development, and frankly, have always wanted more neighbors. These additional housing units can help justify running more frequent transit and support even more businesses and density in the area, helping to turn the sad, auto-oriented blocks surrounding Artesia Blvd into a vibrant, walkable, dense community.

300 units of new housing is an invaluable addition to our community and state at a time when more than ever we must address the crippling regional housing crisis and develop more sustainable ways of living in the face of climate change.

Replacing the current use (and eyesore) of a dilapidated warehouse is a public service unto itself, and, coupled with the improvements to pedestrian walkability and bicycle access, adds tremendous value to the city. I hope it is only the first step in a citywide process of densification and homebuilding.

If I had my druthers this project would be far larger and even denser, but absent the overdue rewrite of Gardena's zoning code, this will do for the time being. I urge the council to take advantage of this opportunity and to approve the planned development unconditionally and without delay.

Thank you for your consideration.

Sincerely,
Graham W. Jenkins
1568 W Artesia Sq Unit C
Gardena, CA

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

As a local business owner, I believe that this new apartment and townhome development will benefit the community by bringing much needed new housing to Gardena. The developer has a proven track record of developing and managing high quality residential projects, and this is the type of new development that our business and community need.

Sincerely,

Name: JUAN ESCOBAR

Title: MANAGER

Business: EL POLLO INKA

Address: 1425 W. ARTESIA BLVD.
GARDENA CA 90248

Date: 07-16-2024

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

As a local business owner, I believe that this new apartment and townhome development will benefit the community by bringing much needed new housing to Gardena. The developer has a proven track record of developing and managing high quality residential projects, and this is the type of new development that our business and community need.

Sincerely,

Name: Joongmo Koo

Title: President

Business: Nomura Cleaners

Address: 1425 W. Artesia Blvd. #30

Gardena, CA 90248

Date: 11/16/24

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

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Sincerely,

Name: Dina Vega

Title: MGR

Business: Aloha Pizza

Address: _____

_____

Date: 7/16/24

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

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Sincerely,

Name: charley Chung Soo Ra

Title: owner

Business: prime Dry Cleaners

Address: 16402 S, Normandie Ave
Gardena, 90247

Date: 7/16/2024

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

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Sincerely,

Name: Lynda Lax

Title: President

Business: Pulp Studio Inc.

Address: 2100 W. 139th St.
Gardena, CA 90249

Date: 7/15/24

PULPSTUDIO

Lynda Nishimoto Lax
President & Founder

Pulp Studio, Inc.
2100 West 139th Street Gardena, CA 90249
T: 310-815-4999 F: 310-815-4990
lynda@pulpstudio.com

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

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Sincerely,

Name: Maria Oropeza

Title: Receptionist

Business: Infamous Barbershop

Address: 16407 St. Normandie Ave

Gardena, CA 90247.

Date: 7/16/24.

INFAMOUS BABERSHOP
16407 S. Normandie Ave #C
Gardena, CA 90247
(310) 428-6776

Barber:

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

Dear Sirs,

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

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Sincerely,

Name: Benjamin Verdi

Title: President

Business: Majestic Lighting

Date: 6/25/2024

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

Dear Sirs,

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

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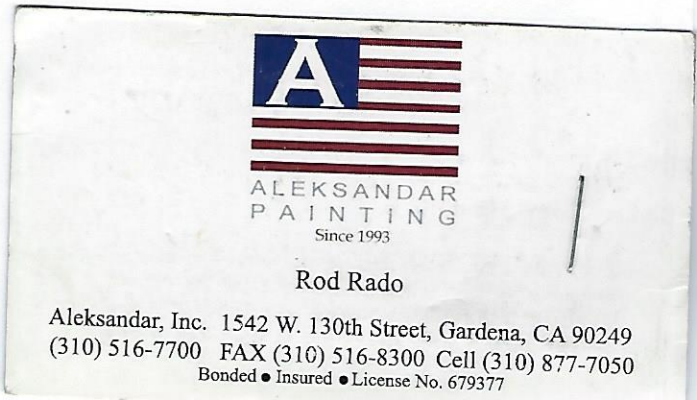
Sincerely,

Name: ROD RADO

Title: OWNER

Business: ALEKSANDAR INC

Date: 6-28-24



To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

As a local business owner, I believe that this new apartment and townhome development will benefit the community by bringing much needed new housing to Gardena. The developer has a proven track record of developing and managing high quality residential projects, and this is the type of new development that our business and community need.

Sincerely,

Name: Jesus Moreno

Title: Manager

Business: Pit Burger

Address: 16602 S. Normandie Ave

Date: 07/30/2024

To: City of Gardena Planning Commission and City Council

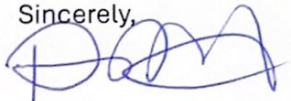
Re: Proposed Apartment and Townhome Development at 16831-16911 Normandie Avenue

Date: July 15, 2024

As a long-time member of the Gardena Buddhist Church located on 166th Street, I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Avenue between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Avenue.

As a local stakeholder, I believe that this new apartment and townhome development will benefit the community by bringing much needed new housing to Gardena. The developer has a proven track record of developing and managing high quality residential projects, and this is the type of new development that Gardena needs.

Sincerely,



Dave Mitani

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

As a local business owner, I believe that this new apartment and townhome development will benefit the community by bringing much needed new housing to Gardena. The developer has a proven track record of developing and managing high quality residential projects, and this is the type of new development that our business and community need.

Sincerely,

Name: Luis Perez

Title: Sales & Training mgr.

Business: SAM's club

Address: 1399 Artesia Blvd

Gardena CA 90247

Date: 7/15/24

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

As a local business owner, I believe that this new apartment and townhome development will benefit the community by bringing much needed new housing to Gardena. The developer has a proven track record of developing and managing high quality residential projects, and this is the type of new development that our business and community need.

Sincerely,

Name: EDDIE VILLALOBOS

Title: ASSISTANT STORE DIRECTOR

Business: ALBERTSONS

Address: 1735 ARTESIA BLVD. GARDENA.

Date: 7/16/24

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

As a local business owner, I believe that this new apartment and townhome development will benefit the community by bringing much needed new housing to Gardena. The developer has a proven track record of developing and managing high quality residential projects, and this is the type of new development that our business and community need.

Sincerely,

Name: Erick Rojas

Title: Manager

Business: Pita 360

Address: 1556 Artesia Blvd.
Gardena, CA 90248

Date: 7/16/24

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

As a local business owner, I believe that this new apartment and townhome development will benefit the community by bringing much needed new housing to Gardena. The developer has a proven track record of developing and managing high quality residential projects, and this is the type of new development that our business and community need.

Sincerely,

Name: Ectoria Straughter

Title: Owner

Business: The Toss Up restaurant

Address: 1550 Artesia Bl
Gardena CA 90248

Date: 7/16/24

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

As a local business owner, I believe that this new apartment and townhome development will benefit the community by bringing much needed new housing to Gardena. The developer has a proven track record of developing and managing high quality residential projects, and this is the type of new development that our business and community need.

Sincerely,

Name: Graciela Contreras

Title: Asst. Manager

Business: 85c Bakery cafe

Address: 1386 w. Artesia Blvd.

Gardena, CA 90248

Date: 7/16/24

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

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Sincerely,

Name: Dimitri Vass

Title: Manager

Business: Yorgo's Burgers

Address: 17325 Western Ave

Date: 7/18/24

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

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Sincerely,

Name: Jeeyong Cheong

Title: Owner

Business: Pizza Machine

Address: 1610 W Redondo Bch Blvd #14 Gardena CA 90247

Date: 7/18/24

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

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Sincerely,

Name: Alma Zepeda

Title: General Manager

Business: CA Fish Grill

Address: 1425 W. Artesia Blvd. Gardena CA. 90248

Date: 7/18/24

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

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Sincerely,

Name: Jorge Chan

Title: Owner - Gen. manager.

Business: El Rocoto Restaurant

Address: 1356 - 1358 W. Artesia Blvd.
Gardena, CA 90248.

Date: 7/16/24

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

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Sincerely,

Name: Rishab Oberoi

Title: Owner.

Business: Dickens BBQ Pit.

Address: Artesia Blvd.

Gardena, CA.

Date: 7/18/24.

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

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Sincerely,

Name: Eun Kim

Title: Owner

Business: EJ Express, Inc

Address: 1451 W. Artesia Blvd Ste 8
Gardena, CA 90248

Date: 7/24/2024

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

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Sincerely,

Name: TRACY PRINCE

Title: Owner

Business: Barbershop

Address: 1836 w 182nd St

Date:

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

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Sincerely,

Name: PHILIP SHAR.

Title: PRESIDENT.

Business: SHARP JANG ENT. INC.

Address: 1106 W. GARDENA BLVD.
GARDENA, CA 90247.

Date: 9/30/2024.

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

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Sincerely,

Name: Santos Carrillo

Title: _____

Business: SantosCreations

Address: 1045 W Gardena Blvd

_____

Date: 7-30-25

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

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Sincerely,

Name: Taylor Lax

Title: Dist manager

Business: Kin Whiskey

Address: 260 W 131th St

Gardena CA 90247

Date: 9-5-24

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

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Sincerely,

Name: Tyler Nakazaki

Title: Owner

Business: Cafe Pruvia

Address: 1610 W Redondo Beach Blvd Suite 11, Gardena 90247

Date: 7-24-24

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

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Sincerely,

Name: Mami Sagimoto

Title: Manager

Business: Dog Salon

Address: 1601 W Redondo

Date: 7-24-2023

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

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Sincerely,

Name: Emi Castillo

Title: Manager

Business: Sakae Sushi

Address: 1601 W. Redondo Beach Blvd. #112
Gardena, CA 90247

Date: 7/24/24

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

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Sincerely,

Name: Eugene Yoon

Title: CEO

Business: Economico Animal Hospital

Address: 1451 W Artesia Blvd

Suite 3 Gardena CA 90248

Date: 7/24/24.

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

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Sincerely,

Name: T-Son Nguyen

Title: _____

Business: Nam Kitchen Restaurant

Address: 1530 Artesia, Gardena CA 90248

Date: 07/24/24

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

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Sincerely,

Name: JAVAID

Title: FRANCHISEE

Business: BASKIN ROBBINS

Address: 1699 ARTESIA BLVD

GARDENA CA 90248

Date: 07/24/2024.

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

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Sincerely,

Name: Aiden Daye

Title: Owner/Operator

Business: 7-Eleven #34498

Address: 18203 S. Western Ave, Gardena, CA 90248

Date: 7/24/24

To: City of Gardena Planning Commission and City Council

RE: Apartment and Townhome Development at 16831-16911 Normandie Ave.

Dear Sirs,

I am writing this letter to express my support for Saiko / NexGen's proposed apartment and townhome development at 16831 – 16911 S. Normandie Ave. between 169th & 170th Streets. This Project will convert an obsolete industrial property to residential use, bringing the property into conformity with the surrounding residential neighborhood. The development will also help revitalize this section of Normandie Ave. and provide new customers to support local retail businesses.

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Sincerely,

Name: Freddy Garcia

Title: Owner

Business: Mary's Nails Plus

Date: 6-28-24

Docusign Envelope ID: 3F1E63C0-D87C-46A0-9802-393F955A8AF5

RESOLUTION NO. 6683

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 NORMANDIE CROSSING SPECIFIC PLAN AND RELATED ENTITLEMENTS FOR THE 5.25 ACRE PROPERTY LOCATED AT 16829, 16835, and 16907 SOUTH NORMANDIE AVENUE AND LAND USE AND ZONING CHANGES FOR THE 0.11 ACRE PROPERTY LOCATED AT 16964 BRIGHTON AVENUE AND THE 0.43 ACRE PROPERTY LOCATED TO THE EAST OF THE PROJECT SITE

WHEREAS, on December 22, 2021, 16911 Normandie Associates, LLC ("Developer"), filed an application for a General Plan Amendment to the Land Use Plan (the "General Plan Amendment"), Specific Plan, Zone Change, Zoning Code Amendment, Vesting Tentative Tract Map, and Site Plan Review to develop a 273 unit apartment building and 76 townhome style units on a total of 5.25 acres located at 16829, 16835, and 16907 South Normandie Avenue (APN ## 6106-030-011, 6106-030-015, 6106-030-016 - 6106-030-017) (the "Property); and

WHEREAS, on December 22, 2022, Developer amended its project to develop a 328 unit apartment building and 75 townhomes on the Property; and

WHEREAS, the City determined that in addition to the residential development and needed entitlements proposed by Developer, the project should also include revisions to the General Plan land use designations and zoning for two adjacent properties on the same block as the Project to match the actual uses of the properties. Specifically, for the property located at 16964 Brighton Avenue (APN # 6106-030-008), change the General Plan Amendment from Industrial to Single Family Residential and change the zoning from General Industrial (M-2) to Single Family Residential (R-1); and for the property just to the east of the Project site owned by the Southern Pacific Railroad (APN # 6106-030-800), change the General Plan land use designation from Industrial to Public/Institutional and change the zoning from General Industrial (M-2) to Official (O); and

WHEREAS, the General Plan Amendments, Specific Plan, Zone Changes, Zoning Code Amendment, Development Agreement, Site Plan Review, and Vesting Tentative Tract Map are collectively referred to as the Project; and

WHEREAS, on March 19, 2024, 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; and

Docusign Envelope ID: 3F1E63C0-D87C-46A0-9802-393F955A8AF5

WHEREAS, on April 2, 2024, the Planning Commission adopted PC Resolution No. 4-24, recommending that the City Council certify the Environmental Impact Report ("EIR"), but did not recommend approval of the Project; and

WHEREAS, after the Planning Commission's actions, Developer attended a community meeting where the project was discussed; and

WHEREAS, on September 30, 2024, Developer submitted revised plans to the City for a new alternative to be considered which consists of 70 fewer units in the apartment building and a reduction in height level from ground floor from seven stories to five stories, with one underground level of parking (hereafter the "Community Input Alternative;" and

WHEREAS, on December 3, 2024, the Planning Commission held a duly noticed public hearing on the Project, including revisions to the Final EIR to address the new Community Input Alternative submitted by the Developer; and

WHEREAS, at the close of the public hearing the Planning Commission recommended that the City Council certify the Revised and Updated Final EIR, make CEQA findings regarding mitigation measures and alternatives, and adopt a statement of overriding considerations; and

WHEREAS, on January 14, 2025, the City Council held a duly noticed public hearing on the Project, at which time it also considered the EIR prepared for 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 December 2021, the City entered into a consultant agreement with Kimley-Horn and Associates to prepare an EIR for the Project.

B. On June 23, 2022, a First Amendment to the consultant agreement was entered into to account for the change in the project description submitted by the applicant. The City entered into a number of other amendments to the consultant agreement and reimbursement agreement required of the Developer throughout the process.

C. 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 was from May 10, 2023 through June 9, 2023.

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D. On May 8, 2023, the City held a scoping meeting in accordance with Public Resources Code § 21083.9 and CEQA Guidelines § 15082(c).

E. The Draft EIR was made available for a 45-day public review period from December 4, 2023, through January 20, 2024. 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 filed with 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.

F. 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.

G. The City received and reviewed comments on the Draft EIR and prepared responses to those comments which were incorporated into that document entitled Final EIR and dated March 2024. The Final EIR consisted of the Draft EIR and all Appendices thereto, incorporating the written comments and responses thereto, as well as the changes to the DEIR.

H. Prior to releasing the Final EIR dated March 2024, the applicant submitted changes to the previous Project plans that were primarily required by the Los Angeles County Fire Department and Southern California Edison. The changes do not modify the total number of units or impacts associated with the Project. Instead, the changes primarily have to do with reductions in open space and landscaped area, size of the townhome units, and layout of the amenity space in the townhome area.

I. Responses were sent to the public agencies that commented on the DEIR and the Final EIR was made available for public review on March 13, 2024.

J. None of the comments received or the changes submitted resulted in any changes that necessitated recirculation of the DEIR. The comments did not disclose any significant information. The changes in the plans did not lead to any new or different impacts. The changes made to the document merely clarify/amplify and make insignificant modifications to the DEIR.

K. After Developer submitted plans for the Community Input Alternative, the City's Consultant provided an analysis of this alternative. The analysis showed that there

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would be no new significant impacts, no increase in the severity of any identified significant impacts, and no new mitigation measures that would be required.

L. City, through its Consultant, prepared a Revised and Updated Final EIR dated November 2024. This document amended the previous Final EIR in part by including a thorough analysis of the Community Input Alternative and responding to all comments that had been received after the close of the public comment period on the DEIR.

M. Although not required by law, the Revised and Updated Final EIR was sent to public agencies who responded to the DEIR on November 22, 2024.

N. The City has complied with all procedural requirements relating to CEQA and other requirements of law. The Revised and Updated Final EIR is adequate and complete and complies with all CEQA requirements.

O. After the Planning Commission hearing, the City received a number of additional comment letters. None of the comments raised any new issues or provided any new information and there was no need fur further revisions to the Revised and Updated Final EIR

P. In certifying the Revised and Updated 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 Revised and Updated Final EIR, agenda reports, written reports, public testimony, and other information in the record and reviewed this information prior to acting upon the Project.

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.

B. Despite the findings of the Initial Study, the EIR examined two topics under aesthetics (conflict with applicable zoning and other regulations governing scenic quality and creation of a new source of light or glare), as well as hydrology and water quality with respect to a decrease in groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin (see Impact 4.7-2).

C. The City Council finds that the topics listed in Section 7.0 of the EIR of Effects Found Not to Be Significant did not require any further analysis.

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D. The impacts that are analyzed in the EIR are discussed in detail in Sections 4.1 through 4.16 and summarized in Section ES.8 of the Draft EIR and identified therein as less than significant, less than significant after mitigation, and significant even after mitigation. Project Design Features (PDFs) were incorporated into the analysis under the topics of Air Quality, Energy, Greenhouse Gas Emissions, and Transportation. The following is a summary of the mitigation measures and impacts which are all fully described in the EIR.

E. 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 CUL-1, and TCR-1 through TCR-3, 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-2 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. Standard conditions of approval, along with Mitigation Measure GEO-1, 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 requiring 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 and HAZ 2 requiring the installation of an impermeable vapor membrane under the slab areas, along with standard conditions of approval relating to asbestos and lead-based paint, will reduce the impacts to a less than significant level.

4. Under Noise, it was determined that the Project could result in the generation of excessive groundborne vibration or noise levels. Mitigation Measure NOE-3 which requires that large construction equipment be used a minimum of 45 feet away from the house at 16964 Brighton Avenue will mitigate this impact to less than significant.

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5. Under Tribal Cultural Resources, it was determined that the project could potentially result in significant impacts. The City consulted with the Gabrielino Band of Mission Indians – Kizh Nation and in accordance with such consultation is imposing Mitigation Measure TCR-1 through TCR-3, which will mitigate the impacts to a less than significant level.

6. The construction of the utilities associated with the project would have potentially significant impacts under the impact areas described above, as well as construction noise describe below. The mitigation measures listed above and Mitigation Measures NOI-1 and NOI-2 described below will reduce these impacts to less than significant, except for construction noise.

F. 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 power construction equipment to be equipped with state-of-the-art noise shielding and muffling devices and to be properly maintained. Mitigation Measure NOI-2 requires a temporary and impermeable sound barrier of at least 10 feet that reduces noise by at least 12dB(A). Even with these measures, construction noise could be significant and unavoidable.

SECTION 3. Alternatives.

A. In accordance with CEQA, the EIR examined four alternatives to the Project. Three of the Alternatives are discussed in detail in Chapter 6 of the EIR and summarized in Section ES.6. The fourth alternative was analyzed in the Revised and Updated Final EIR.

B. 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 decades-old buildings 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.

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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 industrial purposes. This alternative involves the demolition of the existing buildings and construction up to 228,690 square feet of new industrial uses within an industrial business park. Redevelopment of the site in this manner would still cause significant and unavoidable noise impacts and the alternative would not meet any of the Project's objectives.

3. The Reduced Density Alternative would still develop the 75 townhomes along the western and southern borders of the Project site, but would reduce the number of units in the apartment building from 328 to 192 and reduce the height to five stories. This alternative would still have significant and unavoidable noise impacts and would not provide any affordable housing.

4. The Community Input Alternative would also still develop the 75 townhomes along the western and southern borders of the Project site, but there is now increased guest parking that has been added and the driveway access along 170th Street has been realigned so as to avoid any problem with lights shining into the homes across 170th Street. Additionally, the number of apartment buildings has been reduced by 70 units and the height of the project was reduced by 20 feet to a maximum of 70 feet. The overall density is reduced from 77 units per acre to 63 units per acre. This alternative will include seven moderate units for the apartment building. While the number of units is reduced by 70 units, the number of parking spaces is only reduced by 12 spaces and 29 guest parking spaces have been added. There will still be significant and unavoidable construction noise impacts.

C. 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. As demolition of the existing buildings will create a significant and unavoidable noise impact, the only way to avoid this impact would be to reuse the buildings, which is not feasible for a residential development. An alternative site was considered but rejected because the applicant does not have an interest in any alternative site in the City which is not also the subject of a development application.

D. 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. Among the other alternatives, the reduced density alternative is the environmentally superior alternative. However, while construction noise impacts would be reduced, the impact would still be

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significant and unavoidable and the developer would not be able to provide any affordable housing.

SECTION 4. 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 help avoid impacts relating to air quality, energy, greenhouse gas emissions, and transportation.

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, noise impacts relating to groundborne vibration, tribal cultural resources to less than significant levels.

C. Mitigation Measures 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 Reduced Density alternative would achieve most of the objectives, but would still have significant construction noise and would eliminate 20 affordable units for lower income families that the project will provide. Social and economic justifications lead the City Council to reject this alternative.

1. The Reduced Density alternative would reduce the amount of housing available in the City. The City 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 was broken down as follows: above-moderate units -2,595; moderate units – 894; low income units – 761; and very low income units – 1,485. The Reduced Density alternative will cause a loss of 136 units, including 20 units for lower income households. Although only a portion of the Project Site was identified as a Housing Inventory Site, the entire Project of 403 was included in the Housing Element as a credit against future needs.

2. The Reduced Density alternative would not bring the same level of economic benefits to the City. A reduction in size would reduce the both the one-time economic impacts as construction time would be reduced and would also reduce the recurring economic impacts from the Project as proposed.

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E. The two No Project alternatives would not achieve any of the project objectives or provide the housing and economic benefits of the Project.

F. The Community Input Alternative responds to the objections raised by the community regarding parking, height and density and provides seven moderate income units; this is a housing income-category that has not previously been provided for anywhere in the City.

SECTION 5. 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 Revised and Updated 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 and that impact is temporary in nature (construction noise).

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 and 2,246 units allocated to lower income units. This Community Input Alternative Project will satisfy approximately 10 percent of the City's above-moderate allocation and provide seven moderate income units.

B. The Project will help revitalize a site that does not meet current development standards and whose buildings are in a deteriorated condition.

C. The Project will provide the following one-time economic benefits from the construction:

1. The Project will provide numerous construction jobs amounting to the equivalent of 1,580 total job years. As the Project includes a commitment from the developer to implement a local hiring policy, this will benefit lower income individuals and individuals who live in the City. Additionally, there will be an indirect benefit of additional jobs created because of the construction jobs, amounting to approximately another 414 job years; and

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2. Construction is expected to create approximately $109 million in total labor income, due to direct, indirect, and induced workers associate with the construction. Of that, $80.9 million is projected to be paid to onsite construction employees, providing individuals with additional income to spend on services and goods in Gardena; and

3. The principles of Developer also own Tasoro, a company which provides quality building materials for apartments and is located in Gardena. Use of these products will provide sales tax revenue to the City. Additionally, the Development Agreement provides for a local buying program for construction goods as well as a local hire program; and

4. Developer will pay in-lieu park fees under the Subdivision Map Act of $10,000 per unit on the 75 condominium units; and

5. Developer will provide one-time construction-related revenues totaling over $3 million, including construction fees, development impact fees, and sales tax from construction materials; and

6. Each contractor that does business in the City will be required to obtain and pay for a City business license.

D. The Project will provide the following recurring annual revenues to the City:

1. The creation of approximately 73 jobs per year which includes 47 direct onsite jobs, plus indirect and induced jobs created in the local economy by residential spending; and

2. Economic output associated with operations of approximately $12.6 million per year in the local economy, of which $7.1 million is attributable to the value of direct project operations and household spending; and

3. Over $455,538 in revenues per year, $444,938 larger than the estimated revenues generated by the current use at the Property. This includes sales tax, property tax, utility tax, and other revenues generated from the new residential units.

E. 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 and will therefore help existing businesses and encourage new businesses.

F. The Project will help encourage people to use alternate means of transportation by providing one-month free transit passes to persons who sign a one-year lease.

G. The Project will provide off-site safety improvements by providing sidewalks

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along 169th street where there currently are none.

H. The Project will provide safety improvements by upgrading the railway crossing and sidewalks in front of the Project site along Normandie Avenue.

SECTION 6. Certification. Based on the above, the City Council hereby certifies the Final Environmental Impact Report for the Normandie Crossing Specific Plan Project attached hereto has Exhibits A (Draft EIR) and B (Revised Final and Updated EIR) and adopts the Mitigation Monitoring and Reporting Program attached hereto as Exhibit C.

SECTION 7. 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 Greg Tsujiuchi, Community Development Director who can be reached at 310/217-9546 or gtsujiuchi@cityofgardena.org.

SECTION 8. 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 9. Certification. The City Clerk shall certify the passage of this resolution.

SECTION 10. Effective Date. This Resolution shall be effective immediately.

Passed, approved, and adopted this 14 day of January, 2025.

TASHA CERDA, Mayor

ATTEST:

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MINA SEMENZA, City Clerk

APPROVED AS TO FORM:

CARMEN VASQUEZ, City Attorney

Exhibit A – Draft EIR, dated December 2023
Exhibit B – Revised and Updated Final EIR, dated November 2024
Exhibit C – Mitigation Monitoring and Reporting Program

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Exhibit A – Draft EIR, dated December 2023

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Exhibit B – Revised and Updated Final EIR, dated November 2024

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Exhibit C – Mitigation Monitoring and Reporting Program

DRAFT

ENVIRONMENTAL IMPACT REPORT

SCH # 2023050241

NORMANDIE CROSSING SPECIFIC PLAN PROJECT

LEAD AGENCY

CITY OF GARDENA

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NEXTGEN APARTMENTS

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DECEMBER 2023

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The Appendices are available on the City website at:
https://cityofgardena.org/community-development/planning-projects/

ES EXECUTIVE SUMMARY

ES Executive summary

ES.1 INTRODUCTION

This document is an Environmental Impact Report (EIR) prepared for the City of Gardena (City) in compliance with CEQA. This EIR evaluates the potential environmental impacts associated with planning, constructing, and operating the proposed Normandie Crossing Specific Plan Project (the "Project" or "proposed Project"). The Project would develop up to 403 dwelling units (DUs) and adopt the Normandie Crossing Specific Plan (herein referred to as "Specific Plan" or "NCSP"). The proposed Specific Plan would establish site specific zoning regulations and development standards for the area, which would accommodate the proposed number of dwelling units. The Specific Plan 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. In addition to the Zoning Code Text Amendment, the Project seeks approval of the following entitlements: Zone Change/Map Amendment; General Plan/Map Amendment; Site Plan Review; Development Agreement; Vesting Tentative Tract Map TTM #; Affordable Housing Agreement; Environmental Assessment; and EIR certification.

ES.2 PROJECT LOCATION AND SETTING

The Project site is in the City of Gardena (City), which encompasses approximately 6.0 square miles in the County's South Bay region. The City is approximately 12 miles southwest of downtown Los Angeles. The approximately 5.25-acre Project site is comprised of four parcels (APNs 6106-030-011, 6106-030-015, 6106-030-016, 6106-030-017) generally bound by West 169th and West 170th Streets on the north and south, and South Normandie Avenue and Brighton Way on the east and west.

Regional access to the Project site is provided via four major freeways: I-105 to the north; I-405 to the south and east; and I-110 and SR-91 (becomes West Artesia Boulevard) to the east. From I-105, access to the Project site is provided via Vermont Avenue, from I-405, access is provided via South Normandie Avenue, from I-110, access is provided via Artesia Boulevard at the City's northern portion, which intersects with Normandie Avenue, and from SR-91, access is provided via Artesia Boulevard in the City's southern portion, which intersects with Normandie Avenue. Local access is also provided via the following:

- Normandie Avenue, which is a four-lane Major Collector oriented north-south to the west of the Project site.
- Brighton Way, which is a two-lane alleyway classified as a Local Street oriented north-south and forms the Project site's western boundary.
- West 169th and West 170th Streets are two-lane Local Streets oriented east west and form the Project site's northern and southern boundaries, respectively.

ES.3 PROJECT CHARACTERISTICS SUMMARY

The Project proposes the construction and operation of a residential development comprised of 403 dwelling units (DU). The Project would construct two subareas – an apartment portion and a townhomes portion – connected by internal streets. The following proposed land uses would be developed in each sub area:

- Apartments (Subarea A); See **Table 2-5: Land Use Summary – Proposed Apartment Building**
    - A single 7 story, 90-foot tall 308,308-SF apartment building with 328 DU at a density of approximately 155 DU/AC
    - Minimum 50 SF of private open space per DU
    - 22,698 SF of common open space
- Townhomes (Subarea B); See **Table 2-6: Land Use Summary – Proposed Townhomes**
    - Nine townhome buildings with 75 3-story, 40-foot-tall townhomes totaling 120,673 SF at a density of approximately 24 DU/AC
    - 50 SF private open space per DU
    - 7,645 SF of common open space

The Project is designed to be residential development with a variety of housing types. and common open spaces. The apartment subarea common open space includes a swimming pool, a dog park, fitness room, club houses, and a courtyard; and the townhomes subarea common open space includes a swimming pool, dog park, club house, and paseos with seating areas.

The Project proposes 568 vehicle, and 173 bicycle parking spaces as follows:

- Apartments (Subarea A)
    - Level 1
        - Bicycle Parking, 173 spaces
        - Vehicle Parking, 204 spaces
    - Level 2
        - Vehicle Parking, 204 spaces
- Townhomes (Subarea B)
    - Approximately 160 vehicle parking spaces
        - 150 spaces in attached garages
        - 10 guest spaces

Additionally, the Project proposes offsite improvements/actions as described below:

- Sidewalk improvements
- Various railroad improvements on South Normandie Avenue, including the removal of 1,000 linear feet of railroad spur track.
- Redesignate the residential parcel at 16964 179th Street from Industrial to Single Family Residential and rezone from General Industrial Zone (M-2) to Single Family Residential Zone (R-1) consistent with the existing residential land use.
- Redesignate the adjacent Union Pacific Railroad Parcel from Industrial to Public/Institutional and rezone from General Industrial Zone (M-2) to Official (O) consistent with the existing railroad land use.

The Project construction is anticipated to occur in a single phase over approximately 3.5 years, beginning June 2024 and ending September 2027. Phased occupancy of the proposed Project would be permitted, provided all occupiable areas are deemed safe for fire and life safety purposes. Grading for the Project would require cut and fill, which would include export. The Project site would be graded to match the existing grading and drainage patterns. The overall site grading and drainage pattern would be southeasterly towards Normandie Avenue.

ES.4 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 are:

- Diversify the City of Gardena's existing housing options, by providing a range of housing types and sizes, to serve the region's growing and evolving technology and creative sectors and aid in recruiting and retaining talent for local companies.
- Support the expanding technology and creative sector with newly constructed, high-quality housing opportunities, enabling local employees to live close to where they work.
- Cluster urban residential development near technology firms, other large employment centers, and commercial corridors providing City residents with the opportunity to live, work, and shop with less reliance on automobiles.
- Establish housing development that meets high standards of design and pursues environmental sustainability.
- Redevelop a blighted site, increase tax revenues to the City, provide affordable housing to support the City's Regional Housing Needs Assessment goals, and create a catalyst for future development in this part of Gardena.

ES.5 SIGNIFICANT UNAVOIDABLE IMPACTS

Based on the analysis contained in **Section 4: Environmental Impact Analysis** of this Draft EIR, the Project would have a significant unavoidable impact concerning construction noise; see **Section 4.9.6: Significant Unavoidable Impacts**.

ES.6 ALTERNATIVES TO THE PROJECT

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, three 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; and
- "Reduced Density" Alternative.

"NO PROJECT/NO CONSTRUCTION" ALTERNATIVE

The No Project/No Construction Alternative would retain the Project site in its current condition. The Project site is fully developed with six industrial buildings, asphalt surface parking lots, hardscapes, and minimal landscaping. Approximately 115,424 square feet (SF) of industrial floor area is present on the Project site, however, only 106,100 SF of industrial uses are currently operational. Under this Alternative, the existing industrial uses would continue to operate and none of the proposed Project improvements would be implemented. Further, the Project's requested entitlement (i.e., General Plan/General Plan Map Amendment (GPA #3-21), Zone Change and Zone Map Amendment (ZC #4-21), Zoning Text Amendment (ZTA #6-21), Normandie Crossing Specific Plan (NCSP) (SP #1-21), Site Plan Review (SPR #11-21), Vesting Tentative Tract Map (TTM #4-21), Development Agreement (DA #2-21), and CPUC General Order 88-B Permit) would not be granted.

"NO PROJECT/EXISTING LAND USE DESIGNATION" ALTERNATIVE

This Alternative consists of a "No Project" condition whereby the Project would not proceed, but rather the Project site is redeveloped pursuant to the existing General Plan land use designation. **Table 2-2: Existing Land Use Designations and Zoning** identifies the GGP land use designations for the Project site and indicates the Project site is designated Industrial, which provides for a wide range of industries, technology-related uses and supporting facilities, and business parks. Additionally, the GGP assigns a High Density 30 Overlay to the northern approximately 1.4 acres of the Project site. Based on the existing Industrial land use designation, the Project site's maximum development capacity is approximately 228,690 SF of industrial floor area. It is noted, although the High Density 30 Overlay on the Project site's northerly 1.4 acres would allow

development of residential uses, only industrial uses would be allowed on the site's southerly portion. Also, because no roadway or other buffer would exist between these two areas, this Alternative assumes no residential development on the Project site. Therefore, this Alternative assumes demolishing the existing 115,424 SF of industrial uses and in their place constructing up to 228,690 SF of industrial uses. Given that the Industrial land use designation is intended for a wide range of industrial uses, and since the Project site is surrounded by residential uses, this Alternative assumes development of an industrial business park, which could include any uses permitted within the Industrial zone; see GMC §18.36.020. Additionally, because the proposed access driveways under this Alternative are unknown, it is unknown whether it, like the Project, would require offsite railroad improvements pursuant to California Public Utilities Commission (CPUC) standards and Union Pacific Railroad (UPRR) guidelines.

"REDUCED DENSITY" ALTERNATIVE

The Reduced Density Alternative assumes development of the Project site similar to the proposed Project. The townhomes would remain unchanged; however, for purposes of this Alternative, the apartment building would be reduced to 192 DUs (from 328) and the building height would be reduced to five stories (from seven stories). This Alternative proposes a total of 267 DU, or approximately 34 percent fewer DU than the Project, and would reduce the density to 51 DU/AC. Thus, with fewer total units, the Applicant would not be able to provide affordable housing. Additionally, it is assumed that the access driveways would be the same under this Alternative, thus, similarly to the Project, this Alternative would require offsite railroad improvements pursuant to CPUC standards and UPRR guidelines.

ES.7 AREAS OF CONTROVERSY

This Draft EIR discusses environmental impacts that would occur as a result of implementing the proposed Project. This Draft EIR also includes proposed mitigation measures that have been identified to reduce or avoid significant effects that would result from the construction and operation of the proposed on-site uses. CEQA Guidelines § 15123(b)(2) requires that areas of controversy known to the Lead Agency (City of Gardena) be stated in the EIR summary. The following discussion identifies issues raised by other agencies and the public during the 30-day public comment period of the NOP.

The following issues were raised during the commenting period of the NOP. These issues will be examined in the cited sections of this Draft EIR.

- Project-related impacts on Air Quality and Greenhouse Gas Emissions; see **Section 4.1: Air Quality** and **Section 4.5: Greenhouse Gas Emissions**
- Project proximity to the existing railroad right-of-way; see **Section 4.6: Hazards and Hazardous Materials**
- Project-related traffic causing congestion and excess noise on local roads; see **Section 4.13: Transportation** and **Section 4.9: Noise**

- Project-related impacts on utilities; see **Section 4.15: Utilities and Service Systems**
- Project-related impacts on local services; see **Section 4.11: Public Services**
- Project's visual character; see **Section 4.16: Aesthetics**

ES.8 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

The following table is a summary of impacts and proposed mitigation measures and conditions of approval associated with the Project as identified in this Draft EIR. Refer to **Section 4.1** through **Section 4.16** for a detailed description of the environmental impacts and mitigation measures for the Project.

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
Section 4.1: Air Quality			
Impact 4.1-1: Would the Project conflict with or obstruct implementation of the applicable air quality plan?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.1-2: 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 is required.	Less Than Significant
Impact 4.1-3: Would the Project expose sensitive receptors to substantial pollutant concentrations?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.1-4: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less Than Significant	No mitigation is required.	Less Than Significant
Section 4.2: Cultural Resources			
Impact 4.2-1: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	No impact	No mitigation is required.	No Impact

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
Impact 4.2-2: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	Potentially Significant	**MM CUL-1: Inadvertent Discovery of an Archaeological Resource.** Before ground disturbing activities are initiated on the Project site, a qualified archaeologist shall be retained to conduct a Pre-construction Worker Training on the types of unanticipated resources that could be encountered during construction, based on the site's history. This archaeologist may also be retained to ensure prompt assessment in the event that unanticipated cultural resources are encountered during construction. If archaeological resources are exposed during construction, work within 50 feet of the find must stop until a qualified archaeologist can evaluate the significance of the find. Construction activities may continue in other areas. If the discovery proves significant under CEQA (14 CCR 15064.5[f]; PRC 21082), additional work such as testing, or data recovery may be warranted. See also MM TCR-1, MM TCR-2, MM TCR-3 below.	Less Than Significant
Impact 4.2-3: Would the Project disturb any human remains, including those interred outsides of dedicated cemeteries?	Potentially Significant	See MM TCR-2 below.	Less Than Significant

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
Section 4.3: Energy			
Impact 4.3-1: Would the Project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.3-2: Would the Project conflict with or obstruct state or local plan for renewable energy or energy efficiency?	Less Than Significant	No mitigation is required.	Less Than Significant
Section 4.4: Geology, Soils and Paleontological Resources			
Impact 4.4-1: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially Significant	**COA GEO-1.** 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	Less Than Significant

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
		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. **COA GEO-2.** 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. **MM GEO-1: 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. A Project Paleontologist shall prepare a Paleontological Resources Monitoring and Mitigation Plan (PRMMP). As defined in the PRMMP, Paleontological monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive	

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
		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.	
Section 4.5: Greenhouse Gas Emissions			
Impact 4.5-1: Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment? Impact 4.5-2: 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 is required.	Less Than Significant
Section 4.6: Hazards and Hazardous Materials			
Impact 4.6-1: Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Potentially Significant	**COA HAZ-1: Asbestos Survey.** Prior to demolition activities, an Asbestos Hazard Emergency Response Act (AHERA) and California Division of Occupational Safety and Health (Cal/OSHA) certified inspector shall conduct an Asbestos Survey to determine the presence or absence of asbestos containing-materials (ACMs) pursuant to South Coast Air Quality Management District (SCAQMD) regulations. **COA HAZ-2.** If paint is separated from building materials	Less Than Significant

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
		(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, a qualified Lead Specialist shall complete abatement 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. **MM HAZ-1: Construction Management Plan.** Prior to issuance of any demolition permit for the onsite structures, a construction management plan addressing procedures and requirements for responding to disturbance of undocumented contaminated soil shall be prepared and submitted to the City for review and approval.	

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
		MM HAZ-2: Engineered Vapor Mitigation and Ventilation. Prior to commencement of construction activities, the City of Gardena Building Department shall review the building plans to verify that an engineered vapor measure (such as an impermeable membrane or equivalent) is included in the design of all townhomes and that the apartment parking structures include sufficient ventilation to minimize accumulation of VOCs on the Project site. 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 City of Gardena Building Department shall have oversight/sign-off responsibility for the vapor barrier.	
Section 4.7: Hydrology and Water Quality			
Impact 4.7-1: 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 is required.	Less Than Significant
Impact 4.7-2: Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the projects may impede sustainable groundwater management of the basin?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.7-3: Would the Project substantially alter the existing	Less Than Significant	No mitigation is required.	Less Than Significant

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
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?			
Impact 4.7-4: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less Than Significant	No mitigation is required.	Less Than Significant

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
Section 4.8: Land Use and Planning			
Impact 4.8-1: Would the Project cause a significant environmental impact due to a conflict with any Gardena General Plan 2006 land use plan, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.8-2: 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 is required.	Less Than Significant
Impact 4.8-3: Would the Project cause a significant environmental impact due to a conflict with any Connect SoCal 2020-2045 RTP/SCS land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant	No mitigation is required.	Less Than Significant

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
Section 4.9: Noise			
Impact 4.9-1: Would the Project 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?	Potentially Significant	**MM NOI-1: Construction Equipment Noise.** Prior to issuance of any Demolition or Grading Permit, the Public Works Department shall verify that the Project plans and specifications include provisions that require all power construction equipment (including combustion engines), fixed or mobile to be: 1) equipped with state-of-the-art noise shielding and muffling devices (consistent with manufactures' standards); and 2) properly maintained to ensure that no additional noise, due to worn or improperly maintained parts, would be generated. **MM NOI-2: Construction Noise.** A temporary and impermeable sound barrier shall be provided along the Project northern, southern, and western property line. The temporary sound barrier shall be minimum 10-foot high and provide minimum 12 dBA noise reduction, and shall have a minimum Sound Transmission Class rating of STC-25, such as, acoustical barrier blanket (with STC-25 rating) or 3/4" thick exterior grade plywood.	Significant and Unavoidable Impact
Impact 4.9-2: Would the Project result in the generation of excessive groundborne vibration or groundborne noise levels?	Potentially Significant	**MM NOI-3: Construction Vibration Impacts.** The use of large construction equipment (e.g., large bulldozer greater than 400 horsepower and/or loaded trucks) shall be a minimum of 45 feet away from the off-site residence adjacent to the Project site (receptor R1) (16964 Brighton Avenue).	Less Than Significant
Section 4.10: Population and Housing			
Impact 4.10-1: Would the Project induce substantial unplanned population growth in an area, either directly (for	Less Than Significant	No mitigation is required.	Less Than Significant

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			
Section 4.11: Public Services			
Impact 4.11-1: 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 is required.	Less Than Significant
Impact 4.11-2: 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	Less Than Significant	No mitigation is required.	Less Than Significant

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?			
Impact 4.11-3: 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 is required.	Less Than Significant
Impact 4.11-4: 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	Less Than Significant	No mitigation is required.	Less Than Significant

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library facilities?			
Section 4.12: Recreation			
Impact 4.12-1: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental park facilities, need for new or physically altered governmental 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?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.12-2: Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical	Potentially significant	See MM GEO-1, MM GEO-2, COA HAZ-1, COA HAZ-2, MM HAZ-1, MM HAZ-2, MM NOI-1, MM NOI-2, and MM NOI-3.	Less Than Significant

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
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?			
Section 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 is required.	Less Than Significant
Impact 4.13-2: Would the Project conflict or be inconsistent with State CEQA Guidelines § 15064.3, subdivision (b)?	Less Than Significant	No mitigation is 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 is required.	Less Than Significant

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
Impact 4.13-4: Would the Project result in inadequate emergency access?	Less Than Significant	No mitigation is required.	Less Than Significant
Section 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 § 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 § 5020.1(k), or b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant	Potentially Significant	**MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.** A. The Applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject Project at all Project locations (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and	Less Than Significant

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
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 Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?		historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Applicant/lead agency upon written request to the Tribe. D. On-site tribal monitoring shall conclude upon the latter of the following: (1) written confirmation to the monitor from a designated point of contact for the Applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project site or in connection with the Project are complete; or (2) a determination and written notification by the monitor to the Applicant/lead agency that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact TCRs. E. Upon discovery of any TCRs or archaeological resources, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the monitor and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983). • If the resources are Native American in origin, the Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.	

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
		• If the archaeologist determines that the resource contains a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures or appropriate mitigation shall be made available. The treatment plan shall be in accordance with CEQA Guidelines § 15064.5(f) for historical resources and Public Resources Code § 21083.2(b) for unique archaeological resources. If not left in place, any historic or archaeological material that is not Native American in origin shall be curated at a public, nonprofit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum at the University of California Los Angeles, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society for educational purposes. **MM TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects.** A. 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 Public Resources Code § 5097.98, are also to be treated according to this statute. B. If human remains and/or grave goods are discovered or recognized on the Project site, then all construction activities shall immediately cease within 200 feet of the discovery. Health and Safety Code § 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County	

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
		Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code § 5097.98 shall be followed. C. Human remains and grave/burial goods found with such remains shall be treated alike per California Public Resources Code § 5097.98(d)(1) and (2). D. Construction activities may resume in other parts of the Project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the monitor determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the Project manager express consent of that determination (along with any other mitigation measures the monitor and/or archaeologist deems necessary). (CEQA Guidelines § 15064.5(f).) E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance. **MM TCR-3: Procedures for Burials and Funerary Remains.** This mitigation measure shall only apply if the Gabrielino Band of Mission Indians-Kizh Nation is designated the Most Likely Descendant ("MLD") by the NAHC: A. 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	

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
		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. B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created. C. 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. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials. D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will 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 should be posted outside of working hours. The Tribe will 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 will be removed. E. In the event preservation in place is not possible despite good faith efforts by the Applicant/developer and/or landowner, before ground-disturbing activities may resume on the Project site, the landowner shall arrange a designated site location within the	

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
		footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects. F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should 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. G. The Tribe will work closely with the Project's qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall 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.	
Section 4.15: Utilities and 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	Potentially Significant	See MM GEO-1, MM CUL-1, MM HAZ-1, MM HAZ-2, MM NOI-1, MM NOI-2, MM NOI-3, MM TCR-1, MM TCR-2, and MM TCR-3.	Less Than Significant

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
relocation of which could cause significant environmental effects?			
Impact 4.15-2: Would the Project require or result in the relocation or construction of new or expanded wastewater conveyance/ wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects?	Potentially Significant	See MM GEO-1, MM GEO-2, COA HAZ-1, COA HAZ-2, MM HAZ-1 MM HAZ-2, MM NOI-1, MM NOI-2, and MM NOI-3.	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?	Potentially Significant	See MM GEO-1, MM GEO-2, COA HAZ-1, COA HAZ-2, MM HAZ-1, MM HAZ-2, MM NOI-1, MM NOI-2, and MM NOI-3.	Less Than Significant
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 is required.	Less Than Significant

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
Impact 4-15.5: Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.15-6: 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 is required.	Less Than Significant
Impact 4.15-7: 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? Impact 4.15-8: Would the Project comply with federal, state, and local management and reduction statutes and	Less Than Significant	No mitigation is required.	Less Than Significant

Table ES-1: Summary of Impacts, Proposed Mitigation Measures, and Conditions of Approval

Resource Impact	Level of Significance Before Mitigation	Mitigation Measure(s) and/or Condition(s) of Approval	Level of Significance After Mitigation
regulations related to solid waste?			
Section 4.16: Aesthetics			
Impact 4.16-1: If an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	Less Than Significant	No mitigation is required.	Less Than Significant
Impact 4.16-2: 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 is required.	Less Than Significant

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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 Normandie Crossing Specific Plan Project (hereafter, the "Project" or "proposed Project"). The Project would develop up to 403 dwelling units (DUs) and adopt the Normandie Crossing Specific Plan (herein referred to as "Specific Plan"). The State CEQA Guidelines are included within 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 3.0: Basis of Cumulative Analysis** outlines both the geographic context and list of cumulative projects which will be analyzed for cumulative analysis in **Section 4.0: Environmental Impact Analysis**. **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 effects, and consider alternatives to the proposed Project, which would eliminate or reduce the significant effects. The potential impacts include 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.
- 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.

In addition to making findings under State CEQA Guidelines §15093, when there is an unavoidable adverse environmental impact, the decision-makers must also make findings under State CEQA Guidelines §15091 relating to mitigation measures and alternatives. Findings under both sections must be supported by substantial evidence.

1.3 SCOPE OF THE ENVIRONMENTAL IMPACT REPORT

1.3.1 INITIAL STUDY

As lead agency, the City undertook preparation of an "Initial Study," which is a preliminary analysis intended to determine whether there may be a significant environmental impact (State CEQA Guidelines §§15063, 15365; Public Resources Code §§21080.1, 21080.3); see **Appendix 1.0-1: Initial Study, Notice of Preparation, and Comment Letters**. The key purpose of the Initial Study is for the lead agency to determine whether to prepare a:

- Negative Declaration (ND): If a project would result in no impact or less than significant impacts; or
- Mitigated Negative Declaration (MND): If a project would result significant impacts that can be mitigated to a less than significant level; or
- Environmental Impact Report (EIR): If a project would result in one or more significant impacts that cannot be mitigated to a less than significant level.

Other purposes of the Initial Study are to facilitate environmental review early in a project's design, enable a project applicant to modify the project to mitigate impacts, and to identify potentially significant issues, and to assist with EIR preparation (scope, analysis, and type).

1.3.2 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. Additionally, the City mailed the NOP to owners and occupants of properties within a 300-foot radius of the Project site. The NOP was filed with the County of Los Angeles Clerk of the Board of Supervisors and State Clearinghouse (SCH) within the Governor's Office of Planning and Research. The NOP was distributed on May 9, 2023, with a 30-day public review period ending on June 8, 2023. **Table 1.3-1: Summary of 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 1.0-1**.

Table 1.3-1: Summary of Comments on Notice of Preparation

Commenter	Summary of Comment and Where Addressed
Written Comments Received on the NOP	
Margaret Carnright, Email Correspondence (received May 16, 2023)	• Concerned about increased demands placed on public services (e.g., police and fire protection). • Apartment building would look out of place. • Traffic is already bad. • Perry Middle School and Gardena High School are also on Normandie Avenue. Concerned that the Project would increase the number of vehicles in the area, increasing traffic accidents and causing danger to kids walking home. • There are already other housing projects under construction on Normandie Avenue. See **Section 4.11: Public Services**, **Section 4.16: Aesthetics**, **Section 7.0: Effects Found Not To Be Significant**, **Section 4.13 Transportation**, and **Section 4.10: Population and Housing**, respectively.
Susan Prieto Email Correspondence (received May 16, 2023)	• Traffic is already bad. • Concerned that City infrastructure would not be able to handle the increased population. See **Section 4.13: Transportation**, **Section 4.11: Public Services** and **Section 4.15: Utilities and Service Systems**, respectively.
Mitchell M. Tsai Email Correspondence (received June 2, 2023)	• Requests that the City provide notice for any and all notices issued under CEQA and the Planning and Zoning Law. No other comments provided related to the EIR's scope.
Brandon Smith Email Correspondence (received June 6, 2023)	• Providing additional housing in the County of Los Angeles is critical. • Traffic concerns would be minimized because the project beautifies the area and shifts people towards movement outside of their car such as biking, walking, and more utilization of public transportation (GTrans). See **Section 4.10: Population and Housing**, **Section 4.16: Aesthetics**, and **Section 4.13: Transportation**, respectively.
Martha Bjerke Email Correspondence (received June 7, 2023)	• Concerned that Project construction, specifically demolition and operations would add additional vehicles to the area and cause toxic air quality. • Concerned that the proposed apartment building would cast great shadows over the existing houses on Brighton Avenue, especially in the winter, due to the height of the proposed apartment building. • Concerned the Project would cause constant noise.

Commenter	Summary of Comment and Where Addressed
	• Concerned that existing houses and properties on Brighton Avenue would lose all privacy in their backyards. See **Section 4.1: Air Quality**, **Section 4.5: Greenhouse Gas Emissions**, **Section 4.6: Hazards and Hazardous Materials** regarding construction impacts, and **Section 4.9: Noise** regarding noise. There are no State CEQA Guidelines Appendix G thresholds concerning shadows or privacy.
Mitchell M. Tsai Email Correspondence (received June 9, 2023)	• Recommend local hire provisions to reduce environmental impacts (Air Quality, Greenhouse Gas, and transportation) and improve positive economic impact of the Project. • Recommend considerations of CEQA mitigation measures to mitigate public health risks related to COVID-19 from the Project's construction. See **Section 4.1: Air Quality**, **Section 4.5: Greenhouse Gas**, and **Section 4.13: Transportation**, respectively.
Walter Kronberger Email Correspondence (received June 9, 2023)	• Concerned that building an apartment complex close to the railroad right-of-way may be dangerous in the case of chemical spills, hazardous gas releases, fire, or explosions. • Concerned about increased demands placed on public services (e.g., police and fire protection). • The schools in Gardena are already overcrowded. • The project is surrounded by small side streets. The project increases the number of vehicles in the area and the surrounding streets would not be able to support this increase. • Traffic is already bad and he is concerned that the Project would increase the number of vehicles in the area, increasing traffic accidents and causing danger to pedestrians. • Concerned the electric power grid in Gardena would not be sufficient. See **Section 4.6: Hazards and Hazardous Materials**, **Section 4.11: Public Services**, **Section 4.13: Transportation**, and **Section 4.15: Utilities and Service systems**, respectively.
Los Angeles County Sanitation Districts Letter (dated June 7, 2023, received June 9, 2023)	• Wastewater would be discharged to a local sewer line, not maintained by the districts, for conveyance to the District's Gardena Pump Trunk Sewer located in Normandie Avenue, north of Artesia Boulevard. • Wastewater would be treated at the Joint Water Pollution Control Plant (JWPCP) in the City of Carson. • Connection fees would be charged. • Wastewater treatment facilities' capacity is based on regional growth forecast adopted by Southern California Association of Governments (SCAG). See **Section 4.15: Utilities and Service Systems**.

Commenter	Summary of Comment and Where Addressed
California Department of Transportation (Caltrans) – District 7 Letter (dated June 7, 2023, received June 9, 2023)	• Vehicle Miles Traveled (VMT) should be used as the primary metric in identifying transportation impacts for development projects. • The EIR should ensure that planning and development activities consider reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions. • Caltrans encourages Lead Agencies to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications, and transit service and bicycle and pedestrian connectivity improvements. • Caltrans recommends the Lead Agency include queuing analysis with signal timing for existing conditions and existing plus project traffic conditions for: ○ I-405 off-ramps to Normandie Ave/190th Street ○ I-110 off-ramps to Redondo Beach Blvd. ○ Turning pockets at I-405 on/off ramps and Normandie Avenue, SR-91 and Vermont Avenue, and I-110 on/off ramps and Redondo Beach Boulevard • Caltrans recommends the Lead Agency include a Multi-Modal Conflict Analysis and address Complete Street Access (ADA Curb Ramps, Sidewalks, Bike Lane, High Visibility Crosswalks, APS, etc.) for: ○ SR-91 (Artesia Boulevard) and Vermont Avenue ○ I-405 on/off ramps and 190th Street/Normandie Avenue intersections ○ I-110 on/off ramps and Redondo Beach Boulevard intersections As to system operations comments, these are not CEQA matters, thus, are addressed in the Project's Local Transportation Assessment.[1] As to other transportation matters, see **Section 4.13: Transportation**.
Brandon Smith Letter (dated June 6, 2023, received June 14, 2023)	• Expresses support for the Project. • Discusses need of active/alternative modes of transportation. See **Section 4.13: Transportation**
Los Angeles County Sanitation Districts Letter (dated and received June 22, 2023)	• An addendum to the previous comment letter notes that direct connections to the trunk sewer would require sufficient justification for approval and a trunk Sewer Connection Permit issued by Districts. See **Section 4.15: Utilities and Service Systems**
County of Los Angeles Fire Department Letter (dated June 15, 2023,	• Health Hazardous Materials Division (HHMD) requests evaluation of the site's potential vapor intrusion of gaseous volatile organic compounds (VOCs) following CalEPA's Final Draft "Supplemental

[1] *Normandie Crossing Specific Plan Local Transportation Assessment* ("Local Transportation Assessment") (Fehr & Peers, July 2023); see **Appendix 4.13-2: Local Transportation Assessment.**

Commenter	Summary of Comment and Where Addressed
received June 29, 2023)	Guidance: Screening and Evaluating Vapor Intrusion" as portions of the final guidance may become law. • HHMD also requests to review the DEIR and previous Phase I and Phase II Environmental Site Assessments before issuing clearance. See **Section 7.5: Hazards and Hazardous Materials**
Native American Heritage Commission Letter (dated May 15, 2023, received July 12, 2023)	• Outlines AB 52 (Tribal Consultation) requirements concerning the tribal consultation process during environmental review. See **Section 4.14: Cultural Resources**
Verbal Comments Received at the May 18, 2023 Public Scoping Meeting	
Walter Kronberger	• Traffic is already bad on Normandie Avenue around the schools. • Concerned that the development would add more students to schools. See **Section 4.13: Transportation** and **Section 4.11: Public Services**, respectively.
Kevin Collier	• Concerned with traffic and wants the noise study to look at West 170th Street and West 169th Street. • Wants the traffic study to address vehicles accessing Normandie Avenue northbound. See **Section 4.13: Transportation.**
Christine Brean	• Would the Project have an effect on well-water? • Would it impact residents' access to water? See **Section 4.15: Utilities and Service Systems.**

1.3.3 SCOPING MEETING

Pursuant to CEQA Statute §21083.9, 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 in the EIR. The City held a public scoping meeting on May 18, 2023 at 7:00 PM at the City of Gardena City Council Chambers, 1700 West 162nd Street, Gardena, California 90247. Three public comments were provided during the scoping meeting and are detailed above in **Table 1.3-1**.

1.3.4 SCOPE AND FOCUS OF EIR

This Draft EIR addresses the Project's potential environmental effects 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 Initial Study findings and public and agency input received through the NOP process. Based on the Initial Study

findings, a determination was made that an EIR was required to address the Project's potentially significant environmental effects concerning the following topical issues:

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils (Paleontological Resources)
- 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 Initial Study/NOP also noted that cumulative and growth-inducing impacts would be analyzed in the EIR and that alternatives would be considered.

Where the Initial Study determined that the Project would have "no impact" or a "less than significant impact" on environmental topics or specific threshold questions, these topics and thresholds are not addressed in the EIR. Based on the Initial Study findings, the following environmental topical issues are not addressed in the EIR. Substantiation for the "no impact" or "less than significant impact" findings 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 and planning, noise, and population and housing are also included in **Section 7.0** based on the Initial Study findings.

1.4 PUBLIC REVIEW – COMPLIANCE WITH CEQA

1.4.1 PUBLIC REVIEW OF DRAFT EIR

The Notice of 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 of 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, as follows:

- https://www.cityofgardena.org/community-development/planning-projects/

If you cannot retrieve a copy from the website, please contact Amanda Acuna 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:

Amanda Acuna, Senior Planner
City of Gardena Community Development Department
1700 West 162nd Street
Gardena, CA 90247-3732
Email: aacuna@cityofgardena.org
Phone: (310) 217-6110

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 FINAL EIR

The Final EIR will be considered by the City's Planning Commission and City Council (the recommending and 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 CONSIDERATIONS

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 Project's environmental impacts.

This EIR is organized into the following sections:

Section ES: 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, which are available at the City's website, as follows:

https://www.cityofgardena.org/community-development/planning-projects/

The City can also provide copies on a 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 TRUSTEE AGENCIES

Other federal, state, and local agencies engage 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

All or portions of another document, which is a matter of public record or is generally available to the public, may be incorporated by reference. Where all or part of another document is incorporated by reference, the incorporated language shall be considered to be set forth in full as part of the document's text.

The references outlined below, which were utilized during preparation of this EIR, are available for review on the City of Gardena Website, at https://cityofgardena.org/planning-and-zoning/and by request at the Community Development Department – please see above contact information.

Gardena General Plan 2006. The City adopted the comprehensive Gardena General Plan 2006 (GGP) in 2006 and various elements and plans have been amended since that time as noted below. 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 plans:

- Community Development Element
  - Land Use Plan (updated in June 2012, March 2013, and February 2023)
  - Economic Development Plan
  - Community Design Plan
  - Circulation Plan (updated in July 2020)
- Community Resources Element
  - Open Space Plan
  - Conservation Plan
- Community Safety Element
  - Public Safety Plan (updated February 2022)
  - Noise Plan

- Housing Element (updated in February 2023; see below)
- Environmental Justice Element (adopted in February 2022)
- Implementation
    - Implementation Program (updated in February 2022)

The GGP was used throughout this EIR as a source of baseline data.

City of Gardena General Plan 2006 Final Environmental Impact Report (GRC Associates, Inc., April 2006) (SCH #2005021125). The GGP Final Environmental Impact Report (GGP FEIR) analyzed the potential environmental impacts that would result from the GGP implementation. At the time of the GGP FEIR's writing, the City was 98.5 percent developed and approximately 45 acres of vacant land existed. GGP FEIR Tables 2 and 3 present the forecast capacity at the City's buildout as 22,329 DU, a population of 63,799 persons, and approximately 18.9 million SF of non-residential land uses. Buildout was estimated to occur over 20 years. The GGP FEIR concluded significant and unavoidable impacts concerning Transportation (GGP FEIR page 138).

In February 2023, the City updated its Land Use Plan and changed the zoning for the Inventory Sites identified in the Housing Element. As the City also intends to update its Land Use Plan and change the zoning for Non-inventory Sites to provide a more coherent zoning pattern, the City is currently preparing an EIR to examine the environmental impacts of all of the proposed changes. The GGP FEIR was used throughout this EIR as a source of land use, policy, and baseline data.

Revised 2021-2029 Housing Element 6th Cycle. The City of Gardena's 2021-2029 Housing Element (HE) was adopted in January 2022, and then readopted on February 15, 2023, with additional revisions. The HE analyzes the City's housing needs for all income levels and develops strategies to provide for those housing needs. It is a key part of the City's General Plan. This HE is an eight-year program extending from 2021 through 2029. The HE identifies strategies and programs that focus on the following: 1) conserving and improving existing affordable housing; 2) providing adequate sites for residential development; 3) assisting in the provision of affordable housing; 4) removing governmental and other constraints on housing development; and 5) affirmatively furthering fair housing. The HE identified 122 candidate sites (468 parcels consolidated) that are considered viable for housing development and will receive a housing overlay designation. HE Appendix C: Sites Inventory provides detailed parcel data for sites receiving the overlay designation. The northern portion of the Project site (i.e., APNs 6106-030-011, 6106-030-015, and 6106-030-017), where the Project proposes an apartment building, is identified as candidate housing site #91. The HE was used throughout this EIR as a source of baseline data for the northern portion of Project site. As noted, preparation of an EIR for the update of the City's Land Use Plan, Zoning Code, and Zoning Map is currently underway (Land Use/Zoning Project). A Notice of Preparation for the Land Use/Zoning Project EIR was issued on April 13, 2023 and the actions are anticipated to be complete in early 2024.

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 regulatory 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 Normandie Crossing Specific Plan ("Project") site is in the County of Los Angeles, approximately 12 miles southwest of downtown Los Angeles, in the southeast portion of the City of Gardena ("City"), at 16829, 16835, and 16907 South Normandie Avenue; see **Exhibit 2-1: Regional Vicinity Map**.

The approximately 5.25-acre Project site is comprised of four parcels (APN: 6106-030-011, 6106-030-015, 6106-030-016, 6106-030-017) generally bound by West 169th and West 170th Streets on the north and south, and South Normandie Avenue and Brighton Way on the east and west; see **Exhibit 2-2: Local Vicinity Map**.

2.4 ENVIRONMENTAL SETTING

The City encompasses approximately 6.0 square miles in the County's South Bay region. Gardena is bordered by the City of Hawthorne and unincorporated County lands to the north, the cities of Los Angeles and Torrance to the south, the City of Los Angeles to the east, and unincorporated County lands and the cities of Hawthorne and Torrance to the west. 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.

Regional access to the Project site is provided via four major freeways: I-105 to the north; I-405 to the south and east; and I-110 and SR-91 (becomes West Artesia Boulevard) to the east. From I-105, access to the Project site is provided via Vermont Avenue, from I-405, access is provided via South Normandie Avenue, from I-110, access is provided via Artesia Boulevard at the City's northern portion, which intersects with Normandie Avenue, and from SR-91, access is provided via Artesia Boulevard in the City's southern portion, which intersects with Normandie Avenue. The existing conditions and Circulation Plan classifications [1] for surrounding roadways are summarized below:

- **Normandie Avenue,** which is oriented north-south on the Project site's eastern boundary, contains four divided vehicle lanes with left-turn lanes provided at major intersections, pedestrian sidewalks on both sides of the right of way (ROW), and Union Pacific Railroad (UPRR) railroad tracks along the road's western boundary. The railroad tracks cross onto the roadway's eastern side along the Project's frontage. Normandie Avenue is classified as a Major Collector (four lanes, undivided with parking and Class II bike lane). Normandie Avenue is designated as a truck route within the City.

[1] City of Gardena. (2006). Gardena General Plan 2006, updated 2022. Figure CI-1: Roadway Network and Figure CI-2: Roadway Cross Sections. Gardena, CA: City of Gardena. Retrieved from: https://cityofgardena.org/wp-content/uploads/2016/04/Circulation-Plan-2020-Update.pdf, accessed April, 2023.

- **Brighton Way,** which is oriented north-south and forms the Project site's western boundary, is an alleyway. Brighton Way is classified as a Local Street (two lanes undivided with parking). On-street parking is not provided.
- **West 169th and West 170th Streets**, are oriented east-west and form the Project site's northern and southern boundaries, respectively. West 169th and West 170th Streets are two-lane, undivided with parking. These roadways are classified as Local Streets (two lanes undivided with parking). West 170th Street dead ends at the railroad right-of-way and does not connect to Normandie Avenue or the segment east of it.

The Project site is located less than one mile walking distance from five different bus routes and the Harbor Gateway Transit Center, which are discussed further in **Section 4.13: Transportation**. Pedestrian access to the Project site is provided by sidewalks, which are present on West 169th Street, West 170th Street, and Normandie Avenue surrounding the Project site, except along the south side of 169th Street, between Brighton Way and the alley just west of Brighton Avenue.

2.1.1 ONSITE LAND USES

The Project site is relatively level, sloping from the northeast corner to the southwest corner, with an elevation difference of approximately 7.0 feet across the site. As depicted in **Exhibit 2-2**, the Project site is fully developed with six industrial buildings, asphalt surface parking lots, hardscapes, and minimal landscaping. **Table 2-1: Existing Onsite Structure Summary** summarizes the existing onsite land uses by APN and address, and indicates approximately 115,424 square feet (SF) of industrial floor area) is present on the Project site. One of the buildings on Parcel 4 contains approximately 9,324 SF of industrial floor area that is in a dilapidated condition and is therefore not occupiable or currently being used. Additionally, the Project site includes a railroad spur from the adjacent UPRR northern track. The spur is associated with former onsite industrial operations but is no longer in use.

Table 2-1: Existing Onsite Structure Summary

Parcel ID[1]	Assessor's Parcel Number[2]	Parcel Size (Acres)[2]	Address[2]	Number of Buildings	Year Built[2]	Building (SF)[2]
1	6106-030-011	0.55	16829 South Normandie Avenue	2	1963, 1976	10,880
2	6106-030-015	0.47	16835 South Normandie Avenue	1	1956/1957	9,600
3	6106-030-016	0.30	No Address	0	-	-
4	6106-030-017	3.93	16907 South Normandie Avenue	3	1952	94,944[3]
	Total	***5.25***		***6***		***115,424[3]***

Notes:
1. The Parcel ID (Identification Number) correlates with labels on **Exhibit 2-2**.
2. ParcelQuest. (January 2021). Assessor Data. Retrieved from: https://pqweb.parcelquest.com/#home.
3. This total includes 9,324 square feet of building that is unoccupied and dilapidated.

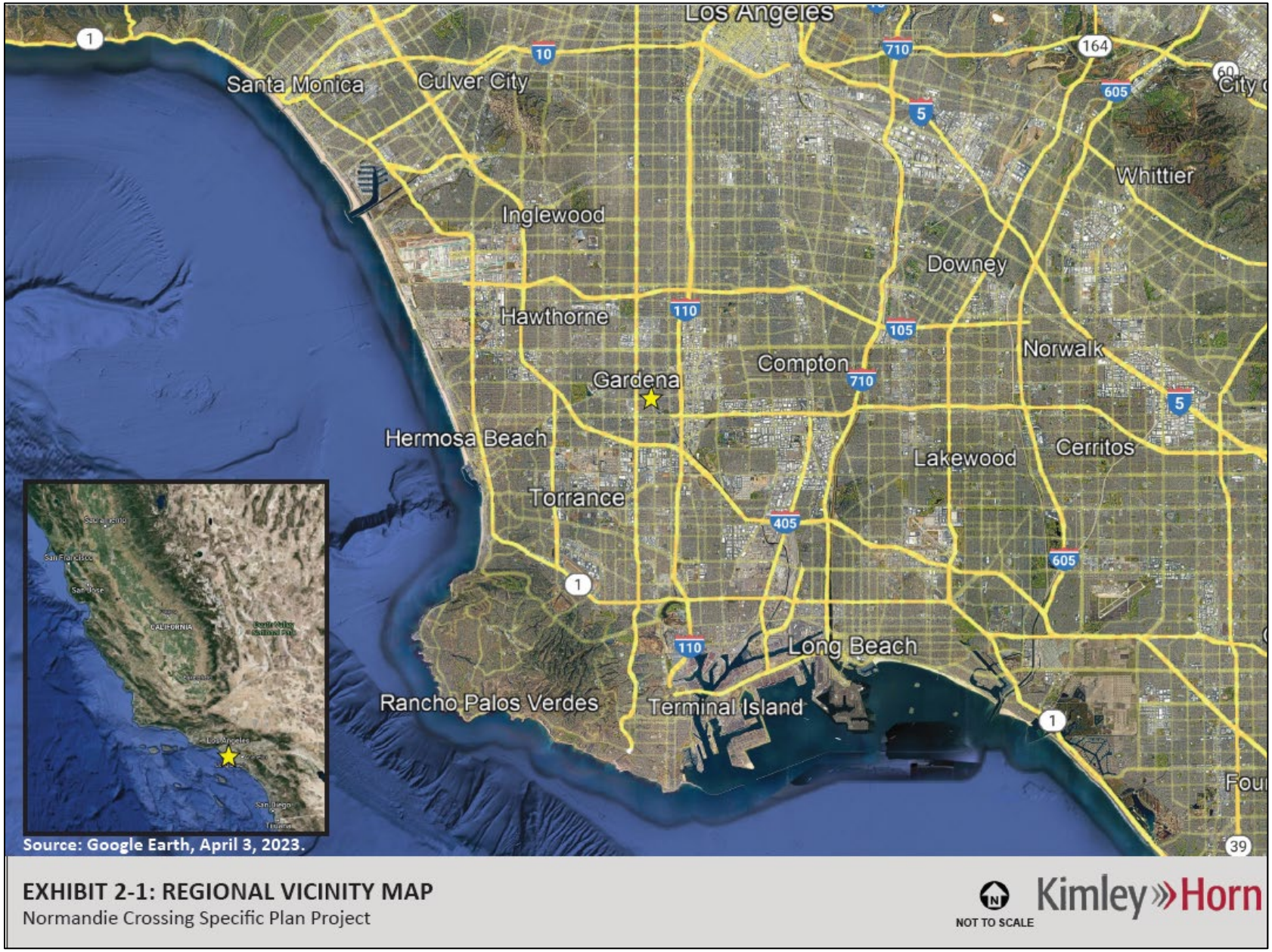

EXHIBIT 2-1: REGIONAL VICINITY MAP
Normandie Crossing Specific Plan Project

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EXHIBIT 2-2: LOCAL VICINITY MAP
Normandie Crossing Specific Plan Project

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2.1.1 EXISTING GENERAL PLAN AND ZONING

Table 2-2: Existing Land Use Designations and Zoning identifies the Gardena General Plan (GGP) land use designations and zoning for the Project site. As indicated in **Table 2-2**, the GGP designates the Project site as Industrial, which provides for a wide range of industries, technology-related uses and supporting facilities, and business parks.[2] Additionally, the GGP assigns a High Density 30 Overlay to the Project site's northern approximately 1.32 acres (i.e., Parcels 1, 2, and 3).

The Zoning Map classifies the Project site's northern approximately 1.32 acres (i.e., Parcels 1, 2, and 3) as Industrial Zone (M-1) and the southern approximately 3.93 acres (Parcel 4) as General Industrial Zone (M-2); see **Table 2-2**.[3] Commercial, manufacturing, and industrial uses are permitted in the M-1 and M-2 zones.[4] Additionally, Parcels 1, 2, and 3 are zoned Housing Overlay 4 (HO-4), which allows a density of 21-30 dwelling unit per acre (DU/AC).

Table 2-2: Existing Land Use Designations and Zoning

Parcel ID[1]	Assessor's Parcel Number[2]	Size (Acres)[2]	Address[2]	Existing General Plan Land Use[3]	Existing Zoning[4]
1	6106-030-011	0.55	16829 South Normandie Avenue	Industrial, High Density 30 Overlay	Industrial Zone (M-1), Housing Overlay 4 (HO-4)[5]
2	6106-030-015	0.47	16835 South Normandie Avenue	Industrial, High Density 30 Overlay	Industrial Zone (M-1), Housing Overlay 4 (HO-4)[5]
3	6106-030-016	0.30	No Address	Industrial, High Density 30 Overlay	Industrial Zone (M-1), Housing Overlay 4 (HO-4)[5]
4	6106-030-017	3.93	16907 South Normandie Avenue	Industrial	General Industrial Zone (M-2)[6]
	Total	***5.25***			

Notes:
1. The Parcel ID (Identification Number) correlates with labels on **Exhibit 2-2** and **Exhibit 2-3**.
2. ParcelQuest. (January 2021). Assessor Data. Retrieved from: https://pqweb.parcelquest.com/#home.
3. City of Gardena. (2006, Updated February 2013). *Gardena General Plan 2006, Updated 2022. Figure LU-2: 2013 General Plan Land Use Policy Map*. Gardena, CA: City of Gardena. Retrieved from: https://cityofgardena.org/wp-content/uploads/2023/03/Land-use-Plan-2023-Update-FINAL.pdf. Accessed April, 2023.
4. City of Gardena. (2020). Zoning. Available at https://cityofgardena.org/wp-content/uploads/2020/11/Gardena_Zonning_2020.pdf. Accessed April, 2023.
5. See GMC §18.36.060: Property Development Standards and Ordinance 1847.
6. See GMC §18.38.010: General Industrial Zone (M-2).

[2] City of Gardena. (2006, Updated February 2023). *Gardena General Plan 2006, Updated 2023*. page LU-19. Gardena, CA: City of Gardena. Retrieved from: https://cityofgardena.org/wp-content/uploads/2023/03/Land-use-Plan-2023-Update-FINAL.pdf, accessed April, 2023.

[3] City of Gardena. (2020). *City of Gardena Zoning 2020*. Retrieved from: https://cityofgardena.org/wp-content/uploads/2020/11/Gardena_Zonning_2020.pdf. accessed April, 2023.

[4] Gardena Municipal Code §18.36.020: Uses Permitted and §18.38.010: General Industrial Zone (M-2).

EXHIBIT 2-3: ZONING MAP
Normandie Crossing Specific Plan Project

NOT TO SCALE

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2.1.2 SURROUNDING LAND USES

The Project site is generally surrounded by single- and multi-family residential uses. There are two immediately adjacent parcels that are outside the Specific Plan area, but are where entitlement actions are proposed; see **Section 2.3: Project Characteristics.** The parcel immediately adjacent to the Project site's southwest corner, at 16964 West 179th Street, is occupied by a single-family residential (SFR) DU. The parcel immediately adjacent and east of the Project site is occupied by UPRR tracks. Both of these parcels are currently designated Industrial and zoned M-2. The surrounding land uses and zoning are summarized in **Table 2-3: Surrounding Land Uses and Zoning** (see **Exhibit 2-3**).

Table 2-3: Surrounding Land Uses and Zoning

Direction	Existing On-the-Ground Land Uses	Zoning[1]
North	North: West 169th Street, with a 63-unit single-room occupancy multi-family development across the street, at 16819 South Normandie Avenue.	North: Industrial Zone (M-1)[2]
	Northwest: Single-family residential uses are west of South Normandie Avenue.	Northwest: Low-Density Multi-Family Residential Zone (R-2)[3]
South	South: West 170th Street, with single-family residential uses across the street.	South: Single-Family Residential Zone (R-1)[4]
	Southwest: One single-family residential dwelling unit is immediately adjacent, at 16964 West 179th Street.	Southwest: General Industrial Zone (M-2)[5]
East	East: South Normandie Avenue and an existing UPRR track (north/south orientation) are immediately adjacent and to the east.	East: General Industrial Zone (M-2)[5]
	Northeast/Southeast: Multi- and single-family residential uses are across South Normandie Avenue, respectively.	Northeast: Normandie Estates Specific Plan[6] / Southeast: Single-Family Residential Zone (R-1)[4]
West	Brighton Way (an alleyway) is to the west, with single-family and duplex residential uses across the alley.	Low-Density Multiple Family Residential Zone (R-2)[3]

Notes:
1. City of Gardena. (2020). Zoning. Available at https://cityofgardena.org/wp-content/uploads/2020/11/Gardena_Zonning_2020.pdf.
2. GMC Chapter 18.36: Industrial Zone (M-1). See GMC §18.36.040: Performance Standards, for property development standards.
3. GMC Chapter 18.14: Low-Density Multi-Family Residential Zone (R-2). See GMC §18.14.050: Property Development Standards, for property development standards.
4. GMC Chapter 18.12: Single-Family Residential Zone (R-1). See GMC §18.12.050: Property Development Standards, for property development standards.
5. GMC Chapter 18.38: General Industrial Zone (M-2). M-1 Zone performance standards apply; see GMC §18.36.040.
6. Normandie Estates Specific Plan single-family detached residential.
7. GMC §18.14.050: Property Development Standards.

2.5 PROJECT CHARACTERISTICS

2.1.3 PROJECT OVERVIEW

The Applicant seeks approval of the Normandie Crossing Specific Plan (NCSP)(SP #1-21) Project. The Project proposes to establish a maximum allowable development within the approximately 5.25-acre NCSP area of up to 403 DU. Because the City does not have any zone which would accommodate the proposed development, the Applicant is proposing the NCSP, which would establish the site-specific zoning regulations and development standards for this area. The NCSP 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. In addition to requiring a Specific Plan, the Project requires various other approvals, including a Development Agreement; see **Section 2.6: Agreements, Permits, and Approvals** below. The approvals are collectively referred to as the "Project."

For analysis purposes, it is assumed all existing approximately 115,424 SF of industrial uses would be removed and replaced with the proposed residential development. However, because 9,324 SF of one of the existing industrial buildings are in a dilapidated condition and therefore are not occupiable, this analysis will evaluate the loss of 106,100 SF of industrial uses.

The Project proposes offsite sidewalk and railroad improvements at the locations depicted on **Exhibit 2-2.** The offsite sidewalk improvements are proposed along the south side of 169th Street, west of the Project site**,** between Brighton Way and the alley just west of Brighton Avenue. The offsite track and other railroad improvements are proposed on South Normandie Avenue along the Project site's eastern boundary, pursuant to California Public Utilities Commission (CPUC) standards and UPRR guidelines.

Additionally, the Project proposes to redesignate and rezone two parcels that are adjacent to the site and outside the proposed Specific Plan area to be consistent with existing uses, as depicted on **Exhibit 2-2**. These areas include the residential parcel at 16964 West 179th Street and the UPRR parcel immediately adjacent and east of the Project site.

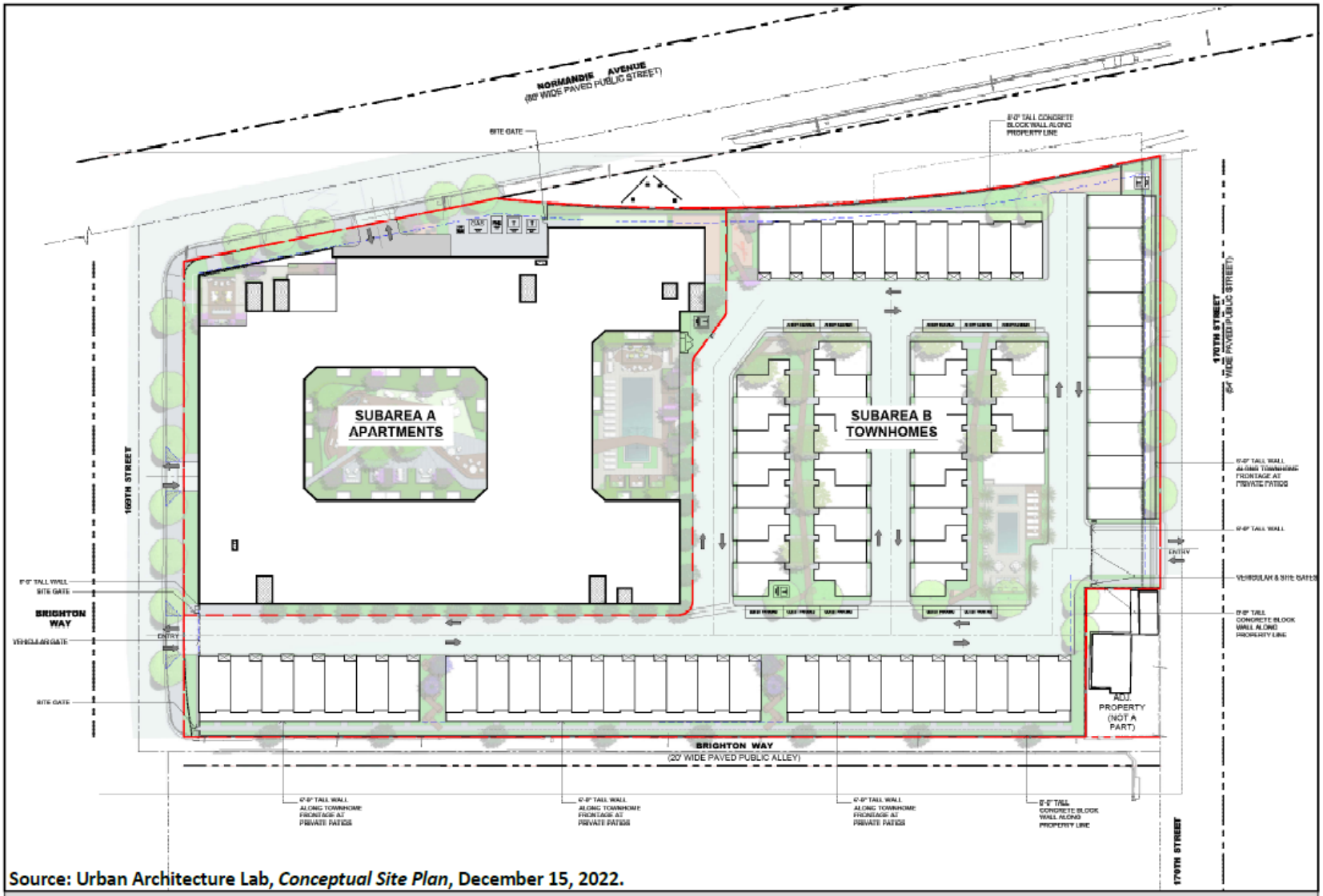
The proposed Project components are further described below.

2.1.4 LAND USE PLAN

The Specific Plan proposes a 403-DU multi-family residential development divided into two Subareas as depicted in **Exhibit 2-4: Conceptual Site Plan.**

- Subarea A, which is at the Project site's northern portion, is proposed to contain 328 apartment units within one building and associated open space and amenities; and

- Subarea B, which is at the Project site's southern portion, is proposed to contain 75 townhome-style units within nine buildings and associated open space and amenities.



Source: Urban Architecture Lab, *Conceptual Site Plan*, December 15, 2022.

EXHIBIT 2-4: CONCEPTUAL SITE PLAN
Normandie Crossing Specific Plan Project

NOT TO SCALE

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Overall, the Project site would be developed at a density of approximately 77 DU/AC. Additionally, the Project proposes approximately 50,493 total SF of open space, comprised of approximately 20,150 SF of private open space and approximately 30,343 SF of common open space.

Table 2-4: Land Use Summary - Proposed Project, summarizes the proposed development according to land use type.

Table 2-4: Land Use Summary - Proposed Project

Description	Industrial (Square Feet)[1]	Residential[1]	
		(Square Feet)	(Dwelling Units)
Industrial (to be removed)	-115,424	-	-
Industrial (to be removed, but excluded from Project impact offsets)	9,324		
Apartment Building	-	308,308	328
Townhome-Style Residential	-	120,673	75
Project Total	***-106,100***	***+428,981***	***+403***

Notes:
1. See **Table 2-1.**
2. Urban Architecture Lab (2022). *16911 Normandie Apartments and Townhomes Entitlement Set, Sheet No. G0.01: Project Information.*

Apartments (Subarea A)

The Project proposes an approximately 308,308-SF apartment building with 328 DU at a density of approximately 155 DU/AC. The building would be seven stories at a maximum height of approximately 90 feet. **Table 2-5: Land Use Summary – Proposed Apartment Building** summarizes the apartment building's proposed floor areas. The various proposed apartment product types are 68 studio, 194 one-bedroom, and 66 two-bedroom units.

Each Subarea A unit would be provided a minimum of 50 SF of private open space. The common open space amenities proposed in Subarea A total approximately 22,698 SF and include: roof deck with BBQs and seating areas; swimming pool with BBQ and seating areas; a dog park fitness room; club houses; and a courtyard with seating area.

Table 2-5: Land Use Summary – Proposed Apartment Building [1]

Level	Description	Floor Area[2] (Square Feet)	Dwelling Units
L1	Lobby	2,800	
	Amenity I: Fitness Room	2,682	
L2 - L7	Apartments	241,109	328 (68 Studio, 194 1-Bedroom, 66 2- Bedroom)
	Balconies (Covered)[4]	6,991	
L3	Amenity II: Courtyard	1,446	
	Amenity III: Pool Court	1,500	
L4	Amenity IV: BBQ Covered Dining Area	795	
Other	Other[3]	50,985	
Total		***308,308***	

Notes:
1. Urban Architecture. (2022). *16911 Normandie Apartments & Townhomes Entitlement Set*.
2. "Floor Area," as defined in GMC Chapter 18:04: Definitions.
3. Other = Circulation, stairs, elevator shafts, trash vestibules, and trash rooms.
4. Only covered portions of balconies are included in the floor area calculation.

Onsite vehicle parking (approximately 399 spaces) and bicycle parking (173 spaces) are proposed in the building's first two levels, as follows:

- Level 1:
  - Bicycle Parking, 173 Spaces: 16 short-term and 157 long-term.
  - Vehicle Parking, 195 Spaces: 135 Standard, 20 electric vehicle charging (one of which is a van electric vehicle charging), and 8 accessible.
- Level 2:
  - Vehicle Parking, 204 Spaces: 150 Standard and 20 electric vehicle charging.

The vehicle parking spaces would be unbundled from the rental of the apartment units to encourage alternate modes of transportation. Up to 90 spaces could be tandem; tandem spaces could only be rented as a pair to a single unit.

Townhomes (Subarea B)

The Project proposes 75 townhome-style units in nine buildings (totaling approximately 120,673 SF), at a density of approximately 24 DU/AC. The townhome buildings would be three-story at a maximum height of approximately 40 feet**. Table 2-6: Land Use Summary – Proposed Townhomes** summarizes the townhome proposed floor areas. The various proposed townhome product types are 30 two-bedroom, 35 three-bedroom, and 10 four-bedroom units.

Table 2-6: Land Use Summary – Proposed Townhomes

Level	Description	Floor Area[1] (Square Feet)	Dwelling Units
L1-L3	Townhouses	115,982	30 two-bedroom 35 three-bedroom 10 four-bedroom
	Balconies (Covered)[2]	3,916	
L1	Amenity V	775	
	Subtotal	**120,673**	

Source: Urban Architecture. (2022). *16911 Normandie Apartments & Townhomes Entitlement Set*.

Notes:
1. "Floor Area," as defined in GMC Chapter 18:04: Definitions.
2. Only covered portions of balconies are included in the floor area calculation.

Each Subarea B unit would be provided 50 SF of private open space (i.e., balconies and roof decks). The common open space amenities proposed in Subarea B total approximately 7,645 SF and include the following: swimming pool with BBQ and seating areas; dog park; club house; and paseos with seating areas.

Approximately 160 vehicle parking spaces (150 spaces in attached garages and 10 guest spaces) are proposed in Subarea B.

2.1.5 UTILITIES AND INFRASTRUCTURE

NCSP Chapter 4, Section V: Public Facilities and Utilities Plan addresses the NCSP's public facilities and utilities. The NCSP includes the distribution, location, extent of major components of public and private utilities and infrastructure, and other essential facilities within the NCSP area that are needed to support the proposed development. The utilities and infrastructure proposed in the NCSP area include a domestic, fire and irrigation water line connection, sewer line connection, onsite stormwater drainage and management design, electrical power line connection, natural gas line connection, and solid waste collection areas.

The Project would comply with the California Green Building Standards Code (CALGreen Code) (California Code of Regulations Title 24, Part 11) for electric vehicle (EV) charging design (Project Design Feature (**PDF**) **AQ-2/PDF GHG-1. Electrical Vehicle Charging Design**). Compliance would provide 10% of parking stalls to be EV capable, 25% of parking stalls to be EV ready with Level 2 EV charging receptacles, and 5% of parking stalls to be equipped with Level 2 EV chargers. The final design may vary from this in compliance with the CALGreen Code. Additionally, the Project would be all electric- there would be no natural gas use by any of the Project land uses (**PDF AQ-3/PDF GHG-2. All Electric**).

NCSP Chapter 4, Section III: Transportation and Circulation Plan specifies the proposed transportation and circulation plan. Vehicular access to the NCSP would be provided by the following four driveways:

- Driveway 1 would serve Subarea A and provide access to the apartment building's parking garage from 169th Street west of South Normandie Avenue.
- Driveway 2 would serve Subarea A and provide a right-in/right-out only driveway that would also serve the apartment building's parking garage from southbound South Normandie Avenue.
- Driveway 3 would serve Subarea B and provide access to the townhomes from 170th Street. This driveway would also serve as fire truck access for both Subareas A and B.
- Driveway 4 would serve Subarea B and provide access to the townhomes from 169th Street. This driveway would also serve as fire truck access for both Subareas A and B.
- For onsite pedestrian access, the Project proposes sidewalk improvements along the Project frontages (i.e., West 169th and West 170th Streets, South Normandie Avenue, and Brighton Way).

2.1.6 DEVELOPMENT REGULATIONS AND REQUIREMENTS

NCSP Chapter 5, Section I: Development Standards provides the specific regulations and requirements for development in the NCSP. The NCSP specifies the standards to which development in the NCSP area would be subject. These regulations (which would replace the existing zoning regulations) address various aspects of development, as follows:

- Permitted and Prohibited Uses: A project in the NCSP area would only be occupied by land uses identified in the NCSP and would be subject to the applicable City approval process.
- Development Standards: A project in the NCSP area would be subject to the NCSP's density and development capacity, maximum building height, floor area ratio, dwelling unit size, and setback requirements.
- Design Standards: A project in the NCSP area would be subject to the NCSP's design requirements concerning siding materials, colors, landscaping, lighting, and sustainability.
- Recreation and Open Space Standards
- Parking and Loading Standards
- Requirements related to Nonconforming Uses and Structures
- Maintenance Standards
- Standards for Accessory Structures, Additions, Walls, Fences, and Other Changes
- Sign Program Requirements

2.1.7 IMPLEMENTATION

NCSP Chapter 7: Implementation presents the program necessary to implement the NCSP's land use plan, utilities/infrastructure, and development standards described above, which address the framework, review authority, substantial conformance, and NCSP modifications.

2.1.8 OFFSITE IMPROVEMENTS AND ENTITLEMENTS

The Project proposes offsite sidewalk and railroad improvements, and land use and zoning entitlements, as described below.

Sidewalk Improvements

The Project proposes to construct approximately 266 linear feet of offsite sidewalk improvements along the south side of 169th Street, just west of the Project site**,** between Brighton Way and the alley just west of Brighton Avenue. The sidewalk improvements would be constructed pursuant to GMC §17.08.170: Improvements and designed to be consistent with the GGP Circulation Element requirements for a Local Street.

South Normandie Avenue Railroad Improvements

The Project proposes various railroad track and roadway improvements along South Normandie Avenue pursuant to current CPUC standards and UPRR guidelines, as follows:

- Removing approximately 170 linear feet of railroad spur track, which enters the Project site and formerly served the southernmost industrial building (i.e., 16911 South Normandie Avenue).
- Removing approximately 830 linear feet of railroad spur track, which enters the Project site and formerly served the central industrial building (16907 South Normandie Avenue).
- Constructing a new median both north and south of the track alignment.
- Installing new warning devices and tactile warning strips on the South Normandie Avenue east and west sidewalks.
- Refreshing (i.e., adding a slurry seal) the railroad crossing pavement markings immediately north and south of the track alignment.

Residential Parcel at 16964 West 179th Street

Concerning the SFR parcel immediately adjacent to the Project site's southwest corner (not a part of the Specific Plan area) at 16964 West 179th Street, the Project proposes to redesignate the parcel from Industrial to Single Family Residential, and rezone from General Industrial Zone (M-2) to Single Family Residential Zone (R-1) consistent with the existing residential land use.

Union Pacific Railroad Parcel

Concerning the parcel immediately adjacent and east of the Project site that is currently occupied by UPRR tracks, the Project proposes to redesignate the property from Industrial to Public/Institutional, and rezone from General Industrial Zone (M-2) to Official (O) consistent with the existing railroad land use.

2.4 PROJECT CONSTRUCTION ACTIVITIES AND PHASING

Project construction is conservatively analyzed to occur in a single phase. Phased occupancy of the proposed Project would be permitted, provided all occupiable areas are deemed safe for fire and life safety purposes. For purposes of the environmental analysis, opening year is assumed to be 2027.

Project construction is scheduled to occur over approximately 3.5 years, beginning June 2024 and ending September 2027. Project construction is proposed to occur in the following sequence:

- Demolition (2 months);
- Site preparation (1 month);
- Grading (2 months);
- Building Construction (24 months); and
- Architectural Coating and Paving (10 months).

Grading for the proposed improvements would require approximately 10,000 cubic yards of cut and fill and approximately 10,000 cubic yards of export. The Project site would be graded to mimic the existing grading and drainage patterns. The overall site grading and drainage pattern would be southeasterly towards Normandie Avenue.

The Project would utilize off-road diesel-powered construction equipment which would meet, at a minimum, the Tier 4 emission standards for nonroad diesel engines promulgated by the USEPA for equipment greater than 50 horsepower (**PDF AQ-1. Nonroad Diesel Engines)**. Additionally, prior to the start of construction, a Construction Traffic Management Plan would be prepared and submitted to the City for review and approval (**PDF TR-1. Construction Traffic Management Plan**). The Construction Traffic Management Plan would minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, the Construction Traffic Management Plan would include, but not be limited to, the following measures:

- Identified routes for vehicular traffic, bicyclists, and pedestrians around traffic lane, parking lane, and/or sidewalk closures, as they are required;

- Provisions to ensure that access remains unobstructed for land uses near the Project site during construction;
- Provisions to accommodate parking for construction workers either on-site or at off-site, off-street locations. Parking would be prohibited on streets in the Project site vicinity; and
- Prior to the start of construction, the Applicant would coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project site and neighboring businesses and residences.

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 Normandie Crossing Specific Plan, are:

1. Diversify the City of Gardena's existing housing options, by providing a range of housing types and sizes, to serve the region's growing and evolving technology and creative sectors and aid in recruiting and retaining talent for local companies.
2. Support the expanding technology and creative sector with newly constructed, high-quality housing opportunities, enabling local employees to live close to where they work.
3. Cluster urban residential development near technology firms, other large employment centers, and commercial corridors providing City residents with the opportunity to live, work, and shop with less reliance on automobiles.
4. Establish housing development that meets high standards of design and pursues environmental sustainability.
5. Redevelop a blighted site, increase tax revenues to the City, provide affordable housing to support the City's Regional Housing Needs Assessment goals, and create a catalyst for future development in this part of Gardena.

2.6 AGREEMENTS, PERMITS, AND APPROVALS

The City, as Lead Agency for the Project, has discretionary authority over the Project. To implement the Project, the Applicant would need to obtain, at a minimum, the following discretionary permits/approvals:

- General Plan/General Plan Map Amendment (GPA #3-21):
  - Concerning the NCSP area, a General Plan amendment to: (i) change the land use designation on the General Plan Land Use Map from "Industrial" and "Industrial, High Density 30 Overlay" to "Specific Plan" and (ii) amend the Land Use Plan text and Land Use Plan Table LU-3 to allow the mix of uses and densities specified in the NCSP;

  - Concerning the residential parcel at 16964 West 179th Street, a General Plan amendment to change the land use designation on the General Plan Land Use Map from Industrial to Single-Family Residential; and rezone from General Industrial Zone (M2) to Single Family Residential Zone (R-1) consistent with existing residential land use.
  - Concerning the Union Pacific Railroad parcel immediately adjacent and east of the Project site, a General Plan amendment to change the land use designation on the General Plan Land Use Map from Industrial to Public/Institutional.
- Zone Change and Zone Map Amendment (ZC #4-21):
  - Concerning the NCSP area, a zoning map amendment to change the zones on the Zoning Map from Industrial (M-1) Zone with a High Density 30 Overlay and General Industrial (M-2) Zone to Normandie Crossing Specific Plan Zone;
  - Concerning the residential parcel at 16964 West 179th Street, a zoning map amendment to change the zone on the Zoning Map from General Industrial (M-2) Zone to Single-Family Residential (R-1) Zone; and
  - Concerning the Union Pacific Railroad parcel immediately adjacent and east of the Project site, a zoning map amendment to change the zone on the Zoning Map from General Industrial (M-2) Zone to Official (O).
- Zoning Text Amendment (ZTA #6-21): A GMC zoning text amendment to add Normandie Crossing Specific Plan;
- Normandie Crossing Specific Plan (NCSP) (SP #1-21);
- Site Plan Review (SPR #11-21): Review of the development's physical design;
- Vesting Tentative Tract Map (TTM #4-21): A vesting TTM to combine four lots into two and create one parcel for the apartment building and one parcel for the townhome-style buildings with the ability to create condominiums on the 75 townhome-style units;
- Development Agreement (DA #2-21): The development agreement would guarantee that the Specific Plan's terms would not be amended for a set period of years without the Developer's consent and would include the benefits to the City including affordable housing and sidewalk improvements along 169th Street, outside the Project boundaries;
- Affordable Housing Agreement to guarantee five (5) percent affordable housing for a period of 55 years; and
- Environmental Assessment (EA #20-21).

In addition to the above City approvals, the Project also requires that the Applicant, in collaboration with the City and UPRR, request from the CPUC authorization to modify the rail crossing pursuant to CPUC General Order 88-B requirements.

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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.

[1] *Sierra Club v. West Side Irrigation Dist.* (2005) 128 Cal.App.4th 690, 700.

(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.

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:

(1) 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.

(2) 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.

(3) 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.

(4) 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.

(5) 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 PROJECT 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 City of Gardena; see **Table 3-1: List of Cumulative Projects** and **Exhibit 3-1: Cumulative Project Locations**. As indicated in **Table 3-1**, the related projects collectively include 1,132 DU and approximately 654,538 SF of non-residential land uses. The cumulative development, inclusive of the proposed Project, includes 1,535 DU and approximately 654,538 SF of non-residential land uses.

The cumulative impacts analyses are provided in **Sections 4.1: Air Quality** through **4.16: Aesthetics**. 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 **Table 3-1**. Not all related projects would contribute to significant cumulative impacts for each topical area. For example, not all cumulative projects would have noise 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 3-2: Geographic Context for Cumulative Analysis** presents the geographic context for each environmental issue area.

Table 3-1: List of Cumulative Projects

ID	Type	Location (Project Name)[1]	Description	Distance to Project Site (miles)	Non-Residential (SF)	Residential (DU)
City of Gardena						
1	Commercial	15106 South Western Avenue	Commercial (Restaurant) & Drive-thru	1.17	3,720	-
2	MFR[2]	1333 West 168th Street	Condominiums	0.14[3]	-	3
3	Residential	1348 West 168th Street (Normandie Courtyard Project)	Small Lot Subdivision, 3-Story	0.08[4]	-	9
4	Residential	13919 Normandie Avenue	Single-Room Occupancy	1.91	-	20
5	MFR	12850 Crenshaw Boulevard (GTOD SP Project)	Apartments	2.95	-	265
6	MFR	1938 West 146th Street	Townhomes	1.60	-	6
7	Residential	13126 South Western Avenue	Single-Room Occupancy, 7 DU Affordable	2.50	-	121
8	MFR	2545 Marine Avenue	Townhomes, 2 DU Affordable	1.70	-	22
9	MFR	1031 Magnolia Avenue	Townhomes	0.88	-	6
10	MFR	2800 Rosecrans Avenue	Townhomes, 4 DU Live-Work	2.20	-	20
11	Industrial	1600 West 135th Street	Warehouse	2.10	190,860	-
12	Industrial	1450 West Artesia Boulevard	Self-Storage/ Warehouse	0.30	268,000	-
13	Commercial	14206 Van Ness Avenue	Self-Storage/ Warehouse	2.00	177,573	-
			Office	2.00	8,000	
14	Mixed-Use	14600 Western Avenue	Apartments & Commercial (Retail)	1.50	3,000	196
15	MFR	1515 West 178th Street (Melia 178th Street Project)	Townhomes	0.50	-	114
16	Mixed-Use	1341 West Gardena Boulevard	Apartments & Commercial (Retail/Office)	0.30	3,385	14
17	MFR	1621 West 147th Street	Townhomes, 3-Story	1.40	-	6

ID	Type	Location (Project Name)[1]	Description	Distance to Project Site (miles)	Non-Residential (SF)	Residential (DU)
18	MFR	1335 West 141st Street	Townhomes, 3-Story	1.80	-	50
19	Mixed-Use	2129 West Rosecrans Avenue	Townhomes, 3-Story, 15 DU Live-Work	2.00	-	113
20	MFR	13615 South Vermont Avenue	Townhomes, 2 DU Affordable	2.10	-	84
21	MFR	2500-2508 Rosecrans Avenue	Townhomes, 3 DU Live-Work	2.00	-	53
22	MFR	15717 & 15725 Normandie Avenue	Townhomes, 3 DU Affordable	0.70	-	30
23	MFR	1610 Artesia Boulevard[5]	Multi-Family Apartments	0.60	-	300
				Total Related Projects	***654,538***	***1,432***
-	MFR	Proposed Project 16911 South Normandie Avenue	Apartments	-	-	328
			Townhomes	-	-	75
				Total Proposed Project	***0***	***403***
				Total Cumulative Project	***654,538***	***1,835***

Notes:
1. Color Legend:
   a. Green fill – project is approved and not constructed;
   b. Gold fill – project is approved and under construction; and
   c. Blue fill – project is not approved and application in review.
2. MFR = Multi-Family Residential
3. This related project is approximately 720 feet northeast of Project site. This is second nearest related project to proposed Project site. No recent action from Applicant. Plan Check Review anticipated expiration November 2023. Construction start date unknown. (A. Acuna, City of Gardena, Personal Email Communication, June 12, 2023)
4. This related project is approximately 400 feet northeast of Project site. Nearest related project to proposed Project site. No recent action from Applicant. Plan Check Review has expired. Construction start date unknown. (A. Acuna, City of Gardena, Personal Email Communication, June 12, 2023).
5. Pre Application received, however, formal application is anticipated. (A. Acuna, City of Gardena, Personal Email Communication, June 12, 2023)

Source: A. Acuna, City of Gardena, Personal Email Communications, March 13, 2023, and June 15, 2023.

Table 3-2: Geographic Context for Cumulative Analysis

Environmental Topic Area	Description
Air Quality	South Coast Air Basin
Cultural Resources	Historic Resources: 500-Foot Radius of Project site Archaeological Resources: 0.5-Mile Radius of Project site
Energy	County of Los Angeles
Geology and Soils (Paleontological Resources)	City of Gardena
Greenhouse Gas Emissions	Global
Hazards and Hazardous Materials	1.0-mile Radius of Project site
Hydrology and Water Quality	Dominguez Watershed
Land Use and Planning	City of Gardena
Noise [2,3]	1,000-foot Radius of Project site
Population and Housing	City of Gardena, County of Los Angeles, and SCAG Planning Region
Public Services	Fire Protection: Los Angeles County Fire Department (LACFD) Service Area Police Protection: City of Gardena (i.e., Gardena Police Department Service Area) Schools: Los Angeles Unified School District (LAUSD) Libraries: Los Angeles County Library service area
Recreation	City of Gardena
Transportation	Transit Facilities: GTrans Service Area, Torrance Transit Service Area, and Metro Service Area Roadway, Bicycle, and Pedestrian Facilities: City of Gardena Vehicle Miles Traveled: City of Gardena
Tribal Cultural Resources	0.5-Mile Radius of Project site
Utilities and Service Systems	Water: Golden State Water Company (GSWC) Service Area Sewer: Los Angeles County Sanitation District (LACSD) Electric Power: Southern California Edison (SCE) Service Area Natural Gas: Southern California Gas Company (SoCalGas) Service Area Solid Waste: County of Los Angeles

[2] City of Los Angeles. (2006). *L.A. CEQA Thresholds Guide*. Retrieved from: https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf , accessed June 2023.

[3] The City of Gardena currently does not have construction noise screening criteria, thus, the City of Los Angeles CEQA Threshold Guide screening criteria was used to determine the geographic context for noise; see **Section 4.9: Noise** for additional information regarding the geographic context.

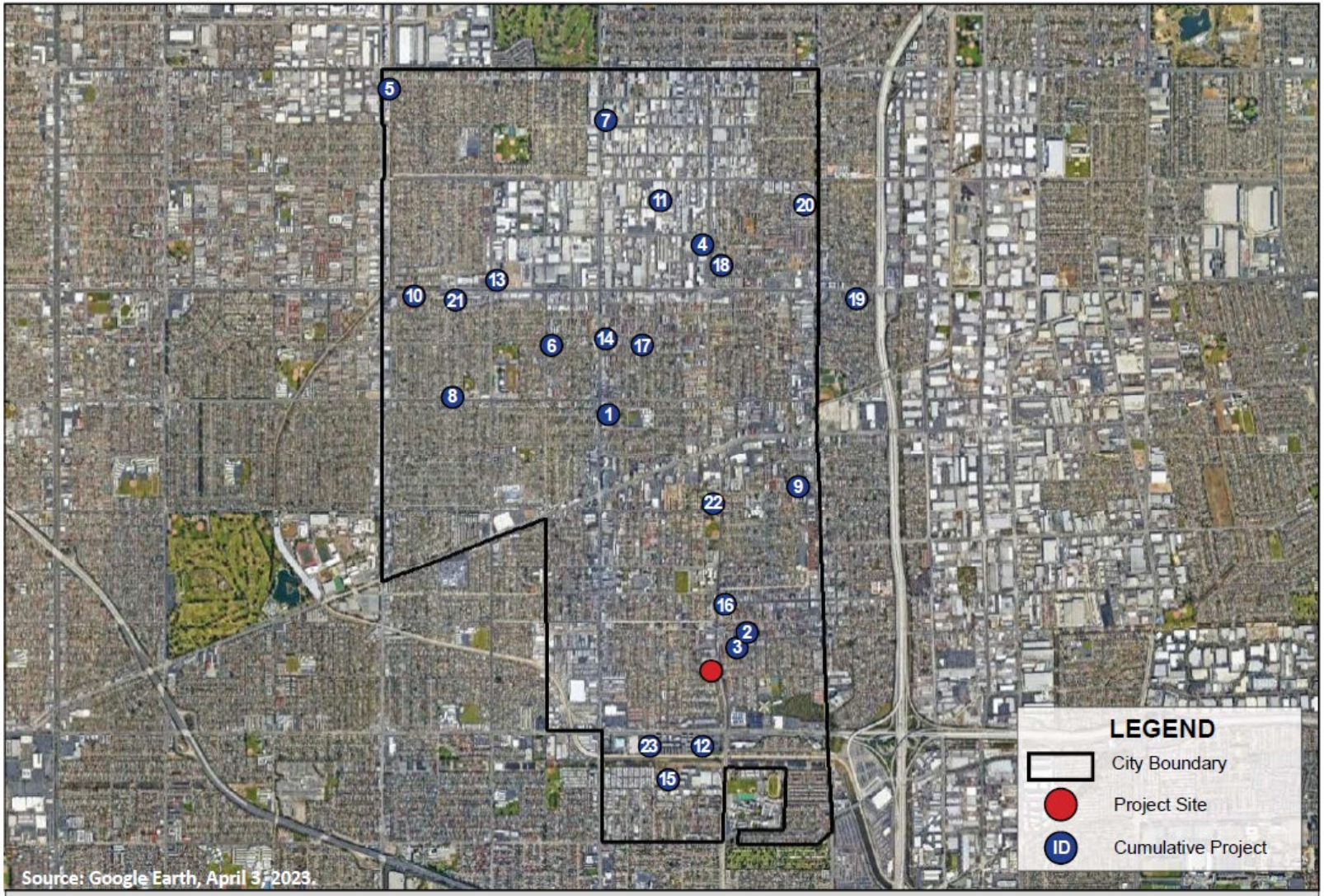

EXHIBIT 3-1: CUMULATIVE PROJECT LOCATIONS
Normandie Crossing Specific Plan Project

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4.0 ENVIRONMENTAL ANALYSIS

4.0 ENVIRONMENTAL ANALYSIS

The following EIR subsections describe the existing environmental and regulatory settings, evaluate the Project's potential environmental impacts (including direct and indirect, short-term, long-term, and cumulative), recommend mitigation measures, and identify unavoidable significant impacts, if any. **Sections 4.1: Air Quality** through **4.16: Aesthetics** analyze those environmental resource areas where potentially significant impacts could occur, based on Initial Study findings, as stated in the Notice of Preparation; see **Appendix 1.0-1: Initial Study, Notice of Preparation, and Comment Letters**.

This EIR examines environmental factors outlined in State CEQA Guidelines Appendix G Environmental Checklist Form, for the following issue areas:

4.1 Air Quality
4.2 Cultural Resources
4.3 Energy
4.4 Geology and Soils (Paleontological Resources)
4.5 Greenhouse Gas Emissions
4.6 Hazards and Hazardous Materials
4.7 Hydrology and Water Quality
4.8 Land Use and Planning
4.9 Noise
4.10 Population and Housing
4.11 Public Services
4.12 Recreation
4.13 Transportation
4.14 Tribal Cultural Resources
4.15 Utilities and Service Systems
4.16 Aesthetics

As set forth in the Initial Study, 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: Effects Found Not to be Significant.** based on Initial Study findings.

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.
- "Existing Setting" describes the physical conditions in the Project's vicinity that exist at the time the Notice of Preparation was published (May 9, 2023) and that may influence or affect the issue under investigation.

- "Regulatory Setting" 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; see also **Section 3.0: Basis for Cumulative Analysis**.
- "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 AIR QUALITY

4.1 AIR QUALITY

The purpose of this section is to describe the existing air quality-related environmental and regulatory settings and evaluate the Project's potential to conflict with or obstruct implementation of the applicable air quality plan, result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment, expose sensitive receptors to substantial pollutant concentrations, or result in other emissions such as those leading to odors adversely affecting a substantial number of people. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's potentially significant environmental impacts.

Information in this section is based primarily on air quality data provided in the following sources:

- *Air Quality Technical Report, Normandie Crossing Specific Plan Project* ("Air Quality Report") (Ramboll Americas Engineering Solutions, Inc., July 2023); **Appendix 4.1-1: Air Quality Technical Report**.
- *Normandie Crossing Specific Plan Project, Construction Health Risk Assessment* ("Health Risk Assessment") (Air Quality Dynamics, July 2023); **Appendix 4.1-2: Health Risk Assessment**.

It is noted that Kimley-Horn conducted a third-party review on behalf of the City of Gardena ("City") of the Project's Air Quality Report and Health Risk Assessment; see **Appendix 4.1-1 and Appendix 4.1-2**. The third-party review concluded the analysis meets the applicable provisions of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines.

4.1.1 EXISTING SETTING

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 San Gabriel Mountains to the north, Santa Margarita Peak to the south, the San Jacinto and San Bernardino Mountains to the east, and the Pacific Ocean to the west.[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 natural factors such as topography, meteorology, and climate, in addition to the presence of existing air pollution sources and ambient conditions.

The Air Basin lies in the eastern Pacific Ocean's semi-permanent high-pressure zone. The usually mild climatological pattern is interrupted by periods of hot weather, winter storms, or Santa Ana

[1] South Coast Air Quality Management District. (2016). *Air Quality Management Plan*. page 1-4.

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 Air Basin's emissions, light winds, and shallow vertical atmospheric mixing. These factors reduce the potential for pollutant dispersion causing elevated air pollutant levels. The Air Basin's pollutant concentrations vary with location, season, and time of day. O_3 concentrations, 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" ("CAPs") and are categorized into primary and secondary pollutants.

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 4.1-1: Air Contaminants and Associated Public Health** Concerns.

Table 4.1-1: Air Contaminants and Associated Public Health Concerns

Pollutant	Major Man-Made Sources[1]	Human Health Effects[2]
Particulate Matter (PM_{10} and $PM_{2.5}$)	Can be emitted directly from a source, such as construction sites, unpaved roads, fields, smokestacks, or fires. Although, most particles form in the atmosphere as a result of complex reactions of chemicals such as sulfur dioxide and nitrogen oxides, which are emitted from power plants, industries and automobiles.	**Short-term:** increase in mortality rates; increase in respiratory infections; increase in number and severity of asthma attacks; COPD exacerbation; increase in combined respiratory-diseases and number of hospital admissions; increased mortality due to cardiovascular or respiratory diseases; increase in hospital admissions for acute respiratory conditions; increase in school absences; increase in lost

Table 4.1-1: Air Contaminants and Associated Public Health Concerns

Pollutant	Major Man-Made Sources[1]	Human Health Effects[2]
		workdays; decrease in respiratory function in children; increase medication use in children and adults with asthma. **Long-term:** reduced lung function growth in children; changes in lung development; development of asthma in children; increased risk of cardiovascular diseases; increased total mortality from lung cancer; increased risk of premature death. Possible link to metabolic, nervous system, and reproductive and developmental effects for short-term and long-term exposure to $PM_{2.5}$.
Ozone (O_3)	Created by chemical reactions between oxides of nitrogen (NOx) and volatile organic compounds (VOC)[1]. This happens when pollutants emitted by cars, power plants, industrial boilers, refineries, chemical plants, and other sources chemically react in the presence of sunlight.	Pulmonary function decrements and localized lung injury in humans and animals; asthma exacerbation; chronic obstructive pulmonary disease (COPD) exacerbation; respiratory infection; increased school absences, and hospital admissions and emergency department (ED) visits for combined respiratory diseases; increased mortality; possible metabolic effects. Vegetation damage; property damage.
Sulfur Dioxide (SO_2)	The largest source of SO_2 in the atmosphere is the burning of fossil fuels by power plants and other industrial facilities. Smaller sources of SO_2 emissions include industrial processes such as extracting metal from ore; natural sources such as volcanoes; and locomotives, ships and other vehicles and heavy equipment that burn fuel with a high sulfur content. SO_2 emissions that lead to high concentrations of SO_2 in the air generally also lead to the formation of other sulfur oxides (SOx). SOx can react with other compounds in the atmosphere to form small particles. These particles contribute to PM pollution.	Respiratory symptoms (bronchoconstric-tion, possible wheezing or shortness of breath) during exercise or physical activity in persons with asthma. Possible allergic sensitization, airway inflammation, asthma development.
Carbon Monoxide (CO)	A colorless, odorless gas that is released when something is burned. The greatest sources of CO to outdoor air are cars, trucks and other vehicles or machinery that burn fossil fuels. A variety of	Visibility reduction. Aggravation of angina pectoris and other aspects of coronary heart disease; decreased exercise tolerance in persons with peripheral vascular disease and lung disease; possible

Table 4.1-1: Air Contaminants and Associated Public Health Concerns

Pollutant	Major Man-Made Sources[1]	Human Health Effects[2]
	household items such as unvented kerosene and gas space heaters, leaking chimneys and furnaces, and gas stoves also release CO and can affect air quality indoors.	impairment of central nervous system functions; possible increased risk to fetuses; possible increased risk of pulmonary disease; possible emergency department visits for respiratory diseases overall and visits for asthma.
Nitrogen Dioxide (NO_2)	NO_2 is primarily emitted in the air from the burning of fuel from cars, trucks and buses, power plants, and off-road equipment. NO_2 can react with other chemicals in the air to form both PM and ozone.	**Short-term:** asthma exacerbations ("asthma attacks") **Long-term:** asthma development; higher risk of all-cause, cardiovascular, and respiratory mortality. Both short and long term NO_2 exposure is also associated with chronic obstructive pulmonary disease (COPD) risk. Potential impacts on cardiovascular health, mortality and cancer, aggravate chronic respiratory disease. Contribution to atmospheric discoloration.
Lead (Pb)	Lead is a metal found naturally in the environment as well as in manufactured products. Two major sources of lead in the air are metals and ore processing and piston-engine aircraft operating on leaded aviation fuel. Other sources are waste incinerators, utilities, and lead-acid battery manufacturers. Today the highest air concentrations of lead are usually found near lead smelters as a result of EPA's regulatory efforts in the removal of lead from motor vehicle gasoline.	Learning disabilities; impairment of blood formation and nerve function; cardiovascular effects, including coronary heart disease and hypertension. Possible male reproductive system effects.

Notes:
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).
2. List of health and welfare effects is not comprehensive; detailed health effects information can be found in the U.S. EPA National Ambient Air Quality Standards (NAAQS) documentation at https://www.epa.gov/naaqs.

Source:
1. United States Environmental Protection Agency (U.S. EPA), Criteria Air Pollutants, Accessed May 15, 2023.
2. South Coast Air Quality Management District, *Air Quality Management Plan*, 2022; California Air Resources Board, *Ambient Air Quality Standards and Key Health and Welfare Effects*, December 2, 2022.

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 various 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 the Air Basin, the South Coast Air Quality Management District (South Coast AQMD) 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 $PM_{2.5}$, O_3, 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, O_3, NO_2, $PM_{2.5}$, and lead.

Existing Site Emissions

Table 2.2-1: Existing Onsite Structure Summary summarizes the existing onsite land uses by address and indicates approximately 115,424 square feet (SF) of industrial floor area is present on the Project site. However, approximately 9,324 SF of industrial floor area is in a dilapidated condition, thus, is not being used or occupiable. Therefore, approximately 106,100 SF of the existing industrial land uses are currently operating. The estimated criteria pollutant emissions from the existing 106,100 SF of active industrial land uses were estimated using the California Emission Estimator Model (CalEEMod) and are identified in **Table 4.1-2: Maximum Daily Net Criteria Air Pollutant Emission Estimates For Existing Conditions.**

Sensitive Receptors and Locations

Sensitive populations are more susceptible to the effects of air pollution than the general population. Sensitive receptors that are near 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 sensitive receptors nearest the Project site are the residential uses located north of West 169th Street, south of West 170th Street, east of South Normandie Avenue, and west of Brighton Way.

Table 4.1-2: Maximum Daily Net Criteria Air Pollutant Emission Estimates For Existing Conditions

Emission Source	Maximum Daily Criteria Air Pollutant Emissions [1,3](lb/day)					
	VOC[2, 3]	NO_X	CO	SO_X	PM_{10}[4]	$PM_{2.5}$[4]
Existing Conditions[4]						
Area	2.40	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.10	0.10	0.00	0.01	0.01
Mobile	0.70	1.00	8.00	0.02	1.65	0.45
Total	**3.10**	**1.10**	**8.10**	**0.02**	**1.66**	**0.46**

Notes:
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 CalEEMod = California Emissions Estimator Model; CAP = criteria air pollutant; CO = carbon monoxide; EMFAC = Emission Factors model; lb = pounds; NOx = nitrogen oxides; PM2.5 = particulate matter less than 2.5 microns in diameter; PM10 = particulate matter less than 10 microns in diameter; ROG = reactive organic gases; South Coast AQMD = South Coast Air Quality Management District; SOx = oxides of sulfur; VOC = volatile organic compounds
4 PM emissions for mobile sources are estimated as a sum of exhaust emissions, tire wear, brake wear, and entrained road dust.
5 Emissions for existing conditions were estimated using CalEEMod. See **Appendix 4.1-1** for CalEEMod outputs.
6 South Coast AQMD Air Quality Significance Thresholds.

Source: Ramboll US Corporation. (2023). See **Appendix 4.1-1.**

4.1.2 REGULATORY SETTING

Federal

Federal Clean Air Act

The Federal Clean Air Act (FCAA) 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 of the Act 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) 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 NAAQS 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 FCAA 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 CAAQS 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.

identifies the CAAQS and NAAQS. The Air Basin is currently designated as a nonattainment area with respect to the states O_3, PM_{10}, and $PM_{2.5}$ standards, as well as the federal 8-hour O_3 and $PM_{2.5}$ standards. The Air Basin is designated as in attainment or unclassified for the remaining CAAQS and NAAQS.

Table 4.1-3: 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)
Nitrogen Dioxide (NO_2)	1 Hour	0.18 ppm (339 µg/m^3)	100 ppb[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)	NA
	1 Hour	0.25 ppm (655 µg/m^3)	75 ppb
Respirable 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
	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
Hydrogen Sulfide (H_2S) [10]	1 Hour	0.03 ppm	NA

ppm = parts per million; - parts per billion by volume (0.01 ppm = 10 ppb); µg/m^3 = micrograms per cubic meter; mg/m^3 = milligrams per cubic meter; – = no information available.

1 State standards are values that are not to be exceeded. These standards 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, PM_{10}, $PM_{2.5}$, and NO_2 annual standard), then some measurements may be excluded. Measurements are excluded that CARB determines would occur less than once per year on the average.

2 Federal standards shown are the "primary standards" designed to protect public health. Federal 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 Federal particulate standards, annual standards are met if the annual average falls below the standard at every site. The Federal 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 Federal 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 Federal 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 The $PM_{2.5}$ standards currently in effect are the 2006 24-hour standard of 35 µg/m^3, and the 2013 annual standard of 12 µg/m^3. The U.S. EPA last reviewed the PM2.5 and ozone standards in 2020 and decided to retain them at their current levels. However, the present administration is re-evaluating the 2020 review and expects to finalize that re-evaluation within the next few years.

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 Federal 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*, 2022; California Air Resources Board, *Ambient Air Quality Standards and Key Health and Welfare Effects*, December 2, 2022.

Regional

South Coast Air Quality Management District

The South Coast AQMD 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 South Coast AQMD rules and regulations in effect at the time of construction.

The South Coast AQMD 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 South Coast AQMD Governing Board adopted the most recent AQMP on December 2, 2022. The 2022 AQMP addresses the 1997 8-hour and 2008 8-hour ozone standards, as well as $PM_{2.5}$ standards. This document focuses on attaining the 2015 8-hour ozone standard of 70 parts per billion (ppb). The AQMP incorporates the latest scientific and technological information and planning assumptions, including the *Connect SoCal (2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy)* (2020-2045 RTP/SCS) and updated emissions inventory methodologies for various source categories. As part of its air quality planning, SCAG has prepared the Regional Comprehensive Plan and Guide and the 2020-2045 RTP/SCS. The RTP/SCS was determined to conform to the federally mandated SIP for attainment and maintenance of the NAAQS. The 2020-2045 RTP/SCS has been incorporated into the 2022 AQMP. Both the Regional Comprehensive Plan and Guide and the AQMP are based, in part, on projections originating with county and city general plans.

The South Coast AQMD has published the CEQA Air Quality Handbook (approved by the South Coast AQMD Governing Board in 1993 and augmented with guidance for Localized Significance Thresholds [LST] in 2008). The South Coast AQMD guidance helps local government agencies and consultants develop environmental documents required by CEQA and provides identification of suggested thresholds of significance for criteria pollutants for both construction and operations. 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 existing and proposed projects affect air quality in order to meet the requirements of the CEQA review process. The South Coast AQMD periodically provides supplemental guidance and updates to the Handbook on their website.

4.1.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning air quality. The issues presented in the Environmental Checklist have been used as significance criteria in this section. The Project would have a significant effect on the environment if it would:

- Conflict with or obstruct implementation of the applicable air quality plan (see Impact 4.1-1)
- 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 4.1-2)
- Expose sensitive receptors to substantial pollutant concentrations (see Impact 4.1-3)
- Result in other emissions such as those leading to odors adversely affecting a substantial number of people (see Impact 4.1-4)

South Coast AQMD Thresholds. The significance criteria established by South Coast AQMD may be relied upon to make the above determinations. According to the South Coast AQMD, 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 South Coast AQMD has established thresholds of significance for a land use development project's air quality during construction- and operational-related activities, as shown in **Table 4.1-4: South Coast Air Quality Management District Emissions Thresholds.**

Table 4.1-4: South Coast Air Quality Management District Emissions Thresholds

Criteria Air Pollutants and Precursors	Construction-Related (lbs/day)	Operational-Related (lbs/day)
Reactive Organic Gases (ROG)/Volatile Organic Compounds (VOC)	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
Lead	3	3
Source: South Coast Air Quality Management District, *South Coast AQMD Air Quality Significance Thresholds,* March 2023.		

Localized Carbon Monoxide. In addition to the daily thresholds listed above, 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

state 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.

4.1.4 PROJECT DESIGN FEATURES

The following Project design features (PDF) were incorporated into the analysis:

- **PDF AQ-1. Nonroad Diesel Engines:** The Project would utilize off-road diesel-powered construction equipment which would meet, at a minimum, the Tier 4 emission standards for nonroad diesel engines promulgated by the USEPA for equipment greater than 50 horsepower.[2]
- **PDF AQ-2/PDF GHG-1. Electrical Vehicle Charging Design:** The Project would comply with the California Green Building Standards Code (CALGreen Code) (California Code of Regulations Title 24, Part 11) for electric vehicle (EV) charging design. Compliance would provide 10% of parking stalls to be EV capable, 25% of parking stalls to be EV ready with Level 2 EV charging receptacles, and 5% of parking stalls to be equipped with Level 2 EV chargers. The final design may vary from this in compliance with the CALGreen Code.[3]
- **PDF AQ-3/PDF GHG-2. All-Electric:** There would be no natural gas use by any of the Project land uses.[4]

4.1.5 IMPACTS AND MITIGATION MEASURES

Impact 4.1-1:
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 NAAQS. 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 CAAQS and NAAQS. South Coast AQMD's AQMPs establish a program of rules and regulations directed at reducing air pollutant emissions and achieving CAAQS and NAAQS. The SCAQMD's CEQA Handbook identifies two key indicators of consistency with the AQMP:

[2] The Project construction emissions inventory quantified this measure.
[3] The Project operational emissions inventory did not quantify this measure, but it has been included here qualitatively.
[4] The Project operational emissions inventory quantified this measure.

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 South Coast AQMD'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 4.1-5: Construction Air Pollutant Emissions**, and **Table 4.1-6: 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 South Coast AQMD regulations for controlling fugitive dust pursuant to South Coast AQMD 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 2022 AQMP was prepared to accommodate growth, reduce pollutant levels within the areas under the jurisdiction of South Coast AQMD, 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 AQMP's formulation.

Table 4-8.2: Existing General Plan Land Use Designations summarizes the Project site's existing land use designations and maximum allowable development capacity by APN and address. As indicated in **Table 4.8-2: Existing General Plan Land Use Designations**, the Project site's maximum development capacity, based on the existing land use designations (i.e., Industrial, with a High Density 30 Overlay over the northern portion), is 40 DU (on the northerly portion) and/or approximately 228,690 SF of industrial floor area. However, because the City only recently (i.e., February 2023) adopted this overlay, Connect SoCal and the AQMP do not account for residential uses or associated population on the Project site.

As discussed in **Section 4.8: 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 "Industrial, with a High Density 30 Overlay" over the northern portion, to "Specific Plan" to allow

for the proposed residential uses. As such, excluding the previously planned 40 DU, the Project would result in a forecast population growth of approximately 1,088 persons, or approximately 1.7 percent of the General Plan's forecast population of 63,799 persons at buildout, and approximately 1.6 percent over Connect SoCal's forecast 2045 population of 65,700 persons by 2045. Although the Project would include a General Plan Amendment, the forecast population growth resulting from the land use change would be nominal and is not considered substantial concerning Connect SoCal's forecasted growth; see **Section 4.11: Population and Housing**. Also, the Project site's existing non-residential (i.e., industrial) development capacity of approximately 228,690 SF, which is accounted for in Connect SoCal and the AQMP, would be removed with the Project's proposed General Plan amendment. Further, the Project would not exceed South Coast AQMD's significance thresholds. Therefore, the Project is consistent with the second criterion. Because the Project is consistent with the South Coast AQMD consistency finding criteria, the Project would not conflict with or obstruct implementation of the AQMP. A less than significant impact would occur in this regard, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.1-2:

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

Project construction activities 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-related 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 South Coast AQMD'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 PM 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 3.5 years, beginning June 2024 and ending September 2027. The Project's construction-related emissions

were calculated using the CARB-approved CalEEMod computer program, which is designed to model emissions for land use development projects (see **Appendix 4.1-1** for more information regarding the construction assumptions used in this analysis). The Project's construction-related maximum daily emissions are identified in **Table 4.1-5.** The Project would be subject to compliance with SCAQMD Rule 403 to minimize fugitive dust, which is incorporated into this analysis. As shown in **Table** 4.1-5, the Project's construction-related CAP emissions would be below the SCAQMD's mass daily significance thresholds. Therefore, the Project's construction activities would result in a less than significant air quality impact.

Table 4.1-5: Construction Air Pollutant Emissions

Year	Maximum Daily Criteria Air Pollutant Emissions [1,2,3] (lb/day)					
	VOC[5]	NO_x	CO	SO_x	PM_{10}[6]	$PM_{2.5}$[6]
2024	1.2	5.7	24.9	0.1	8.8	4.7
2025	1.4	4.0	27.3	0.1	3.6	1.0
2026	10.8	3.9	28.2	0.1	3.6	1.0
2027	10.8	2.6	27.7	0.1	3.5	1.0
Maximum Unmitigated[7]	**11**	**6**	**28**	**0**	**9**	**5**
SCAQMD Significance Threshold[8]	**75**	**100**	**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. 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 4.1-1** for detailed CalEEMod outputs. Analysis assumes on-site fugitive dust control [watering three times daily during construction].
3. Project construction assumes the use of USEPA Tier 4 for construction equipment greater than 50 hp.
4. Numbers are rounded for reporting purposes.
5. For purposes of this analysis the VOC emissions are assumed to be equal to ROG.
6. PM emissions are estimated as a sum of exhaust, tire wear, brake wear, and fugitive dust emissions. PM fugitive dust emissions during construction include a 55% reduction (for watering at least two times daily to comply with SCAQMD Rule 403).
7. The maximum emissions reported for each pollutant may occur on different days. The sum of the emissions may not add up due to rounding.
8. SCAQMD Air Quality Significance Thresholds. Available at http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2.

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. (2023). See **Appendix 4.1-1.**

Operational emissions

The Project's operational maximum daily emissions are summarized in **Table 4.1-6**. For CAPs, the emissions associated with the existing uses that would be removed are subtracted from the

Project's mass emissions, to get the net mass emissions, which are then compared to the South Coast AQMD mass daily significance thresholds. The estimated emissions include on-site emissions from stationary sources and offsite emissions from on-road sources. The primary source of the operational CAP emissions (except VO) is traffic-related mobile sources. As shown in **Table 4.1-6**: Operational Air Pollutant Emissions, the Project's operational CAP emissions would be below the SCAQMD's mass daily significance thresholds. Therefore, Project operations would result in a less than significant air quality impact.

Table 4.1-6: Operational Air Pollutant Emissions

Emission Source	Maximum Daily Criteria Air Pollutant Emissions [1] (lb/day)					
	VOC[2]	NO_X	CO	SO_X	PM_{10}[3]	$PM_{2.5}$[3]
Project[4]						
Area	8.8	0.4	33.3	0.0	0.18	0.18
Energy[5]	0.0	0.0	0.0	0.0	0.0	0.0
Mobile	5.4	5.6	53.8	0.12	14.10	3.81
Total	***14.2***	***6.0***	***87.1***	***0.1***	***14.3***	***4.0***
Existing Conditions[4]						
Area	2.4	0.0	0.0	0.00	0.00	0.00
Energy	0.0	0.1	0.1	0.00	0.01	0.01
Mobile	0.7	1.0	8.0	0.02	1.65	0.45
Total	***3.1***	***1.1***	***8.1***	***0.0***	***1.7***	***0.5***
Project Minus Existing Conditions (Net Change)[6]						
Total Net Emissions	***11***	***5***	***79***	***0***	***13***	***4***
SCAQMD Significance Thresholds[6]	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 4.1-1** for CalEEMod outputs.
5. There are zero energy criteria air pollutant emissions for Full Buildout Operations as there is no natural gas usage.
6. South Coast AQMD Air Quality Significance Thresholds.
7. 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. (2023). See **Appendix 4.1-1.**

Mitigation Measures

No mitigation is required.

Impact 4.1-3:
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 receptors to the Project site are residential uses located north of West 169th Street, south of West 170th Street, east of South Normandie Avenue, and west of Brighton Way.

Construction

Localized Significance Thresholds (LSTs) are used to evaluate the Project's construction-related emissions relative to the SCAQMD ambient air quality standard significance thresholds. The onsite construction and operational 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 is SRA Number 3, Southwest Coastal Los Angeles County, based on the Project's location. As a conservative approach, the thresholds chosen are for a 5.0-acre Project area since there is no published threshold specifically for the 5.25-acre Project site. Per guidance in SCAQMD's LST Methodology, the receptor distance was chosen based on the lowest (i.e., 25 meters), and thus most conservative, threshold for each pollutant for the "5.0-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 4.1-7: Localized Significance of Construction Emissions,** the Project's maximum daily on-site construction-related emissions would be less than the SCAQMD mass-rate LSTs 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 could occur on the Project site on any given day. Since the screening analysis shows that Project construction emissions would be below the mass-rate LSTs, the Project's contribution to the localized air concentrations of these pollutants would be less than significant.

Table 4.1-7: Localized Significance Of Construction Emissions (Maximum Pounds Per Day)

Emission Type	Maximum Daily On-Site Construction Emissions (lb/day) [1]				
	CO	NO_X	1-Hour NO_X [2]	PM_{10} [3]	$PM_{2.5}$ [3]
Onsite Construction Emissions[4]	23.3	2.6	2.6	8.5	4.6
SCAQMD Localized Significance Thresholds[5]	1,796	197	109	15	8
Exceeds Threshold?	***No***	***No***	***No***	***No***	***No***

Notes:
1. Emissions represent the change in on-site emissions due to the proposed land uses relative to emissions from the existing conditions.
2. An approximated LST was estimated to evaluate the federal 1-hour NO_2 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-hr NO_2 standard with the ratio of the federal to state 1-hr NO_2 standard (0.10 ppm/0.18 ppm).
3. PM fugitive dust emissions during unmitigated construction include a 55% reduction (for watering at least two times daily to comply with South Coast AQMD Rule 403).
4. Construction and Project Total emissions presented are on-site emissions.
5. LSTs based on a 5-acre project site SRA 3 (Southwest Coastal LA County) for a 25-m receptor distance. LSTs were obtained from the 2008 SCAQMD Final Localized Significance Threshold Methodology, Appendix C, Mass Rate LST Look-up Tables. Available at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysishandbook/localized-significance-thresholds. Accessed: November 2022.

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; South Coast AQMD - South Coast Air Quality Management District

Source: Ramboll US Corporation. (2023). See **Appendix 4.1-1.**

Diesel Particulate Matter

Project construction activities would generate Diesel Particulate Matter (DPM) emissions from the use of required off-road diesel equipment. The amount to which the nearest sensitive receptors would be exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

A Health Risk Assessment (HRA) was conducted using the American Meteorological Society (AMS)/EPA Regulatory Model (AERMOD), see **Appendix 4.1-2**. AERMOD is the U.S. Environmental Protection Agency's guideline model for the assessment of near-field pollutant dispersion. The SCAQMD provides guidance on the evaluation of localized air quality impacts to public agencies conducting environmental review of projects located within its jurisdiction with the Localized Significance Threshold Methodology. Refined air dispersion models require meteorological information to account for local atmospheric conditions. 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 based on relative spatial and temporal conditions that exist in the area of concern. In response to this recommendation, meteorological data from the SCAQMD Hawthorne Airport monitoring station, located approximately 3.62 miles northwest of the Project site, was used to represent local weather conditions and prevailing winds.

The Project's construction-related activities would generate DPM emissions from the exhaust of off-road, heavy-duty diesel equipment for site preparation (e.g., clearing, grading); building construction; paving; application of architectural coatings; on-road truck travel; and other miscellaneous activities. For construction activity, DPM is the primary TAC of concern. On-road diesel-powered haul trucks traveling to and from the construction site to deliver materials and equipment are less of a concern because they would not stay on the site for long durations. Diesel exhaust from construction equipment operating at the construction site poses a health risk to nearby sensitive receptors.

To assess localized impacts, construction phase, calendar year, and number of days associated with on-site construction activity were identified to produce an average daily DPM emission rate. Construction activities are estimated to occur for 994 days over a 1,160-day construction period based upon a 6-day per week construction schedule, which accounts for concurrent phase activities during paving and architectural coating operations. See **Appendix 4.1-2** for a summary of estimated average daily particulate emissions associated with various construction activities.

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 SCAQMD has established a maximum incremental cancer risk which meets or exceeds a threshold of 10 in one million (10E-06) for projects prepared under CEQA. This threshold is also consistent with the State of California as a level posing no significant risk for exposures to carcinogens regulated under the Safe Drinking Water and Toxic Enforcement Act (Proposition 65).

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.

Error! Reference source not found. presents the carcinogenic risk estimate for the maximum exposed residential receptor. The HRA determined that the off-site construction health risk would result in a maximum cancer risk of 6.6 in ten million, which would not meet or exceed the South Coast AQMD threshold of 10 in one million. Therefore, based upon the predicted carcinogenic risk and noncarcinogenic hazard estimates for the residential exposure scenario, the HRA demonstrates that Project construction activities would not result in unacceptable localized impacts from DPM exposure.

Table 4.1-8: Maximum Residential Receptor and Carcinogenic Risk

Age Group	Exposure Scenario
Third Trimester	2.8E-08
0 to 2 years	4.9E-07
2 to 9 years	1.5E-07
Total	6.6E-07
Source: **Appendix 4.1-2.**	

An evaluation of the potential noncancer effects of DPM exposure were also evaluated in the HRA. Under the point estimate approach, adverse health effects are evaluated by comparing the pollutant concentration with the appropriate Reference Exposure Level (REL). There are no available acute/8-hour reference exposure levels for DPM. 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). To calculate the hazard index, the pollutant concentration or dose is divided by its toxicity value. Should the total equal or exceed one (i.e., unity), a health hazard is presumed to exist. No exposure frequency or duration adjustments are considered for noncarcinogenic exposures. The HRA determined that for chronic noncarcinogenic effects, the Project's hazard index for the respiratory endpoint totalled approximately 0.0041 for the maximum exposed residential receptor, which would not meet or exceed the South Coast AQMD hazard index threshold of one. Therefore, impacts would be less than significant. Refer to **Appendix 4.1-2** for analysis methodology, results, and model data.

Operations

Localized Carbon Monoxide Impacts

A Carbon Monoxide (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 the Project would not cause or contribute to a violation of the CO standard at intersections for which a significant impact would occur. It is 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 Air Basin's four most congested intersections 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, given the Project's estimated 1,713 average daily trips, it can be reasonably inferred that CO hot spots would not be experienced at any intersections. Therefore, impacts would be less than significant, and no mitigation is required.

Diesel Particulate Matter

Pursuant to California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369, Case No. S213478, agencies are not required to analyze the CEQA impact of existing environmental conditions on a project's future users or residents, unless the proposed project risks exacerbating those environmental hazards or conditions that already exist. Therefore, operational-related DPM is not included as a part of this analysis.

Conclusion

Since the above analysis shows that the Project's construction and operations emissions would not exceed any significance thresholds for pollutants and therefore would not expose sensitive receptors to substantial pollutant concentrations, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation required.

Impact 4.1-4:
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. South Coast AQMD Rule 1113 limits the allowable amount of VOCs from architectural coatings and solvents. Since compliance with South Coast AQMD 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 *South Coast AQMD 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 South Coast AQMD 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.

4.1.6 CUMULATIVE IMPACTS

For purposes of the air quality impact analysis, cumulative impacts are considered for cumulative development within Gardena, according to the related projects; see **Table 3-1: List of Cumulative Projects**. The geographic context for cumulative analysis of air quality is the SCAB; see also **Table 3-2: Geographic Context for Cumulative Analysis**.

Cumulative Construction Emissions

As previously concluded above, the Project would not conflict with the applicable air quality plans (Threshold 4.1.1). Similarly, all related projects would be required to demonstrate no conflict would occur with the applicable air quality plans. Therefore, the Project would not result in a cumulatively considerable impact concerning a conflict with the applicable air quality plan.

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 South Coast AQMD 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 South Coast AQMD 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 South Coast AQMD 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 South Coast AQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the federal Clean Air Act mandates. The analysis assumes fugitive dust controls would be used during construction, including frequent water applications. Compliance with South Coast AQMD rules and regulations would further reduce the Project construction-related impacts. Cumulative projects would also be subject to project-level review and project-specific measures would be required, as needed, to reduce significant impacts. Cumulative projects would also be required to comply with South Coast AQMD rules and regulations. Therefore, Project-related construction emissions, combined with those from other projects in the area, would not substantially deteriorate local air quality significantly given compliance with the established regulatory framework would be required. Consequently, the Project combined with other cumulative development 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.

Project construction activities would generate temporary DPM emissions from the use of off-road diesel equipment. Considering the relatively short duration of DPM-emitting construction activity at any one location, and the highly dispersive properties of DPM, the Project would not expose sensitive receptors to substantial concentrations of construction-related TAC emissions. Similarly, cumulative project construction activities would generate temporary DPM emissions from the use of off-road diesel equipment. Given that the amount to which sensitive receptors near cumulative project construction sites would be exposed would be a function of proximity, concentration, and duration of exposure. As such, cumulative project's potential to result in the exposure of DPM would be determined on a site-by-site basis. Therefore, Project implementation would not result in a cumulative impact concerning DPM. As concluded above, the Project would not generate odors. Therefore, no cumulative impact concerning odors would occur.

4.1.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning air quality have been identified.

4.1.8 REFERENCES

Air Quality Dynamics. (2023). *16911 South Normandie – Construction Health Risk Assessment*; **Appendix 4.1-2: Health Risk Assessment**.

Ramboll US Corporation. (2023). *Air Quality Technical Report;* **Appendix 4.1-1: Air Quality Technical Report**.

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South Coast Air Quality Management District. (2022). *Air Quality Management Plan, 2022; California Air Resources Board, Ambient Air Quality Standards and Key Health and Welfare Effects*.

South Coast Air Quality Management District. (2016). *Air Quality Management Plan.* Pages 1-4.

United States Environmental Protection Agency (U.S. EPA). *Criteria Air Pollutants*. https://www.epa.gov/criteria-air-pollutants. Accessed May 15, 2023.

4.2 CULTURAL RESOURCES

4.2 CULTURAL RESOURCES

The purpose of this section is to describe the existing regulatory and environmental conditions related to cultural resources, and to evaluate the Project's potential to cause a substantial adverse change in the significance of a historical or archaeological resource, or to disturb any human remains. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or lessen the Project's potentially significant impacts.

Information in this section is based primarily on the following sources:

- *Archaeological Resources Assessment* for the Proposed Development at 16911 South Normandie Avenue Project, City of Gardena, Los Angeles County, California (Archeological Assessment); see **Appendix 4.2-1: Archaeological Resources Assessment**.
- *Historical Resources Assessment Report*, 16911 South Normandie Avenue, Gardena, Los Angeles County, California (Historical Resources Assessment); see **Appendix 4.2-2: Historical Resources Assessment**).

BCR Consulting LLC (BCR) conducted a third-party review on behalf of the City of Gardena ("City") of the Archaeological Assessment and Historical Resources Assessment; see **Appendix 4.2-1** and **Appendix 4.2-2**, respectively. The third-party review concluded the reports meet the applicable provisions of California Environmental Quality Act (CEQA) and the state CEQA Guidelines. The Tribal Resources Assessment is addressed as a part of **Section 4.14: Tribal Cultural Resources** of this EIR.

4.2.1 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. An archeological 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 ("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 15-foot buffer around construction areas.

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.

Prehistoric Period. The period 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.

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.

4.2.2 EXISTING SETTING

Ethnographic, Archaeological, and Historic Contents

See **Section 4.14: Tribal Cultural Resources** for the Ethnographic Setting.

Prehistoric Setting

The prehistoric chronology for the southern California coastal region that is applicable to near-coastal and many inland areas is identified by the following prehistoric sequence: Early Man, Milling Stone, Intermediate, and Late Prehistoric. These horizons are described in detail in **Appendix 4.2-1**.

Historic Setting

Between 1769 and 1822, the Spanish colonized California and established missions, presidios, and pueblos. After winning its independence from Spain, Mexico worked to lessen the wealth and power held by these missions. In 1833, in accordance with the Spanish-Mexican Grant Act of 1851, the missions and their lands were given to the Mexican governor, who redistributed them in the form of grants to private owners, who set up ranchos.

On April 4, 1850, five months prior to California's achieving statehood, Los Angeles became an American city. Los Angeles County was established on February 18, 1850, one of 27 counties established in the months prior to California's statehood. When California was granted statehood in 1850, the United States promised to honor rancho land grants. However, the process of defining land boundaries and proving legal ownership was often costly and time consuming. In combination with environmental factors detrimental to the cattle industry, many ranchos incurred debt and went into bankruptcy. This resulted in ranchos being divided up and sold inexpensively into agricultural parcels or towns.

City of Gardena

The City was part of the 43,000-acre Spanish land grant known as Rancho San Pedro. Gardena's path to incorporation began during the 1880's real estate boom.

The City was incorporated on September 11, 1930, nearly 50 years after the first settlers moved to the area, consolidating the surrounding communities of Gardena, Strawberry Park, and Moneta. At that time, the City was a farming community of approximately 20,000 people.

In 1890, the railroad extended along Western Avenue. Another key development in the 1890s was the selection of San Pedro as the official port for the City of Los Angeles. The impact of this designation reverberated through the South Bay Region in the late 19th century and early 20th century. The siting of the port in San Pedro influenced development and settlement patterns through the south bay, since connecting cities and communities became important transit stops and centers as well as locations for industrial and manufacturing plants which attracted new residents.

Since its earliest years, Gardena has owed its growth and development to its proximity to evolving transportation corridors and lines. Before the advent of the automobile, transportation options included the Los Angeles and Redondo Railroad line, the 1903 California Pacific Railway line connecting San Pedro and Los Angeles via Gardena, and the Pacific Electric Railway Line (or the "Red Cars") which were established through Gardena in 1912.

Through the first quarter of the 20th century, Gardena remained largely agricultural in nature. The town became known as "Berryland," Southern California's berry-growing capital. There was a rapid influx of new settlers and new construction in the 1920s, which started Gardena's shift from agriculture to new development, including new residential, commercial, and institutional expansion.

Historical Development of the Project Site

Until the 1950s, most of the Project site remained largely undeveloped. The establishment of the Southern Pacific Railroad in Gardena in the 1890s and the arrival of the Red Car system along Normandie Avenue in 1912 spurred residential, commercial, and manufacturing expansion in the City as well as near the Project site. Areas around the Project site were subdivided and developed into blocks with residential buildings. The Project site itself was primarily devoted to manufacturing/industrial uses, with some residential development in the pre-World War II era. The post-World War II boom in construction and settlement brought the most significant, rapid changes to the Project site.

Existing Historic Resources

As depicted in **Exhibit 2-2: Local Vicinity Map**, situated on the property are six industrial buildings totaling approximately 115,424-SF. Because the Project site has buildings over 45 years old, a

Historical Resources Assessment (**Appendix 4.2-2**) was conducted for the existing structures. **Table 4.2-1: Onsite Land Use Characteristics** details the existing onsite land uses by APN and address, as well of dates of initial construction and of any significant modifications as described in **Appendix 4.2-2**. The Historical Resources Assessment evaluated the six structures identified below, see **Appendix 4.2-2** for images of the existing onsite structures. The buildings were characterized as being in poor, fair, good, or excellent conditions.

In summary, Building 4, constructed in 1952 as a canning plant/food manufacturer, is the earliest extant property in the Project site. This canning plant grew quickly and expanded in 1953 with the construction of Building 5. The parcel to the north was developed in 1957, with the construction of Building 3, for use as a general contracting company. The next additions in the Project site were Buildings 2 and 6, in the north and south portions of the Project site in 1963 and 1967, respectively. Building 1, the warehouse at the north of the Project site, was added in 1976. Additional changes and additions over the years have taken place, as well, with new construction as well as removal of ancillary buildings and structures.

Table 4.2-1: Onsite Land Use Characteristics

Parcel ID[1]	APN[2]	Building Number[2]	Address[2]	Year Built[2]	Square Feet	Latest Significant Modification[2]
1	6106-030-011	1	16829 South Normandie Avenue	1976	10,000	Interior remodel and window replacement in 2016, and re-roofing in 2018.
		2	16829 South Normandie Avenue	1963	880	Possible re-roofing in 2018.
2	6106-030-015	3	16835 South Normandie Avenue	1956/ 1957	9,600	Re-roofing in 1991 and interior remodels in 1977, 1983, and 2015.
3	6106-030-016	None	Parking lot	–	–	–
4	6106-030-017	4	16907 South Normandie Avenue	1952	94,944[3]	Minimal alterations in the 1950s. Demolition and expansion in the 1960s. Major structural repairs in 2019.
		5	16911 South Normandie Avenue	1953		Remodeled in multiple times between 1952 and 1967. In 1987, a new 20,825-SF building was constructed. Additional interior alterations in the 1980s.
		6	16911 South Normandie Avenue	1967		

Notes:
1. The Parcel ID (Identification Number) correlates with labels on **Exhibit 2-2: Local Vicinity Map**.
2. See **Appendix 4.2-2** for further information.
3. This total includes 9,324 square feet of building that is unoccupied and dilapidated.

Building 1, located at the northern edge of the Project site, is a large-scale warehouse with limited ornamentation and wall openings constructed in 1976. High, vehicle-sized roll-up doors on the south and west elevations, along with the utilitarian, program-driven design of the building, reflect its industrial and manufacturing use. The building is capped with a flat roof with no roof eaves. Built on a concrete foundation, the building is made of concrete-block construction. Encircling the building is a series of simple, full-height pilasters. The principal elevation, which is located on the south, has nine pilasters; the shorter side elevations, on the east and west, have two pilasters. The building is in fair condition with few visible alterations.

Building 2, located at the northeast corner of the Project site, is a one-story building set on a concrete foundation and has a rectangular footprint. Constructed in 1963, the building has a flat roof with varying eaves depending on the elevation. The north elevation does not have roof eaves; the east elevation has moderately overhanging, closed eaves; and the south elevation has broadly overhanging eaves with exposed rafter tails. A narrow roof extension on the west side of the building connects Building 2 to Building 1 to create a short, covered walkway. Located on the south elevation, the primary entrance appears to be a solid wood or metal door. A similar door is located on the west elevation facing Building 1. A decorative stone-clad wall is located at the northeast corner of the building, and a short, concrete walkway extends from the east elevation to the sidewalk. It appears that a door opening was enclosed at this location. Fenestration consists of vinyl-sash picture and sliding windows. The building is in fair condition.

Building 3, located at the northeastern end of the Project site along South Normandie Avenue, is a one-story, masonry building set on a concrete foundation. Constructed in 1955/1957, it has a rectangular footprint that is divided for three storefronts. The perimeter of the building is edged with a small parapet. The east façade is clad with brick with three identical storefronts, each separated by a concrete block pilaster. Each storefront includes a centered door flanked by recessed, vinyl-frame storefront windows covered with security grilles. Black awnings are mounted on the façade to shelter the doors and windows. The north and south elevations appear to be painted concrete block; these elevations do not have fenestration. Painted signage reading "Miracle Water" is painted on the south elevation. The west elevation has three bays with garage doors and inset pedestrian doors. A shallow, paved parking lot on the east side of the building exits to Normandie Avenue. The building is in good condition with few visible alterations.

Building 4, located at the center of the Project site, is the oldest building on the Project site. In its entirety, Building 4 extends from Normandie Avenue to Brighton Way. The original L-shaped portion of the building was constructed in 1952 building (roughly the western half) and a large addition comprising the eastern half. A small addition was also built perpendicular to the building at its southwest corner. Both the original portion of the building and the addition have varied roof heights. Set on a concrete foundation, the building has a flat roof, areas of which have a parapet wall. The building's exterior appears to be concrete or stucco. Facing Brighton Way, the building's west elevation has a louvered window covered by a security grille, and a similarly sized window opening that has been enclosed. The north elevation has mechanical equipment and

conduits mounted on the walls; no fenestration was observed on this elevation. The small addition projecting from the southwest corner of the building is slightly taller with no fenestration on its west elevation. The south elevation has one door and what appears to be a window opening that has been enclosed. The east elevation is a large addition with a solid metal door accessed via a set of concrete steps lined with a metal pole railing. The south elevation appears to have a secondary entrance and several loading docks. The southeast corner of the addition has a lower roof height and large, two-light windows with fabric awnings, and a single door. Although a portion of this building is in dilapidated condition and not occupiable or currently being used, the overall building is in fair condition with various additions and alterations.

Building 5, is also located at the center of the Project site. Constructed in 1953, the building is on a concrete foundation and has a generally rectangular footprint. It is composed of a large domed volume, and one-story sections along the south side of the building, which have flat and shed roofs. The exterior walls include portions constructed with concrete block, and portions sheathed with stucco and corrugated metal panels. The east façade includes a large expanse of wall with no fenestration, and an area at the southeast corner that is framed to define the primary entrance, which consists of commercial metal-frame double doors with full-length glazing. Adjacent to the entrance is a large area of glass block. There appears to be a second window near the north end of the façade. The west elevation does not have fenestration but has small signs mounted on the upper wall. The south elevation is the one-story, flat- and shed-roofed portions of the building and includes mechanical equipment and metal pole railings. The north elevation does not appear to contain windows but has a pedestrian entrance and a larger garage door sheltered by a roof. The building is in fair condition.

Building 6, located at the southern edge of the Project site, is a large warehouse with an irregular footprint – its eastern elevation is slanted to parallel Normandie Avenue. The building has a flat roof, and its exterior appears to be concrete or stucco. A one-story element is located at the northeast corner of the building. It has a flat roof supported by rods attached to the main warehouse and is clad with corrugated metal siding. The east elevation has three evenly spaced corrugated metal roll-up doors. The north elevation appears to include several loading bays with large roll-up doors, at least one of which is sheltered by a flat roof canopy. The south and west elevations do not have any fenestration. The building is in good condition with few visible alterations.

Existing Archaeological Resources

Previously Recorded Resources

For the Project Archaeological Assessment, a California Historical Resources Information System (CHRIS) records search (within a 0.5-mile radius of the Project site) was conducted at the South-Central Coastal Information Center at California State University, Fullerton. The CHRIS records search indicated that 13 cultural resource studies have been conducted within a 0.5-mile radius

of the Project site. The record search results for reports within 0.5 mile of the Project site are summarized in **Appendix 4.2-2.** The CHRIS records search identified seven previously recorded resources within a 0.5-mile radius of the Project site. None of the resources were located at the site. Five resources identified within the 0.5-mile radius are historic resources and two are prehistoric sites.

Prehistoric artifacts and sites are more likely to be found near sources of water. Water features including perennial springs and small wetlands are known to have existed just southeast of the Project site. The site records indicate that both prehistoric resources were located near or adjacent to the Dominguez Slough. The slough is approximately 0.2 mile to the southeast of the Project site. A portion of the Dominguez Channel, located approximately 1.5 miles to the west-northwest of the Project site, fed into the Laguna Dominguez river going southeast to the slough. As the previously documented sites indicate, areas such as this would have been frequented by Native Americans.

Archival Research

Concurrent with the CHRIS records search, research on property-specific historical and ethnographic context was conducted to identify information relevant to the Project site. Research focused on a variety of primary and secondary materials relating to the history and development of the Project site, including historical maps, aerial and ground photographs, ethnographic reports, and other environmental data. Review of Sanborn Fire Insurance maps, newspaper articles, and building permits failed to produce conclusive results for the site. This is likely because the area was undeveloped and may have been used primarily as an agricultural field until as late as the mid-20th century, when warehouses were constructed, see the *Historical Development of the Project site* discussion above for further analysis on construction of the Project site.

4.2.3 REGULATORY SETTING

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. Additionally, the policies of the NHPA are implemented by the California Office of Historic Preservation, a division of the California

Department of Parks and Recreation. The Office of Historic Preservation is also tasked with carrying out the duties described in the Public Resources Code and maintaining the California Historic Resources Inventory and California Register of Historical Resources (CRHR).

National Register of Historic Places

As codified in 36 Code of Federal Regulations [CFR] 60.2, the NRHP was established by the NHPA of 1966 as "an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment."

The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. A property is eligible for the NRHP if it is significant under one or more of the following criteria:

- Criterion A: It is associated with events that have made a significant contribution to the broad patterns of our history;
- Criterion B: It is associated with the lives of persons who are significant in our past;
- Criterion C: It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; and/or
- Criterion D: It has yielded, or may be likely to yield, information important in prehistory or history.

Ordinarily cemeteries, birthplaces, or graves of historic figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, and properties that are primarily commemorative in nature, are not considered eligible for the NRHP, unless they satisfy certain conditions. In general, a resource must be 50 years of age to be considered for the NRHP, unless it satisfies a standard of exceptional importance.

In addition to meeting these criteria, a property must retain historic integrity, which is defined in National Register Bulletin 15 as the "ability of a property to convey its significance." 1 To retain integrity, a property must possess several, if not all, of these seven qualities, which are defined in the following manner in National Register Bulletin 15:

1. Location – the place where the historic property was constructed or the place where the historic event occurred;
2. Design – the combination of elements that create the form, plan, space, structure, and style of a property;

3. Setting – the physical environment of a historic property;
4. Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
5. Workmanship – the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory;
6. Feeling – a property's expression of the aesthetic or historic sense of a particular period of time;
7. Association – the direct link between an important historic event or person and a historic property.

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:

1. 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.).

2. a resource included in a local register of historical resources, as defined in PRC §5020.1(k)or identified as significant in an historical resource survey meeting the PRC §5024.1(g) requirements, 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.

3. 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:

Criteria 1: If the resource is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

Criteria 2: If the resource is associated with the lives of persons important in our past.

Criteria 3: If the resource 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

Criteria 4: If the resource 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" (State 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."

Public Resources Code (PRC §5024.1[a])

The evaluation criteria for inclusion in the CRHR are cited in PRC §5024.1(a). This section states that a resource may be listed as a historical resource in the California registrar if it meets any of the following national register of historic places criteria:

1. The resource is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

2. The resource is associated with the lives of persons important in our past.

3. The resource embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work on an important creative individual, or possesses high artistic values.

4. The resource has yielded, or may be likely to yield, information important in prehistory or history.

Public Resources Code (PRC §5024.1[b])

This section states that any agency proposing a project that could potentially impact a resource listed on the CRHR must first notify the state historic preservation officer and must work with the officer to ensure that the project incorporates "prudent and feasible measures that will eliminate or mitigate the adverse effects."

Public Resources Code (PRC §5097.98)

See **Section 4.14: Tribal Cultural Resources**.

Senate Bill 18

See **Section 4.14: Tribal Cultural Resources**.

Assembly Bill 52

See **Section 4.14: Tribal Cultural Resources**.

Local

City of Gardena General Plan

The Gardena 2006 General Plan (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.

The GGP Community Development Element provides a Land Use Plan with the following goals and policies for the treatment of historic and cultural resources:

- **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 1.7**: Preserve the City's residential buildings of historic and cultural significance.

- **LU Goal 4:** Provide the highest quality of public facilities possible to meet the needs of the City's residents and businesses and promote the City's image and cultural heritage.
    - **Policy LU 4.5:** Encourage the preservation of historical and cultural locations and monuments to preserve the heritage of the City.

The City does not have a local historic preservation ordinance with adopted criteria for designation. Therefore, this analysis considers Federal and State significance criteria.

4.2.4 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 4.2-1);
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to [State CEQA Guidelines] §15064.5 (see Impact 4.2-2);
- Disturb any human remains, including those interred outside of formal cemeteries (see Impact 4.2-3).

4.2.5 IMPACTS AND MITIGATION MEASURES

Impact 4.2-1:
Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Level of Significance: No Impact

The Project site is developed with six commercial buildings. The conclusions of the historical assessment are provided below.

Buildings 1 and 2

Broad Patterns of History. Building 1 and 2 were previously occupied by a variety of companies over the years. The Bjerke-Nicholson Construction Company occupied the buildings from the 1950s until at least 1970. Based on available sources, research did not suggest or show that the Bjerke-Nicholson Construction Company has an association with significant patterns of development or events significant to the City, region, state, or nation.

From 1977 to 1990, the buildings were occupied by Owen Machine Company, which was established in 1972 by owner Frank W. Owen. In subsequent years, the building were occupied

by several companies, including the YMD Moving Company (as of 1990), Olympic Van Lines (as of 1990), Avenue Auto Body (as of 1995), and KS Custom Cabinets (as of 2001). Research did not suggest that any of these companies and businesses have an association with a significant pattern or development or event.

In addition, the buildings are among numerous industrial properties developed in the postwar period in Gardena, and do not uniquely reflect or embody a pattern of development significant to the City, region, state, or nation. In addition, research to date has not indicated any historically significant events have taken place at the buildings. Therefore, Buildings 1 and 2 do not appear eligible for listing in the NRHP under Criterion A or for the CRHR under Criterion 1, either individually or as a contributor to a historic district.

Significant Persons. Research has not revealed that Buildings 1 or 2 have an association with the lives of significant individuals in the history of the City, region, state, or nation, either in terms of design professionals, owners, or occupants associated with the buildings. Therefore, the buildings do not appear eligible for listing in the NRHP under Criterion B or the CRHR under Criterion 2, either individually or as a contributor to a historic district.

Architecture. The structures are highly utilitarian, purpose-built industrial/manufacturing and office buildings. They do not represent a distinctive or outstanding example of industrial or office building design, nor do they embody the distinctive characteristics of a type, style, design, period, or method of construction. Building 1 exhibits the highly common (but not distinctive) characteristics of a warehouse, in an area of Gardena with numerous examples of buildings designed for industrial/manufacturing uses. Based on research conducted for this EIR, the buildings do not appear to be the work of a notable architect, builder, or designer, nor do they possess high artistic values. Therefore, Buildings 1 and 2 do not appear eligible under NRHP Criterion C or CRHR Criterion 3, either individually or as a contributor to a historic district.

Important Prehistory and History. The structures on the subject property are constructed with common building materials and typical construction techniques that are widely understood and documented. The property itself has been thoroughly documented over time and it is not expected that additional significant information would be revealed. Therefore, Buildings 1 and 2 do not appear eligible under NRHP Criterion D or CRHR Criterion 4, either individually or as a contributor to a historic district.

Therefore, Buildings 1 and 2 are not eligible for listing as a historic resource.

Building 3

Broad Patterns of History. Building 3 was occupied by a variety of companies over the years. Following construction of the Building 3, the first listed occupant, in 1958, was Prescon Corporation. From the 1960s through the 1970s, other companies listed at the address include Fuji Cabinet Works (1964), Riviera Catering (1970), and Gardena Catering (1975 to 1976). The

Miracle Water Company of Southern California occupied the address from 1980 to 1995. Based on available sources, research did not suggest or show that any of the companies or businesses have an association with a significant pattern or development or event.

Building 3 is among numerous industrial properties developed in the postwar period in Gardena, and it does not uniquely reflect or embody a pattern of development significant to the City, region, state, or nation. Research does not indicate any historically significant events have taken place at the building. Building 3 does not appear eligible for listing in the NRHP under Criterion A or for the CRHR under Criterion 1, either individually or as a contributor to a historic district.

Significant Persons. Research conducted to date has not revealed Building 3 to have an association with the lives of significant individuals in the history of the city, region, state, or nation, either in terms of design professionals, owners, or occupants associated with the property. Therefore, Building 3 does not appear eligible for listing in the NRHP under Criterion B or the CRHR under Criterion 2, either individually or as a contributor to a historic district.

Architecture. Building 3 is a highly utilitarian, commercial/industrial building. It does not represent a distinctive or outstanding example of industrial or commercial design, nor does it embody the distinctive characteristics of a type, style, design, period, or method of construction. Based on research conducted for this EIR, the structure does not appear to be the work of a notable architect, builder, or designer, nor does it possess high artistic values. Therefore, Building 3 does not appear eligible under NRHP Criterion C or CRHR Criterion 3, either individually or as a contributor to a historic district.

Important Prehistory and History. The structures on the subject property are constructed with common building materials and typical construction techniques that are widely understood and documented. The property itself has been thoroughly documented over time and it is not expected that additional significant information would be revealed. Therefore, Building 3 does not appear eligible under NRHP Criterion D or CRHR Criterion 4, either individually or as a contributor to a historic district.

Therefore, Building 3 is not eligible for listing as a historic resource.

Buildings 4, 5, and 6

Broad Patterns of History. Buildings 4, 5, and 6 were previously occupied by a variety of companies over the years. Research does not suggest or show that any of the companies have an association with significant patterns of development or events significant to the city, region, state, or nation. In addition, Buildings 4, 5 and 6 are among numerous industrial properties developed in the postwar period in Gardena, and they do not uniquely reflect or embody a pattern of development significant to the city, region, state, or nation. In addition, research to date has not indicated any historically significant events have taken place at the subject

properties. Buildings 4, 5, and 6 do not appear eligible for listing in the NRHP under Criterion A or for the CRHR under Criterion 1, either individually or as a contributor to a historic district.

Significant Persons. Buildings 4, 5, and 6 do not have an association with the lives of significant individuals in the history of the city, region, state, or nation, either in terms of design professionals, owners, or occupants associated with the properties. Therefore, Buildings 4, 5, and 6 do not appear eligible for listing in the NRHP under Criterion B or the CRHR under Criterion 2, either individually or as a contributor to a historic district.

Architecture. Buildings 4, 5, and 6 are highly utilitarian, purpose-built industrial/manufacturing and office buildings. They do not represent a distinctive or outstanding example of industrial or office building design, nor do they embody the distinctive characteristics of a type, style, design, period, or method of construction. The structures do not appear to be the work of a notable architect, builder, or designer, nor do they possess high artistic values. Therefore, Buildings 4, 5, and 6 do not appear eligible under NRHP Criterion C or CRHR Criterion 3, either individually or as a contributor to a historic district.

Important Prehistory and History. The structures on the subject property are constructed with common building materials and typical construction techniques that are widely understood and documented. The property itself has been thoroughly documented over time and it is not expected that additional significant information would be revealed. Therefore, Buildings 4, 5, and 6 do not appear eligible under NRHP Criterion D or CRHR Criterion 4, either individually or as a contributor to a historic district.

Therefore, Buildings 4, 5, and 6 are not eligible for listing as a historic resource.

None of the buildings evaluated, which are at least 45 years old, are eligible at either the federal, state, or local level of historic designation, either individually or as a contributor to a historic district. Further, no portion of the Project site is listed in the Los Angeles Historic Resources Inventory, NRHP or the CRHR, nor appears to be eligible under any of the NRHP Criteria. The City does not have a historic designation program or historic preservation ordinance.

Therefore, none of the subject properties are historical resources for purposes of CEQA and the Project would not cause a substantial adverse change in the significance of a historical resource. No impact would occur and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.2-2:
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

The CHRIS records search identified seven previously documented cultural resources within a 0.5-mile radius of the Project site. However, none of the seven resources are on the Project site and only two resources are prehistoric archaeological sites. While the CHRIS records search results did not identify any such archaeological resources within the Project site or its immediate vicinity, most of the site was not inspected for archaeological resources because of the developed nature of the site.

The depth of excavation for the Project is approximately 60 feet below the surface, which would likely require excavation of underlying alluvial sediments and removal of the overlying artificial fill. Ground-disturbing construction activities would involve grading, excavation, shoring tie-backs, and drilling of soldier piles conducted using loaders, excavators, compactors, hauling trucks, and a drill. The Project site is identified as having moderate sensitivity for prehistoric or historic Native American archaeological resources, see **Section 4.14 – Tribal Cultural Resources** for discussion of the Projects potential impacts to Native American tribal resources. Based on previous development of the Project site, the archaeological assessment determined the Project site has a moderate sensitivity for containing historic period (non–Native American) archaeological resources. Therefore, the Project has moderate potential to encounter archaeological resources during construction (i.e., ground disturbing activities).

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 to have 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 Project site consists of a comparatively small area within the greater region and has been subject to multiple episodes of ground disturbance. As a result, any archaeological material once located on the surface or in shallow deposits is unlikely to have been preserved within the Project site, though more deeply buried deposits could exist. The significance of any impacts would be based upon the criteria presented in the thresholds of significance (i.e., is the archaeological resource determined to be "historic" or "unique").

Although such a discovery is unlikely, any previously unidentified archaeological resources, if present, have the potential to be significant under CEQA. Mitigation Measures (MM) CUL-1 and

MMs TCR-1 through TCR-3 (see **Section 4.14: Tribal Cultural Resources**) 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-3, 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, a qualified archaeologist shall be retained to conduct a Pre-construction Worker Training on the types of unanticipated resources that could be encountered during construction, based on the site's history. This archaeologist may also be retained to ensure prompt assessment in the event that unanticipated cultural resources are encountered during construction.

If archaeological resources are exposed during construction, work within 50 feet of the find must stop until a qualified archaeologist can evaluate the significance of the find. Construction activities may continue in other areas. If the discovery proves significant under CEQA (14 CCR 15064.5[f]; PRC 21082), additional work such as testing, or data recovery may be warranted.

See **Section 4.14** for the following measures:

- **MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.**
- **MM TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects**.
- **MM TCR-3: Procedures for burials and funerary remains: This mitigation measure shall only apply if the Gabrieleno Band of Mission Indians-Kizh Nation is designated the Most Likely Descendent ("MLD") by the NAHC.**

Impact 4.2-3:
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. No dedicated cemeteries are on or near the Project site. Ground-disturbing construction activities would involve grading, excavation, shoring tie-backs, and drilling of soldier piles conducted using loaders, excavators, compactors, hauling

trucks, and a drill. The maximum anticipated depth of excavation below the existing surface grade is estimated at 60 feet.

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. 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 a less than significant. Compliance with MM TCR-2 would further minimize potential to impact human remains.

Mitigation Measures

See **Section 4.14: Tribal Cultural Resources**, for **MM TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects**.

4.2.6 CUMULATIVE IMPACTS

For purposes of the cultural resources impact analysis, cumulative impacts for Historic Resources are considered for cumulative development within a 500-foot radius of the Project site and within a 0.5-mile radius for Archaeological Resources, according to the related projects; see **Table 3-2: Geographic Context for Cumulative Analysis**. As indicated in **Table 3-1: List of Cumulative Projects** and depicted in **Exhibit 3-1: Cumulative Project Locations**, there are seven related projects within the geographic context for the cultural resources analysis: Related Project No. 2[1] (a multi-family condominium development approximately 0.14 mile to the northeast); Related Project No. 3[2] (a small lot subdivision with three-story dwelling units approximately 0.08 mile to the northeast); Related Project No. 9 (a townhome development approximately 0.88 mile to the northeast); Related Project No. 12 (a self-storage/warehouse development approximately 0.30 mile to the south); Related Project No. 15 (a townhome development approximately 0.50 mile to the south); Related Project No. 16 (a mixed use development, including apartments and commercial retail and office space, approximately 0.30 mile to the north); Related Project No. 22 (a multi-family townhome development with 3 affordable dwelling units approximately 0.70 mile

[1] This related project is approximately 720 feet northeast of Project site. This is second nearest related project to proposed Project site. No recent action from Applicant. Plan Check Review anticipated expiration November 2023. Construction start date unknown. (A. Acuna, City of Gardena, Personal Email Communication, June 12, 2023)

[2] This related project is approximately 400 feet northeast of Project site. Nearest related project to proposed Project site. No recent action from Applicant. Plan Check Review has expired. Construction start date unknown. (A. Acuna, City of Gardena, Personal Email Communication, June 12, 2023).

to the north); and Related Project No. 23 (a multi-family apartment development approximately 0.60 mile to the north).

There is a potential for undiscovered archaeological resources to be adversely impacted during Project construction. With implementation of MM CUL-1 and MM TCR-1 through MM TCR-3 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.

4.2.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts to cultural resources have been identified.

4.2.8 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.

City of Gardena. (2006). *Gardena General Plan 2006: Community Development Element, Land Use Plan*. Retrieved from 2021-Updated-Land-Use-Plan-04-21.pdf (cityofgardena.org).

SWCA. (2022). *Archaeological Resources Assessment* for the Proposed Development at 16911 South Normandie Avenue Project, City of Gardena, Los Angeles County, California; see **Appendix 4.2-1: Archaeological Resources Assessment**.

SWCA. (2023). *Historical Resources Assessment Report* for the 16911 South Normandie Avenue Project, City of Gardena, Los Angeles County, California; see **Appendix 4.2-2: Historical Resources Assessment**.

4.3 ENERGY

4.3 ENERGY

The purpose of this section is to describe the existing regulatory and environmental conditions related to energy and evaluate the Project's potential to result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, and/or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or lessen the Project's potentially significant impact.

Information in this section is based primarily on energy data provided in the following sources:

- Normandie Crossing Specific Plan Project – Energy Assessment ("Energy Assessment") (Kimley-Horn and Associates, 2023); **Appendix 4.3-1: Energy Data**.
- Air Quality Technical Report – Normandie Apartments Project Gardena, California ("Air Quality Technical Report") (Ramboll US Consulting, Inc, 2023); **Appendix 4.1-1: Air Quality Technical Report**.

It is noted that Kimley-Horn conducted a third-party review on behalf of the City of Gardena ("City") of the Project's Air Quality Technical Report; see **Appendix 4.1-1**. The third-party review concluded the analysis meets the applicable provisions of the California Environmental Quality Act (CEQA) and the state CEQA Guidelines.

4.3.1 EXISTING SETTING

The Project site is in the County of Los Angeles ("County"), approximately 12 miles southwest of downtown Los Angeles, in the City's southeast portion, at 16829, 16835, and 16907 South Normandie Avenue; see **Exhibit 2-1: Regional Vicinity Map**. The City encompasses approximately 6.0 square miles in the County's South Bay region. Gardena is bordered by the City of Hawthorne and unincorporated County lands to the north, the Cities of Los Angeles and Torrance to the south, the City of Los Angeles to the east, and unincorporated County lands and the Cities of Hawthorne and Torrance to the west. 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. As depicted on **Exhibit 2-2: Local Vicinity Map,** the approximately 5.25-acre Project site is fully developed with six industrial buildings, asphalt surface parking lots, hardscapes, and landscaping. **Table 2-1: Existing Onsite Land Uses** summarizes the existing onsite land uses by address and indicates approximately 115,424 square feet (SF) of industrial floor area is present on the Project site. However, approximately 9,324 SF of industrial floor area in one of the buildings on Parcel 4 is in a dilapidated condition, thus, is not being used or occupiable. Therefore, approximately 106,100 SF of the existing industrial land uses are currently operating.

Electricity

Southern California Edison (SCE) provides electrical services to the City through state-regulated public utility contracts. Over the past 15 years, electricity generation in California has undergone a transition. Historically, California relied heavily on oil- and gas-fired plants to generate electricity. Spurred by regulatory measures and tax incentives, California's electrical system become more reliant on renewable energy sources, including cogeneration, wind energy, solar energy, geothermal energy, biomass conversion, transformation plants, and small hydroelectric plants. Unlike petroleum production, electricity generation is not usually tied to the location of the fuel source and can be delivered great distances via the electrical grid. The generating capacity of a unit of electricity is expressed in megawatts (MW). Net generation refers to the gross amount of energy produced by a unit; minus the amount of energy the unit consumes. Generation is typically measured in megawatt-hours (MWh), kilowatt-hours (kWh), or gigawatt-hours (GWh).

Natural Gas Services

Southern California Gas Company (SoCalGas) provides natural gas services to the City and County. Natural gas is a hydrocarbon fuel found in reservoirs beneath the Earth's surface and is composed primarily of methane (CH_4). It is used for space and water heating, process heating and electricity generation, and as transportation fuel. Use of natural gas to generate electricity is expected to increase in coming years because it is a relatively clean alternative to other fossil fuels (e.g., oil and coal). In California and throughout the western United States, many new electrical generation plants fired by natural gas are being brought online. Thus, there is great interest in importing liquefied natural gas from other parts of the world. California's natural gas-fired electric generation accounted for 50.2 percent of in-state generation.

The City's ongoing development review process includes a review and comment opportunity for privately owned utility companies to provide input on all development proposals. The input facilitates a detailed review of projects by service purveyors to assess the potential demands for utility services on a project-by-project basis. The ability for utility providers to provide services concurrently with each project is evaluated during the development review process. Utility companies are bound by contract to update energy systems to meet any additional demand.

Energy Usage

Energy usage is typically quantified using the British Thermal Unit (BTU). Total energy usage in California was 6,922.8 trillion BTUs in 2020 (the most recent year for which this specific data is available). Of California's total energy usage, the transportation sector consumes the most energy, see **Table 4.3-1: California's Total Energy Usage 2020**. Electricity and natural gas in California are generally consumed by stationary uses such as residential, commercial, and industrial land uses, whereas petroleum consumption is generally accounted for by

transportation-related energy use. In 2021, taxable gasoline sales (including aviation gasoline) in California accounted for 13,060,407,775 gallons of gasoline.

Table 4.3-1: California's Total Energy Usage 2020

Sector	Percentage of Total Consumption
Transportation	34%
Industrial	24.6%
Commercial	19.6%
Residential	21.8%

Source: California Energy Commission. (2020). *Electricity Consumption by County.* http://www.ecdms.energy.ca.gov/. Accessed January 2023.

The electricity consumption attributable to the County from 2011 to 2021 is shown in **Table 4.3-2: Electricity Consumption in Los Angeles County 2011-2021**. Electricity consumption in the County increased steadily between 2011 and 2014 with a slight decrease in 2013, and relatively decreased between 2015 and 2021.

The natural gas consumption attributable to the County from 2011 to 2021 is shown in **Table 4.3-3: Natural Gas Consumption in Los Angeles County 2011-2021**. Natural gas consumption in the County relatively decreased between 2011 and 2015 with an increase in 2013, increased between 2015 and 2019, and decreased between 2019 and 2021.

Automotive fuel consumption in the County from 2011 to 2021 is shown in **Table 4.3-4: Automotive Fuel Consumption in Los Angeles County 2011-2021**. As shown in **Table 4.3-4**, on-road automotive fuel consumption in the County relatively increased from 2011 to 2016, decreased between 2018 and 2020, and increased in 2021. Heavy-duty vehicle fuel consumption increased between 2012 and 2017, decreased between 2017 and 2020, and increased in 2021.

Table 4.3-2: Electricity Consumption in Los Angeles County 2011-2021

Year	Electricity Consumption (in millions of kilowatt hours)
2011	68,180
2012	69,248
2013	68,342
2014	69,924
2015	69,503
2016	69,390
2017	68,632
2018	67,887
2019	66,805
2020	65,650
2021	65,375
Source: California Energy Commission. (2021). *Electricity Consumption by County*. http://www.ecdms.energy.ca.gov/. Accessed January 2023.	

Table 4.3-3: Natural Gas Consumption in Los Angeles County 2011-2021

Year	Natural Gas Consumption (in millions of therms)
2011	3,055
2012	2,985
2013	3,065
2014	2,794
2015	2,761
2016	2,878
2017	2,956
2018	2,922
2019	3,048
2020	2,937
2021	2,881
Source: California Energy Commission. (2021*). Natural Gas Consumption by County* http://www.ecdms.energy.ca.gov/. Accessed January 2023.	

Table 4.3-4: Automotive Fuel Consumption in Los Angeles County 2011-2021

Year	On-Road Automotive Fuel Consumption (gallons)	Heavy-Duty Vehicle/Diesel Fuel Consumption (Construction Equipment) (gallons)
2011	3,745,485,930	434,920,563
2012	3,714,743,617	430,477,995
2013	3,720,160,331	453,247,552
2014	3,754,124,477	457,345,104
2015	3,864,098,889	462,749,587
2016	3,990,292,164	489,895,770
2017	3,961,448,725	506,904,226
2018	3,914,668,171	494,484,395
2019	3,844,847,561	492,605,543
2020	3,381,588,164	491,579,947
2021	3,816,162,983	507,214,212
Source: California Air Resources Board. (2021). *EMFAC2021*.		

4.3.2 REGULATORY SETTING

State

California Code of Regulations (California Building Standards Code) Title 24

California Code of Regulations Title 24, also known as the California Building Standards Code, includes regulations for how buildings are designed and constructed. Title 24 is comprised of 12 "Parts." The Title 24 Parts relevant to energy efficiency are described below.

Title 24 Part 3 - California Electrical Code. The California Electrical Code (CEC) contains electrical design and construction standards.

Title 24 Part 6 - California Energy Code. The California Energy Code contains energy conservation standards applicable to all residential and non-residential buildings throughout California, including schools and community colleges. Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission [CEC]) in June 1977 and are updated every three years. Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. On June 10, 2015, the CEC adopted the 2016 Building Energy Efficiency Standards, which went into effect on January 1, 2017. On May 9, 2018, the CEC adopted the 2019 Building Energy Efficiency Standards, which took effect on January 1, 2020. The 2022 Standards went into effect January 1, 2023.

The 2016 Standards improved upon the previous 2013 Standards for new construction of and additions and alterations to residential and nonresidential buildings. Under the 2016 Standards, residential buildings are 28 percent more energy efficient and nonresidential buildings are 5 percent more energy efficient than under the 2013 Standards. Buildings that are constructed in accordance with the 2013 Building Energy Efficiency Standards are 25 percent (residential) to 30 percent (nonresidential) more energy efficient than the prior 2008 standards as a result of better windows, insulation, lighting, ventilation systems, and other features.

The 2019 Standards improve upon the 2016 Standards. Under the 2019 Title 24 standards, residential buildings will be about 7 percent more energy efficient, and when the required rooftop solar is factored in for low-rise residential construction, residential buildings that meet 2019 Title 24 standards use approximately 53 percent less energy than those built to meet the 2016 standards.

The 2022 Standards went into effect January 1, 2023. The updated Standards encourage efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards.

Title 24 Part 11 - California Green Building Standards (CALGreen Code). The CALGreen Code contains standards applicable to residential and non-residential buildings throughout California, including schools and community colleges. The CALGreen Code is intended to improve public health, safety, and public welfare through sustainable construction practices. 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 state adopted the most recent update to the CALGreen Code in 2022 and it went into effect January 1, 2023.

California Public Utilities Commission (CPUC) Energy Efficiency Strategic Plan

The California Public Utilities Commission (CPUC) prepared an Energy Efficiency Strategic Plan in 2011 with the goal of promoting energy efficiency and a reduction in greenhouse gases. Assembly Bill 1109, adopted in 2007, also serves as a framework for lighting efficiency. AB 1109 required the State Energy Resources Conservation and Development Commission to adopt minimum energy efficiency standards as a means to reduce average Statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018. According to the Energy Efficiency Strategic Plan, lighting comprises approximately one-fourth of California's electricity use while non-residential sector exterior lighting (parking lot,

area, walkway, and security lighting) usage comprises 1.4 percent of California's total electricity use, much of which occurs during limited occupancy periods.

Renewable Portfolio Standard

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 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 (CARB) 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, CARB adopted its Renewable Electricity Standard regulations, which require all the state's load-serving entities to meet this target. In October 2015, then-Governor Brown signed into legislation Senate Bill 350, which requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030. Signed in 2018, SB 100 revised the program's goals 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. Under the bill, the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Local

City of Gardena General Plan

The Gardena 2006 General Plan ("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 adopted their Climate Action Plan (CAP) in December 2017 as a joint effort between Gardena and the South Bay Cities Council of Governments. The CAP is 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.

4.3.3 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 4.3-1);
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency (see Impact 4.3-2).

Methodology and Assumptions

This section focuses on the three sources of energy that are relevant to the proposed Project: electricity; natural gas; and transportation fuel for vehicle trips associated with the Project, as well as the fuel necessary for Project construction.

Construction-related electricity use would be associated with water use for dust control and electric vehicles projected to be in the on-road fleet. Construction-related consumption of natural gas would occur from natural gas fuel consumption from construction vehicles. 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 vehicle fuel efficiency in miles per gallon. Construction fuel consumption is 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.

Operational-related electricity use would occur from building energy and would consist of constant day-to-day building energy and water use. Operational-related consumption of natural gas would occur from space heating and cooling, cooking, fireplaces, and laundry. However, Title 24 standards requires all new residential construction to be all electric and not connect to natural gas supply. The electricity and natural gas use during Project operations is calculated using respective CalEEMod default rates based on building use type. The gasoline and diesel fuel consumption associated with on-road vehicular trips is calculated based on total annual operational VMT, CalEEMod default vehicle fleet mix informed by the EMFAC model, and average fuel economy derived from the United States Department of Transportation. The CalEEMod emissions and default rates are specific to the construction year and operational year and include fleet adjustments based on current regulations and equipment turnover. The results of CalEEMod and energy calculations are included in **Appendix 4.3-1**.

4.3.4 PROJECT DESIGN FEATURES

The following Project design features (PDF) were incorporated into the analysis:

- **PDF AQ-2/PDF GHG-1:** The Project would comply with the CALGreen Code for electric vehicle (EV) charging design. Compliance would provide 10% of parking stalls to be EV capable, 25% of parking stalls to be EV ready with Level 2 EV charging receptacles, and 5% of parking stalls to be equipped with Level 2 EV chargers. The final design may vary from this in compliance with the CALGreen Code.[1]
- **PDF AQ-3/PDF GHG-2:** There would be no natural gas use by any of the Project land uses.[2]

[1] The Project operational emissions inventory did not quantify this measure, but it has been included here qualitatively.
[2] The Project operational emissions inventory quantified this measure.

4.3.5 IMPACTS AND MITIGATION MEASURES

Impact 4.3-1:

Would the Project result in a 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

As previously noted, the existing onsite industrial land uses total approximately 115,424 SF. However, approximately 9,324 SF of industrial floor area is in a dilapidated condition, thus, is not being used or occupiable. The Project's net energy consumption is summarized in **Table 4.3-5: Project and Countywide Energy Consumption**.

Table 4.3-5: Project and Countywide Energy Consumption

Energy Type	Existing Project Site Energy Consumption[1]	Proposed Project Annual Energy Consumption	Net Annual Energy Consumption Attributable to Project	Los Angeles County Annual Energy Consumption[2,3]	Percentage of Countywide Consumption
Project Construction					
Diesel[4]	--	138,115 gallons	138,115 gallons	507,214,212 gallons	0.0272%
Gasoline[4]	--	111,682 gallons	111,682 gallons	3,816,162,983 gallons	0.0029%
Project Operations					
Electricity	875,071 kWh	4,017,999 kWh	3,142,928 kWh	65,374,721,369 kWh	0.0048%
Natural Gas	3,929 therms	0 therms	-3,929 therms	2,880,994,891 therms	-0.0001%
Diesel[4]	3,055 gallons	25,314 gallons	22,259 gallons	507,214,212 gallons	0.0044%
Gasoline[4]	34,091 gallons	272,283 gallons	238,193 gallons	3,816,162,983 gallons	0.0062%

Notes:
1. Existing energy consumption based on estimated operational modeling provided in the Air Quality Technical Report prepared by Ramboll US Consulting, Inc. (December 2022).
2. The Project increases in electricity and natural gas consumption are compared with the total consumption in Los Angeles County in 2021.
3. The Project increases in automotive fuel consumption are compared with the countywide fuel consumption in 2021.
4. Countywide fuel consumption is from the California Air Resources Board EMFAC2021 model.
5. Construction fuel consumption is based on equipment and load factors from California Emissions Estimator Model (CalEEMod version 2020.4.0) and the Air Quality Technical Report prepared by Ramboll US Consulting, Inc. (December 2022).
6. The estimated construction fuel consumption is based on the Project's construction equipment list timing/phasing, and hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips provided in the Air Quality Technical Report prepared by Ramboll US Consulting, Inc. (December 2022).

Refer to **Appendix 4.3-1** for assumptions used in this analysis.

Construction-Related Energy

During Project construction, little to no electrical and natural gas consumption is anticipated since construction vehicles and equipment are generally diesel-powered. During construction, the Project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during demolition, grading, paving, and building construction. Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. Some incidental 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 emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption.

Substantial reductions 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 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.

As indicated in **Table 4.3-5**, the Project's construction-related diesel and gasoline fuel consumption would be approximately 138,115 gallons and approximately 111,682 gallons, respectively, which would result in a nominal increase in fuel use in the County. Construction-related off-road automotive fuel consumption would constitute approximately 0.0272 percent of the County's diesel consumption and approximately 0.0029 percent of the County's gasoline consumption. As such, Project construction would have a minimal effect on the local and regional energy supplies. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual Project 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. Therefore, construction fuel consumption would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature.

Operational Energy

Electricity and Natural Gas

Project operations would require approximately 3,142,928 additional kWh of electricity per year and (compared to existing conditions). The Project would be required to comply with Title 24 Building Energy Efficiency Standards, which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. The electricity provider, SCE, is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 36 percent of total procurement by 2020 and to 60 percent of total procurement by 2030. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures projects will not waste finite energy resources.

As indicated in **Table 4.3-5**, the Project's net operational electricity consumption would represent less than 0.01 percent of electricity consumption in the County. The Project would adhere to all federal, state, and local requirements for energy efficiency, including the Title 24 standards. As such, the Project would not result in the inefficient, wasteful, or unnecessary consumption of electric energy.

Pursuant to Title 24 standards, the Project would be all electric and would not connect to natural gas supply. Therefore, the Project's net operational natural gas consumption would be a decrease of approximately -3,929 therms; see **Table 4.3-5**.

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration (NTSA) is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. **Table 4.3-5** provides an estimate of the daily fuel consumed by vehicles traveling to and from the Project site. As indicated in **Table 4.3-5**, Project operations are estimated to consume approximately 22,259 additional gallons of diesel fuel and 238,196 additional gallons of gasoline fuel per year (compared to existing conditions), which would result in less than approximately 0.01 percent increase in Countywide consumption, respectively. The Project would not result in any unusual characteristics that would result in excessive long-term operational fuel consumption. Fuel consumption associated with vehicle trips generated by the Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Additionally, the Project's proposed apartment building would provide 1.2 parking spaces per unit, including approximately 40 electric vehicle (EV) charging stations, to encourage carpooling or other alternate modes of transportation. The Project would also include approximately 173 bicycle parking spaces and offsite sidewalk improvements along the south end of 169th Street to enhance access to public transit (GTrans, Torrance Transit, and Metro). Further, new residents who sign a 12-month lease would be offered one free monthly Metro pass. Incorporation of these Project features will further encourage reduction in the Projects automotive fuel energy consumption.

As shown in **Table 4.3-5**, the increase in electricity and automotive fuel consumption over existing conditions is minimal. For the reasons described above, the Project would not place a substantial demand on regional energy supply or require significant additional capacity, or significantly increase peak and base period electricity demand. Considering these requirements and design features including the elimination of natural gas consumption at the Project site, the Project would not result in the inefficient, wasteful, or unnecessary use of building energy. Therefore, the Project would result in a less than significant impact in this regard, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.3-2:
Would the Project conflict with or obstruct state or local plan for renewable energy or energy efficiency?

Level of Significance: Less Than Significant

Title 24 contains energy efficiency standards for residential and non-residential buildings based on a state mandate to reduce California's energy demand. Specifically, Title 24 addresses various energy efficiency measures that impact energy used for lighting, water heating, heating, and air conditioning, including energy impacts of building envelopes such as windows, doors, skylights, wall/floor/ceiling assemblies, attics, and roofs.

Additionally, the Project would comply with Title 24 Part 6, which specifically establishes energy efficiency standards for residential and nonresidential buildings constructed in the State of California in order to reduce energy demand and consumption. In accordance with Title 24 Part 6, the Project would have:

- Sensor-based lighting controls - for fixtures located near windows, the lighting would be adjusted by taking advantage of available natural light;
- Electrical components providing electric-ready buildings (allowing for electric heating, cooking, and clothes drying); and

- Efficient equipment - improved technology offers significant savings through more efficient equipment and appliances.

Title 24, Part 11, contains voluntary and mandatory energy measures that are applicable to the Project under the California Green Building Standards Code. As discussed above, the Project would result in an increased demand for electricity and petroleum. In accordance with Title 24 Part 11 mandatory compliance, the Project would have:

- 50 percent of its construction and demolition waste diverted from landfills;
- Mandatory inspections of energy systems to ensure optimal working efficiency;
- Low pollutant emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring and particle boards; and
- A 20 percent reduction in indoor water use.

Compliance with all these mandatory measures would decrease the consumption of electricity and petroleum.

As discussed in **Section 4.5: 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. 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 not conflict with any federal, state, or local plans for renewable energy and energy efficiency. Because the Project would comply with Title 24 Parts 6 and 11 and with the City's CAP measures, no conflict with existing energy standards and regulations would occur. Therefore, the Project's potential impacts associated with renewable energy or energy efficiency plans would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation is required.

4.3.6 CUMULATIVE IMPACTS

For purposes of this energy analysis, cumulative impacts are considered for cumulative development within Gardena, according to the related projects; see **Table 3-1: List of Cumulative Projects**. The geographic context for cumulative analysis of energy is the County of Los Angeles.

As concluded previously, Project construction and operations 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 Countywide electricity, gasoline, and diesel consumption; see **Table 4.3-1** through **Table 4.3-4**. For the reasons described above, the Project

would not place a substantial demand on regional energy supply or require significant additional capacity, or significantly increase peak and base period electricity demand. 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 a 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 result in a less than significant impact on energy. Therefore, when combined with cumulative development, the Project's potential impacts to energy would not be cumulatively considerable.

4.3.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning energy have been identified.

4.3.8 REFERENCES

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Ramboll US Consulting, Inc. (2022). *Air Quality Technical Report, Normandie Apartments Project, Gardena, California*; see **Appendix 4.1-1: Air Quality Technical Report**.

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4.4 GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES

4.4 GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES

This section describes the existing and regulatory conditions related to geology/soils and paleontological resources and analyzes the Project's potential to cause a substantial adverse effect directly or indirectly destroy a unique paleontological resource, paleontological site, site, or unique geologic feature. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's potentially significant impacts.

Information in this section is based primarily on the General Plan Environmental Impact Report (EIR) and geology and soils data provided in the Preliminary Geotechnical Investigation, Proposed 5.5-Acre Apartment and Townhome Development, 16831 & 16911 South Normandie Avenue, Gardena, California ("Preliminary Geotechnical Investigation"); see **Appendix 4.4-1: Preliminary Geotechnical Investigation.**

It is noted that, Iwasa Consulting conducted a third-party review of the Project's analysis on behalf of the City; see **Appendix 4.4-1**. 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**.

4.4.1 EXISTING SETTING

Paleontological Setting

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. These resources are valued for the information they yield about the history of the earth and its past ecological settings. The potential for fossil occurrence depends on the rock type exposed at the surface in a given area.

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.[1] 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

[1] City of Gardena.(2006). *Final Environmental Impact Report for the City of Gardena General Plan 2006, updated 2022*. Retrieved from: https://cityofgardena.org/general-plan/, accessed May 2023.

sediments that compose the uppermost units in the Los Angeles Basin creating a coastal alluvial plain.

Within this extensive alluvial plain, the Project site is situated on an uplifted marine alluvium and terrace landform, with remnant alluvial fans and uplifted alluvium and estuarine deposits. Several major watercourses drain the Los Angeles Basin, including the Los Angeles, Rio Hondo, San Gabriel, and Santa Ana Rivers. The Project site is within a fully urbanized setting on an open-aspect plain at an elevation of approximately 40 feet above mean sea level. An 1896 topographic map shows that before urbanization, the Project site was on a relatively level alluvial plain approximately 0.2 mile northwest of the Dominguez Slough.

The Project site is in the Qae unit for a characterization of the soil and geophysical setting.[2] The sediments that form the Qae unit were deposited before approximately 12,500 years ago, during the late Pleistocene. Soils within the project site are described as unconsolidated to weakly consolidated alluvial sediments, characterized by alluvial gravel, sand, and clay. The soils are further characterized as Windfetch loam with overly uplifted alluvium and terraces, varying from 8 centimeters to 2 meters (3–78 inches) deep and consisting of pale brown to dark brown, friable, moderate to blocky-textured clay loam.

Ice Age sediments, such as those found on site and described above, 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.

4.4.2 REGULATORY SETTING

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. Because the Project site is not on federal lands, the provisions of this Act do not apply to the Project.

[2] **Appendix 4.4-1**, Figure 2.

The National Environmental Policy Act (NEPA) of 1969

The National Environmental Policy Act of 1969 (NEPA) recognizes the continuing responsibility of the federal government to "preserve important historic, cultural, and natural aspects of our national heritage…" (§1010 42 USC §4321; No. 382). With the Passage of the Paleontological Resources Preservation Act, paleontological resources are considered a significant resource, and it is therefore now standard practice to include paleontological resources in NEPA studies in all instances where there is a possible impact. As the Project area is not on federal lands, the provisions of this Act do not apply to the Project.

State

Public Resources Code §5097.5

Requirements for paleontological resource management are included in Public Resources Code (PRC) Division 5, Chapter 1.7, §5097.5 which states in part:

> *"(a) A person shall not 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."*

Subsection (c) makes violation of the section a misdemeanor.

Additionally, PRC §30244 requires reasonable mitigation measures where development would adversely impact archaeological or paleontological resources identified by the State Historic Preservation Officer.

Local agencies are required to comply with these provisions for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others.

Local

Gardena Municipal Code (GMC) §18.42.210.C – Post Permit Requirements, Paleontological Resources

This section establishes the following procedures to protect any paleontological resources which may potentially be discovered during any ground-disturbing activities associated with project construction.

1. Prior to commencement of ground-disturbing activities a qualified vertebrate paleontologist (as defined by the Society for Vertebrate Paleontology) shall develop worker environmental awareness 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.

2. If fossils or fossil-bearing deposits are encountered during ground-disturbing activities, work within a twenty-five-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.

4.4.3 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: Effects Found Not to be Significant**).

- 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: Effects Found Not to be Significant**).

- 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: Effects Found Not to be Significant**).
- 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: Effects Found Not to be Significant**).
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature (see Impact 4.5-1).

4.4.4 IMPACTS AND MITIGATION MEASURES

Impact 4.4-1:
Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Level of Significance: Less Than Significant With Mitigation Incorporated

The potential for fossil occurrence depends on the rock type exposed at the surface in a given area and potential effects to paleontological resources would primarily be associated with ground disturbing activities. Paleontological resources are found in geologic deposits of sedimentary rock (i.e., sandstone, siltstone, mudstone, claystone, or shale). As previously noted, the Project site's surface area consists of weakly consolidated alluvial sediments dating back to the late Pleistocene, which are of an age to preserve fossil resources and have high paleontological potential. The Natural History Museum of Los Angeles County has records of numerous fossil localities from the same geologic units as exist in the Project area.

As depicted on **Exhibit 2-2: Local Vicinity Map**, the Project site is fully developed with industrial land uses. The Project proposes to remove the existing land uses and, in their place, construct a new 403-dwelling unit residential development. Previous construction-related excavation on the Project site has disturbed sediments beyond depths at which buried prehistoric cultural resources are likely. Notwithstanding, the potential exists for accidental discovery of paleontological resources during ground-disturbing activities. 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 Project would be subject to compliance with GMC §18.42.210, included as Condition of Approval (COA) GEO-1 and GEO-2, which require a qualified vertebrate paleontologist to develop and implement training for construction personnel, and which details the appropriate steps should paleontological resources be encountered during ground-disturbing activities. Additionally, the Project would require Mitigation Measure (MM) GEO-1, which pertains to retaining a Project Paleontologist and preparation of a monitoring plan. Following

compliance with COA GEO-1 and COA GEO-2, and with MM GEO-1 incorporated, the Project's potential impacts concerning directly or indirectly destroying a unique paleontological resource or site or unique geologic feature would be less than significant. Therefore, Project impacts would be less than significant with mitigation incorporated.

CONDITIONS OF APPROVAL

COA GEO-1: 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.

COA GEO-2: 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: **Paleontological Resources Monitor.** Monitoring shall be conducted by a Paleontological Resources Monitor, defined as one who meets the SVP standards for a Paleontological Resources Monitor. The Paleontological Resources Monitor shall be under the supervision of the Project Paleontologist. A Project Paleontologist shall prepare a Paleontological Resources Monitoring and

Mitigation Plan (PRMMP). 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.

4.4.5 CUMULATIVE IMPACTS

For purposes of the paleontological resource impact analysis, cumulative impacts are considered for cumulative development within Gardena; see **Table 3-1: List of Cumulative Projects**. The geographical context of the cumulative analysis for paleontological resources is the City of Gardena.

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 COAs and 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. On a project-by-project basis, all development would be subject to compliance with the established federal, state, and local regulatory framework concerning protection of paleontological resources, which would include compliance with GMC §18.42.210. 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, COA, and site-specific MM requirements.

4.4.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts to paleontological resources have been identified.

4.4.7 REFERENCES

City of Gardena.(2006). *Final Environmental Impact Report for the City of Gardena General Plan 2006, updated 2022*. Retrieved from: https://cityofgardena.org/general-plan/, accessed May 2023.

Hamilton & Associates, Inc. (2023). Preliminary Geotechnical Investigation; see **Appendix 4.4-1: Preliminary Geotechnical Investigation**.

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4.5 GREENHOUSE GAS EMISSIONS

4.5 GREENHOUSE GAS EMISSIONS

The purpose of this section is to describe the existing regulatory and environmental conditions related to greenhouse gas (GHG) emissions and analyze the Project's potential to generate GHG emissions that may have a significant impact on the environment and/or to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's potentially significant environmental impacts.

Information in this section is based primarily on the *Greenhouse Gas Technical Report – Normandie Apartments Project – Gardena, California ("GHG Technical Report") (*Ramboll Americas Engineering Solutions, Inc., 2023*)*; see **Appendix 4.5-1: GHG Technical Report.**

Kimley-Horn conducted a third-party review on behalf of the City of Gardena ("City") of the GHG Technical Report; see **Appendix 4.5-1**. The third-party review concluded the analysis meets the applicable provisions of the California Environmental Quality Act (CEQA) and State CEQA Guidelines.

4.5.1 EXISTING SETTING

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.

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3); however, it is noted that these gases are not associated with typical land use development. Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change or global warming.

GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric lifetimes (one to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of a GHG molecule is dependent on multiple variables and cannot be pinpointed, more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms of carbon sequestration. Of the total annual human-caused CO_2 emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO_2 emissions remains stored in the atmosphere.[1] **Table 4.5-1: Description of Greenhouse Gases** describes the primary GHGs attributed to global climate change, including their physical properties.

Table 4.5-1: Description of Greenhouse Gases

Greenhouse Gas	Description
Carbon Dioxide (CO_2)	CO_2 is a colorless, odorless gas that is emitted naturally and through human activities. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood. The largest source of CO_2 emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, and industrial facilities. The atmospheric lifetime of CO_2 is variable because it is readily exchanged in the atmosphere. CO_2 is the most widely emitted GHG and is the reference gas (Global Warming Potential [GWP] of 1) for determining GWPs for other GHGs.
Nitrous Oxide (N_2O)	N_2O is largely attributable to agricultural practices and soil management. Primary human-related sources of N_2O include agricultural soil management, sewage treatment, combustion of fossil fuels, and adipic and nitric acid production. N_2O is produced from biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N_2O is approximately 120 years. The GWP of N_2O is 298.
Methane (CH_4)	CH_4, a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. Methane is the major component of natural gas, about 87 percent by volume. Human-related sources include fossil fuel production, animal husbandry, rice cultivation, biomass burning, and waste management. Natural sources of CH_4 include wetlands, gas hydrates, termites, oceans, freshwater bodies, non-wetland soils, and wildfires. The atmospheric lifetime of CH_4 is about 12 years and the GWP is 25.
Hydrofluorocarbons (HFCs)	HFCs are typically used as refrigerants for both stationary refrigeration and mobile air conditioning. The use of HFCs for cooling and foam blowing is

[1] Intergovernmental Panel on Climate Change. (2013). *Carbon and Other Biogeochemical Cycles. In: Climate Change 2013: The Physical Science Basis, Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change.*

Greenhouse Gas	Description
	increasing, as the continued phase out of CFCs and HCFCs gains momentum. The 100-year GWP of HFCs range from 124 for HFC-152 to 14,800 for HFC-23.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Two main sources of PFCs are primary aluminum production and semiconductor manufacturing. GWPs range from 6,500 to 9,200.
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. They are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs were synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. The Montreal Protocol on Substances that Deplete the Ozone Layer prohibited their production in 1987. GWPs for CFCs range from 3,800 to 14,400.
Sulfur Hexafluoride (SF_6)	SF_6 is an inorganic, odorless, colorless, and nontoxic, nonflammable gas. It has a lifetime of 3,200 years. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas. The GWP of SF6 is 23,900.
Hydrochlorofluoro-carbons (HCFCs)	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, HCFCs are subject to a consumption cap and gradual phase out. The United States is scheduled to achieve a 100 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.
Nitrogen Trifluoride (NF_3)	NF_3 was added to Health and Safety Code §38505(g)(7) as a GHG of concern. This gas is used in electronics manufacture for semiconductors and liquid crystal displays. It has a high GWP of 17,200.

Sources:
1. U.S. EPA. (2023). *Overview of Greenhouse Gases*. Retrieved from: https://www.epa.goMaiv/ghgemissions/overview-greenhouse-gases.
2. U.S. EPA. (2023). *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021*.
3. U.S. EPA. (2010). *Methane and Nitrous Oxide Emission from Natural Sources*.

4.5.2 REGULATORY SETTING

Federal

To date, national standards have not been established for nationwide GHG reduction targets, nor have any regulations or legislation been enacted specifically to address climate change and GHG emissions reduction at the project level. Various efforts have been promulgated at the federal level to improve fuel economy and energy efficiency to address climate change and its associated effects.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (December 2007), among other key measures, requires the following, which would aid in the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

U.S. Environmental Protection Agency Endangerment Finding

The U.S. Environmental Protection Agency (EPA) authority to regulate GHG emissions stems from the U.S. Supreme Court decision in Massachusetts v. EPA (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing Federal Clean Air Act (FCAA) and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, the U.S. EPA finalized an endangerment finding in December 2009. Based on scientific evidence it found that six GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing FCAA and the U.S. EPA's assessment of the scientific evidence that form the basis for the U.S. EPA's regulatory actions.

Federal Vehicle Standards

In response to the U.S. Supreme Court ruling discussed above, Executive Order 13432 was issued in 2007 directing the U.S. EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011, and in 2010, the U.S. EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, an Executive Memorandum was issued directing the Department of Transportation, Department of Energy, U.S. EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the U.S. EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO_2 in model year 2025, on an average industry fleet-

wide basis, which is equivalent to 54.5 miles per gallon (mpg) if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021, and NHTSA intends to set standards for model years 2022–2025 in a future rulemaking. On January 12, 2017, the U.S. EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks. It should be noted that the U.S. EPA is currently proposing to freeze the vehicle fuel efficiency standards at their planned 2020 level (37 mpg), canceling any future strengthening (currently 54.5 mpg by 2026).

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the U.S. EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the U.S. EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines.

In August 2016, the U.S. EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program applies to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program.[2]

On September 27, 2019, the U.S. EPA and the NHTSA published the "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program" (84 Fed. Reg. 51,310 (Sept. 27, 2019).[3] The SAFE Rule (Part One) revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle (ZEV) mandates in California. On March 31, 2020, the U.S. EPA and NHTSA finalized rulemaking for SAFE Part Two sets CO_2 emissions standards and corporate average fuel economy (CAFE) standards for passenger vehicles and light duty trucks, covering model years 2021-2026. The current U.S. EPA administration has repealed SAFE Rule Part One, effective January 28, 2022, and is reconsidering Part Two.

In December 2021, the U.S. EPA finalized federal GHG emissions standards for passenger cars and light trucks for Model Years 2023 through 2026. These standards are the strongest vehicle emissions standards ever established for the light-duty vehicle sector and are based on sound

[2] U.S. EPA and NHTSA. (2016). *Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium and Heavy-Duty Engines and Vehicles – Phase 2.* Retrieved from: https://www.gpo.gov/fdsys/pkg/FR-2016-10-25/pdf/2016-21203.pdf. Accessed June 2023.

[3] U.S. EPA and NHTSA. (2019). *Federal Register, Vol. 84, No. 188, The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program, September 27, 2019*. Retrieved from: https://www.govinfo.gov/content/pkg/FR-2019-09-27/pdf/2019-20672.pdf. Accessed June 2023.

science and grounded in a rigorous assessment of current and future technologies. The updated standards will result in avoiding more than three billion tons of GHG emissions through 2050.[4]

State

California Air Resources Board

The California Air Resources Board (CARB) is responsible for coordination and oversight of State and local air pollution control programs. Various statewide and local initiatives to reduce California's contribution to GHG emissions have raised awareness about climate change and its potential for severe long-term adverse environmental, social, and economic effects. California is a significant emitter of CO_2 equivalents (CO_2e) in the world and produced 459 gross million metric tons of carbon dioxide equivalent ($MMTCO_2e$) in 2013. The transportation sector is the State's largest emitter of GHGs, followed by industrial operations such as manufacturing and oil and gas extraction.

The State's legislature enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation, such as the landmark Assembly Bill (AB) 32, California Global Warming Solutions Act of 2006, was specifically enacted to address GHG emissions. Other legislation, such as Title 24 building efficiency standards and Title 20 appliance energy standards, were originally adopted for other purposes such as energy and water conservation, but also provide GHG reductions. This section describes the legislation's major provisions.

Assembly Bill 32 - California Global Warming Solutions Act of 2006

AB 32 instructs the CARB to develop and enforce regulations for reporting and verification of statewide GHG emissions. AB 32 also directs CARB to set a GHG emissions limit based on 1990 levels, to be achieved by 2020. It set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

California Air Resource Board (CARB) Scoping Plan

CARB adopted the Scoping Plan to achieve AB 32 goals. The Scoping Plan establishes an overall framework for the measures that would be adopted to reduce California's GHG emissions. CARB determined that achieving the 1990 emissions level would require a reduction of GHG emissions of approximately 29 percent below what would otherwise occur in 2020 in the absence of new laws and regulations (referred to as "business-as-usual").[3][5] The Scoping Plan evaluates

[4] U.S. EPA. (2021). *Final Rule to Revise Existing National GHG Emissions Standards for Passenger Cars and Light Trucks Through Model Year 2026*. Retrieved from: https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-revise-existing-national-ghg-emissions. Accessed June 2023.

[5] CARB defines business-as-usual (BAU) in its Scoping Plan as emissions levels that would occur if California continued to grow and add new GHG emissions but did not adopt any measures to reduce emissions. Projections for each emission-generating sector were compiled and used to estimate emissions for 2020 based on 2002–2004 emissions intensities. Under CARB's definition of BAU, new growth is assumed to have the same carbon intensities as was typical from 2002 through 2004.

opportunities for sector-specific reductions, integrates early actions and additional GHG reduction measures by both CARB and the State's Climate Action Team, identifies additional measures to be pursued as regulations, and outlines the adopted role of a cap-and-trade program.[6] Additional development of these measures and adoption of the appropriate regulations occurred through the end of 2013. Key elements of the Scoping Plan include:

- Expanding and strengthening existing energy efficiency programs, as well as building and appliance standards.
- Achieving a statewide renewables energy mix of 33 percent by 2020.
- Developing a California cap-and-trade program that links with other programs to create a regional market system and caps sources contributing 85 percent of California's GHG emissions (adopted in 2011).
- Establishing targets for transportation related GHG emissions for regions throughout California and pursuing policies and incentives to achieve those targets (several sustainable community strategies have been adopted).
- Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, heavy-duty truck measures, the Low Carbon Fuel Standard (amendments to the Pavley Standard adopted 2009; Advanced Clean Car standard adopted 2012), goods movement measures, and the Low Carbon Fuel Standard (adopted 2009).
- Creating targeted fees, including a public goods charge on water use, fees on gases with high global warming potential, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.
- The California Sustainable Freight Action Plan was developed in 2016 and provides a vision for California's transition to a more efficient, more economically competitive, and less polluting freight transport system. This transition of California's freight transport system is essential to supporting the State's economic development in coming decades while reducing pollution.
- CARB's Mobile Source Strategy 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. The mobile Source Strategy includes increasing ZEV buses and trucks.

In 2012, CARB released revised estimates of the expected 2020 emissions reductions. The revised analysis relied on emissions projections updated in light of current economic forecasts that accounted for the economic downturn since 2008, reduction measures already approved and put in place relating to future fuel and energy demand, and other factors. This update reduced the

[6] The Climate Action Team, led by the secretary of the California Environmental Protection Agency, is a group of State agency secretaries and heads of agencies, boards, and departments. Team members work to coordinate statewide efforts to implement global warming emissions reduction programs and the State's Climate Adaptation Strategy.

projected 2020 emissions from 596 $MMTCO_2e$ to 545 $MMTCO_2e$. The reduction in forecasted 2020 emissions means that the revised business-as-usual reduction necessary to achieve AB 32's goal of reaching 1990 levels by 2020 is now 21.7 percent, down from 29 percent. CARB also provided a lower 2020 inventory forecast that incorporated state led GHG emissions reduction measures already in place. When this lower forecast is considered, the necessary reduction from business-as-usual needed to achieve the goals of AB 32 is approximately 16 percent.

CARB adopted the first major update to the Scoping Plan on May 22, 2014. The updated Scoping Plan summarizes the most recent science related to climate change, including anticipated impacts to California and the levels of GHG emissions reductions necessary to likely avoid risking irreparable damage. It identifies the actions California has already taken to reduce GHG emissions and focuses on areas where further reductions could be achieved to help meet the 2020 target established by AB 32. By 2016, California had reduced GHG emissions below 1990 levels, achieving AB 32's 2020 goal four years ahead of schedule.

In 2016, the Legislature passed Senate Bill (SB) 32, which codified a 2030 GHG emissions reduction target of 40 percent below 1990 levels. With SB 32, the Legislature passed companion legislation, AB 197, which provides additional direction for developing the Scoping Plan. On December 14, 2017, CARB adopted a second update to the Scoping Plan.[7] The 2017 Scoping Plan details how the State will reduce GHG emissions to meet the 2030 target set by Executive Order B-30-15 and codified by SB 32. Other objectives listed in the 2017 Scoping plan are to provide direct GHG emissions reductions; support climate investment in disadvantaged communities; and support the Clean Power Plan and other federal actions.

Adopted December 15, 2022, CARB's 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. To achieve the targets of AB 1279, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (i.e., Climate Action Plan) consistent with CEQA Guidelines §15183.5.

[7] California Air Resources Board. (2017). *California's 2017 Climate Change Scoping Plan.* Retrieved from: https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Accessed June 2023.

The 2022 CARB Scoping Plan's key elements focus on transportation. Specifically, the 2022 Scoping Plan aims to rapidly move towards zero-emission transportation (i.e., electrifying cars, buses, trains, and trucks), which constitutes California's single largest source of GHGs. The regulations that impact the transportation sector are adopted and enforced by CARB on vehicle manufacturers and are outside the jurisdiction and control of local governments. The 2022 Scoping Plan accelerates development of new regulations as well as amendments to strengthen regulations and programs already in place.

Included in the 2022 Scoping Plan is a set of Local Actions (2022 Scoping Plan Appendix D) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. The 2022 Scoping Plan Appendix D includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new residential and mixed-use development in order to determine consistency with the 2022 Scoping Plan.[8] These approaches are recommendations only and are not requirements. They do not supplant lead agencies' discretion to develop their own evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

Senate Bill 32 - California Global Warming Solutions Act of 2006: Emissions Limit

Signed into law in September 2016, SB 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

Senate Bill 375 - The Sustainable Communities and Climate Protection Act of 2008

Signed into law on September 30, 2008, SB 375 provides a process to coordinate land use planning, regional transportation plans, and funding priorities to help California meet AB 32's GHG reduction goals. SB 375 requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, aligns planning for transportation and housing, and creates specified incentives for the implementation of the strategies.

Assembly Bill 1493 - Pavley Regulations and Fuel Efficiency Standards

AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by the U.S. EPA's denial of an implementation

[8] California Air Resources Board. (2022). *2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D: Local Actions.*

waiver. The U.S. EPA subsequently granted the requested waiver in 2009, which was upheld by the U.S. District Court for the District of Columbia in 2011. The regulations establish one set of emission standards for passenger vehicle and light duty truck model years 2009–2016 and a second set of emissions standards for model years 2017 to 2025. By 2025, when all rules will be fully implemented, new passenger vehicles are anticipated to emit 34 percent fewer CO_2e emissions and 75 percent fewer smog-forming emissions.

Senate Bill 1368 - Emission Performance Standards

SB 1368 is the companion bill of AB 32, which directs the California Public Utilities Commission (CPUC) to adopt a performance standard for GHG emissions for the future power purchases of California utilities. SB 1368 limits carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than five years from resources that exceed the emissions of a relatively clean, combined cycle natural gas power plant. The law effectively prevents California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. The CPUC adopted the regulations required by SB 1368 on August 29, 2007. The regulations implementing SB 1368 establish a standard for baseload generation owned by, or under long-term contract to publicly owned utilities, for 1,100 pounds of CO_2 per megawatt-hour.

Senate Bill 1078, Senate Bill 107, and Senate Bill X1-2 - Renewable Electricity Standards

SB 1078 requires California to generate 20 percent of its electricity from renewable energy by 2017. SB 107 (2006) changed the due date to 2010 instead of 2017. On November 17, 2008, then Governor Arnold Schwarzenegger signed Executive Order S-14-08, which established a Renewable Portfolio Standard target for California requiring that all retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. Executive Order S-21-09 also directed CARB to adopt a regulation by July 31, 2010, requiring the State's load serving entities to meet a 33 percent renewable energy target by 2020. CARB approved the Renewable Electricity Standard on September 23, 2010, by Resolution 10-23. SBX1-2 codified the 33 percent by 2020 target.

Senate Bill 350 - Clean Energy and Pollution Reduction Act of 2015

Signed into law on October 7, 2015, SB 350 implements Executive Order B-30-15's goals. The SB 350 objectives are to increase the procurement of electricity from renewable sources from 33 percent to 50 percent (with interim targets of 40 percent by 2024, and 45 percent by 2027) and to double the energy efficiency savings in electricity and natural gas end uses of retail customers through energy efficiency and conservation. SB 350 also reorganizes the Independent System Operator to develop more regional electricity transmission markets and improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

Assembly Bill 398 - Market-Based Compliance Mechanisms

Signed on July 25, 2017, AB 398 extended the duration of the Cap-and-Trade program from 2020 to 2030. AB 398 required CARB to update the Scoping Plan and for all GHG rules and regulations adopted by the state. It also designated CARB as the statewide regulatory body responsible for ensuring that California meets its statewide carbon pollution reduction targets, while retaining local air districts' responsibility and authority to curb toxic air contaminants and criteria pollutants from local sources that severely impact public health. AB 398 also decreased free carbon allowances over 40 percent by 2030 and prioritized Cap-and-Trade spending to various programs including reducing diesel emissions in impacted communities.

Senate Bill 150 - Regional Transportation Plans

Signed on October 10, 2017, SB 150 aligns local and regional GHG reduction targets with state targets (i.e., 40 percent below 1990 levels by 2030). SB 150 creates a process to include communities in discussions on how to monitor their regions' progress on meeting these goals. The bill also requires the CARB to regularly report on that progress, as well as on the successes and the challenges regions experience associated with achieving their targets. SB 150 provides for accounting of climate change efforts and GHG reductions and identify effective reduction strategies.

Senate Bill 100 - California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases

Signed into law in September 2018, SB 100 increased California's renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

Assembly Bill 1346 - Air Pollution: Small Off-Road Engines

Signed into law in October 2021, AB 1346 requires CARB to adopt cost-effective and technologically feasible regulations to prohibit engine exhaust and evaporative emissions from new small off-road engines, consistent with federal law, by July 1, 2022. AB 1346 requires CARB to identify and, to the extent feasible, make available funding for commercial rebates or similar incentive funding as part of any updates to existing applicable funding program guidelines to local air pollution control districts and air quality management districts to implement to support the transition to zero-emission small off-road equipment operations.

Assembly Bill 1279 - The California Climate Crisis Act

AB 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that Scoping Plan updates identify and recommend measures to

achieve carbon neutrality, and to identify and implement policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage technologies.

Senate Bill 1020 - 100 Percent Clean Electric Grid

Signed on September 16, 2022, SB 1020 provides additional goals for the path to the 2045 goal of 100 percent clean electricity retail sales. It creates a target of 90 percent clean electricity retail sales by 2035 and 95 percent clean electricity retail sales by 2040.

Senate Bill 905 - Carbon Sequestration Program

Signed on September 16, 2022, SB 905 establishes regulatory framework and policies that involve carbon removal, carbon capture, utilization, and sequestration. It also prohibits the injecting of concentrated carbon dioxide fluid into a Class II injection well for the purpose of enhanced oil recovery.

Executive Orders Related to GHG Emissions

California's Executive Branch has taken several actions to reduce GHGs using executive orders. Although not regulatory, they set the tone for the State and guide the actions of State agencies.

Executive Order S-3-05. Executive Order S-3-05 was issued on June 1, 2005, which established the following GHG emissions reduction targets:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The 2050 reduction goal represents what some scientists believe is necessary to reach levels that will stabilize the climate. The 2020 goal was established to be a mid-term target. Because this is an executive order, the goals are not legally enforceable for local governments or the private sector.

Executive Order S-01-07. Issued on January 18, 2007, Executive Order S 01-07 mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. The executive order established a Low Carbon Fuel Standard (LCFS) and directed the Secretary for Environmental Protection to coordinate the actions of the California Energy Commission, CARB, the University of California, and other agencies to develop and propose protocols for measuring the "life-cycle carbon intensity" of transportation fuels. CARB adopted the LCFS on April 23, 2009.

Executive Order S-13-08. Issued on November 14, 2008, Executive Order S-13-08 facilitated the California Natural Resources Agency's development of the 2009 California Climate Adaptation

Strategy. Objectives include analyzing risks of climate change in California, identifying, and exploring strategies to adapt to climate change, and specifying a direction for future research.

Executive Order S-14-08. Issued on November 17, 2008, Executive Order S-14-08 expands the State's Renewable Energy Standard to 33 percent renewable power by 2020. Additionally, Executive Order S-21-09 (signed on September 15, 2009) directs CARB to adopt regulations requiring 33 percent of electricity sold in the state come from renewable energy by 2020. CARB adopted the Renewable Electricity Standard on September 23, 2010, which requires 33 percent renewable energy by 2020 for most publicly owned electricity retailers.

Executive Order S-21-09. Issued on July 17, 2009, Executive Order S-21-09 directs CARB to adopt regulations to increase California's Renewable Portfolio Standard (RPS) to 33 percent by 2020. This builds upon SB 1078 (2002), which established the California RPS program, requiring 20 percent renewable energy by 2017, and SB 107 (2006), which advanced the 20 percent deadline to 2010, a goal that was expanded to 33 percent by 2020 in the 2005 Energy Action Plan II.

Executive Order B-30-15. Issued on April 29, 2015, Executive Order B-30-15 establishes a California GHG reduction target of 40 percent below 1990 levels by 2030 and directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of $MMTCO_2e$. The 2030 target acts as an interim goal on the way to achieving reductions of 80 percent below 1990 levels by 2050, a goal set by Executive Order S-3-05. Executive Order B-30-15 also requires the State's climate adaptation plan to be updated every three years and for the State to continue its climate change research program, among other provisions. With the enactment of SB 32 in 2016, the Legislature codified the goal of reducing GHG emissions to 40 percent below 1990 levels by 2030.

Executive Order B-55-18. Issued on September 10, 2018, Executive Order B-55-18 establishes a goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. This goal is in addition to the existing statewide targets of reducing GHG emissions. The executive order requires CARB to work with relevant state agencies to develop a framework for implementing this goal. It also requires CARB to update the Scoping Plan to identify and recommend measures to achieve carbon neutrality. The executive order also requires state agencies to develop sequestration targets in the Natural and Working Lands Climate Change Implementation Plan.

Executive Order N-79-20. Signed in September 2020, Executive Order N-79-20 establishes as a goal that where feasible, all new passenger cars and trucks, as well as all drayage/cargo trucks and off-road vehicles and equipment, sold in California, will be zero-emission by 2035. The executive order sets a similar goal requiring that all medium and heavy-duty vehicles will be zero-emission by 2045 where feasible. It also directs CARB to develop and propose rulemaking for passenger vehicles and trucks, medium-and heavy-duty fleets where feasible, drayage trucks, and off-road vehicles and equipment "requiring increasing volumes" of new ZEVs "towards the target of 100 percent." The executive order directs the California Environmental Protection

Agency, the California Geologic Energy Management Division (CalGEM), and the California Natural Resources Agency to transition and repurpose oil production facilities with a goal toward meeting carbon neutrality by 2045. Executive Order N-79-20 builds upon the CARB Advanced Clean Trucks regulation, which was adopted by CARB in July 2020.

California Regulations and Building Codes

California has a long history of adopting regulations to improve energy efficiency in new and remodeled buildings. These regulations have kept California's energy consumption relatively flat even with rapid population growth.

Title 20 Appliance Efficiency Regulations. The appliance efficiency regulations (California Code of Regulations [CCR] Title 20, §§1601-1608) include standards for new appliances. 23 categories of appliances are included in the scope of these regulations. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

Title 24 Building Energy Efficiency Standards. California's Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR Title 24, Part 6) was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions.

On August 11, 2021, the California Energy Commission adopted the 2022 Energy Code. In December 2021, it was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. Among other updates like strengthened ventilation standards for gas cooking appliances, the 2022 Energy Code includes updated standards such as new electric heat pump requirements for residential uses, schools, offices, banks, libraries, retail, and grocery stores; the promotion of electric-ready requirements for new homes including the addition of circuitry for electric appliances, battery storage panels, and dedicated infrastructure to allow for the conversion from natural gas to electricity; and the expansion of solar photovoltaic and battery storage standards to additional land uses including high-rise multi-family residences, hotels and motels, tenant spaces, offices (including medical offices and clinics), retail and grocery stores, restaurants, schools, and civic uses (including theaters auditoriums, and convention centers). Projects whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code.

Title 24 California Green Building Standards Code. The California Green Building Standards Code (CALGreen Code) (CCR Title 24, Part 11) is a Statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. The CALGreen Code standards require new residential and commercial buildings to comply with mandatory measures under the topics of planning and

design, energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code 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 CEC adopted the 2022 CALGreen Code in December 2021, went into effect on January 1, 2023. The 2022 CALGreen code focuses on battery storage system controls, demand management, heat pump space and water heating, and building electrification.

Regional

Southern California Association of Governments (SCAG)

On September 3, 2020, SCAG's Regional Council adopted Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]). The RTP/SCS charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The strategy was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses, and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. SCAG's RTP/SCS establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035 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 Executive Orders 5-03-05 and B-30-15. The 2020 RTP/SCS is a long-range vision plan that balances future mobility and housing needs with economic, environmental, and public health goals.

The RTP/SCS contains over 4,000 transportation projects, ranging from highway improvements, railroad grade separations, bicycle lanes, new transit hubs and replacement bridges. These future investments were included in county plans developed by the six county transportation commissions and seek to reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices for everyone. The RTP/SCS is an important planning document for the region, allowing project sponsors to qualify for federal funding.

The RTP/SCS accounts for operations and maintenance costs to ensure reliability, longevity, and cost effectiveness. It is also supported by a combination of transportation and land use strategies that help the region achieve state GHG emissions reduction goals and FCAA requirements, preserve open space areas, improve public health and roadway safety, support our vital goods movement industry, and utilize resources more efficiently.

Local

City of Gardena 2006 General Plan

The Gardena 2006 General Plan (GGP) does not contain goals or policies concerning GHG emissions. However, GGP Community Development Element, Circulation Plan, includes the following goals and policies that address vehicle trips:

- **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 3.3:** 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.

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 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 (LUT), Energy Efficiency (EE), Energy Generation (EG), Solid Waste (SW), and Urban Greening (UG).

The LUT category contains the following goals and policies that are applicable to the Project:

Policy LUT B Facilitate private and public mobility services (ride-hailing, ride-sharing, car-sharing, bike-sharing).

- **Policy Action LUT B1.1:** Facilitate car-sharing.
- **Policy Action LUT D.2.3:** Facilitate ride-hailing and ride-sharing.

Policy LUT D Improve design of development.

- **Policy Action LUT D.2.2:** Require new developments to provide pedestrian, bicycle, and transit amenities.
- **Policy Action LUT D.2.3:** Require commercial and multi-family residential projects to provide permanent bicycle parking facilities.

Policy LUT E2 Unbundle parking costs from property costs.

- **Policy Action LUT E.2.2:** Encourage developers of new development to unbundle parking and eliminate the assignment of specific stalls.

Policy LUT G Increase density.

- **Policy Action LUT G1.1:** Encourage higher density through general plan appropriately in targeted areas.
- **Policy Action LUT G1.2:** Encourage higher density through zoning code appropriately in targeted areas.
- **Policy Action LUT G1.3:** Increase housing density near transit.

The EE category contains the following goals and policies that are applicable to the Project:

Policy E1 Promote or require water efficiency through SB X7-7.

- **Policy Action EE E1.2:** Require low-irrigation landscaping.

Policy E2 Promoting water efficiency standards exceeding SB X7-7.

- **Policy Action EE E2.2:** Allow recycled or grey water uses for non-municipal uses.

Gardena Municipal Code

The Gardena Municipal Code does not contain any standards concerning GHG emissions.

4.5.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning GHG emissions. 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**)

Addressing GHG emissions generation impacts requires an agency to determine what constitutes a significant impact. Amendments to the State CEQA Guidelines specifically allow lead agencies

to determine thresholds of significance that illustrate the extent of an impact and are a basis from which to apply mitigation measures. This means that each agency is left to determine whether a project's GHG emissions will have a "significant" impact on the environment. The guidelines direct that agencies are to use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" the project's GHG emissions.[9]

Greenhouse Gas Thresholds

The South Coast Air Quality Management District (South Coast AQMD) formed a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. The Threshold Working Group was formed to assist South Coast AQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research, CARB, the Attorney General's Office, a variety of city and county planning departments in the SCAB, various utilities such as sanitation and power companies throughout the SCAB, industry groups, and environmental and professional organizations. The Threshold Working Group proposed a tiered approach to evaluating GHG emissions for development projects where the South Coast AQMD is not the lead agency, wherein projects are evaluated sequentially through a series of "tiers" to determine whether the project is likely to result in a potentially significant impact due to GHG emissions.

With the tiered approach, a project is compared against the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. The South Coast AQMD established a threshold of 10,000 metric tons of CO_2e ($MTCO_2e$) per year for industrial projects and a 3,000 $MTCO_2e$ threshold was proposed for non-industrial projects but it has not been adopted. The South Coast AQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact.

Tier 4 consists of three decision tree options. Under the Tier 4 first option, the South Coast AQMD initially outlined that a project would be excluded if design features and/or mitigation measures resulted in emissions 30 percent lower than business as usual emissions. However, the Threshold Working Group did not provide a recommendation for this approach. The Threshold Working Group folded the Tier 4 second option into the third option. Under the Tier 4 third option, a project would be excluded if it were below an efficiency-based threshold of 4.8 $MTCO_2e$ per service population per year. Tier 5 would exclude projects that implement offsite mitigation (GHG

[9] Ramboll US Corporation. (2023). *Greenhouse Gas Technical Report – Normandie Apartments Project, Gardena, CA.*

reduction projects) or purchase offsets to reduce GHG emission impacts to less than the proposed screening level.

Tier 3 Screening (Project) Thresholds. This analysis assesses the significance of GHG impacts under a single threshold: Compliance with applicable statewide and local regulatory programs designed to reduce GHG emissions consistent with AB 32 and SB 32, including CARB's 2022 Updated Scoping Plan, the City of Gardena CAP, and the RTP/SCS' growth assumptions.

To further demonstrate that the Project's GHG emissions would not create significant impacts, the Project's emissions inventory is compared to the SCAQMD unadopted, proposed draft screening threshold for residential projects. Because the SCAQMD proposed draft screening threshold is not adopted and relies on outdated statewide goals, this analysis does not rely on this comparison for significance determination and provides it for informational purposes only.

When the SCAQMD unadopted tiered approach is applied to a proposed project, and the project is found not to comply with Tier 1 or Tier 2, the project's emissions are compared against a screening threshold, as described above, for Tier 3. The screening threshold formally adopted by South Coast AQMD is an "interim" screening threshold for stationary source industrial projects where the South Coast AQMD is the lead agency under CEQA. The threshold was termed "interim" because, at the time, South Coast AQMD anticipated that CARB would be adopting a statewide significance threshold that would inform and provide guidance to South Coast AQMD in its adoption of a final threshold. However, no Statewide threshold was ever adopted, and the interim threshold remains in effect.

For projects where South Coast AQMD is not a lead agency, no screening thresholds have been formally adopted. However, in 2008, the South Coast AQMD Threshold Working Group recommended a threshold of 10,000 $MTCO_2e$/year for industrial projects and 3,000 $MTCO_2e$/year for residential and commercial projects. The South Coast AQMD staff determined that these thresholds would "capture" 90 percent of GHG emissions from these sectors, "capture" meaning that 90 percent of total emissions from all new projects would be subject to some type of CEQA analysis (i.e., found potentially significant).[10]

4.5.4 METHODOLOGY AND ASSUMPTIONS

This section describes the methods used to develop the Project's GHG emissions inventories, which include construction and operational emissions. Sub-categories of GHG operational emissions include the following: 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

[10] South Coast AQMD. (2008). *Staff Report: Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, Attachment E: "Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*. Page 3-2.

activities emit GHGs, continue to evolve; as such, the inventories in this report reflect the guidance and knowledge currently available.

Units of Measurement: Metric Tons of Co2 And Co2e

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 manmade and that are emitted through the use of modern industrial products, such as hydrofluorocarbons (HFCs) and chlorofluorocarbons (CFCs). The most important greenhouse gas 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 80.1 percent of the GWP of all GHGs emitted by the United States.[10]

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 will contribute to global warming relative to how much warming would be caused by the same mass of CO_2.[19] CH_4 and N_2O are substantially more potent than CO_2, with GWPs of 25 and 298, respectively, see **Table 4.5-1**. 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.

In many sections of this report, including the final summary sections, 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.

In this report, emissions are 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®

The GHG Technical Report primarily utilized the California Emission Estimator Model version 2020.4.0 (CalEEMod®) 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 air pollutant and GHG emissions from development projects in California. CalEEMod® provides a simple platform to calculate both construction emissions and operational emissions for 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 also provides default values for water and energy use.

Additionally, CalEEMod® contains default values and existing regulation methodologies to use in each specific local air district region. Appropriate statewide default values can be utilized if regional default values are not defined. The GHG Technical Report 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. The CalEEMod® output files are provided for reference in **Appendix 4.5-1** to this report.

Indirect GHG Emissions From Electricity Use

Project-related electricity use results in indirect emissions, due to electricity generation activities occurring at offsite power plant locations. For this Project, Southern California Edison (SCE) would supply electric power to the site.

One-Time Emissions

One-time emissions are those emissions that are not recurring over the Project's life. This includes emissions associated with construction.

Construction Activities

This section describes the estimation of GHG emissions from construction activities at the Project site. The Project's major construction phases included in this analysis are:

- Demolition: involves tearing down of the existing building on the Project site.
- Site Preparation: involves clearing vegetation (grubbing and tree/stump removal) and stones prior to grading.
- Grading: involves the cut and fill of land to ensure the proper base and slope for the construction foundation.
- Building Construction: involves the construction of structures and buildings.
- Architectural Coating: involves the application of coatings to both the interior and exterior of buildings or structures.
- Paving: involves the laying of concrete or asphalt such as in parking lots or roads.

Emissions from these construction phases are largely attributable to fuel use from construction equipment and worker commuting.

Project construction is scheduled to begin in 2024 and be completed in 2027. The construction schedule, grading volumes, demolition waste volumes, and construction trip information is provided in **Appendix 4.5-1**. Construction emissions are estimated assuming one shift working up to eight hours per day, for six days in a week.

Estimated Emissions from Construction Equipment. The construction equipment emission calculations are from off-road equipment engine use based on the equipment list and phase length. Since the majority 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.

Estimated 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 vehicle miles traveled (VMT) along with emission factors from EMFAC2017. The numbers of worker and vendor trips were based on project-specific data. The number of haul trips was estimated based on the volume of soil to be exported, the amount of building square footage demolished, and the CalEEMod® default assumption for haul truck capacity.

Regulatory Measures. The Project would be subject to compliance with the applicable regulations and programs concerning construction emissions. These include the CARB airborne toxic control measures (ATCM) to limit diesel-fueled commercial motor vehicle idling, and CARB in-use Off-Road and On-Road regulations.

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 solid 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., lawn mowers), 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 lawn mowers. Based on CalEEMod® defaults, all operational days (i.e., 250 days per year) were assumed to be summer days, with no snow days.

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. The Project has no planned natural gas use.

Estimated Emissions from Swimming Pools. The Project proposes two heated pools. This analysis conservatively incorporates the emissions from the electricity associated with heating the pools and the electricity used to power the filters and pumps for 365 days/year.

Estimates Emissions from Building Energy Use. As mentioned above, GHGs are emitted from buildings because of activities for which electricity and natural gas are typically used as energy sources. As previously mentioned, 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.

Regulatory Measures. In California, Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting.[11] The 2022 Title 24 standards are the currently applicable building energy efficiency standards and became effective on January 1, 2023. 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. This is a conservative estimate of the Project's energy use as the Project would meet the 2022 Title 24 Part 6 Building Code. 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.

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.

Regulatory Measures. While the Project is subject to compliance with the CALGreen 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.

[11] Ramboll US Corporation. (2023). *Greenhouse Gas Technical Report – Normandie Apartments Project, Gardena, CA.*

Solid Waste

Municipal solid waste (MSW) is the amount of material that is disposed of by land filling, 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. 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.

Regulatory Measures. While the Project is expected to comply with the state's waste diversion goal of 75 percent waste diversion by 2020,[12] 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.

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 home for work, for shopping, and for other purposes. CalEEMod® uses various sets of trip type breakdown, based on land use type (e.g., residential, commercial, etc.). The residential trips, as described below, are considered for the Project.[14]

- **Residential Trips** – These trips include home-work (H-W), home-shop (H-S), or homeother (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 were shopping takes place (generally retail). An H-O represents all other types of trips generated from the resident such as school, entertainment, etc.

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 the GHG (and air pollutant) emissions.

[12] Ramboll US Corporation. (2023). *Greenhouse Gas Technical Report – Normandie Apartments Project, Gardena, CA.*

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.

Vehicle Fleet Mix. Vehicle fleet mix is another parameter used to estimate mobile source emissions from Project operation. 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.

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 noncommercial personal transportation in the state. In addition, the NHTSA and 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 the proposed project's motor vehicles.

4.5.5 PROJECT DESIGN FEATURES

The following Project design features (PDF) were incorporated into the analysis:

- **PDF AQ-1. Nonroad Diesel Engines:** The Project would utilize off-road diesel-powered construction equipment which would meet, at a minimum, the Tier 4 emission standards for nonroad diesel engines promulgated by the USEPA for equipment greater than 50 horsepower.[13]
- **PDF AQ-2/PDF GHG-1. Electrical Vehicle Charging Design:** The Project would comply with the California Green Building Standards Code (CALGreen Code) (California Code of Regulations Title 24, Part 11) for electric vehicle (EV) charging design. Compliance would provide 10% of parking stalls to be EV capable, 25% of parking stalls to be EV ready with Level 2 EV charging receptacles, and 5% of parking stalls to be equipped with Level 2 EV chargers. The final design may vary from this in compliance with the CALGreen Code.[14]
- **PDF AQ-3/PDF GHG-2. All-Electric:** There would be no natural gas use by any of the Project land uses.[15]

[13] The Project construction emissions inventory quantified this measure.
[14] The Project operational emissions inventory did not quantify this measure, but it has been included here qualitatively.
[15] The Project operational emissions inventory quantified this measure.

4.5.6 IMPACTS AND MITIGATION MEASURES

Impact 4.5-1:

Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact 4.5-2:

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

Quantification of Emissions

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 4.5-2: Summary of Construction GHG Emissions**. It is noted that the GHG emissions shown in **Table 4.5-2** 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 4.5-1**.

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.[15] 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.

Table 4.5-2: 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	234.36	39.86	23.61	52.25	350.09
2022	365.09	301.17	38.28	–	704.53
2023	364.32	375.53	56.40	–	796.25
Total	***238.75***	***244.91***	***37.10***	**–**	***520.76***
				30-year Amortized	**79**

1. Construction emissions include on-site and off-site (worker/vendor/hauling) emissions, estimated using CalEEMod. CO2e includes CO2, CH4, and N2O emissions, weighted by their respective global warming potentials.
2. CalEEMod - California Emissions Estimator Model

CH4 = methane; CO2 = carbon dioxide; CO2e = carbon dioxide equivalents; GHG = greenhouse gases; MT = metric tons; N2O = nitrous oxide; yr = year

Source: Ramboll US Corporation. (2023). Greenhouse Gas Technical Report Table 7; see **Appendix 4.5-1.**

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 Operations section below.

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 solid 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 mobile/traffic were calculated for the expected opening year (2027).

The Project's operational maximum opening year GHG emissions are included in **Table 4.5-3: Summary of Operational 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, onsite combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as offsite 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.

Table 4.5-3: Summary of Operational GHG Emissions

Emission Source	Annual Average GHG Emissions[1,2,3] ($MTCO_2e$/year)	
	Project	Existing Conditions[4]
Area Sources	7	0.003
Energy Usage	577	131
Water	118	97
Solid Waste Disposed	98	50
Mobile/Traffic	1,901	282
Operational Subtotal	*2,700*	*560*
Construction Amortized[5]	79	--
Total	***2,779***	***560***
Net Project GHG Emissions (Project minus Existing Conditions)[6]	**2,219**	

Notes:
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®. Refer to **Appendix 4.5-1** for further details.
2. Emissions are presented as CO_2e, which include CO_2, CH_4, and N_2O emissions, weighted by their respective GWP's.
3. Energy emissions for Full Buildout Operations include pool electricity usage, see **Appendix 4.5-1** for further details.
4. One-time emissions from construction were amortized over a 30-year period.
5. SCAQMD proposed draft screening threshold for residential projects. Available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significancethresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf?sfvrsn=2. Accessed: November 2022.
6. Sum of annualized one-time emissions and operational emissions may not add up due to rounding.

Source: Ramboll US Corporation. (2023). Greenhouse Gas Technical Report, included as **Appendix 4.5-1.** Table ES-1.

As shown in **Table 4.5-3**, the Project would result in an increase in GHG emissions as compared to existing conditions (i.e., operation of the Project site with industrial uses). The Project's net operational emissions would be approximately 2,219 $MTCO_2$. Therefore, although the Project would generate emissions directly and indirectly, Project emissions would not exceed SCAQMD's bright line, unadopted screening-level threshold. This comparison is provided for informational purposes only.

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, SB 32, the City of Gardena CAP, SCAG RTP/SCS (SB 375), and the CARB 2022 Scoping Plan Update.

AB 32 and SB 32 Regulatory Programs

The Project would not conflict with the applicable statewide and local regulatory programs. As discussed above, the Project would be subject to a number of regulatory programs intended to reduce GHG emissions consistent with AB 32 and SB 32.

The list below summarizes the regulations and regulatory programs related to the emission source categories:

- Energy Use:
  - CCR Title 20 Standards
  - CCR Title 24, Part 6 Standards (2022)
  - CCR Title 24, Part 11 Standards
  - California Renewable Portfolio Standard (SB X1 2)
- Water Supply, Treatment and Distribution:
  - Executive Order B-29-15
  - CCR 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
  - USEPA/NHTSA CAFE Standards (through model year 2018)
- Construction:
  - CARB In-Use Off-Road Regulation
  - CARB In-Use On-Road Heavy-Duty Diesel Vehicles Regulation

As previously noted, the net Project emissions are approximately 2,219 $MTCO_2$, which would not exceed 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 ensure no conflict with AB 32 and SB 32 would occur.

City of Gardena CAP

The City of Gardena's CAP seeks to identify community-wide strategies to lower GHG emissions and integrates these efforts with the other priorities such as economic development, regional mobility and connectivity, and improving the local air and water quality. The Project would not conflict with the Gardena CAP's primary goals and strategies. The Project would comply with California Code of Regulations California Green Building Standards Code, Title 24, Part 11 for EV charging design, which would in turn provide 10 percent of parking stalls to be EV capable, 25

percent of parking stalls to be EV ready with Level 2 EV charging receptacles, and 5 percent of parking stalls to be equipped with Level 2 EV chargers. Additionally, the Project would be built to meet the California Building Standards Code Title 24 and 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.

Table 4.5-4: City of Gardena Climate Action Plan Analysis evaluates the Project concerning the City of Gardena CAP. As indicated in **Table 4.5-4**, the Project would not conflict with the CAP's applicable primary strategies concerning land use development, including land use and transportation, energy efficiency, solid waste, and urban greening. As such, the Project would not conflict with the Gardena CAP concerning goals adopted for the purpose of reducing GHG emissions. A less than significant impact would occur in this regard, and no mitigation is required.

Table 4.5-4: City of Gardena Climate Action Plan Analysis

Strategy	Goal		Project Analysis
Land Use and Transportation (LUT)	**A**	Accelerate the market for EV vehicles	**No Conflict**. The Project would designate approximately 40 percent of the 399 parking stalls to be capable, ready, or equipped for EV Chargers. More specifically, the Project would provide 10 percent of parking stalls to be EV capable, 25 percent of parking stalls to be EV ready with Level 2 EV charging receptacles, and 5 percent of parking stall to be equipped with Level 2 EV Chargers.
	B	Encourage ride-sharing	**No Conflict**. A designated loading area at the apartment building along Normandie Avenue would be signed and distinguished (e.g., with paving and/or paint) such that it may be utilized as a pick-up and drop-off zone for ride-sharing services.
	C	Encourage transit usage	**No Conflict**. Existing GTrans bus stops are located less than 600 feet to the north of the Project site along 166th Street. The Project includes ROW improvements along 169th Street which would create a continuous pedestrian path and allow greater access to public transit opportunities. Additional Torrance Transit and Metro services are located approximately 0.25 mile south of the Project site, at the Artesia Boulevard and South Normandie Avenue intersection. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9 mile to the south, providing more access to public transit opportunities. Per the NCSP, new residents who sign a 12-month lease would be offered a one-time free monthly Metro pass.

Strategy	Goal		Project Analysis
	D	Adopt active transportation initiatives	**No Conflict**. The Project would provide 173 bicycle parking spaces on the first level of the apartment building (located in secured facilities accessible only by apartment building residents). All bicycle parking would be located in a safe, convenient location, encouraging the use of bicycle transportation by residents and guests.
	E	Parking strategies	**No Conflict**. The vehicle parking spaces would be unbundled from the rental of the apartment units to encourage alternate modes of transportation.
	F	Organizational strategies	**No Conflict**. The proposed apartment amenities include a multi-purpose office space to provide workspace for residents that work from home. Additionally, this amenity would encourage future residents to telecommute work and therefore reduce VMT.
	G	Land use strategies	**No Conflict**. The Project proposes 403 DU at a density of 77 (DU/AC). The apartment building would provide 155 DU/AC and the townhomes would provide 24 DU/AC.
	H	Digital technology strategies	**No Conflict**. The Project buildings would be capable of connection to a future fiber network in order to implement the South Bay Fiber-Optic Master Plan.[16]
Energy Efficiency (EE)	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	**No Conflict**. The Project would be built to meet the California Green Building Code. Additionally, the proposed pools would use electricity for filters, pumps, and water heating rather than natural gas.
	C	Increase energy efficiency in existing commercial units	**Not Applicable**. The Project site is currently occupied by industrial uses.
	D	Increase energy efficiency in new commercial developments	**Not Applicable**. The Project includes only residential uses.
	E	Increase energy efficiency through water efficiency	**No Conflict**. The Project would be subject to compliance with the California Green Building Code, which requires that indoor potable water use

[16] Magellan Advisors. (2017). *Fiber-Optic Master Plan – Prepared for the South Bay Workforce Investment Board and the South Bay Cities Council of Governments.*

Strategy	Goal		Project Analysis
			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	**No Conflict**. The Project would reduce the impervious surface area by 13.8 percent, thereby reducing the temperature of the site and surrounding area. The Project would also provide shade from providing 89 new trees.
	G	Participate in education, outreach, and planning for energy efficiency	**Not Applicable**. The Project is a new residential development, and as such, 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, and as such, would not directly be involved in planning for the City's infrastructure efficiency.
	J	Reduce energy consumption in the long- term	**No Conflict**. New residential and non-residential buildings would be subject to the 2022 Title 24 Part 6 Building Code.
Solid Waste (SW)	**A**	Increase Diversion and Reduction of Residential Waste	**No Conflict**. The Project would be subject to compliance with the state's waste diversion goal of 75 percent 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 (UG)	**A**	Increase and maintain urban greening in the community	**No Conflict**. The Project includes an increase of approximately 50,493 SF of open space and proposed to plant 89 new trees.
	B	Increase and maintain urban greening in municipal facilities	**Not Applicable**. The Project does not involve municipal facilities.
Energy Generation & Storage (EGS)	**A**	Support energy generation and storage in the community	**Not Applicable.** The Project is a new residential development, which would be serviced by SCE.
Sources: Refer to **Exhibit 2-4: Conceptual Site Plan** and **Appendix 4.5-1** for assumptions used in this analysis.			

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 will integrate land use and transportation strategies that will 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 and approximately 455,000 households in Los Angeles County from 2023 to 2045.[17] For Gardena, the 2020-2045 RTP/SCS projects an increase of 1,077 households between 2023 and 2045.[14] The Project proposes 403 dwelling units (DU), which is approximately 0.03 percent of the projected household growth for the region, approximately 0.09 percent of the projected household growth for Los Angeles County, and approximately 37 percent of the projected household growth for Gardena; see **Section 4.10: Population and Housing** for analysis. Therefore, the Project would not conflict with SCAG's 2020 RTP/SCS and the SCAQMD 2020 AQMP.

The SCAG RTP also identifies ten goals related to housing, transportation technologies, equity and resilience in order to adequately reflect the increasing importance of these topics in the region. **Table 4.5-5: RTP/SCS Goals Analysis** evaluates the Project's consistency with these goals. As indicated in **Table 4.5-5**, the Project would not conflict with the RTP/SCS Goals adopted for the purpose of reducing GHG emissions. As such, Project impacts concerning consistency with the RTP/SCS Goals would be less than significant, and no mitigation is required.

Table 4.5-5: RTP/SCS Goals Analysis

Goal		Project Analysis
Goal 1	Encourage regional economic prosperity and global competitiveness.	**Not Applicable.** The Project proposes residential uses only.
Goal 2	Improve mobility, accessibility, reliability, and travel safety for people and goods.	**No Conflict.** The Project includes ROW improvements along West 169th Street which would create a continuous pedestrian path and allow greater access to public transit opportunities. The Project proposes to construct sidewalks along the Project site frontage: on the south side of West 169th Street (between Brighton Way and South Normandie Avenue), on the north side of West 170th Street (between Brighton Way and South Normandie Avenue), on the west side of South Normandie Avenue (between West 169th Street and West 170th Street), and on the east side of Brighton Way (between West 169th Street and West 170th

[17] State of California, Department of Finance. (2023). *E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2023, Table 2: E-5 City/County Population and Housing Estimates.* Accessed May 2023.

Goal		Project Analysis
		Street). Additionally, the Project proposes to construct approximately 266 linear feet of offsite sidewalk improvements along the south side of West 169th Street, just west of the Project site, between Brighton Way and the alley just west of Brighton Avenue. Additionally, the Project includes railroad improvements on Normandie Avenue. Both ROW and Railroad improvements would upgrade existing infrastructure and increase mobility, reliability, and travel safety for people and goods.
Goal 3	Enhance the preservation, security, and resilience of the regional transportation system.	**No Conflict**. The Project includes railroad improvements on Normandie Avenue. These improvements would enhance the preservation, security, and resilience of the regional transportation system.
Goal 4	Increase person and goods movement and travel choices within the transportation system.	**No Conflict.** The Project includes sidewalk improvements, as described in Goal 2 above. The Project also proposes railroad track improvements along South Normandie Avenue, which include the following: • Removing the spur track, which enters the Project site. • Removing approximately 830 linear feet of railroad spur currently located along the Project site's eastern boundary. • A new median both north and south of the track alignment, and • New warning devices and tactile warning strips on the South Normandie Avenue east and west sidewalks. • Refreshing railroad crossing pavement markings immediately north and south of the track alignment.
Goal 5	Reduce greenhouse gas emissions and improve air quality.	**No Conflict.** The Project site is in an urban area near existing transit routes and freeways. The Project's location within an urbanized, walkable area would reduce trip lengths, which would reduce GHG and air quality emissions.
Goal 6	Support healthy and equitable communities	**No Conflict.** The Project does not exceed South Coast AQMD's regional or localized thresholds. Based on the Friant Ranch decision, projects that do not exceed the South Coast AQMD's localized significance thresholds (LSTs) would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and result in no criteria pollutant health impacts.

Goal		Project Analysis
Goal 7	Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Not Applicable.** This is not a project-specific goal.
Goal 8	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**No Conflict.** As mentioned previously, the Project would designate approximately 40 percent of the 559 parking stalls to be capable, ready, or equipped for EV Chargers. Each townhome unit would have one EV ready space within each garage. Additionally, a designated loading area at the apartment building along Normandie Avenue would 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.
Goal 9	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**No Conflict.** The Project proposes various housing types that would provide diverse housing options and be served by public transit located within approximately 0.25 mile of the Project site. Existing GTrans bus stops are located less than 600 feet north of the Project site along 166th Street. Additional Torrance Transit and Metro services are located approximately 0.25 mile south of the Project site, at the Artesia Boulevard and South Normandie Avenue intersection. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9 mile south of the Project site, providing more access to public transit opportunities. The Project includes ROW improvements along 169th Street, which would create a continuous pedestrian path and allow greater access to public transit opportunities. Further, the Project would provide new residents who sign a 12-month lease one free monthly Metro pass.
Goal 10	Promote conservation of natural and agricultural lands and restoration of habitats.	**Not Applicable.** The Project site is not located on agricultural lands and does not contain native habitat.

Source: Southern California Association of Governments. (2020). *Connect SoCal (2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy.*

The SCAG RTP also outlines seven guiding principles which take the goals outlined above in **Table 4.5-4** and focuses them, creating a specific direction for plan investments. **Table 4.5-6: RTP/SCS Guiding Principles Analysis** evaluates the Project's consistency with these guiding principles. As indicated in **Table 4.5-6**, the Project would not conflict with the RTP/SCS Guiding Principles adopted for the purpose of reducing GHG emissions. As such, Project impacts

concerning consistency with the RTP/SCS Guiding Principles would be less than significant, and no mitigation is required.

Table 4.5-6: RTP/SCS Guiding Principles Analysis

Guiding Principle		Project Analysis
Guiding Principle 1	Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.	**Not Applicable.** The Project proposes residential development.
Guiding Principle 2	Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.	**No Conflict.** The Project does not involve transportation funding. Notwithstanding, as mentioned above, the Project includes ROW improvements both offsite and along the Project frontage which would create a continuous pedestrian path and allow greater access to public transit opportunities. Additionally, the Project includes railroad improvements on Normandie Avenue, which would upgrade and preserve the existing rail line. For further discussion on railroad improvements, see **Section 4.14: Transportation**. Both ROW and Railroad improvements would improve mobility, accessibility, reliability and safety, and preserve the existing transportation system.
Guiding Principle 3	Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.	**No Conflict**. The Project assures that land use and growth strategies recognize local input through the CEQA Notice of Preparation (NOP) process. As outlined in **Section 4: Environmental Analysis**, the Project received multiple public comments which have been addressed in various sections of this document. The Project would also promote sustainable transportation options by encouraging the use of existing public transit through the following features: ▪ The Project site would be located where multiple public transit opportunities are located. Public transit services are provided by GTrans, Torrance Transit and Metro Further, the Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9 mile to the south, providing more access to public transit opportunities.

Guiding Principle		Project Analysis
		▪ The NCSP allows new residents who sign a 12-month lease would be offered one free monthly Metro pass. Further, the Project would support equitable and adaptable communities by offering various types of housing options which include studio, 1- and 2-bedroom apartments, townhomes, and affordable housing units. The variety of housing options would allow people of various incomes to reside within the City.
Guiding Principle 4	Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	**No Conflict**. As mentioned above, the Project would promote sustainable transportation options by encouraging the use of existing public transit through the following features: ▪ The Project site would be located where multiple public transit opportunities are located. ▪ The NCSP allows new residents who sign a 12-month lease would be offered one free monthly Metro pass. Collectively, these features would result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.
Guiding Principle 5	Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions	**Not Applicable.** The Project proposes residential development.
Guiding Principle 6	Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.	**Not Applicable.** This guiding principle refers to a SCAG responsibility and does not apply to the proposed Project.
Guiding Principle 7	Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.	**No Conflict.** Analysis of the Project was conducted with the most current information and resources available at the time the NOP was released as required per CCR §15125.1(a).

Source: Southern California Association of Governments. (2020). *Connect SoCal (2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy.*

CARB Scoping Plan Consistency

Pursuant to AB 32 requirements, CARB adopted the Climate Change Scoping Plan (Scoping Plan) in 2008, which provides a range of GHG reduction actions. There were three previous Scoping

Plans, which focused on specific GHG reduction targets for industrial, energy, and transportation sectors — first to meet 1990 levels by 2020, then to meet the more aggressive target of 40 percent below 1990 levels by 2030. The 2022 Scoping Plan, addressing recent legislation and direction from Governor Newsom, extends and expands upon earlier plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. These measures build upon those identified in the Scoping Plan's first update in 2013.

Table 4.5-7: CARB Scoping Plan Analysis identifies the key attributes for residential (and mixed-use) projects to qualitatively determine consistency with the Scoping Plan and evaluates the Project's consistency with these attributes. As indicated in **Table 4.5-7**, the Project would be consistent with these key attributes, thus, would not conflict with the CARB Scoping Plan GHG reduction goals. As such, the Project would not conflict with the Scoping Plan. Project impacts would be less than significant, and no mitigation is required.

Table 4.5-7: CARB Scoping Plan Analysis

Priority Areas	Key Project Attributes	Project Analysis
Transportation and Electrification	Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval.	**No Conflict.** The proposed Project would comply with the CALGreen Code for electric vehicle (EV) charging design. Compliance would provide 10 percent of parking stalls to be EV capable, 25 percent of parking stalls to be EV ready with Level 2 EV charging receptacles, and 5 percent of parking stalls to be equipped with Level 2 EV chargers. The final design may vary from this in compliance with the CALGreen Code.
VMT Reduction	Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer).	**No Conflict.** The Project is proposed on an infill site that is entirely surrounded by existing urban uses. The Project proposes to redevelop an underutilized industrial property that is presently served by existing utilities and essential services; see **Section 4.15: Utility and Services Systems** and **Section 4.11: Public Services**, respectively. As such, the Project would limit urban sprawl.
	Does not result in the loss or conversion of natural and working lands.	**No Conflict.** The Project is proposed on a site that is currently occupied by industrial uses and devoid of natural or working lands. Therefore, no loss or conversion of such lands would occur.
	Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre) or is in proximity to existing	**No Conflict.** The Project proposes 403 DU at a density of 77 DU/AC. The Project is proposed on an infill site and is accessible

Priority Areas	Key Project Attributes	Project Analysis
	transit stops (within a half mile) or satisfies more detailed and stringent criteria specified in the region's SCS.	to public transit via bus service provided within approximately 0.25 mile of the Project site. Existing GTrans bus stops are located less than 600 feet to the north of the Project site along 166th Street. Additional Torrance Transit and Metro services are located approximately 0.25 mile to the south of the Project site, at the Artesia Boulevard and South Normandie Avenue intersection. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9 mile to the south, providing further access to public transit opportunities. The Project includes ROW improvements along 169th Street which would create a continuous pedestrian path and allow greater access to public transit opportunities. Further, the Project would provide new residents who sign a 12-month lease one free monthly Metro pass.
	Reduces parking requirements by: ▪ Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or ▪ Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or ▪ For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.	**No Conflict.** The Project would include 1.2 parking spaces per apartment DU, which is less than Gardena Municipal Code requirements. Additionally, parking would be provided unbundled from apartment rents.
	At least 20 percent of units included are affordable to lower income residents.	**Conflict.** While the Project would not include 20 percent of units as affordable housing, the Project would include 5.0 percent (20 DU) of units as affordable. This conflict is considered a less than significant impact given the Project complies with the City's development standards and supports the goal of providing affordable housing.
	Results in no net loss of existing affordable units.	**No Conflict.** There are no existing affordable units on the Project site.

Priority Areas	Key Project Attributes	Project Analysis
Building Decarbonization	Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking.	**No Conflict.** The proposed Project would meet the 2022 Title 24 Part 6 building code and Title 24 Part 11 (CalGreen) standards. In addition, the Project would be all electric, requiring no natural gas.
Sources: Refer to **Exhibit 2-4** and **Appendix 4.5-1** for assumptions used in this analysis.		

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, SCAG's RTP/SCS, and the Scoping Plan. 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, and no mitigation is required.

Mitigation Measures

No mitigation is required.

4.5.7 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 4.5-2**, 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 not conflict with the City's CAP. In addition, the Project would not conflict with the 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.

4.5.8 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning GHG emissions have been identified.

4.5.9 REFERENCES

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Intergovernmental Panel on Climate Change. (2013). *Carbon and Other Biogeochemical Cycles. In: Climate Change 2013: The Physical Science Basis, Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change.* Retrieved from: http://www.climatechange2013.org/images/report/WG1AR5_ALL_FINAL.pdf. Accessed June 2023.

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4.6 HAZARDS AND HAZARDOUS MATERIALS

4.6 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, and evaluate potential impacts that could result from Project implementation. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or lessen the Project's potentially significant impact.

Information concerning the Project site's southern portion (APN 6106-030-017) in this section is based primarily on data from the following resource:

- Partner Engineering and Science, Inc., *Phase I Environmental Site Assessment Report, Food & Beverage Processing Plant, 16911 South Normandie Avenue*, Gardena, California, January 7, 2021; see **Appendix 4.6-2: South Phase I ESA.**

Information concerning the Project site's northern portion (APNs 6106-030-011, 6106-030-015, and 6106-030-016) in this section is based primarily on data from the following resources:

- Partner Engineering and Science, Inc., *Phase I Environmental Site Assessment Report, 16831 South Normandie Avenue*, Gardena, California, July 13, 2021; see **Appendix 4.6-1: North Phase I ESA.**
- Partner Engineering and Science, Inc., *Assessment Report 16829-16839 South Normandie Avenue*, Gardena, California, November 4, 2021; see **Appendix 4.6-3: Soil/Gas Phase II.**
- Partner Engineering and Science, Inc., *Phase II Subsurface Investigation Report 16829-16839 South Normandie Avenue*, Gardena, California, July 26, 2021; see **Appendix 4.6-4: Soil/Groundwater Phase II.**
- Hillman Consulting, *Opinion Letter: Light Industrial Property 16829-16839 South Normandie Avenue*, Gardena, California, July 26, 2021; see **Appendix 4.6-5: Opinion Letter.**
- Hillman Consulting, *Technical Memorandum Vapor Intrusion Risk Evaluation 16829-16839 South Normandie Avenue*, Gardena, California, August 11, 2023; see **Appendix 4.6-6: VIRE.**

It is noted, Kimley-Horn conducted third-party reviews on behalf of the City of Gardena ("City"), as listed below. The third-party reviews concluded the analyses meet the applicable provisions of Environmental Quality Act (CEQA) and the State CEQA Guidelines.

- Kimley-Horn and Associates, *Hazardous Materials Data for Normandie Crossing Project Peer Review*, Orange, California, March 15, 2023; see **Appendix 4.6-1.**
- Kimley-Horn and Associates, *Supplemental Hazardous Materials Data for Normandie Crossing Project Peer Review*, Orange, California, March 15, 2023; see **Appendix 4.6-3.**

- Kimley-Horn and Associates, *Vapor Intrusion Risk Evaluation for Normandie Crossing Project Peer Review*, Orange, California, September 7, 2023; see **Appendix 4.6-6**.

Due to multiple phases of due diligence and acquisitions, Phase I Environmental Site Assessments (Phase I ESAs) were completed separately for the Project site's northern portion (16831 South Normandie Avenue; see **Appendix 4.6-1**) and southern portion (16907-16911 South Normandie Avenue; see **Appendix 4.6-2**).

The Phase I ESA for the Project site's northern portion (see **Appendix 4.6-1**) identified the release of volatile organic compounds (VOCs) and petroleum hydrocarbons, thus, a Phase II ESA was recommended and performed. The Phase II consisted of two parts: a July 2021 assessment of soil, gas, and groundwater samples (see **Appendix 4.6-3**); and a November 2021 supplemental investigation of VOCs (see **Appendix 4.6-4**).

4.6.1 EXISTING SETTING

Site Reconnaissance

Methodology and Limiting Conditions

Partner Engineering and Science, Inc. (Partner) conducted a Phase I ESA for the Project site's northern and southern portions (see **Appendix 4.6-1** and **Appendix 4.6-2**, respectively). The assessments were performed in conformance with the ASTM Practice E1527-13 Standard Practice for Environmental Site Assessments and included: 1) a property and adjacent site reconnaissance; 2) interviews with key personnel; 3) review of historical sources; 4) review of regulatory agency records; and 5) review of regulatory database report provided by a third-party vendor. Partner contacted local agencies, such as environmental health departments, fire departments, and building departments to determine any current and/or former hazardous substance usage, storage, and/or release of hazardous substances on the Project site. Additionally, Partner researched information on the presence of activity and use limitations (AULs) at these agencies. Specific limitations and exceptions to the ESAs are described below:

Interviews with past owners, operators and occupants were not reasonably ascertained and thus constitute a data gap. Based on information obtained from other historical sources, this data gap is not expected to alter the findings of this assessment.

Partner requested information relative to deed restrictions and environmental liens, a title search, and completion of the AAI User Questionnaire from the Report User. This information was not provided at the time of the assessment. Based on information obtained from other historical sources, this data gap is not expected to alter the findings of this assessment.

Partner was unable to determine the property use at five-year intervals, which constitutes a data gap. Except for property tax files and recorded land title records, which were not considered to

be sufficiently useful, Partner reviewed all standard historical sources and conducted appropriate interviews.

Partner submitted Freedom of Information Act (FOIA) requests to the Los Angeles County Department of Public Health for information pertaining to hazardous substances, underground storage tanks, releases, inspection records, etc. for the property and/or adjacent properties. As of January 7, 2021, this agency has not responded to Partner's request. Based on information obtained from other historical sources, this limitation is not expected to alter the overall findings of this assessment.

Current Use

The Project site is currently developed as an industrial park that encompasses land south of 169th Street and north of 170th Street. The Project site is fully developed with six industrial buildings: three light industrial buildings at the northern portion (APNs 6106-030-011, 6106-030-015, and 6106-030-016); and three industrial/office buildings at the southern portion (APN 6106-030-017). In addition to the buildings, the Project site is also improved with asphalt-paved and unpaved parking areas.

The Project site's southern portion contains a vacant production building (16907 South Normandie Avenue), a vacant office building (16911 South Normandie Avenue), and a warehouse building (16911 South Normandie Avenue).

One the three light industrial buildings at the Project site's northern portion contains approximately 9,324 SF of industrial floor area that is in a dilapidated condition and is therefore not being used or occupiable. The other light industrial buildings on the Project site's northern portion are currently occupied by Property Prep Services and leased out to general office and storage tenants. Onsite operations consist of the storage of power wash equipment that is used during the prep and cleaning of parking structures. The property has equipped with an aboveground clarifier that is used to separate sediment from dirty wash water that is brought in from offsite cleaning operations.

The production building, office building, and warehouse at the southern portion are currently unoccupied, with the exception of the warehouse building that is currently being cleared of storage. The property consists of one single-story production building with a mezzanine level, one single-story office building, and one single-story warehouse building. In addition to the current structures, the property is also improved with a railroad spur, loading docks, asphalt-paved parking areas, and drainage features.

Current Use of Adjacent Properties

Table 2-2: Surrounding Land Uses and Zoning in **Section 2.0: Project Description**, describes the land uses on properties adjoining the Project site that Partner observed during the vicinity reconnaissance.

General Site Characteristics

Solid Waste Disposal. Solid waste generated at the Project site is disposed of in commercial dumpsters located on the site. An independent solid waste disposal contractor, Waste Resources, removes solid waste from the site. According to property personnel, only household trash is collected in the onsite solid waste dumpsters. No evidence of illegal dumping of solid waste was observed during the Partner site reconnaissance.

Sewage Discharge and Disposal. Sanitary discharges from the site are directed into the municipal sanitary sewer system. The City and Los Angeles County Sanitation District serve uses in the vicinity of the Project site. No wastewater treatment facilities or septic systems were observed or reported on the Project site.

Additionally, the three light industrial buildings at the Project site's northern portion were equipped with an aboveground clarifier/water treatment system.

Surface Water Drainage. Stormwater is discharged from the Project site primarily by sheet flow action across the paved surfaces towards stormwater drains located throughout the site and public right-of-way. Stormwater collected in landscaped areas percolates into the soil with overflow spilling onto adjacent paved areas. The Project site is connected to a municipal owned and maintained stormwater system.

The property is not a designated wetland area, based on information obtained from the U.S. Fish and Wildlife Service. No surface impoundments, wetlands, natural catch basins, settling ponds, or lagoons are located on site. No drywells were identified on the Project site.

Source of Heating and Cooling. Heating and cooling systems as well as domestic hot water equipment are fueled by electricity and natural gas provided by Southern California Edison and Southern California Gas Company, respectively. Heating and cooling systems for existing buildings onsite mostly consist of roof-mounted HVAC units.

Wells and Cisterns. No aboveground evidence of wells or cisterns was observed during the site reconnaissance.

Wastewater. The three industrial buildings at the Project site's northern portion are equipped with an above-ground clarifier/water treatment system. Domestic wastewater generated at the production building, office building, and warehouse (southern portion) is disposed by means of the sanitary sewer system. No industrial process is currently performed at the Project site.

Septic Systems. No septic systems were observed or reported on the Project site.

Potential Environmental Hazards

Hazardous Substances and Petroleum Products Used or Stored at the Site. Partner identified hazardous substances used, stored, and/or generated on the three light industrial buildings at the northern portion of the site, which are listed in **Table 4.6-1: Hazardous Substances and Petroleum Products Noted at Northern Portion of Project Site.** The materials were found to be properly labeled and stored at the time of the assessment, and there were no signs of leaks, stains, or spills. Secondary containment is not provided. Based on the nature of use, overall small quantities observed, and lack of violations, these materials are not expected to represent a recognized environmental concern (REC).

Table 4.6-1: Hazardous Substances and Petroleum Products Noted at Northern Portion of Project Site

Substance	Container Size	Location	Nature of Use	Disposal Method
Used Oil Filters	1 x 55-gallon drum	Warehouse area	Equipment maintenance	Transported offsite by Safety-Kleen monthly
Oil	2 x 55-gallon drum	Warehouse area	Equipment maintenance	N/A
Paints	Various 5-gallon cans	Warehouse area	Concrete striping	N/A
Dirty Wash Water	Two 250-gallon totes	Exterior storage area	Offsite concrete power washing	Onsite water treatment system
Source: **Appendix 4.6-1.**				

No hazardous substances or petroleum products were observed at the southern portion during the site reconnaissance.

Aboveground and Underground Hazardous Substance or Petroleum Product Storage Tanks (ASTs/USTs). No evidence of current or former ASTs or USTs were observed during the site reconnaissance for the northern portion.

In the southern portion, there are circular concrete pads on the exterior of the production building indicative of the use of former ASTs. According to a 1993 Equipment Plan of the packaging area, the property was equipped with one 20,000-gallon syrup AST, one 20,000-gallon fructose AST, one 10,000-gallon water supply AST, and one 10,000-gallon sugar AST. Based on the non-hazardous nature of contents, no RECs were identified in connection with the former ASTs. Additionally, a concrete cut at the exterior of the warehouse building appears to have been related to former USTs.

Evidence of Releases. Black surface staining near damaged concrete was observed in the southwest corner of the equipment storage yard at the site's northern portion. According to the regulatory database report, four open-top poly drums of unidentified dark sludge/liquid were located near the southwest corner of the equipment storage yard during the fire department's

routine inspection in 2020. A proper waste determination had reportedly not been made at the time; however, compliance was subsequently achieved in September 2020. The area of staining appeared to be primarily confined to the concrete surface with some minor impacts to surface soil in the areas of damaged concrete. Based on the limited extent of the staining, surficial nature, and proper offsite removal of the former drums, this area of black staining is considered de minimis and not a recognized environmental concern at this time.

No spills, stains, or other indications that a surficial release occurred in the southern portion were observed.

Polychlorinated biphenyls (PCBs). The on-site reconnaissance addressed indoor and outdoor transformers that may contain PCBs. Three modern-style pole-mounted transformers, one pad-mounted transformer, and four interior dry-type transformers were observed on the Project site. The transformers are not labeled indicating PCB content. No staining or leakage was observed in the vicinity of the transformers. Based on the good condition of the equipment, the transformers are not expected to represent a recognized environmental concern.

Additionally, no other potential PCB-containing equipment (oil-filled switches, hoists, lifts, dock levelers, hydraulic elevators, balers, etc.) was observed during Partner's reconnaissance.

Strong, Pungent, or Noxious Odors. No strong, pungent, or noxious odors were evident at the Project site during the site reconnaissance.

Pools of Liquid. No pools of liquid were observed on the Project site during the site reconnaissance.

Drains, Sumps, and Clarifiers. The industrial buildings in the northern portion are equipped with an aboveground clarifier/water treatment system. This feature is within a concrete-bermed area with no indications of a release within containment. This feature is permitted with the Los Angeles Department of Public Works (LACDPW), and no significant violations or releases have been reported in connection with the feature. Based on the aboveground nature and regulatory status, the aboveground clarifier/water treatment system is not considered a REC. No other drains, other than those associated with stormwater removal, were observed on the northern portion during the site reconnaissance.

No clarifiers were observed during Partner's site reconnaissance at the southern portion; however regulatory records indicate clarifier and "interceptors" systems were historically located on the property.

One sump pump was observed next to the fire riser on the warehouse building's southern wall. Another sump pump was observed that is used for stormwater drainage. No hazardous substances or petroleum products were noted in the vicinity of the sump pumps. Based on the nature of use of the sump pumps, these units are not expected to represent a recognized

environmental concern. No other drains, other than those associated with stormwater removal, were observed on the Project site during the site reconnaissance.

Pits, Ponds, and Lagoons. No pits, ponds or lagoons were observed on the site.

Stressed Vegetation. No stressed vegetation was observed on the site.

Additional Potential Environmental Hazards. No additional environmental hazards, including landfill activities or radiological hazards, were observed at either the northern or southern portions.

Railroad and Utility Corridors, and Roads— A railroad spur diverges from the rail right-of-way at the property's southeast portion. The spur runs to the property's northwestern portion. This feature was investigated as part of the 2020 South Phase I; see **Appendix 4.6-2**. Hazardous substances potentially associated with railroad and utility corridors include heavy metals in ballast rock, lead (from wood preservatives), herbicides, PCBs, asbestos (from train disc brake pads), creosote (from railroad ties), arsenic (from railroad ties and some herbicides), and petroleum hydrocarbons. The assessment found no concentrations of these substances above regulatory thresholds and did not recommend further evaluation of the rail spur.

Non-ASTM Services

Asbestos Containing Materials (ACMs). Partner was not provided building plans or specifications for review, which may have been useful in determining areas likely to have used ACMs. However, based on the age of the buildings, there is a potential that ACMs are present.

Lead Based Paint (LBP). Based on the age of the buildings (pre-1978), there is a potential that LBP is present. Interior and exterior painted surfaces were observed in good condition and therefore not expected to represent a "hazard," although the condition of the paint should be monitored and maintained to ensure that it does not become deteriorated.

Radon. Radon sampling was not conducted as part of this assessment. Review of the US EPA Map of Radon Zones places the property in Zone 2 (moderate potential for elevated radon levels). Based upon the radon zone classification, radon is not considered to be a significant environmental concern.

Lead in Drinking Water. According to available information, Golden State Water Company serves the Project site. Golden State Water Company sources are a blend of groundwater pumped from the West Coast and Central Groundwater Basins and imported water from the Colorado River Aqueduct and the State Water Project. According to Golden State Water Company 2019 Annual Water Quality Report, water supplied to the site complies with all federal and state regulations pertaining to drinking water standards, including lead and copper.

Mold. Partner inspected accessible interior areas of the buildings for significant evidence of mold growth (exceptions detailed in Section 1.5 of **Appendix 4.6-1** and **Appendix 4.6-2**). No obvious indications of water damage or mold growth were observed during Partner's site reconnaissance.

Adjacent Property Reconnaissance. No RECs were identified on the adjacent properties during the site reconnaissance, including hazardous substances, petroleum products, ASTs, USTs, evidence of releases, PCBs, strong or noxious odors, pools of liquids, sumps or clarifiers, pits or lagoons, stressed vegetation, or any other potential environmental hazards.

Historical Information

Research was conducted during the Phase I ESAs 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.

Northern Portion of Project Site. According to available historical sources, the site was formerly occupied by a rural residence from at least 1928 until at least 1952. The property appears to have been occupied by industrial operations since construction of the first building in 1957. One industrial building was developed in 1957; the second was developed in 1963; and the third industrial building was developed by 1976. The three light industrial buildings have been occupied by various light-industrial tenants since initial development in 1957. These tenants have included two machine shops, an auto body repair operation, an engine repair business (FM Engine), a cabinet maker, and several manufacturing entities, all operations that would have used or stored hazardous substances. There were RECs and "Environmental Issues" that were identified during the Phase I ESA; see **Appendix 4.6-1**.

Recognized Environmental Conditions

Several of the manufacturing tenant listings were prior to 1980, thus, there is no documentation pertaining to historical hazardous substance use, storage, or disposal practices. Additionally, several paint booths were historically identified in connection with former tenants Avenue Auto Body and KS Custom Cabinets, which confirms the historical onsite usage of solvents. Based on the plan to redevelop this site with a sensitive receptor (i.e., residential development), the long-term duration of use/occupancy by businesses that used, stored, and disposed of hazardous substances (60+ years), and lack of any subsurface data, the long-term light-industrial usage of the Project site is considered to be a REC.

Environmental Issues

According to California Division of Oil, Gas and Geothermal Resources (CalGEM), no oil or gas wells are located on or immediately adjacent to the site. The closest well was identified to be located approximately 480 feet south of the site and is reported as "abandoned."

As previously addressed, due to the age of the buildings, there is a potential that ACMs and/or lead-based paint (LBP) are present. Readily visible suspect ACMs and painted surfaces were observed in good condition. The identified suspect ACMs and LBPs would need to be sampled to confirm the presence or absence of asbestos or lead prior to any renovation or demolition activities to prevent potential exposure to workers and/or building occupants.

Southern Portion of Project Site. According to available historical sources, the southern portion is shown with no structural improvements as early as 1896. In 1928 one residential and one ancillary structure were constructed, and the remainder of the property was in agricultural use from 1928 to 1947. In 1952 the industrial building and one residence were developed. In 1953 and 1967 the remaining industrial structures and a rail spur running into the northwestern building were developed. Former on-site operations included office activities, packaging and warehousing operations, and manufacturing of fruit bases for use in preparation of yogurt, ice creams, and pies. Various tenants have occupied the site from 1928 through 2019. There were no RECs or Controlled Recognized Environmental Condition (CRECs) identified, but there were Historical Recognized Environmental Conditions (HRECs) and "Environmental Issues" that were identified during the Phase I ESA and are described below:

Historical Recognized Environmental Conditions

The property was formerly equipped with one 10,000-gallon diesel UST and one 2,500-gallon diesel UST along the northern exterior of the warehouse building. The property also historically contained one 550-gallon fuel UST on the southern exterior of the production building. It was determined that impacted soils had been successfully removed and perched ground water had not been impacted. Regulatory closure was issued by the Los Angeles County Department of Public Works on November 2, 1989 for the 10,000-gallon diesel UST and 2,500-gallon diesel UST and on July 28, 1994 for the 550-gallon fuel UST.

Based on the removal of the USTs, the removal of impacted soils, and regulatory closures, the releases at the former USTs on the property represent an HREC and no further investigation is considered necessary; see **Appendix 4.6-1**.

Environmental Issues

Several additional areas of potential environmental concern were identified in connection with the historical operations at the Project site including the following: a railroad spur, washout area, chemical storage area, former clarifier, storage yard, testing laboratory, maintenance area, and

former ASTs and refrigerant system. Additionally, due to the age of the buildings, there is a potential that ACMs and/or LBP are present.

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.

The Project site was identified in various databases in the regulatory database report searched by EDR. The site is not included on the list of hazardous materials sites compiled pursuant to Government Code §659621.5.1. Therefore, no further analysis is required.

The properties adjacent to the north, south (southern portion of Project site), and east were identified in various databases in the regulatory database report searched by EDR; see **Appendix 4.6-2** for the full database report.

Phase II Subsurface Investigation

There were no RECs or Controlled Recognized Environmental Condition (CRECs) identified in the Phase I performed for the Project site's southern portion, and the Historical Recognized Environmental Conditions (HRECs) and "Environmental Issues" that were identified during the Phase I ESA for the Project site's southern portion did not necessitate a Phase II investigation. Therefore, the discussion below focuses on the Project site's northern portion.

Northern Portion of the Project Site. Following the Phase I ESA, a Phase II Investigation was performed for the northern portion of the Project site to evaluate the potential impact of petroleum hydrocarbons and VOCs to soil gas, soil, and/or groundwater as a consequence of a release or releases from the current and/or former on-site industrial activities. The Phase II investigation included observations of site conditions and laboratory analysis of soil, groundwater, and soil gas samples taken at the Project site. Soil samples were analyzed for TPH-cc, PAHs, and VOCs, groundwater samples were analyzed for PAHs and VOCs, and soil gas samples were analyzed for VOCs. Results from soil sampling indicated various VOC's, PAHs, DRO and ORO were detected but did not exceed the respective regulatory thresholds for residential uses. Results from groundwater samples indicated that various VOC's and PAH naphthalene were detected, but also did not exceed the respective regulatory thresholds.

Results from the soil gas sampling indicated several VOCs including Benzene, ethylbenzene, methylene chloride, tetrachloroethene -PCE, and trichloroethene – TCE exceeded residential screening levels, and some exceeded commercial screening levels. The Phase II Investigation recommended conducting post-grading soil gas sampling to confirm whether soil gas concentrations have been reduced to acceptable concentrations.

A Vapor Intrusion Risk Evaluation (VIRE) was conducted in September 2022 and updated in August 2023. 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 exposure under for the proposed townhomes and apartments. The cancer risk estimated to result from unmitigated vapor intrusion at the apartment buildings was below the DTSC threshold. However, the townhomes were estimated to have estimated cancer risks exceeding the DTSC threshold. Therefore, the VIRE recommends that an engineered vapor mitigation measure (such as an impermeable membrane) be included in the design of any townhome and that parking structures include sufficient ventilation to minimize accumulation of VOCs on the Project site.

Proximity to Schools

There are no schools located within 0.25 mile of the Project site. The school nearest the Project site is Peary Middle School, located approximately 0.4 mile north of the Project site, at 1415 West Gardena Boulevard.

Proximity to Airports

The airport nearest the Project site is Hawthorne Municipal Airport/Jack Northrop Field, located approximately 3.4 miles north of the Project site. 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, which are pre-identified for use during times of crisis.[2] 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 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 designates Artesia Boulevard to the south and I-110 to the east as disaster routes.[3] The City does not designate disaster or evacuation routes.

[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.
[2] Los Angeles County Dept. of Regional Planning. (2008). *Disaster Routes with Road Districts: South Los Angeles County.* https://pw.lacounty.gov/dsg/DisasterRoutes/map/disaster_rdm-South.pdf
[3] Ibid.

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.[4]

4.6.2 REGULATORY SETTING

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 geology- and soils-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.

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

[4] CalFire. (2022). FHSZ Viewer. https://egis.fire.ca.gov/FHSZ/

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).

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/Spill Prevention Control and Countermeasure (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 to issue an NPDES General Construction Storm Water Permit, referred to as the "Construction Stormwater General Permit." Construction activities can comply with and be covered under the Construction Stormwater General 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 Stormwater 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)

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 §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); Above ground 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 §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 California Health and Safety Code Chapter 6.95 Article 1 – Hazardous Materials Release Response and Inventory Program (§§25500 to 25520), Article 2 – Hazardous Materials Management (§§25531 to 25543.3).

CCR Title 19, Division 2, Chapter 4, 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 §§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.

2022 California Fire Code

CCR Title 24, Part 9 (2022 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 2022 (effective January 1, 2023). 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 2022 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 2022 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 2017 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.

4.6.3 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 **Section 7.0: Effects Found Not To Be Significant**);
- 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 4.7-1**);
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school (see **Section 7.0: Effects Found Not To Be Significant**);
- 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 **Section 7.0: Effects Found Not To Be Significant**);
- 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 **Section 7.0: Effects Found Not To Be Significant**);

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan (see **Section 7.0: Effects Found Not To Be Significant**); 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: Effects Found Not To Be Significant**).

4.6.4 IMPACTS AND MITIGATION MEASURES

Impact 4.6-1:

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?

Level of Significance: Less Than Significant With Mitigation Incorporated

Construction

Project construction would include demolition of all structures and complete over-excavation and re-compaction of soils, which could be contaminated.

The existing buildings were noted as a REC due to potential ACM and LBP. Demolition of the onsite buildings 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. Condition of Approval (COA) HAZ-1 requires an ACM and LBP survey of the existing onsite buildings. COA HAZ-1 includes measures for the safe dismantling and removal of building components and debris and prevents the accidental release of asbestos, and COA HAZ-2 includes measures to safely demolish structures containing potential LBP, thereby protecting workers and the public from potential exposure to hazardous materials and wastes during demolition. Therefore, following compliance with COA HAZ-1 and COA HAZ-2, the potential presences of these materials would not result in a significant hazard to the public through reasonably foreseeable upset and accident conditions.

As previously addressed, the Phase I ESAs identified various onsite RECs associated with past uses of the Project site. Additionally, there could be other undocumented contamination associated with previous uses on the Project site. Therefore, Project demolition and construction activities could 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. MM HAZ-1 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-1 requires 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. With implementation of COA HAZ-1 and COA HAZ-2, and MM HAZ-1, impacts would be less than significant in this regard.

Operations

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 evaluated the potential for VOC vapor intrusion exposure under for the townhomes and apartments based on the specifications outlined in the California DTSC's February 2023 Draft Supplemental Guidance. The cancer risk estimated to result from unmitigated vapor intrusion at the apartment buildings was below the DTSC. However, the townhomes were estimated to have estimated cancer risks exceeding the DTSC threshold. Therefore, the VIRE recommends that an engineered vapor mitigation measure (such as an impermeable membrane) be included in the design of any townhome and that parking structures include sufficient ventilation to minimize accumulation of VOCs on the Project site. MM HAZ-2 incorporates the VIRE's recommendations and requires that an engineered vapor measure (such as an impermeable membrane) be included in the proposed townhome design and proper ventilation be included in the apartment building parking structure design. With implementation of MM HAZ-2, 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.

As previously noted, South Normandie Avenue contains railroad tracks along the roadway's western boundary, near West 170th Street, but these tracks cross onto the roadway's eastern boundary near Asher Court. During operations, trains could derail, and cause potential upset and accident conditions. To assess the Project's potential to increase transportation hazards associated with the existing railroad facilities, the City and Applicant consulted with the California Public Utilities Commission (CPUC) and Union Pacific Railroad (UPRR). Through the consultation process, various railroad improvements were identified as being required along South Normandie Avenue pursuant to current CPUC standards and UPRR guidelines. As such, the Project proposes railroad track improvements along South Normandie Avenue, which would be designed pursuant to current CPUC standards and UPRR guidelines, and include the following:

- Removing approximately 170 linear feet of railroad spur track which enters the Project site and formerly served the southernmost industrial building (16911 South Normandie Avenue).
- Removing approximately 830 linear feet of railroad spur track which enters the Project site and formerly served the central industrial building (16907 South Normandie Avenue).
- Constructing a new median both north and south of the track alignment.
- Installing new warning devices and tactile warning strips on the South Normandie Avenue east and west sidewalks.
- Refreshing railroad crossing pavement markings immediately north and south of the track alignment.

These improvements would minimize potential impacts from derailments by bringing the crossing up to current CPUC standards and UPRR guidelines. Furthermore, according to the Federal Railroad Administration crossing report (FRA 2023), the maximum speed of trains at this crossing is 10 miles per hour, thus, any derailment would be at very low speeds.

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. 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, Project operations would not 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 following compliance with the established regulatory framework.

Conditions of Approval

COA HAZ-1 **Asbestos Survey.** Prior to demolition activities, an Asbestos Hazard Emergency Response Act (AHERA) and California Division of Occupational Safety and Health (Cal/OSHA) certified inspector shall conduct an Asbestos Survey to determine the presence or absence of asbestos containing-materials (ACMs) pursuant to South Coast Air Quality Management District (SCAQMD) regulations.

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, a qualified Lead Specialist shall complete abatement 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 **Construction Management Plan.** Prior to issuance of any demolition permit for the onsite structures, a construction management plan addressing procedures and requirements for responding to disturbance of undocumented contaminated soil shall be prepared and submitted to the City for review and approval.

MM HAZ-2 **Engineered Vapor Mitigation and Ventilation.** Prior to commencement of construction activities, the City of Gardena Building Department shall review the building plans to verify that an engineered vapor measure (such as an impermeable membrane or equivalent) is included in the design of all townhomes and that the apartment parking structures include sufficient ventilation to minimize accumulation of VOCs on the Project site. 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 City of Gardena Building Department shall have oversight/sign-off responsibility for the vapor barrier.

4.6.5 CUMULATIVE IMPACTS

For purposes of the hazardous materials 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 indicated in **Table 3-1** and depicted in **Exhibit 3-1: Cumulative Project Locations**, there are eight related projects within the geographic context for the cumulative hazardous materials analysis (i.e., 1.0-mile radius):

- Related Project No. 2[5] (a condominium development approximately 720 feet to the northeast);

[5] This related project is approximately 720 feet northeast of Project site. This is second nearest related project to proposed Project site. No recent action from Applicant. Plan Check Review anticipated expiration November 2023. Construction start date unknown. (A. Acuna, City of Gardena, Personal Email Communication, June 12, 2023)

- Related Project No. 3[6] (a small lot subdivision development approximately 400 feet to the northeast);
- Related Project No. 9 (a residential development approximately 0.90 mile to the northeast);
- Related Project No. 12 (a self-storage development 0.30 mile to the south);
- Related Project No. 15 (a residential project 0.50 mile to the southwest);
- Related Project No. 16 (a mixed-use development 0.30 mile to the north);
- Related Project No. 22 (a townhome development 0.70 mile to the north); and
- Related Project No. 23 (multi-family residential development 0.60 mile to the southwest).

As concluded above, Project construction could encounter undocumented LBP, ACMs, and other hazardous materials and hazardous wastes. HAZ COA-1 and HAZ COA-2 would be required to reduce potential impacts related to ACMs and LBP. Preparation of an Environmental Management System, demolition plan and construction management plan (HAZ MM-1) would be required to reduce impacts related to a release of hazardous materials into the environment during construction or operations.

As addressed in this EIR section, the Phase I and Phase II ESA identified various RECs in association with past uses within the Project site. The VIRE found an exceedance of DTSC cancer risk for the townhome component and recommended installing a vapor intrusion barrier and ventilating the apartment parking structure. Therefore, the Project requires compliance with MM HAZ-2 to provide an engineered vapor barrier (such as an impermeable membrane) to reduce impacts to a less than significant level.

Cumulative impacts related to 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 onsite hazardous materials use 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 Project site and serves as the basis for defining the cumulative impacts study area.

Although some of the related projects 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.

[6] This related project is approximately 400 feet northeast of Project site. Nearest related project to proposed Project site. No recent action from Applicant. Plan Check Review has expired. Construction start date unknown. (A. Acuna, City of Gardena, Personal Email Communication, June 12, 2023).

With implementation of the COAs and MMs, the Project would result in a less than significant impact concerning hazardous materials. Therefore, when combined with cumulative development, the Project's hazardous materials-related impacts would not be cumulatively considerable.

4.6.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning hazards and hazardous materials would occur.

4.6.7 REFERENCES

City of Gardena (2006). *Gardena General Plan, updated 2022*. 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, *Opinion Letter: Light Industrial Property 16829-16839 South Normandie Avenue*, Gardena, California, July 26, 2021 (Opinion Letter); see **Appendix 4.6-5: North Opinion Letter.**

Hillman Consulting, *Technical Memorandum Vapor Intrusion Risk Evaluation 16829-16839 South Normandie Avenue*, Gardena, California, August 11, 2023 (VIRE); see **Appendix 4.6-6: North VIRE.**

Partner Engineering and Science, Inc., *Phase I Environmental Site Assessment Report, 16831 South Normandie Avenue*, Gardena, California, July 13, 2021 (North Phase I); see **Appendix 4.6-1**.

Partner Engineering and Science, Inc., *Phase I Environmental Site Assessment Report, Food & Beverage Processing Plant, 16911 South Normandie Avenue*, Gardena, California, January 7, 2021 (South Phase I); see **Appendix 4.6-2**.

Partner Engineering and Science, Inc., *Assessment Report 16829-16839 South Normandie Avenue*, Gardena, California, November 4, 2021 (Soil/Gas Phase II); see **Appendix 4.6-3**

Partner Engineering and Science, Inc., *Phase II Subsurface Investigation Report 16829-16839 South Normandie Avenue*, Gardena, California, July 26, 2021 (Soil/Groundwater Phase II); see **Appendix 4.6-4**.

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4.7 HYDROLOGY AND WATER QUALITY

4.7 HYDROLOGY AND WATER QUALITY

This section analyzes the Project's potential to violate water quality standards or waste discharge requirements or alter the existing drainage pattern of the site. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's potentially significant impacts.

Information in this section is based primarily on hydrology and water quality data provided in **Appendix 4.7-1: Water Resources Technical Report**. Additional resource information was obtained from available public resources, including among others, Los Angeles County Department of Public Works Well Finder website and historical well data.

It is noted that Kimley-Horn conducted a third-party review on behalf of the City of Gardena ("City") of the Project's Water Resources Technical Report; see **Appendix 4.7-1**. The third-party review concluded the analysis meets the applicable provisions of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines.

4.7.1 EXISTING SETTING

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.

Surface Water Quality

The Project site is within Los Angeles Regional Water Quality Control Board (LARWQCB) jurisdiction. The LARWQCB regulates water quality within the Dominguez Watershed. The LARWQCB lists the Dominguez Watershed on the 303(d) list[1] for impaired water bodies which requires the development of a Total Maximum Daily Load (TDML). A TDML is an estimate of the daily load of pollutants that a water body may receive from point sources, non-point sources, and natural background conditions, without exceeding its water quality standard. **Table 4.7-2: Dominguez Channel List of 303(d) Impairments and TDML's** summarizes existing 303(d) Impairments and Total Maximum Daily Load (TMDLs) in the Dominguez Channel watershed.

[1] Under §303(d) of the CWA, states are required to identify water bodies that do not meet their water quality standards. Biennially, the LARWQCB prepares a list of impaired waterbodies in the region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired.

Table 4.7-1: Dominguez Channel List of 303(d) Impairments and TDML's

Water Body	303(d) Impairment & TDMLs
Dominguez Channel (lined portion above Vermont Ave)	Copper, Indicator Bacteria (*303d only*), Lead, Toxicity, Zinc
Dominguez Channel (unlined portion below Vermont Ave)	Benthic Community Effects, Benzo(a)anthracene, Benzo(a)pyrene(3,4-Benzopyrene-7-d), Chlordane (tissue), Chrysene (C1-C4), Copper, DDT (tissue & sediment), Dieldrin (tissue), Indicator Bacteria (*303d only*), Lead, PCBs (Polychlorinated biphenyls), Phenanthrene, Pyrene, Toxicity
Los Angeles Harbor – Consolidated Slip	2-Methylnaphthalene, Benthic Community Effects, Benzo(a)anthracene, Benzo(a)pyrene(3,4-Benzopyrene-7-d), Cadmium (sediment), Chlordane (tissue & sediment), Chromium, Chrysene (C1-C4), Copper (sediment), DDT (tissue & sediment), Dieldrin, Lead (sediment), Mercury (sediment), PCBs (Polychlorinated biphenyls), Phenanthrene, Pyrene, Toxaphene (tissue), Toxicity, Zinc (sediment)
Los Angeles/Long Beach Inner Harbor	Beach Closures (*TMDL only*), Benthic Community Effects, Benzo(a)anthracene, Benzo(a)pyrene(3,4-Benzopyrene-7-d), Chrysene (C1-C4), Copper, DDT (Dichlorodiphenyltrichloroethane), PCBs (Polychlorinated biphenyls), Toxicity, Zinc (sediment)
Los Angeles/Long Beach Outer Harbor (inside breakwater)	DDT (Dichlorodiphenyltrichloroethane), PCBs (Polychlorinated biphenyls), Toxicity
San Pedro Bay Near/Offshore Zones	Chlordane, PCBs (Polychlorinated biphenyls), Total DDT (sum of 4,4' and 2,4'-isomers of DDT, DDE, and DDD), Toxicity
Source: **Appendix 4.7-1**, Table 4	

Groundwater

The Project site and 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. The Project site is within the West Coast Subbasin, which covers approximately 160 square miles of the Coastal Plain Basin. The West Coast Subbasin was adjudicated in 1961, with the California Department of Water Resources serving as Watermaster and maintaining Sustainable Groundwater Management Act (SGMA) reporting requirements. The West Coast Basin Judgment (West Judgment) limits the amount of groundwater each party can extract annually from the West Coast [Sub]Basin.

The Water Replenishment District of Southern California (WRD) manages groundwater replenishment and recharge. Coastal Plain Basin replenishment occurs primarily through percolation of rainfall throughout the Dominguez 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. Coastal Plain Basin groundwater generally flows in a south/southwesterly direction. West Coast Subbasin groundwater replenishment occurs through stormwater percolation and imported and recycled water that is injected to prevent seawater intrusion.

The Project site is in Golden State Water Company's (GSWC) service area, and specifically, within the Southwest System service area, which serves Gardena, seven other cities, and portions of unincorporated Los Angeles County. The Southwest System's water supply sources are imported water, groundwater wells, and recycled water. The Southwest System is supplied by two active Central Subbasin wells and 12 active West Coast Subbasin wells. As previously noted, the Project site is within the West Coast Subbasin.

Local Setting

The Project site is fully developed with six industrial buildings, asphalt surface parking lots, hardscape, and landscaping.

Surface Water Hydrology

On the Project site, stormwater runoff sheet flows to a catch basin near the West 169th Street and South Normandie Avenue intersection. All roof flows from the southerly existing buildings and paved parking areas are captured by a series of drains and discharge directly to ground level, where they join surface-level sheet flows and discharge to a catch basin on Brighton Way. From the catch basin on Brighton Way, stormwater runoff flows to the Los Angeles County Flood Control District (LACFCD) storm drain system.

Hydrology analysis was conducted to determine peak flows during the 10-year, 25-year, and 50-year storm event under existing and proposed conditions. **Table 4.7-1: Existing Conditions Hydrology**, contains the existing conditions hydrology analysis results; see **Appendix 4.7-1** for existing conditions hydrology calculations. As indicated in **Table 4.7-1**, the Project site is almost entirely (99.7 percent) comprised of impervious surfaces.

Table 4.7-2: Existing Conditions Hydrology

Drainage Area	Area (acres)	% Impervious	Q10 (cfs)	Q25 (cfs)	Q50 (cfs)
A-1	1.34	100	2.61	3.45	4.28
A-2	0.38	100	0.87	1.07	1.21
A-3	0.23	100	0.52	0.65	0.73
A-4	0.58	100	1.32	1.63	1.85
A-5	2.72	98.5	5.29	7.00	8.69
Existing Total	***5.25***	***99.7***	***10.61***	***13.80***	***16.76***

Source: **Appendix 4.7-1**, Table 1.

In the vicinity of the Project site, stormwater runoff is collected and conveyed through offsite storm drain facilities along South Normandie Avenue and West 170th Street. Stormwater sheet flows to a catch basin near the West 169th Street and South Normandie Avenue intersection, as well as a catch basin on South Normandie Avenue. The catch basin on 169th Street and Normandie

Avenue discharge into the LACFCD storm drain system which flows southerly. From there, runoff is piped into the LACFCD catch basin near the intersection of West 169th Street and South Normandie Avenue, where it enters a storm drainpipe within the public right-of-way.

After flowing into the LACFCD storm drainpipe, the runoff then flows southerly within the Dominguez Flood Control Channel (Dominguez Channel). The stormwater then flows 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.

Surface Water Quality

The Project site is fully developed with six industrial buildings, asphalt surface parking lots, hardscapes, and minimal landscaping. There are no known existing water quality best management practices (BMPs) on the Project site. Stormwater leaves the Project site via an existing catch basin, existing drains, and roof drains which penetrate the finished surface, or exits onto adjacent streets and remains untreated.

Existing potential pollutants at the Project site are likely based on the existing six industrial buildings, asphalt surface parking lots, hardscapes, and landscaping. Likely existing pollutants include oil and grease, trash, total suspended solids (TSS), heavy metals, and hydrocarbons from the parking areas.

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: 792W) approximately 0.2-mile southwest of the Project site.[2] As of July 19, 2021, groundwater levels were 28 feet below ground surface (bgs) level.[3] Groundwater levels have been gradually increasing across sampling measurements from 2011.

Flood Hazard, Tsunami, and Seiche Zone

According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM), the Project site is within Zone X. Zone X depicts areas outside of the 0.2-1.0 percent (500-year) annual chance floodplain; see the FEMA FIRM map provided in Appendix E of **Appendix 4.7-1**.

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, which can occur in response to ground

[2] Los Angeles County Department of Public Works. (No Date). *Well Finder*. Retrieved from https://dpw.lacounty.gov/general/wells/#, Accessed May, 2023.
[3] **Appendix 4.6-4: Phase II Subsurface Investigation Report .**

shaking. The Project site is approximately eight miles east of the Pacific Ocean and there are no nearby bodies of standing water. Therefore, the Project site is not within a tsunami or seiche zone.

Therefore, there is no existing flood, tsunami, or seiche hazard potential for the Project site that would risk release of pollutants due to inundation; see also **Section 7.0: Effects Found Not to be Significant**, for a discussion of the Project's potential impacts concerning flood hazards, tsunamis, and seiche zones.

4.7.2 REGULATORY SETTING

Federal

Clean Water Act (CWA)

The 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 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, nine RWQCBs. The City, which is within LARWQCB jurisdiction, operates under Municipal Regional Stormwater NPDES Permit (Order No. R4-2012-0175-A01, NPDES Permit No. CAS004001). This Permit provides the discharge requirements for the MS4 discharges within the Los Angeles County watersheds.

Clean Water Act (CWA) Section 402

Section 402 of the Clean Water Act authorizes the SWRCB to issue NPDES Construction Stormwater General Permit (Water Quality Order 2022-0057-DWQ), referred to as the "Construction Stormwater General Permit."[4] The Construction Stormwater General Permit Order was adopted on September 8, 2022 and becomes effective on September 1, 2023. Construction activities can comply with and be covered under the Construction Stormwater General Permit provided they:

[4] California State Water Resources Control Board. (2022). *National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Permit)*, Order WQ 2022-0057-DWQ, NPDES No. CAS000002. Retrieved from: https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2022/wqo_2022-0057-dwq.pdf, Accessed June 2023.

1. Develop and implement a Stormwater 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 off-site into receiving waters;
2. Eliminate or reduce non-stormwater 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 Construction Stormwater 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 (CWA) Section 303(d)

CWA §303(d) (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 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, California is divided into nine RWQCBs, governing implementation and enforcement of the CWC and CWA. The Project site is 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. The Basin 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 conducted by the SWRCB. 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 Clean Water Act §303(c)(2)(B), 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

In 2014, California adopted the SGMA to help manage its groundwater. The SGMA requires that local Groundwater Sustainability Agencies (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, this 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 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 §10750 et seq.

Senate Bill X7-7 - Water Conservation Bill of 2009

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.

State Water Resources Control Board

The State Water Resources Control Board (SWRCB) preserves, enhances, and restores the quality of California's water resources. Wastewater generators must obtain a permit to discharge their wastewater. Pursuant to the federal CWA and California's Porter-Cologne Water Quality Control Act, the SWRCB and LRWQCB regulates wastewater discharges to surface waters through the National Pollutant Discharge Elimination System (NPDES) program. Some wastewater discharges are exempt from federal NPDES requirements, but California law may still apply. Under California law, the SWRCB and LRWQCB require waste discharge requirements for some discharges, in addition to those subject to NPDES permits. Permits contain specific requirements that limit the

pollutants in discharges. They also require dischargers to monitor their wastewater to ensure that it meets all requirements. Wastewater dischargers must maintain their treatment facilities, and treatment plant operators must be certified. The SWRCB and LRWQCB routinely inspect treatment facilities and strictly enforce permit requirements.

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 (WDRs) contained in Order No. R4-2012-0175 (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. The MS4 Permit Order provides the revised WDRs 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. Gardena adopted the County's LID Standards Manual to use as its guidelines for stormwater quality mitigation, see *Gardena Municipal Code* Section below.

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 square feet (SF) or greater impervious surface area.

County of Los Angeles Hydrology Manual

The Project site is within a watershed that the County classifies as the Dominguez Watershed. The LACFCD is responsible for providing flood protection, water conservation, recreation, and aesthetic enhancement within this entire watershed. The Los Angeles County Department of Public Works (LACDPW) developed the "Hydrology Manual" (January 2006) ("2006 Hydrology Manual"), which establishes the LACDPW hydrologic design procedures based on historic rainfall and runoff data collected within the County. The Project is required to utilize the 2006 Hydrology Manual and accompanying hydrologic tools including the HydroCalc Calculator to calculate existing and proposed Project discharges and volumes.

County of Los Angeles Department of Public Works Low Impact Development Standards Manual

The County's Department of Public Works prepared the Low Impact Development Standards Manual (February 2014)[5] (LID Standards Manual) to comply with NPDES MS4 Permit requirements for stormwater and non-stormwater discharges from the MS4 within the County's coastal watershed (CAS004001, Order No. R42012-0175). The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment projects in unincorporated areas of the County with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges.

Local

City of Gardena General Plan

The Gardena 2006 General Plan (GGP) Community Resource Element provides a Conservation Plan with the following goals and policies concerning hydrology and water quality:

- **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.

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 "construction projects that disturb one or more acres of soil by grading, clearing, and/or excavating or other activities are required to obtain a general construction activity stormwater permit ("GCASWP") from the State Water Resources Control Board ("State Board"). No grading permit shall be issued to such construction projects without obtaining a GCASWP [Construction Stormwater General Permit]," which would be issued by the SWRCB. 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

[5] County of Los Angeles Department of Public Works. (2014). Low Impact Development Standards Manual. Retrieved from: Los Angeles County Low Impact Development (LID) Manual.pdf (lacounty.gov) , Accessed May 2023.

(LID) BMPs; (b) source control BMPs; and (c) structural and nonstructural BMPs for specific types of uses.

4.7.3 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 4.7-1);
- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin (see Impact 4.7-2);
- 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 4.7-3);
- 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 Impact 4.7-4)

4.7.4 IMPACTS AND MITIGATION MEASURES

Impact 4.7-1:
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 site is fully developed with six industrial buildings, asphalt surface parking lots, hardscapes, and landscaping (see **Exhibit 2-2: Local Vicinity Map)**. The Project's construction-related activities would include demolition of the existing six industrial buildings, asphalt surface parking lots, hardscapes, landscaped areas, and all existing improvements and excavation of existing soils. Excavation, grading, and trenching could displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. The main pollutant of concern during construction is typically sediment and soil particles that discharge off of the site due to wind, rain, and construction patterns. Construction-related erosion effects would be addressed through compliance with the NPDES program's Construction Stormwater General Permit. Construction activity subject to the Construction Stormwater 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 proposes demolition and construction activities throughout the entire site, with a land disturbance of approximately 5.25 acres. Therefore, the Project would be subject to the Construction Stormwater General Permit. To obtain coverage under the Construction Stormwater 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 Stormwater 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 Stormwater 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.

The Project would also be required to comply with GMC Chapter 8.70: Stormwater and Runoff Pollution Control, which 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 [Construction Stormwater General Permit] from the SWRCB.

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. As discussed above, these discharges are regulated under countywide WDRs contained in Order No. R4-2012-0175 (NPDES Permit No. CAS004001). The MS4 Permit Order provides the revised WDRs for MS4 discharges within the Los Angeles County watersheds, which includes Gardena. 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 development with land disturbance of 5.25 acres. Additionally, the Project is a new residential development that would replace approximately 228,004 SF (approximately 5.23 acres) of impervious surface area; see **Table 4.7-1**. Therefore, 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.

Table 4.7-3: Potential Pollutants contains a list of materials anticipated during Project operations, which could contribute to pollutants, other than sediment, to stormwater runoff. The Project proposes LID and site design approaches and BMPs that are designed to address runoff and pollution at the source. See **Appendix 4.7-1** for a description of Project BMPs and Impact 4.7-

3ii for a description of existing and proposed site drainage. 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 reducing pollution, reducing runoff and flooding, and recharging groundwater. The second priority BMP is capturing and reusing stormwater onsite fort either landscape irrigation or toilet flushing. Capture and use design features would be implemented to meet the local LID requirements due to high concentration of clay materials and shallow groundwater levels at the Project site.

The Project would treat site runoff in accordance with the LID Standards Manual. To do so, runoff resulting from the 85th percentile rain event would be treated prior to leaving the site. The Project would be subject to Los Angeles County's LID standards. The City has adopted the County's LID Standards Manual to use as its guidelines for stormwater quality mitigation. In accordance with these LID standards, the Project would be required to be infiltrated, evapotranspirated, captured and reused, and/or treated through a high efficiency BMP onsite for the 85th percentile storm event or 0.75"—whichever is greater. As specified in the Project's LID Plan, the Project site's 85-percentile rain event is 0.88 inch, which is used as the design storm for LID.

Table 4.7-3: Potential Pollutants

Potential Pollutant	Source of Pollutants
Sediment	Parking lots, pedestrians, driveways, building rooftops, landscaped areas, read
Nutrients	Landscape areas, lawns
Pesticides	Landscape areas, lawns
Pathogens	Landscape areas, lawns, building rooftops, vehicular traffic/activities
Trash/Debris	Parking lots, pedestrians, driveways, roadways, vehicles
Oil/Grease	Parking lots, driveways, roadways, vehicles
Metals	Parking lots, driveways, roadways
Source: **Appendix 4.7-1,** Table 8.	

Sizing of all stormwater treatment systems and calculation of stormwater quality design volume (SWQDV) would occur in accordance with the LID Standards Manual and would utilize the Hydrocalc program to ensure accuracy.

Percolation testing was not performed as part of the geotechnical investigation.[6] Therefore, compliance with LID water quality regulations would be achieved through capture and use BPS, with biofiltration BMPs remaining as an option if currently unknown circumstances arise.

[6] **Appendix 4.4-1: Geotechnical Report**

Preliminary and Final LID Plans would be coordinated with the City to satisfy the Project's water quality requirements. The Project would use Capture and Use BMPs to ensure adequate capacity to capture and utilize the stormwater design volume within the seven-month wet season period. Capture and Use BMPs require pretreatment devices to clean stormwater before it is stored within a cistern. This stormwater is then used for drip irrigation to water plants within the five-month dry season. This requires enough landscape with the correct planting factors to use the captured water within the seven months. The capture and use irrigation system would be appropriately sized in conformance with the LID manual.

There are no known structural or LID BMPs to treat stormwater under the Project site's existing conditions. Therefore, implementation of the LID features proposed as part of the Project would result in a significant improvement in surface water quality runoff as compared to existing conditions. Implementation of the Project's proposed BMP system would result in the treatment of the entire required volume for the Project site and the elimination of pollutant runoff up to the 85th percentile storm event.

The Project's design would ensure all proposed LID BMPs meet applicable County LID Manual requirements to the maximum extent practical. The proposed LID systems are designed to safely convey stormwater runoff into the sub-surface soil without the threat of contaminant mobilization and would assist in improving the groundwater quality. Additionally, the West Coast Subbasin is managed by the WRD and CDWR and is anticipated to meet all groundwater quality requirements. The Project would be subject to all requirements regarding groundwater quality to ensure that no impacts from proposed stormwater infiltration occur.

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.

Mitigation Measures

No mitigation is required.

Impact 4.7-2:
Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the projects may impede sustainable groundwater management of the basin?

Level of Significance: Less Than Significant Impact

Construction

The historical high groundwater level in the area is 15 feet bgs and groundwater was encountered during exploration with samples taken up to 22 ft bgs; see **Appendix 4.4-1: Preliminary**

Geotechnical Investigation. Although the Project would require excavation of existing soils excavation would be limited to a minimum 5.0-inch-thick slab with the addition of at least 3.0 feet below footing bottoms for foundation support. Since most of the structures would be above an elevation of 15 feet bgs, it is not expected that groundwater would be encountered during construction that would require temporary or permanent dewatering operations. The excavation depth would be at a higher elevation than the groundwater, therefore, 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 were to be encountered, it would be directed to a dewatering system and discharged in accordance with all applicable rules and regulations under NPDES General Construction Permit regulations and City grading permit conditions. As a result, potential construction-related groundwater impacts would be less than significant.

During on-site grading and building activities, minimal amounts of hazardous materials such as fuels, paints, solvents, and concrete additives could be used, and the presence of such materials provides an opportunity for hazardous materials to be released into groundwater. 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. The Project does not include any groundwater pumping and relies on GSWC for water service. As previously noted, the Southwest System's water supply sources are imported water, groundwater wells, and recycled water. The Southwest System is supplied by 12 active wells within the West Coast Subbasin, where the Project site is located.

West Coast Subbasin groundwater replenishment occurs through stormwater percolation and imported and recycled water that is injected to prevent seawater intrusion. The Project site is fully developed with industrial buildings, asphalt surface parking lots, hardscapes, and minimal landscaping. As previously indicated in **Table 4.7-1**, the Project site is almost entirely (99.7 percent) comprised of impervious surfaces. Therefore, under existing conditions, stormwater percolation occurs on only approximately 0.3 percent of the Project site. The Project proposes various exterior open spaces, thus, would increase the Project site's pervious surfaces to 14.1 percent. The increase in pervious areas would improve the Project site's stormwater percolation/ groundwater recharge capacity over existing conditions. Finally, the Project would include low impact development (LID) best management practices (BMPs) to increase infiltration of

stormwater runoff. Therefore, the Project would not interfere with groundwater recharge. Project impacts would be less than significant.

Concerning the Project's potential to decrease groundwater supplies, as discussed in detail in **Section 4.15: Utilities and Service Systems**, GSWC would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Further, the Coastal Plain Basin where the Project site is located, was adjudicated in 1961, and as such, is subject to pumping restrictions to avoid overdraft conditions. Therefore, a less than significant impact would occur in this regard, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.7-3:

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

As depicted on the Proposed Hydrology Map (see **Appendix 4.7-1,** Attachment G), the Project site is divided into two Subareas, A-1 and A-2. Subarea A-1 totals 2.13 acres and is 82.7 percent impervious. Subarea A-1 surface flows east to the catch basin near the 169th Street and South Normandie Avenue intersection. Subarea A-2 totals 3.12 acres and is 89.1 percent impervious. Subarea A-2 surface flows south to the LACFD storm drain pipe within West 170th Street where it runs east until it reaches the line in South Normandie Avenue. The proposed Project would result in an increase in landscaped areas throughout the Project site, which would decrease impervious surfaces from 99.7 percent under existing conditions to 85.9 percent under proposed Project conditions. Therefore, the Project would not substantially alter the site's existing drainage pattern through the addition of impervious surfaces. Further, the Project would not alter the course of a stream or river, as none traverse or are located in the Project vicinity. As shown in **Table 4.7-4: Existing Versus Proposed Drainage Conditions**, the decrease in impervious surfaces on the Project site would result in a reduction of flows under 10-year, 25-year, and 50-year storm events of between 11.7 percent and 13.8 percent when compared to existing conditions; see **Appendix 4.7-1** Attachment H for output calculations.

Table 4.7-4: Existing Versus Proposed Drainage Conditions

Drainage Area	Area (acres)	% Impervious	Q10 (cfs)	Q25 (cfs)	Q50 (cfs)
Existing	5.25	99.70	10.61	13.80	16.76
Proposed	5.25	85.90	9.18	12.10	14.80
Difference	0	13.80	1.43	1.70	1.96
% Change from Existing to Proposed Conditions	-	-13.8%	-13.5%	-12.3%	-11.7%
Source: **Appendix 4.7-1**, Table 6					

(i) Result in a substantial erosion or siltation on- or off-site;

As concluded above, the Project would not substantially alter the Project site's existing drainage pattern through the alteration of the course of a stream or river or through the addition of impervious surfaces. Further, as concluded in Impact 4.8-1, the Project would be subject to compliance with NPDES and GMC requirements, which include implementation of BMPs, thus, would not result in substantial erosion or siltation on- or off-site. A less than significant impact would occur in this regard.

(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

As shown in **Table 4.7-4**, the Project would reduce impervious surfaces thereby reducing flows under 10-year, 25-year, and 50-year storm events between 11.7 percent and 13.8 percent, when compared to existing conditions. Because the Project would decrease surface runoff, it would not result in flooding on- or off-site. No impact would occur in this regard.

(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems; or

As shown in **Table 4.7-4**, the Project site would reduce impervious surfaces, thereby reducing flows under 10-year, 25-year, and 50-year storm events, as compared to the existing condition. Because the Project would decrease surface runoff, it would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems. No impact would occur in this regard.

(iv) Impede or redirect flood flows?

The Project site is located entirely in FEMA Flood Zone X, outside of the 100-year flood hazard area. Therefore, the Project would not impede or redirect flood 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 in this regard, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.7-4:

Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Level of Significance: Less Than Significant Impact

Construction

Project construction activities could result in short-term groundwater quality impacts because of soil or shallow groundwater being exposed to construction activities, materials, wastes and spilled materials. During on-site grading and building activities, minimal amounts of hazardous materials such as fuels, paints, solvents, and concrete additives could be used, and the presence of such materials provides an opportunity for hazardous materials to be released into groundwater. Additionally, as mentioned in **Appendix 4.6-1: North Phase I ESA,** the Phase I ESA for the sites northern portion identified the release of volatile organic compounds VOCs and petroleum hydrocarbons. Thus, the Project requires compliance with **MM HAZ-1**, which requires a construction management plan that includes provisions for responding to the disturbance of undocumented contamination, and compliance with **MM HAZ-2**, which requires an engineered vapor barrier (such as an impermeable membrane) which would protect soil and shallow groundwater from being exposed.

If contaminated soils are found within the excavation limits, contaminated soils would be collected within the excavated material, removed from the Project site, and disposed of in accordance with all applicable regulatory requirements. Compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous materials, will 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, Project construction would not conflict with or obstruct implementation of a sustainable groundwater management plan and impacts would be less than significant.

Operation

The proposed LID systems are designed to safely convey stormwater runoff into the sub-surface soil without the threat of contaminant mobilization and would assist in improving the groundwater quality. The Project's design would ensure all proposed LID systems meet applicable LA County LID Manual requirements. 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 as well as the CDWR and is anticipated to meet all groundwater demands. The Project would follow all requirements regarding groundwater quality to ensure that no impacts from proposed stormwater infiltration occur. Therefore, Project operations would not conflict with or obstruct implementation of a sustainable groundwater management plan and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.7.5 CUMULATIVE IMPACTS

For purposes of the hydrology and water quality analysis, cumulative impacts are considered for cumulative development within Gardena, 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, substantially decrease groundwater supplies or interfere with groundwater recharge, alter existing drainage patterns in a manner that would result in substantial erosion or siltation or result in flooding, impede, redirect flood flows or otherwise contribute to a risk of loss, injury, or death involving water-related hazards, or conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The geographic extent for considering cumulative impacts concerning hydrology and water quality includes the Dominguez Watershed. The City, and more specifically the Project site, is located within the Dominguez Watershed, which covers approximately 133 square miles and is largely built out.

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. Impervious surfaces 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 capture and use, would be appropriately sized and located to treat the design storm event. Therefore, the Project would result in a less than significant impact following compliance with NPDES and GMC requirements.

As concluded above, following compliance with all applicable rules and regulations under the NPDES General Construction Permit regulations and City grading permit conditions requirements, the Project's construction-related and operational activities would not substantially decrease groundwater supplies or interfere with groundwater recharge such that the Project may impede the sustainable groundwater management of the basin. The City's water provider, GSWC, 2020 Urban Water Management Plan - Southwest (UWMP) Tables 5-2, 5-3, and 5-4 identify that water supplies would meet the service area's water demands for normal, single-dry, and multiple dry year conditions through 2045. Finally, the Project and other cumulative projects would include low impact development (LID) best management practices (BMPs) to increase infiltration of stormwater runoff. Therefore, cumulative projects and operational activities would not substantially decrease groundwater supplies or interfere with groundwater recharge such that they may impede the sustainable groundwater management of the basin.

As concluded above, the Project would not substantially alter the Project site's existing drainage pattern through the alteration of the course of a stream or river or through the addition of impervious surfaces. Further, through compliance with NPDES and GMC requirements which include implementation of BMPs, the Project would not result in substantial erosion or siltation on or off of the site. A less than significant impact would occur.

As concluded above, following compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous materials, will reduce the potential for the construction of the Project to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Short-term groundwater quality impacts could potentially occur during construction of the Project because of soil or shallow groundwater being exposed to construction activities, materials, wastes and spilled materials. During on-site grading and building activities, minimal amounts of hazardous materials such as fuels, paints, solvents, and concrete additives could be used, and the presence of such materials provides an opportunity for hazardous materials to be released into groundwater. However, the Project requires compliance with MM HAZ-1 and compliance with MM HAZ-2 to mitigate significant impacts. Cumulative projects within the City would be required to comply with applicable requirements and would be required to conduct similar analysis and implement project specific mitigation measures under CEQA. A less than significant impact would occur in this regard. Additionally, following compliance with applicable LA County LID Manual requirements, the Project's operational activities would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The Projects proposed LID systems are designed to safely convey stormwater runoff into the sub-surface soil without the threat of contaminant mobilization and will assist in improving the groundwater quality. Cumulative projects would be required to meet applicable LA County LID Manual requirements. The LID BMP systems are designed to safely convey stormwater runoff into the sub-surface soil without the threat of contaminant mobilization. The Project and other projects within the City would follow all requirements regarding groundwater quality to ensure

that no impacts from proposed stormwater infiltration occur. Therefore, Project operation would not conflict with or obstruct implementation of a sustainable groundwater management plan and impacts would be less than significant. A less than significant impact would occur in this regard.

Gardena is 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, interference with groundwater recharge with potential groundwater management issues, changes in drainage patterns, and increased stormwater flows with potential downstream capacity issues.

Additionally, cumulative projects could substantially alter the existing drainage patterns and result in substantial erosion throughout the City; impede or redirect flows throughout the City; or conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. However, cumulative development would be subject to compliance with the established federal, state, and local regulatory framework (e.g., NPDES and GMC, concerning hydrology and water quality. Most new developments require minimum landscaping, as well as implementation of LID BMPs, which typically increase permeable surfaces and consequently reduce peak flows in stormwater runoff. All new development within the City would be subject to regional and City water quality and peak flow mitigation requirements and would be reviewed on a per-project basis to ensure that water quality and storm drain infrastructure 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. Therefore, when combined with cumulative development, the Project's potential impacts concerning hydrology and water quality would not be cumulatively considerable.

4.7.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning hydrology and water quality have been identified.

4.7.7 REFERENCES

California State Water Resources Control Board. (2022). National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Permit), Order WQ 2022-0057-DWQ, NPDES No. CAS000002. Retrieved from:

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2022/wqo_2022-0057-dwq.pdf, accessed June 2023.

Fuscoe Engineering, Inc. (2023). *Water Resources Technical Report for Normandie Crossing Specific Plan Project*. See **Appendix 4.7-1**.

Los Angeles County Department of Public Works. (April 19, 2022). Well ID 792 Historical Well Measurement Data. Retrieved from : https://dpw.lacounty.gov/general/wells/#, accessed May 2023.

Los Angeles County Department of Public Works. (No Date). *Well Finder*. Retrieved from https://dpw.lacounty.gov/general/wells/#, accessed May 2023.

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4.8 LAND USE AND PLANNING

4.8 LAND USE AND PLANNING

The purpose of this section is to describe the existing regulatory and environmental conditions related to land use and planning and analyze the Project's potential to physically divide an established community or 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. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's potentially significant impacts.

Information in this section is based primarily on land use and zoning data available from public resources, including among others, the City of Gardena General Plan 2006 (GGP) and the City of Gardena Municipal Code (GMC).

4.8.1 EXISTING SETTING

Local Context

The Project site is in the County of Los Angeles, approximately 12 miles southwest of downtown Los Angeles, in the southeast portion of the City of Gardena ("City"), at 16829, 16835, and 16907 South Normandie Avenue; see **Exhibit 2-1: Regional Vicinity Map**. The City encompasses approximately 6.0 square miles in the County's South Bay region. Gardena is bordered by the City of Hawthorne and unincorporated County lands to the north, the cities of Los Angeles and Torrance to the south, the City of Los Angeles to the east, and unincorporated County lands and the cities of Hawthorne and Torrance to the west.

Gardena is a highly urbanized city that is approximately 99 percent developed. In 2005 there were 44-acres of land considered vacant in the City and as of February 2023, there are only approximately 7.5 vacant acres remaining, which includes approximately 3 acres which cannot be developed.[1] The City's predominant land use has historically been and remains single-family residential, which now accounts for approximately 33 percent of the City's total area. Streets and rights-of-way account for approximately 22 percent of the City's land, while industrial uses account for approximately 15 percent and are largely located north of Rosecrans Avenue between Van Ness Avenue and Normandie Avenue. Multi-family residential land uses, as well as mobile home parks, account for approximately 12 percent of the City. Commercial uses, which are primarily located along Artesia Boulevard, Redondo Beach Boulevard, Crenshaw Avenue, and Western Avenue, account for approximately 10 percent of the City. While much of the City is developed with single-family residential uses, the City's southeast portion where the Project site is located is characterized by both industrial and residential land uses. Arterial roadways such as

1 City of Gardena. (2006) City of Gardena General Plan, updated 2022.

Vermont Avenue, Western Avenue, Redondo Beach Boulevard, and Rosecrans Avenue are characterized by both industrial and commercial uses, with residential uses located behind them.

The approximately 5.25-acre Project site is comprised of four parcels (APN: 6106-030-011, 6106-030-015, 6106-030-016, 6106-030-017) generally bound by West 169th and West 170th Streets on the north and south, and South Normandie Avenue and Brighton Way on the east and west; see **Exhibit 2-2: Site Vicinity Map**.

Onsite Land Uses

Exhibit 4.8-1: Existing Onsite and Surrounding Land Uses depicts the onsite land uses and indicates the Project site is currently fully developed with six industrial buildings, asphalt surface parking lots, hardscapes, and landscaping. **Table 4.8-1: Existing Onsite Land Uses** summarizes the existing onsite land uses by APN and address and indicates approximately 115,424 square feet (SF) of industrial floor area is present on the Project site. However, 9,324 SF of industrial floor area in one of the buildings on Parcel 4 is not being used due to its dilapidated condition and is therefore not occupiable. The onsite buildings were constructed between circa 1952 and 1978. The building heights of the existing onsite uses is at most 35 feet.[2] Additionally, the Project site includes a railroad spur from the adjacent Union Pacific Railroad (UPRR) northern track. The spur is associated with former industrial operations but is no longer in use.

Table 4.8-1: Existing Onsite Land Uses

Parcel ID[1]	APN[2]	Size (Acres)[3]	Address[3]	Existing Land Use	Building (Square Feet)[3]	Year Built[3]
1	6106-030-011	0.55	16829 South Normandie Avenue	Industrial	10,880	1963
2	6106-030-015	0.47	16835 South Normandie Avenue	Industrial	9,600	1957
3	6106-030-016	0.30	No Address	Industrial	-	-
4	6106-030-017	3.93	16907 South Normandie Avenue	Industrial	94,9443	1952
	Total	5.25		Industrial	115,424[4]	

Notes:
1. Identification number (ID) correlates with labels on **Exhibit 4.8-1: Existing Onsite and Surrounding Land Uses.**
2. Accessors Parcel Number (APN)
3. ParcelQuest. (January 2021). Assessor Data. Retrieved from: https://pqweb.parcelquest.com/#home.
4. This total includes 9,324 square feet of building that is unoccupied and dilapidated.

[2] Estimated structure height measurement taken using 3D Path Ruler on Google Earth. Accessed May 2023.

EXHIBIT 4.8-1: EXISTING ONSITE AND SURROUNDING LAND USES
Normandie Crossing Specific Plan Project

NOT TO SCALE

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Surrounding Land Uses

The Project site is generally surrounded by single- and multi-family residential uses. There are two immediately adjacent parcels that are outside the Specific Plan area but included within the Project's proposed entitlement actions: the parcel immediately adjacent to the Project site's southwest corner, at 16964 Brighton Avenue, which is occupied by a single-family residential (SFR) DU; and the parcel immediately adjacent and to the east, which is occupied by Union Pacific Railroad (UPRR) tracks; see **Section 2.3: Project Characteristics**. The surrounding land uses are depicted on **Exhibit 4.8-1: Existing Onsite and Surrounding Land Uses** and described below:

- **North:** West 169th Street is to the north, with a 63-unit single-room occupancy multi-family development across the street, at 16819 South Normandie Avenue.
- **Northeast/Southeast:** Multi- and single-family residential uses are to the northeast/southeast, across South Normandie Avenue, respectively.
- **South:** West 170th Street is to the south, with single-family residential uses across the street.
- **Southwest:** As noted above, there is one single-family residential dwelling unit immediately adjacent to the Project site and to the southwest, at 16964 West 179th Street.
- **East:** South Normandie Avenue and, as noted above, there is an existing UPRR track (north/south orientation) immediately adjacent to the Project site and to the east.
- **West:** Brighton Way (an alleyway) is to the west, with single-family and duplex residential uses across the alley.

4.8.2 REGULATORY SETTING

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 (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 Gardena General Plan 2006 (GGP) in 2006. 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 plans:

- Community Development Element
  - Land Use Plan (updated in June 2012, March 2013 and February 2023)
  - Economic Development Plan
  - Community Design Plan
  - Circulation Plan (updated in July 2020)
- Community Resources Element
  - Open Space Plan

    - Conservation Plan
- Community Safety Element
    - Public Safety Plan (updated February 2022)
    - Noise Plan
- Housing Element (updated in February 2023; see below)
- Environmental Justice Element (adopted in February 2022)
- Implementation
    - Implementation Program (updated in February 2022)

Through its Goals, Objectives, Policies, and Programs, the GGP serves as a decision-making tool to guide future growth and development decisions. The General Plan Goals and policies applicable to the Project are listed in **Table 4.8-2: Gardena General Plan 2006 Consistency** found at the end of this section.

The General Plan designates 13 distinct categories of land use designations (not including Streets and Rights of Way). The General Plan also designates each land use designation with a quantitative measure of intensity of use and the type of uses allowed. In addition to the Land Use Designations, the General Plan includes Overlay Designations, which allow greater flexibility of development alternatives and provide opportunities for housing to meet the City's housing needs. The overlays allow properties to be developed as the underlying land use, as residential areas, or as a combination of commercial and residential uses. **Table 4.8-2**, lists the Project site's existing land use designations and indicates almost all of the Project site (approximately 3.93 acres) is designated Industrial, while the remainder (approximately 1.32 acres) is designated Industrial, High Density 30 Overlay. The Industrial designation provides for a wide range of clean and environmentally friendly industries, technology-related uses and supporting facilities, and business parks.[3] The High Density 30 Overlay provides for 21 to 30 dwelling units per acre (DU/AC). As indicated in **Table 4.8-2**, the Project site's maximum development capacity, based on the existing land use designations, is 40 DU (on the northerly portion) and/or approximately 228,690 SF of industrial floor area throughout the site.

The parcel immediately adjacent to the Project site's southwest corner, at 16964 West 179th Street, and the parcel immediately adjacent and east of the Project site are both designated Industrial.

[3] City of Gardena. (2006). *City of Gardena General Plan 2006, Updated 2022*. Figure LU-2: 2013 General Plan Land Use Policy Map. Gardena, CA: City of Gardena.

Table 4.8-2: Existing General Plan Land Use Designations

Parcel ID[1]	Assessor's Parcel Number	Size (Acres)	Existing Land Use Designation			
			General Plan Land Use[2,3]	Intensity (FAR)/Density (DU/AC)[3,4,5]	Non-Residential Development Capacity (SF)[5]	Residential Development Capacity (DU)[5]
1	6106-030-011	0.55	Industrial, High Density 30 Overlay	1.0 FAR/30 DU/AC	23,958	17
2	6106-030-015	0.47	Industrial, High Density 30 Overlay		20,473	14
3	6106-030-016	0.30	Industrial, High Density 30 Overlay		13,068	9
4	6106-030-017	3.93	Industrial	1.0 FAR	171,191	0
	Total	***5.25***			***228,690***	***40***

Notes:
1. Identification number (ID) correlates with labels on **Exhibit 4.8-1: Existing Onsite and Surrounding Land Uses**.
2. City of Gardena. (2006). *Gardena General Plan 2006, updated 2022. Figure LU-2: 2013 General Plan Land Use Policy Map*. Gardena, CA: City of Gardena. Accessed April 2023.
3. City of Gardena. (2021). *Gardena Housing Element 2021-2029, page 66.*
4. City of Gardena. (2006). *Gardena General Plan 2006, updated 2022, page LU-19.*
5. FAR = Floor Area Ratio; DU/AC = dwelling units per acre; SF = square feet; DU = Dwelling Units.

City of Gardena Municipal Code

Gardena Municipal Code (GMC) Chapter 17.16 - Vesting Tentative Maps. Establishes procedures for implementation of the vesting tentative map statute and supplements the provisions of the Subdivision Map Act. This chapter specifies that land that is subdivided and developed as a vesting tentative map must be consistent with the General Plan, any applicable Specific Plan and any other provisions of the GMC.

GMC Title 18 - Zoning. Among other purposes, GMC Title 18 was adopted to encourage, classify, designate, regulate, restrict and segregate the highest and best location and use of buildings and structures for residence, commerce, trade, industry, water conservation or other purposes in appropriate places and for such purposes to divide the city into zones of such number, shape and area as may be deemed best suited to carry out these regulations and provide for their enforcement.

The zones established by Title 18 and the boundaries of such zones are shown on a map, which is designated as the "official zoning map." **Table 4.8-3: Existing Zoning**, lists the Project site's existing zoning and indicates almost all of the Project site (approximately 3.93 acres) is zoned Industrial Zone (M-2) while the remainder (approximately 1.32 acres) is zoned General Industrial Zone (M-1), High density 30 overlay (HO-4). The M-1 and M-2 zones are intended for general

industrial uses; see Gardena Municipal Code (GMC) Chapters 18.36 and 18.38 for permitted uses in these zones. Additionally, the Housing Overlay 4 (HO-4) zone allows 21-30 DU/AC.

Table 4.8-3: Existing Zoning

Parcel ID[1]	Assessor's Parcel Number	Size (Acres)	Existing Zoning[2,3,4]
1	6106-030-011	0.55	Industrial Zone (M-1),[4] Housing Overlay 4 (HO-4)[5]
2	6106-030-015	0.47	Industrial Zone (M-1), Housing Overlay 4 (HO-4)
3	6106-030-016	0.30	Industrial Zone (M-1), Housing Overlay 4 (HO-4)
4	6106-030-017	3.93	General Industrial Zone (M-2)[6]
	Total	***5.25***	

Notes:
1. Identification number (ID) correlates with labels on **Exhibit 4.8-1: Existing Onsite and Surrounding Land Uses**.
2. City of Gardena. (2020). Zoning Map. Available at https://cityofgardena.org/wp-content/uploads/2020/11/Gardena_Zonning_2020.pdf. Accessed April 2023.
3. See GMC §18.38.010: General Industrial Zone (M-2).
4. See GMC §18.36.010: Industrial Zone (M-1).

GMC Chapter 18.39 - Specific Plans. 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 **GMC Title 18.**

GMC Chapter 18.44 - Site Plan Review. Establishes the procedure for site plan review, prior to issuance of a Building Permit. Additionally, this chapter 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. Establishes procedures for requests to amend, supplement or change the land use designation, regulations, zone boundaries or classifications of property in accordance with California Government Code procedures.

4.8.3 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, the Project may create 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 4.8-1),
  - Gardena Municipal Code (see Impact 4.8-2),
  - Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (see Impact 4.8-3).

Methodology

This analysis analyzes the Project's consistency with regional and local plans, policies, and regulations for the purposes of avoiding or mitigating an environmental effect. Specifically, the Project was analyzed for consistency with the applicable local and regional land use plans, policies, and/or regulations (i.e., GGP and SCAG's RTP/SCS). This analysis also analyzes whether the Project would physically divide an established community.

Approach to Analysis

This analysis of impacts concerning land use and planning examines the Project's consistency with existing land use plans, policies, and regulations. Each criterion is discussed in the context of the Project site and the surrounding characteristics/geography. The impact conclusions consider the potential for changes in land use conditions, as well as compliance with the regulatory framework enacted to protect the environment. The baseline conditions and impact analyses are based on review of Project maps and drawings; analysis of aerial and ground-level photographs; and review of various data available in public records, including local planning documents.

4.8.4 IMPACTS AND MITIGATION MEASURES

Impact 4.8-1:
Would the Project cause a significant environmental impact due to a conflict with any Gardena General Plan 2006 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

As previously noted, the Gardena General Plan's Land Use Plan designates almost all of the Project site (approximately 3.93 acres) as Industrial, while the remainder (approximately 1.32 acres) is designated Industrial and High Density 30 Overlay. The Industrial designation provides for a wide range of clean and environmentally friendly industries, technology-related uses and supporting facilities, and business parks. The High Density 30 Overlay provides for 21 to

30 dwelling units per acre (DU/AC). The Project proposes the Normandie Crossing Specific Plan (NCSP) to establish a maximum allowable development of up to 403 DU. The multi-family residential development proposes two types of residential uses: an apartment building with 328 DU at the Project site's northern portion; and 75 townhome-style units within nine buildings; see **Exhibit 2-4: Conceptual Site Plan**. Overall, the Project site would be developed at a density of approximately 77 DU/AC, **Table 2-3: Surrounding Land Use and Zoning**, summarizes the proposed development according to land use type. As such, the proposed multi-family residential development would conflict with the Project site's existing Industrial land use designation. Therefore, concerning the NCSP area, a General Plan/General Plan Map Amendment is proposed to: (i) change the land use designation on the General Plan Land Use Map from "Industrial" and "Industrial, High Density 30 Overlay" to "Specific Plan" and (ii) amend the Land Use Plan text and Land Use Plan Table LU-3 to allow the mix of uses and densities specified in the NCSP. Separate and unrelated to the NCSP and concerning the residential parcel at 16964 Brighton Avenue, a General Plan amendment is proposed to change the land use designation on the General Plan Land Use Map from Industrial to Single-Family Residential and rezone from General Industrial Zone (M2) to Single Family Residential Zone (R-1) consistent with the existing residential land use. Concerning the parcel immediately adjacent and east of the Project site that is currently occupied by UPRR tracks, the Project proposes to redesignate the property from Industrial to Public/ Institutional, and rezone from General Industrial Zone (M-2) to Official (O) consistent with the existing railroad land use. The Project Applicant seeks approval of General Plan Amendment/General Plan Map Amendment (GPA #3-21) to implement these changes. This amendment would occur pursuant to **GMC Chapter 18.52,** which establishes procedures to amend, supplement, or change a property's land use designation. Following approval of the requested General Plan Amendment, the Project would not conflict with the GGP Land Use Plan, thus, would not cause a significant environmental impact in this regard.

Gardena General Plan 2006 Goals and Policies

Table 4.8-4: Gardena General Plan 2006 Analysis evaluates the Project concerning the relevant GGP goals and policies, and concludes the Project would not conflict with the relevant General Plan goals and policies. Therefore, the Project would not result in a significant environmental impact concerning a conflict with the GGP.

Table 4.8-4: Gardena General Plan 2006 Analysis

General Plan Policy	Project Analysis
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.	**No Conflict**. The NCSP would implement new zoning and development standards to promote development of high-quality housing in the City. The Project facilitates the surrounding neighborhood's transition into a more

General Plan Policy	Project Analysis
	complete community, in that it would bring new residents to the neighborhood, bring new housing to this area, improve the streetscape, and activate the pedestrian realm.
Policy LU 1.2: Protect existing sound residential neighborhoods from incompatible uses and development.	**No Conflict**. Factors influencing land use compatibility include aesthetics, air quality, noise, and traffic. As concluded in **Section 4.2: Air Quality**, **Section 4.9: Noise**, **Section 4.13: Transportation**, and **Section 4.16 Aesthetics,** respectively, the Project would result in less than significant operational impacts concerning these resource areas, which in turn would influence land use compatibility. The surrounding properties include single- and multi-family land uses. Therefore, the Project would be a compatible land use and would involve removal of potentially incompatible industrial uses with NCSP approval.
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.	**No Conflict**. Commercial uses and services are located approximately 0.16 mile south of the Project site at the Artesia Boulevard at Normandie Avenue intersection. These shopping centers are characterized by commercial and retail uses that would provide community services and facilities to the Project's future residents. Additionally, the Project would cluster urban-density housing at an appropriate location in the vicinity of the Harbor Gateway Transit Center, which would offer easy access to public transportation 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.	**No Conflict**. The Project would incorporate quality residential amenities, including private and community open spaces. The Project's apartment amenities include a fitness room, dog park, and bike room on the ground level; pools, BBQ's and courtyards with fire pits on level three; and a roof deck and club room on level seven. The Project's townhome amenities include a dog park, paseos, courtyard with BBQ's and fire pits, and a pool. The Project provides adequate residential amenities which would create more attractive and livable spaces for residents. The Project would also provide approximately 399 off-street vehicle and 173 bicycle parking spaces.
Policy LU 1.6: Ensure residential densities are compatible with available public service and infrastructure systems.	**No Conflict**. The Project 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 Project includes measures to ensure that the plan area is served by adequate public services, infrastructure, and utilities.

General Plan Policy	Project Analysis
Policy LU 1.8: Minimize through-traffic on residential streets.	**No Conflict.** The Project proposes three vehicle access points at 169th Street (north), 170th Street (south), and Normandie Avenue (east). 169th Street and 170th Street are classified as Local Streets in the GGP. Traffic on these two roadways proceed to Normandie Avenue, which is classified as a Major Collector. The Project minimizes through-traffic on residential streets by orienting vehicular access towards Normandie Avenue.
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.	**No Conflict.** The Project facilitates the development of quality housing near 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 quality housing options; social, cultural, and environmental amenities; access to shops and restaurants; and low-stress commutes. Project implementation would help alleviate the negative impacts of a lack of housing for local technology and creative sector employees. 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.	**No Conflict**. The Project has been subject to City review and approval to ensure that future development is held to quality design practices and standards.
Policy DS 1.4: Provide a sense of arrival to Gardena through entry monument signs, landscaping features, architectural and motifs at key gateway locations.	**No Conflict**. The Project would enhance the visual environment by replacing obsolete, industrial warehouse buildings with a new multi-family development. The Project would incorporate high-quality design and landscaping consistent with the Specific Plan standards. Developing new residential uses in proximity to growing local technology and creative sector industries would help create a positive image of the City. The Project would provide onsite landscaping features and a high-quality sign identifying the Project, consistent with GMC Chapter 18.58 sign standards, at a key gateway location in the City.

General Plan Policy	Project Analysis
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.	**No Conflict**. The Project is intended to achieve quality and attractively designed development that can serve as a model for future multi-family development in the City. The Project would replace aged and dilapidated industrial warehouse buildings with a residential development that is intended to serve as a catalyst to transform southeast Gardena into a multi-family 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.	
Policy DS 2.3: Encourage a variety of architectural styles, massing, floor plans, color schemes, building materials, façade treatments, elevation and wall articulations.	**No Conflict.** The NCSP development standards would ensure the development includes a variety of massing, floorplans, color schemes, façade treatments, elevations, 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.	**No Conflict**. The apartment building portion of the Project design and access is oriented towards Normandie Avenue and away from the nearest single-family housing located to the south and west of the Project site. Further, the Project appropriately transitions building massing from a single- to multi-family scale by locating the townhome style buildings along the Project boundary that borders single-family housing (south and west) and the apartment building near the multi-family apartments (north) and Normandie Avenue (east).
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.	**No Conflict**. The Project would provide landscape treatments that would create a "greener" environment. The Project would replace existing industrial warehouses 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.	**No Conflict**. The Project would incorporate quality residential amenities, including 16,120 SF of private and 20,000 SF of community open spaces. The Project's apartment amenities include a fitness room, dog park, pool, and bike room on the ground level; pools, BBQs and courtyards on level 3; and a roof deck and club room on level 7. The Project's townhome amenities include a dog

General Plan Policy	Project Analysis
	park, paseos, courtyard with BBQs, and a pool. These amenities would create more attractive and livable spaces for residents to enjoy.
Policy DS 2.12: Provide well-designed and safe parking areas that maximize security, surveillance, and efficient access to building entrances.	**No Conflict**. The apartment building portion of the Project would provide parking in an enclosed garage consisting of two 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. The townhome units would have enclosed parking garages.
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.	**No Conflict**. The Project includes design guidelines to ensure that the Project is designed with a varied but cohesive architectural style. These design standards would ensure that the Project would be designed with 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.	**No Conflict**. The Project would provide a new high-quality residential development through Specific Plan implementation, which would conform to the latest CALGreen sustainability standards and encourage 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.	**No Conflict.** The Project's apartment building portion would provide 173 bicycle parking spaces and 399 auto parking spaces, consistent with the NCSP but less than the City's parking requirements, providing 1.2 parking spaces per apartment unit. As such, the Project would discourage multi-vehicle households. Providing less parking spaces per unit encourages residents to carpool or seek alternative modes of transportation. The Project further promotes use of multi-modal transportation networks through its close proximity to such networks. Existing GTrans bus stops are located less than 600 feet to the north of the Project site along 166th Street. Additional Torrance Transit and Metro services are located approximately 0.25 mile to the south of the Project site, at the intersection of Artesia Boulevard and South Normandie Avenue. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9

General Plan Policy	Project Analysis
	mile to the south, providing more access to public transit opportunities. Further, per the NCSP, new residents who sign a 12-month lease would be offered one free monthly Metro pass. The Project would provide two parking spaces per townhouse unit, plus 10 guest parking spaces.
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.	**No Conflict.** Transit and pedestrian facilities exist near the Project site. Existing GTrans bus stops are located less than 600 feet to the north of the Project site along 166th Street. Additional Torrance Transit and Metro services are located approximately 0.25 mile to the south of the Project site, at the intersection of Artesia Boulevard and South Normandie Avenue. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9 mile to the south, providing more access to public transit opportunities. To improve access to public transportation, the Project includes the construction of onsite and offsite sidewalks in this area. The Project includes the construction of sidewalks per Local Street requirements along the south side of 169th Street, Brighton Way (west), and 170th Street (south). Additionally, the Project proposes to construct offsite sidewalk improvements offsite along the south side of 169th Street. The Project, with the incorporation of these sidewalk improvements, would improve connectivity to regional services and promote alternative modes of transportation for residents. Further, the NCSP proposes that new residents who sign a 12-month lease would be offered one free monthly Metro pass. This provision would increase the use of established public transit in the area.
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.	**No Conflict.** The Project would include reconstruction of sidewalks, curbs, and gutters adjoining the Project site. Furthermore, as mentioned above, the Project proposes to construct offsite sidewalk improvements offsite along the south side of 169th Street and onsite along Brighton Way (west) and 170th Street (south) pursuant to the GGP Circulation Element requirements for a Local Street (2 lanes, undivided with parking).
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.	**No Conflict.** The Project promotes bicycle usage through provision of bicycle access along street frontages and bicycle parking.

General Plan Policy	Project Analysis
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.	**No Conflict.** The Project reduces the impact of governmental constraints on housing construction and cost by implementing special zoning and development standards to permit more flexibility in housing developments in southeast Gardena. The Project offers an opportunity to create a vibrant, multi-family 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 otherwisebe permitted under existing zoning, the Project incentivizes construction of new multi-family housing with a variety of unit types thereby reducing costs.
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.	**No Conflict.** Upon adoption of the General Plan Amendment and zone change to Specific Plan, the Project would be consistent with land use designations and zoning to provide for the development of multi-family residential development. The provision of up to 403 residential units near regional serving public transit infrastructure assists the City in meeting its share of the regional housing needs allocation. Currently, residential development in southeast Gardena primarily consists of single-family housing with minimal multi-family housing along arterials. The Project permits a greater range of residential densities than is currently permitted in this area of the City. Additionally, three parcels of the existing Project site are designated with a Housing Overlay which identifies that the site has potential to be redeveloped with residential uses to help the City meet its Regional Housing Needs Allocation.
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.	**No Conflict**. The Project conserves and protects 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 site is approximately 99.7% impervious under existing
Policy CN 2.6: Encourage and support the proper disposal of hazardous waste and waste oil. Monitor businesses that generate hazardous waste materials to	

General Plan Policy	Project Analysis
ensure compliance with approved disposal procedures.	conditions.[4] The Project would reduce the impermeable area to approximately 85.90 %, an approximately 13.80% reduction by incorporating approximately 31,000 SF of new planting areas. The Project would be required to 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.	**No Conflict**. The Project would comply with all applicable local and state requirements for waste diversion during both construction and operations, including the City's Source Reduction and Recycling Element.
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.	**No Conflict**. The Project would be a multi-family development subject to 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. The Project would comply with the 2022 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.	**No Conflict.** 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. See **Section 4.14: Tribal Cultural Resources**.
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.	**No Conflict**. The City has considered law enforcement, crime prevention, and fire safety concerns in its Project review. The building and parking structure would be accessible only to residents. The Project proposes 10 guest parking spaces, which would be located near the townhome units. 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.	**No Conflict.** The Project would be required to comply with the seismic safety standards in the Uniform Building Code.

[4] Urban Architecture Lab. (2022). 16911 Normandie Apartments and Townhomes Entitlement Set, Sheet No. G0.01: Project Information.

General Plan Policy	Project Analysis
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.	**No Conflict.** The Project site is near parcels within a liquefaction zone; therefore, a geotechnical study was prepared for the Project area; see **Appendix 4.4-1: Preliminary Geotechnical Investigation**.
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.	**No Conflict.** The Project's proposed multi-family residential building would be professionally managed and the property managers would develop standard emergency preparedness plans and procedures.
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.	**No Conflict**. The Project's potential for generating noise impacts on the surrounding environment both during construction and operation is addressed in **Section 4.9: Noise.** As concluded in **Section 4.9: Noise**, impacts associated with Project onsite construction activities would be significant and unavoidable despite the specified mitigation measures. In accordance with **Policy 2.4**, mitigation is required to minimize construction noise impacts. As to **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. As to **Policy 2.9,** the Project would incorporate design features necessary to control residential interior noise levels and minimize exposure of residents to nearby mobile noise sources 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.	**No Conflict.** The Project would be subject to compliance 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.	**No Conflict.** The Project would be subject to compliance with the City's regulations regarding permitted construction hours.
Source: City of Gardena. 2006. *Gardena General Plan 2006, Updated 2022*. https://www.cityofgardena.org/general-plan/. Accessed May 2023.	

Mitigation Measures

No mitigation is required.

Impact 4.8-2:

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

The following is an analysis of the Project concerning the relevant GMC standards.

GMC Title 17: Subdivisions and GMC Chapter 17.16: Vesting Tentative Maps. The Project Applicant is seeking approval of Vesting Tentative Tract Map (VTTM #4-21) for a lot merger and condominium subdivision. GMC Title 17, and more specifically GMC Chapter 17.16 establishes the procedures necessary for the implementation of the vesting tentative map statute and supplements the provisions of the Subdivision Map Act. The regulations set forth in this chapter ensure the preservation of the public health, safety and general welfare and for the promotion of orderly growth and development. This chapter specifies that no land shall be subdivided and developed pursuant to a vesting tentative map for any purpose which is inconsistent with the General Plan and any applicable Specific Plan or not permitted by the zoning provisions or other applicable provisions of the GMC. Following approval of the Vesting Tentative Map, the Project would not conflict with GMC Title 17 or GMC Chapter 17.16.

GMC Title 18, Zoning. The Project Applicant seeks approval of a Zone Change (ZC # 4-21) and Zone Map Amendment to change the Project site's zoning from Industrial (M-1) with a High Density 30 Overlay and General Industrial (M-2) to Normandie Crossing Specific Plan (NCSP). Additionally, the Project requires a Zoning Text Amendment (ZTA #6-21) that would modify the GMC to include the NCSP Zone and meet GMC Title 18 requirements. These approvals are needed for Project development, which replaces warehouse buildings with 403 multi-family residential dwelling units. Adoption of the NCSP (SP #1-21) would establish the Project area's zoning regulations and development standards. The changes would occur pursuant to GMC Chapter 18.39: Specific Plans, 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.

Additionally, separate and unrelated to the NCSP, the Project Applicant seeks approval of a Zone Change and Zone Map Amendment for two offsite parcels (APN: 6106-030-008 and 6106-030-800). Specifically, the Project proposes to rezone APN 6106-030-008 from General Industrial Zone (M-2) to Single Family Residential Zone (R-1), consistent with the existing residential land use, and to rezone APN 6106-030-800, which is currently occupied by UPRR tracks, from General Industrial Zone (M-2) to Official (O) consistent with the existing railroad land use.

Following approval of the requested Zone Changes, Zone Map Amendment, and Zoning Text Amendment, the Project would not conflict with GMC Title 18.

GMC Chapter 18.39: Specific Plans. The Project applicant is seeking approval of the Normandie Crossing Specific Plan (NCSP) (SP #1-21) which would outline the design standards and guidelines for the Project and any future development on the Project site. GMC Chapter 18.39 outlines the required contents of specific plans and approval procedures. The NCSP would be consistent with both the content requirements and procedures. Therefore, the Project would not conflict with GMC Chapter 18.39.

GMC Chapter 18.44: Site Plan Review. Pursuant to GMC Chapter 18.44, review of the 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 #11-21) to verify compliance with GMC standards. Following approval of the Project's Site Plan, the Project would not conflict with GMC Chapter 18.44.

GMC Chapter 18.52: Amendments. The Project Applicant seeks approval of a General Plan Amendment (SP#3-21) to amend the Land Use Plan text and Land Use Plan Table LU-3 to allow multi-family residential development within the NCSP and a General Plan Map Amendment to reflect those changes on the GGP Land Use Map. These approvals are needed for Project development, which proposes one seven-story apartment building with 328 apartments and nine three-story structures which include 75 townhome style units to replace the warehouse buildings currently on the property. Approval of the General Plan Amendment would establish the Specific Plan Land Use and therefore allow the Project to be consistent with the General Plan.

Additionally, separate and unrelated to the NCSP, the Project Applicant seeks approval of a General Plan Amendment and General Plan Map Amendment for two offsite parcels (APN: 6106-030-008 and 6106-030-800). Specifically, the Project proposes to redesignate APN 6106-030-008 from Industrial to Single Family Residential and to redesignate APN 6106-030-800, which is currently occupied by UPRR tracks, from Industrial to Public/Institutional.

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, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.8-3:

Would the Project cause a significant environmental impact due to a conflict with any Connect SoCal 2020-2045 RTP/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

SCAG established a process to identify a project's impact on a regional scale and how it could contribute to the region's plan and vision, given SCAG is also the designated Regional Transportation Planning Agency under State law and is responsible for preparing the RTP, including the SCS. As previously noted, pursuant to SCAG's Intergovernmental Review (IGR) Program, lead agencies are required to determine the consistency of a regionally significant plan, project, and program with SCAG's adopted regional plans. A project is considered to be of statewide, regional, or areawide significance if it meets various criteria, including among others, a proposed local general plan, element, or amendment thereof for which an EIR was prepared; see State CEQA Guidelines §15206(b)(1). The Project is considered regionally and areawide significant, given it proposes to amend the City's General Plan. Therefore, pursuant to SCAG's IGR Program, as Lead Agency, the City is required to determine the Project's consistency with SCAG's adopted regional plans.

The Project would not conflict with the RTP/RCP's long-term goals and policies concerning air quality, water quality, transportation, and infrastructure; see **Section 4.1: Air Quality**, **Section 4.5: Greenhouse Gas Emissions**, and **Section 4.13: Transportation**, respectively, for further discussion concerning the Project's potential environmental impacts for these resource areas. Additionally, **Table 4.5-5: RTP/SCS Goals Analysis**, presents an analysis of the Project's consistency with applicable RTP/SCS goals. As is evidenced by the analysis provided in **Table 4.5-5**, the Project would not conflict with RTP/RCP goals. Therefore, the Project would result in a less than significant impact concerning a potential conflict with an RTP/SCS land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Mitigation Measures

No mitigation is required.

4.8.5 CUMULATIVE IMPACTS

For purposes of the land use and planning impact analysis, cumulative impacts are considered for cumulative development within Gardena, according to the related projects; see **Table 3-1: List of Cumulative Projects**. The geographic contexts of the land use and planning cumulative analyses are the City, County, and SCAG planning region; see also **Table 3-2: Geographic Context for Cumulative Analysis**.

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 entitlements pursuant to GGP and GMC requirements.

When combining the Project with the other related projects, cumulative development would provide 654,538 SF of non-residential land uses and 1,835 DU. 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 the GGP and GMC. Given that, upon adoption, the Project would not conflict with the land use policies of the applicable 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 GGP and GMC. Each cumulative project would be analyzed to ensure that the applicable goals and policies are consistently upheld. Project-specific measures would be identified, as needed. Consequently, the Project combined with other cumulative development would not result in significant cumulative environmental impact by conflicting with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Project would not cause a cumulatively considerable impact concerning land use and planning.

4.8.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning land use and planning have been identified.

4.8.7 REFERENCES

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4.9 NOISE

4.9 NOISE

The purpose of this section is to describe the existing noise-related environmental and regulatory settings and evaluate the Project's potential to generate a substantial temporary/permanent increase in ambient noise levels and/or excessive groundborne vibration/groundborne noise levels, and expose people residing/working in the Project area to excessive airstrip- or airport-related noise levels. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or lessen the Project's potentially significant impact.

Information in this section is based primarily on noise and vibration data provided in the Noise Impact Study, 16911 Normandie Project - Gardena, CA ("Noise Impact Study") (Acoustical Engineering Services, Inc., 2023); see **Appendix 4.9-1: Noise Impact Study**.

It is noted, Kimley-Horn conducted a third-party review on behalf of the City of Gardena ("City") of the Project's Noise Impact Study; see **Appendix 4.9-1**. The third-party review concluded the analysis meets the applicable provisions of Environmental Quality Act (CEQA) and the State CEQA Guidelines.

4.9.1 EXISTING SETTING

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 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 A-weighted decibel (dBA). The dBA 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. 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. 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 sound sources within the 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 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. Vibration-sensitive receptors 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 (Caltrans, 2013b) 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 West 169th Street immediately adjacent/north of the Project site, West 170th Street immediately adjacent/south of the Project site, and South Normandie Avenue immediately adjacent/east of the Project site. Traffic-related mobile source noise is a function of the roadways' traffic volumes and vehicle speeds. **Table 4.9-1: Offsite Roadway Traffic Noise Levels – Existing Conditions** presents the existing offsite traffic noise levels along the area's roadways. Additionally, according to the Federal Railroad Administration crossing report (FRA 2023), up to two trains per day travel on the adjacent trains at up to 10 miles per hour. As shown in **Table 4.9-1**, the estimated noise levels along the area's roadways range from 47.6 dBA CNEL to 68.6 dBA CNEL.

The Project site is not in the vicinity of a private airstrip or an airport land use plan, or within two miles of a public airport or public use airport. The airport located nearest the Project site is Hawthorne Municipal Airport/Jack Northrop Field ("Airport"), approximately 3.4 miles to the northwest. Therefore, airstrip- and airport-related noise levels will not be further discussed in this section.

Table 4.9-1: Offsite Roadway Traffic Noise Levels – Existing Conditions

Roadway Segment	Estimated Traffic Noise Levels[1] CNEL
	Existing
Normandie Avenue Between 169th Street and 170th Street	68.6
West 169th Street West of Normandie Avenue	55.5
West 170th Street West of Normandie Avenue	47.6
Source: **Appendix 4.9-1,** Table 10	

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 residential 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. The Project site is surrounded by residential uses, as summarized in **Table 2-2: Surrounding Land Uses and Zoning**. Based on a review of the surrounding land uses, the noise-sensitive receptors nearest the Project site are the single--family residential uses located approximately 25 feet to the west.

Six offsite noise-sensitive receptor locations were selected to represent noise-sensitive receptors surrounding the Project area. These noise-sensitive receptors (i.e., R1, R2, R3, R4, R5, and R6) are described in **Table 4.9-2: Existing Ambient Noise Levels**, and their locations are depicted on **Exhibit 4.9-1: Receptor Locations**. Ambient noise measurements were taken at the six offsite noise-sensitive receptor locations on February 3, 2022. The ambient noise measurements were conducted using a Larson-Davis Model 870 Integrating/Logging Sound Level meter, which meets and exceeds the minimum industry performance requirements for "Type 1" standard instruments as defined in the American National Standard Institute (ANSI) S1.4. Daytime and nighttime measurements were conducted at each of the offsite receptor locations and were taken in accordance with the City's standards. As indicated in **Table 4.9-2**, the existing ambient noise levels at the six noise sensitive receptor locations range from 49.0 dBA to 69.9 dBA L_{eq} during daytime hours and from 48.7 dBA to 67.3 dBA L_{eq} during nighttime hours.

Table 4.9-2: Existing Ambient Noise Levels

Offsite Noise-Sensitive Receptors	Approximate Distance from Project Site[1] (Feet)	Ambient Noise Levels dBA L_{eq}	
		Daytime Hours (7 a.m. to 10 a.m.)	Nighttime Hours (10 p.m. to 7 a.m.)
R1 – Single-Family Residential Use adjacent to Project site's southwest corner, at 16964 Brighton Avenue	0 (adjacent)	49.0	52.2
R2 – Single-Family Residential Use south of Project site, at 17001 Brighton Way	40	55.1	53.8
R3 – Single-Family Residential Use east of Project site, at 1337 169th Place	80	69.9	67.3
R4 – Single-Family Residential Use north of Project site, at 16815 Brighton Avenue	60	56.9	56.4
R5 – Single-Family Residential Use west of Project site, at 16904 Brighton Avenue	25	54.8	53.0
R6 – Single-Family Residential Use , west of Project site, at 16934 Brighton Avenue	25	54.6	48.7
R7 – Multi-Family Residential (63-unit single-room occupancy), north of Project sites, at 16819 South Normandie Avenue[2]	25	56.9[2]	56.4[2]

Notes:
1. Distances are estimated based on Google Earth map and are referenced to the Project site's nearest property line.
2. This receptor was under construction when the ambient noise measurements were taken on February 3, 2022. Therefore, no noise measurements were taken at this receptor location at that time. Because receptor locations R4 and R7 share similar surrounding land uses and distance from the Project site, receptor location R4's ambient noise levels are considered representative of receptor location R7's ambient noise levels, thus, are assumed for analysis purposes.

Source: **Appendix 4.9-1**, Table 4.

Vibration-Sensitive Receptors

Vibration-sensitive receptors 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 six offsite noise-sensitive receptor locations identified above were also selected to represent vibration-sensitive receptors surrounding the Project area. There are no older masonry structures or locales with vibration-sensitive equipment in the Project vicinity.

R4
R7
R5
R6
R3
R1
R2
Gardena
LEGEND
Project Site
Offsite Improvements
Noise Receptor Location
Source: Nearmaps, May 25, 2023.
EXHIBIT 4.9-1: RECEPTOR LOCATIONS
Normandie Crossing Specific Plan Project
NOT TO SCALE
Kimley»Horn

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4.9.2 REGULATORY SETTING

STATE

California Noise Standards

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 use 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 §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 §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. 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 Gardena 2006 General Plan (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.

- **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 and 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 4.9-3: 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 4.9-3: 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

Table 4.9-3: Gardena Noise and Land Use Compatibility							
Land Use Category	CNEL, dBA[1]						
	<	55	60	65	70	75	80
Industrial, Manufacturing Utilities, Wholesale, Service Stations	A	A	A	A	B	B	B
Agriculture	A	A	A	A	A	A	A

Notes:
[1] CNEL = Community Equivalent Noise Level; dBA = Decibel
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, Updated 2022.

City of Gardena Municipal Code

City of Gardena Municipal Code (GMC) §8.36.040 – Exterior Noise Standards. Establishes the City's exterior noise standards, respectively, in terms of L_{eq}(15) and Lmax. **Table 4.9-4: Gardena Allowable Exterior Noise Levels**, provides the allowable exterior noise levels at the affected property receiving the noise by land use category. GMC §8.36.040(C) states that if the ambient noise level exceeds the noise standard, then the ambient noise level shall become the noise standard.

Table 4.9-4: Gardena Allowable Exterior Noise Levels

Type of Land Use	15-minute Average Noise Level, dBA (Leq)		Maximum Noise Level, dBA (Lmax)	
	7 a.m. - 10 p.m.	10 p.m. - 7 a.m.	7 a.m. - 10 p.m.	10 p.m. - 7 a.m.
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: Gardena Municipal Code §8.36.040, 2020.

City of Gardena Municipal Code (GMC) §8.36.050 – Interior Noise Standards. Establishes the City's interior noise standards respectively, in terms of L_{eq}(15) and Lmax. 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.

City of Gardena Municipal Code (GMC) §8.36.070 – Prohibited Acts. GMC §8.36.070 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.

City of Gardena Municipal Code (GMC) §8.36.080 – Exemptions. –This section establishes that 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 Sundays or federal holidays.

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.

It is noted, while the GMC does not have a quantitative construction noise standard, the City utilizes a 10 dBA over ambient threshold to analyze construction noise impacts under CEQA. Pursuant to Caltrans, 10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.[1]

Applicable Vibration Standards

City of Gardena Municipal Code (GMC) §8.36.070 – Prohibited Acts. This section 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 (80 VdB).[2]

4.9.3 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

[1] California Department of Transportation. (2013). *Technical Noise Supplement to the Traffic Noise Analysis Protocol, pages 71 and 207*. Retrieved from https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf. Accessed August 2023.

[2] The 80 VdB significance threshold is based on the City vibration limit of 0.01 in/sec converted to VdB, 80 VdB = 20*log(0.01*1,000,000).

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 4.9-1**).
- Result in the generation of excessive groundborne vibration or groundborne noise levels
- 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

METHODOLOGY AND ASSUMPTIONS

Temporary Construction Noise

Construction noise impacts from the Project's onsite construction activities were evaluated by calculating the construction-related noise levels at representative noise-sensitive receptor locations and comparing these estimated Project construction-related noise levels to the existing ambient noise levels (i.e., noise levels without Project construction noise). Project construction noise 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." (FHWA, 2006) Project 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. A 5 dBA attenuation was assigned for receptor locations where the acoustic line-of-sight is just interrupted (i.e., around the edge of a building).

In addition, the construction-related offsite 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 Project's estimated construction noise levels with 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

Offsite 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 (i.e., use of the dog run/park, courtyards, open spaces, pools, and open decks), parking facilities, and trash compactor; (2) calculating the noise level from each noise source at surrounding noise-sensitive receptor property line locations, including the composite noise of all sources; and (3) comparing such noise levels to City noise standards and ambient noise levels to determine significance. The onsite stationary noise sources were calculated using the SoundPLAN, a 3-dimensional computer noise prediction model.

4.9.4 IMPACTS AND MITIGATION MEASURES

Impact 4.9-1:

Would the Project 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?

Level of Significance: Significant 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. Project construction activities would generally include demolition, site grading, site preparation, foundation construction, building construction, and paving/landscaping. Each stage of construction would involve the use of various construction equipment types 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 3.5 years.

Table 4.9-5: 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 from the source (Referenced Maximum Noise Levels) are based on the FHWA Roadway Construction Noise Model User's Guide

(RCNM) (FHWA, 2006), 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 partial power. To characterize the Project's construction-period noise levels more accurately, the average (hourly L_{eq}) noise level associated with each construction stage was calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage.[3] These noise levels are typically associated with multiple pieces of equipment operating simultaneously.

Table 4.9-5: 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
Crane	16	81
Dozer	40	82
Forklift	20	75
Gradall	40	83
Dump/Haul Truck	40	76
Excavator	40	81
Jackhammer	20	89
Man Lift	20	75
Grader	40	85
Rubber Tired Loader	40	79
Delivery Truck	40	74
Welders	40	74
Pneumatic Tool	50	85

Notes:
[1] Construction equipment noise levels are based on the FHWA RCNM and represent exterior noise measurements.

Source: FHWA Roadway Construction Noise Model User's Guide. Table 1, 2006.

Table 4.9-6: Estimated Construction Noise Levels provides the Project's estimated construction noise levels for various construction phases at the nearest offsite noise-sensitive receptors described in **Table 4.9-2**. For a conservative analysis, the estimated noise levels were calculated assuming all pieces of construction equipment for each construction phase are operating simultaneously and located at the construction area nearest the noise-sensitive receptors. These assumptions represent the worst-case noise scenario because construction activities would

[3] 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.

typically be spread out throughout the Project site, and, thus, some equipment would be farther away from the affected receptors.

As shown in **Table 4.9-6**, the Project's estimated construction noise levels during demolition (i.e., the loudest construction phase) would range from 72.1 dBA (L_{eq}) at receptor location R3 to 86.8 dBA (L_{eq}) at receptor location R1. Pursuant to GMC §8.36.080, construction activities are exempt from the City's noise standards, provided construction activities do not take place between 6:00 p.m. and 7:00 a.m. on weekdays, between 6:00 p.m. and 9:00 a.m. on Saturdays, or any time on Sundays and federal holidays. Project construction activities would be subject to compliance with GMC §8.36.080, thus, would not take place during the restricted days/hours. Therefore, the Project's construction activities would be exempt from the City's noise standards. Notwithstanding, the Project's estimated construction noise levels have been conservatively analyzed, as discussed below.

Table 4.9-6: Estimated Construction Noise Levels

Receptor Location	Estimated Noise Levels by Construction Phase[1] dBA (L_{eq})[2]						Measured Ambient Noise Levels[2]	Significance Threshold[3]	Mitigated Noise Level[4]
	Demolition	Grading	Site Preparation	Foundation Construction	Building Construction	Paving/ Landscaping			
R1	**86.8**	**86.7**	**83.0**	**83.5**	**85.3**	**85.1**	49.0	59.0	**74.8**
R2	**83.8**	**83.7**	**79.7**	**80.4**	**81.4**	**81.1**	55.1	65.1	**71.8**
R3	72.1	71.9	67.6	68.4	68.0	67.4	69.9	79.9	60.1
R4	**81.2**	**81.0**	**76.9**	**77.7**	**78.0**	**77.6**	56.9	66.9	**69.2**
R5	**84.6**	**84.5**	**80.7**	**81.3**	**82.5**	**82.2**	54.8	64.8	**72.6**
R6	**84.6**	**84.5**	**80.7**	**81.3**	**82.5**	**82.2**	54.6	64.6	**72.6**
R7	**81.2**	**81.0**	**76.9**	**77.7**	**78.0**	**77.6**	56.9	66.9	**69.2**

Notes:
[1] Detailed calculation worksheets are included in **Appendix 4.9-1**.
[2] See **Table 4.9-5: Construction Equipment Noise Emission Reference Levels and Usage Factors**.
[3] 10 dBA over ambient threshold.
[4] With Mitigation Measure NOI-1: Construction Noise implemented.

Source: **Appendix 4.9-1**, Table 6.

As indicated in **Table 4.9-6**, the Project's estimated construction noise levels would exceed the City's significance thresholds at all noise-sensitive receptor locations except receptor location R3. To reduce the Project's construction-related noise levels, implementation of Mitigation Measure (MM) MM NOI-1: Construction Equipment, which requires power construction equipment to be properly maintained and equipped with noise shielding and muffling devices, and MM NOI-2: Construction Noise, which requires that an impermeable sound barrier be constructed prior to any demolition/construction activities along the Project's northern, southern, and western property lines and that these barriers remain for the duration of construction, are recommended. **Table 4.9-6** provides the estimated construction noise levels at the nearest offsite noise-sensitive receptors with MM NOI-1 and MM NOI-2 incorporated. As indicated in **Table 4.9-6**, despite MM NOI-1 and MM NOI-2 achieving an approximately 12-dBA attenuation (i.e., noise reduction),

construction noise levels at all six of the significantly-impacted noise-sensitive receptors (i.e., receptor locations R1, R2, R4, R5, R6, and R7) would continue to exceed the City's specified thresholds. As previously noted, GMC §8.36.080(G) exempts noise associated with construction activities provided it does not occur within restricted days and hours. Notwithstanding, given that construction-related noise levels would exceed the City's specified thresholds, and considering the proposed building height (seven stories at a maximum height of approximately 90 feet) and extended construction period (i.e., 3.5 years), it is conservatively concluded that the Project's construction-related noise levels would result in a significant unavoidable impact.

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 offsite construction trucks would be from haul trucks during the demolition and site grading/excavation (for import and export), which would require approximately 20 daily truck trips (10 incoming trips and 10 outgoing trips). Construction-related trucks would be fewer during other construction phases with up to 10 delivery truck trips per day. Therefore, the construction-related mobile-source noise analysis is based on the peak period with a maximum of 20 truck trips per day. Based on an eight-hour haul period and a uniform distribution of truck trips, there would be 3 truck trips per hour. Haul trucks would generally access the Project site via I-405 and South Normandie Avenue.

The offsite construction trucks would generate noise levels of approximately 54.7 dBA L_{eq} along Normandie Avenue between the Project site and I-405. The estimated noise from offsite construction trucks would be well below the existing ambient noise level of 69.9 dBA L_{eq} (measured at noise-sensitive receptor location R3) along Normandie Avenue. As such, the Project's offsite construction traffic would result in less than significant noise impacts.

OPERATIONS (NOISE)

The Project's operational noise sources would include: (a) onsite stationary noise sources, including outdoor mechanical equipment (e.g., heating/ventilation/air conditioning (HVAC) equipment), outdoor activities (i.e., use of dog run/park, courtyards, open spaces, pools, and open decks), parking facilities, trash compactor; and (b) offsite mobile (roadway traffic) noise sources.

Outdoor Mechanical Equipment

The Project would include new outdoor mechanical equipment (i.e., HVAC equipment), which would be located on the building roof levels. Project-related outdoor mechanical equipment would be required 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 at the property lines of the nearest noise-sensitive receptors. As shown in **Table 4.9-7: Outdoor Mechanical Equipment Noise Levels,** the estimated mechanical equipment noise levels would range from 28.2 dBA (L_{eq}) at receptor location R5 to 34.1 dBA (L_{eq}) at receptor R1, which would be below the

City's significance thresholds. Therefore, the Project's mechanical equipment noise levels would result in a less than significant impact.

Table 4.9-7: Outdoor Mechanical Equipment Noise Levels

Receptor Location	Nighttime Hours Ambient Noise Levels[1] dBA (L_{eq})	Estimated Noise from Project Mechanical Equipment[2] dBA (L_{eq})	Significance Threshold[3] dBA (L_{eq})	Exceedance over Significance Threshold	Significant Impact?
R1	49.0	34.1	50.0	0.0	No
R2	53.8	29.7	53.8	0.0	No
R3	67.3	31.7	67.3	0.0	No
R4	56.4	28.3	56.4	0.0	No
R5	53.0	28.2	53.0	0.0	No
R6	48.7	29.3	50.0	0.0	No
R7	56.4	28.3	56.4	0.0	No

Notes:
[1] See **Table 4.9 1: Existing Ambient Noise Levels**.
[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 4.9-1**.
[3] Significance threshold is 50 dBA (Leq) (see **Table 4.9-4: Gardena Allowable Exterior Noise Levels**), unless the ambient noise level exceeds the noise standard, then the ambient noise level becomes the noise standard (GMC §8.36.040(C)).

Source: **Appendix 4.9-1**, Table 7.

Outdoor Activities

The Project's outdoor spaces would include several common areas where various outdoor activities would occur, as follows:

- Apartments: dog run, courtyard, and open spaces on Level 1; an outdoor pool and courtyards on Level 3; and an open deck on Level 7.

-Townhomes: swimming pool with BBQ and seating areas; dog park; club house; and paseos with seating areas.

Noise sources associated with the outdoor spaces 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. The noise analysis assumed up to 1,352 people at apartment courtyards 1, 2, and 3, up to 151 people at the open spaces and dog park, and up to 130 people gathering at the apartment Level 7 outdoor deck based on 15 square feet per

person.[4, 5] To analyze a typical noise scenario, it was assumed that up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time. Noise levels associated with the dog run area were calculated based on measured noise levels from an existing dog park,[6] which generated approximately 58.4 dBA (L_{eq}) at a distance of 25 feet.[7]

Table 4.9-8: Outdoor Activity Noise Levels presents the estimated noise levels at the offsite noise-sensitive receptors, resulting from use of outdoor spaces. 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 4.9-8**, the estimated noise levels from the Project's outdoor spaces would range from 28.8 dBA (L_{eq}) at receptor locations R4/R7 to 48.7 dBA (L_{eq}) at receptor location R3, which would be below the City's significance thresholds. Therefore, the Project's outdoor stationary noise source noise levels would result in a less than significant impact.

Table 4.9-8: Outdoor Activity 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	49.0	46.6	50.0	0.0	No
R2	53.8	37.7	53.8	0.0	No
R3	67.3	48.7	67.3	0.0	No
R4	56.4	28.8	56.4	0.0	No
R5	53.0	29.6	53.0	0.0	No
R6	48.7	30.0	50.0	0.0	No
R7	56.4	28.8	56.4	0.0	No

Notes:
[1] Based on City nighttime exterior noise limits.
[2] Detailed calculation worksheets are included in **Appendix 4.9-1.**
[3] Significance threshold is 50 dBA (Leq) (see **Table 4.9-4: Gardena Allowable Exterior Noise Levels**), unless the ambient noise level exceeds the noise standard, then the ambient noise level becomes the noise standard (GMC §8.36.040(C)).

Source: **Appendix 4.9-1**. Table 8.

[4] International Code Council. (2021). *2019 California Fire Code, Title 24, Part 9 with July 2021 Supplement*, Table 1004.5. Retrieved from: https://codes.iccsafe.org/s/CFC2019P4/chapter-10-means-of-egress/CFC2019P4-Pt03-Ch10-Sec1004.5, accessed May 2023.

[5] It is noted, this is a very conservative assumption given the Project's total population growth of 1,088 persons; see **Table 4.10-7: Existing Plus Project Growth Forecast**.

[6] The measured noise levels provided in the referenced report are from an existing dog park with 5 to 11 dogs present in each of the small and large dog areas. The measured noise level is appropriate for the Project as the Project also includes areas for dogs. In addition, the reference noise level was adjusted up by 3.8 dBA to account for the maximum 19 dogs for the Project.

[7] City of San Diego. (2019). *Noise Technical Report Beyer Community Park*.

Parking Facilities

Parking for the apartments would be provided within two above-grade parking levels, with a total of approximately 413[8] parking spaces. In addition to the entrance/exit driveways at the north along South Normandie Avenue and east along West 170th Street, the parking garage includes natural ventilation along all facades. In addition, there would be five surface parking spaces at the east side of the apartment building along South Normandie Avenue. Townhome resident parking would be located in private garages for each unit. Any outdoor parking spaces would be minimal and dispersed throughout the townhome area. As indicated in **Table 4.9-9: Parking Facility Noise Levels**, the estimated noise levels from the Project's parking facilities would range from 22.8 dBA (L_{eq}) at receptor location R2 to 43.9 dBA (L_{eq}) at receptor locations R4/R7, which would be below the City's significance thresholds. Therefore, the Project's parking facility noise levels would result in a less than significant impact.

Table 4.9-9: Parking Facility 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	49.0	23.7	50.0	0.0	No
R2	53.8	22.8	53.8	0.0	No
R3	67.3	40.0	67.3	0.0	No
R4	56.4	43.9	56.4	0.0	No
R5	53.0	30.2	53.0	0.0	No
R6	48.7	28.8	50.0	0.0	No
R7	56.4	43.9	56.4	0.0	No

Notes:
[1] Based on City nighttime exterior noise limits.
[2] Detailed calculation worksheets are included in **Appendix 4.9-1**.
[3] Significance threshold is 50 dBA (Leq) (see **Table 4.9-4: Gardena Allowable Exterior Noise Levels**), unless the ambient noise level exceeds the noise standard, then the ambient noise level becomes the noise standard (GMC §8.36.040(C)).

Source: **Appendix 4.9-1**, Table 9.

Trash Compactor

The Project trash compactor would be located within an enclosed room inside Level 1 parking, at the apartment's interior. The noise levels from the trash compactor operation would be effectively shielded to the offsite noise-sensitive receptor locations. Therefore, the Project's trash compactor noise levels would be less than significant.

[8] **Appendix 4.9-1** assumed 413 parking spaces; however, the Project site plan was subsequently revised to include only 399 parking spaces and therefore the report conservatively assumes noise impacts from parking facilities.

Offsite Mobile Roadway Traffic

The Project is expected to generate approximately 1,715 net daily trips; see **Appendix 4.13-1: CEQA Impact Transit Assessment**. Project-generated traffic noise impacts were evaluated by comparing the change in noise levels from the "existing" condition to the "existing plus project" condition with the significance threshold of a 3-dBA increase (i.e., "barely perceptible"). Traffic noise levels at the offsite 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 4.9-10: Offsite Roadway Traffic Noise Impacts**, Project traffic would result in a maximum noise level increase of 1.8 dBA CNEL along West 170th Street (west of Normandie Avenue). In addition, the estimated noise level increases along Normandie Avenue and West 169th Street (west of Normandie Avenue) would be 0.2 dBA CNEL and 0.3 dBA CNEL, respectively. 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 Project's estimated traffic noise level increases are considered negligible. Therefore, the Project's offsite traffic noise levels would result in a less than significant impact.

Table 4.9-10: Offsite Roadway Traffic Noise Impacts

Roadway Segment	Estimated Traffic Noise Levels[1] CNEL		Increase in Noise Levels, CNEL	Significant Impact?
	Existing	Existing + Project		
South Normandie Avenue Between 169th Street and 170th Street	68.6	68.8	0.2	No
West 169th Street West of Normandie Avenue	55.5	55.8	0.3	No
West 170th Street West of Normandie Avenue	47.6	49.4	1.8	No
1 Detailed calculation worksheets, are included in **Appendix 4.9-1**.				
Source: **Appendix 4.9-1**. 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 could occur at the 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. The Project's principal onsite stationary noise sources would include mechanical equipment, parking facility, and outdoor uses. As indicated in **Table 4.9-11: Composite Noise Impacts**, the Project's composite noise levels would range from 34.2 dBA at receptor locations R5/R6 to 49.3 dBA at receptor location R3,

which would be below the City's significance thresholds. Therefore, the Project's composite operational noise levels would result in a less than significant impact.

Table 4.9-11: Composite Noise Impacts

Receptor Location	Ambient Noise Levels[1] dBA (L_{eq})	Calculated Project-Related Noise Levels, L_{eq} (dBA)[2]			Project Composite Noise Levels, L_{eq} (dBA)	Significance Threshold,[3] dBA (L_{eq})	Significant Impact?
		Mechanical	Outdoor Uses	Parking			
R1	49.0	34.1	46.6	23.7	46.9	50.0	No
R2	53.8	29.7	37.7	22.8	38.5	53.8	No
R3	67.3	31.7	48.7	40.0	49.3	67.3	No
R4	56.4	28.3	28.8	43.9	44.1	56.4	No
R5	53.0	28.2	29.6	30.2	34.2	53.0	No
R6	48.7	29.3	30.0	28.8	34.2	75.0	No
R7	56.4	28.3	28.8	43.9	44.1	56.4	No

1. Based on City nighttime exterior noise limits.
2. Detailed calculation worksheets are included in **Appendix 4.9-1**.
3. Significance threshold is 50 dBA (Leq) (see **Table 4.9-4: Gardena Allowable Exterior Noise Levels**), unless the ambient noise level exceeds the noise standard, then the ambient noise level becomes the noise standard (GMC §8.36.040(C)).

Source: **Appendix 4.9-1**, Table 11.

MITIGATION MEASURES

MM NOI-1 **Construction Equipment Noise.** Prior to issuance of any Demolition or Grading Permit, the Public Works Department shall verify that the Project plans and specifications include provisions that require all power construction equipment (including combustion engines), fixed or mobile to be: 1) equipped with state-of-the-art noise shielding and muffling devices (consistent with manufactures' standards); and 2) properly maintained to ensure that no additional noise, due to worn or improperly maintained parts, would be generated.

MM NOI-2 **Construction Noise.** A temporary and impermeable sound barrier shall be provided along the Project northern, southern and western property line. The temporary sound barrier shall be minimum 10-foot high and provide minimum 12 dBA noise reduction, and shall have a minimum Sound Transmission Class rating of STC-25, such as, acoustical barrier blanket (with STC-25 rating) or 3/4" thick exterior grade plywood.

Impact 4.9-2:

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

Level of Significance: Less Than Significant Impact with Mitigation

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 Federal Transit Administration (FTA) has published standard vibration velocities levels for various construction equipment operations (FTA, 2018). 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 4.9-12: Construction Vibration Impacts – Human Annoyance**, the estimated vibration velocity levels from all construction equipment would be below the City's significance criteria of 80 VdB at all offsite vibration-sensitive receptors, except receptor location R1, where the estimated vibration level would be up to 87 VdB. Therefore, the Project's construction-related vibration levels, pursuant to the significance criteria for human annoyance, would be significant without mitigation. To reduce the Project's construction-related vibration impacts, implementation of MM NOI-3: Construction Vibration Impacts, which prohibits the use of large construction equipment greater than 400 horsepower or loaded trucks within 45 feet from receptor location R1 would be required. At this mitigated distance, the estimated vibration velocities at receptor location R1 would be 79 VdB, which would be below the 80 VdB significance threshold. Therefore, the Project's construction-related vibration levels, pursuant to the significance criteria for human annoyance, would be less than significant with mitigation incorporated.

Table 4.9-12: Construction Vibration Impacts – Human Annoyance

Receptor Location	Estimated Vibration Velocity Levels at the Offsite Vibration-Sensitive Receptors, VdB[1]				Significance Threshold[2] VdB	Significant Impact?
	Large Bulldozer	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Levels at 25 feet	87	86	79	58	--	--
R1	87	86	79	58	80	Yes
R2	78	77	70	49	80	No
R3	68	67	60	39	80	No
R4	74	73	66	45	80	No
R5	79	78	71	50	80	No
R6	75	74	67	46	80	No
R7	74	73	66	45	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 **Appendix 4.9-1** Table 13.

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 FTA are used as the threshold to assess impacts associated with potential building damage. **Table 4.9-13: Construction Vibration Impacts – Building Damage** provides the estimated vibration levels at the nearest offsite buildings. As indicated in **Table 4.9-13** the estimated vibration velocity levels from construction equipment would be below the significance criteria at the nearest offsite buildings. Therefore, the Project's construction-related vibration levels, pursuant to the significance criteria for building damage, would be less than significant.

Table 4.9-13: Construction Vibration Impacts – Building Damage

Receptor Location	Estimated Vibration Velocity Levels at the Offsite Buildings, PPV[1]				Significance Threshold VdB	Significant Impact?
	Large Bulldozer	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Levels at 25 feet	0.089	0.076	0.035	0.003	--	--
Single-story residential building to the North	0.019	0.016	0.008	0.001	0.2[2]	No
Single-story residential buildings to the South	0.024	0.020	0.009	0.001	0.2[2]	No
Single-story residential buildings to the East	0.010	0.008	0.004	0.001	0.2[2]	No
Single-story commercial buildings to West	0.089	0.076	0.035	0.003	0.2[2]	No
Single-story residential building adjacent to the Project site	0.156	0.133	0.061	0.005	0.2[2]	No

[1] Vibration level calculated based on FTA reference vibration level at 25-foot distance.
[2] FTA criteria for non-engineered timber and masonry buildings.

Source: **Appendix 4.9-1**. Table 12.

MITIGATION MEASURES

MM NOI-3 **Construction Vibration Impacts.** The use of large construction equipment (e.g., large bulldozer greater than 400 horsepower and/or loaded trucks) shall be a minimum of 45 feet away from the off-site residence adjacent to the Project site (receptor R1)(16964 Brighton Avenue).

4.9.5 CUMULATIVE IMPACTS

For purposes of the noise and vibration 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 indicated in **Table 3-1** and depicted in **Exhibit 3-1: Cumulative Project Locations**, there are two related projects within the geographic context for the cumulative noise and vibration analysis:

- **Related Project No. 2** is a condominium development approximately 720 feet northeast of the Project site and second nearest the Project site. There has been no recent action from the Applicant for this related project, with Plan Check Review anticipated to expire November 2023. Construction start date for this related project is unknown.
- **Related Project No. 3** is a small lot subdivision development approximately 400 feet northeast of the Project site. There has been no recent action from the Applicant for this

related project, and Plan Check Review has expired. Construction start date for this related project is unknown.

CONSTRUCTION (NOISE)

Proposed Project construction is scheduled to occur over approximately 3.5 years, beginning June 2024 and ending September 2027. As concluded above, construction activities are exempt from the City's noise standards, provided that construction activities do not take place between restricted days/hours (GMC §8.36.080). Because the Project would be subject to compliance with GMC §8.36.080, the Project's construction activities would be exempt from the City's noise standards. Notwithstanding, given that the Project's construction-related noise levels would exceed the City's specified thresholds, and considering the proposed building height (seven stories at a maximum height of approximately 90 feet) and extended construction period (i.e., 3.5 years), it is conservatively concluded that the Project's construction-related noise levels would result in a significant unavoidable impact.

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 between the two construction sites. Although Related Project Nos. 2 and 3 are within the geographic context for the cumulative noise analysis, because there has been no recent action from either Applicant, the Plan Check Review has expired or is immanently set to expire (i.e., November 2023 for Related Project No. 2), and the construction start dates are unknown, these related projects have not been considered in this cumulative analysis. Further, it would be speculative to assume that construction activities for Related Project Nos. 2 and 3 would occur concurrent with the proposed Project's construction. Therefore, no cumulative construction-related noise impact would occur.

CONSTRUCTION (VIBRATION)

As concluded above, the Project would have a less than significant impact construction-related vibration impact. As discussed above, the nearest related project (Related Project No. 3) is approximately 400 feet northeast of the Project site, which would not contribute to the cumulative construction vibration impacts. Therefore, when combined with cumulative development, the Project's potential construction-related vibration impacts would not be cumulatively considerable.

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 dog); and offsite mobile sources (i.e., traffic). The related

projects located within 1,000 feet of the Project site are residential, and these uses are not typically associated with excessive exterior noise levels.

Noise levels from stationary sources are presumed to be less than significant at the property line for each related project, given the related projects would be subject to the City's noise regulations that limit stationary noise sources, and site-specific mitigation measures would be identified, as needed. In addition, due to the distance attenuation and intervening structures (between the related projects and the proposed Project) and the Project's onsite stationary noise sources (i.e., building mechanical equipment, parking facility, loading/trash compactor, and outdoor sources), when combined with cumulative development, the Project's stationary source operational noise impacts would not be cumulatively considerable.

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 1.8 dBA increase in offsite traffic noise along West 170th Street, below the 3 dBA significance threshold. The traffic volume from the related projects would not double the existing traffic volume on West 170th Street, based on the relative location of the related projects to West 170th Street and estimated trip generation. Therefore, when combined with cumulative development, the Project's potential mobile source noise impacts would not be cumulatively considerable.

4.9.6 SIGNIFICANT UNAVOIDABLE IMPACTS

The Project's construction activities would be exempt from the City's noise standards with certain restrictions pursuant to GMC §8.36.080. Notwithstanding, given that the Project's construction-related noise levels would exceed the City's specified thresholds, and considering the proposed building height and extended construction period, it is conservatively concluded that the Project's construction-related noise levels would result in a significant unavoidable impact, despite incorporation of MM NOI-1 and MM NOI-2.

4.9.7 REFERENCES

Acoustical Engineering Services, Inc. (2023). *Noise Impact Study for 16911 Normandie Project*. Gardena, CA; see **Appendix 4.9-1**.

California Department of Transportation. (2013a). *Technical Noise Supplement to the Traffic Noise Analysis Protocol.*

Caltrans (2013b). *Transportation and Construction Vibration Guidance Manual*.

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4.10 POPULATION AND HOUSING

4.10 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 and evaluate the Project's potential to induce substantial unplanned population growth in the area. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or lessen the Project's potentially significant impact.

The Project area's demographics are examined in the context of existing and projected population, housing, and employment for the City of Gardena (City), the South Bay Region, and the County of Los Angeles (County). The South Bay Region includes the cities of Carson, El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Lomita, Manhattan Beach, Palos Verdes Estates, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, and Torrance.

This section is based on the Gardena General Plan 2006 (GGP) Community Development and Housing Elements, California Department of Finance (DOF) Population and Housing Report E-5 2021-2023, 2010-2020 U.S. Census, Southern California Association of Governments (SCAG) Local Profiles Data 2019, and the SCAG Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) – Demographics and Growth Forecast.

4.10.1 EXISTING SETTING

Population

Table 4.10-1: Population, 2023-2045, provides the DOF's estimated 2023 County and City populations. The DOF estimates the County's existing 2023 population is 9,761,210 persons and the City's existing population is 59,809 persons. The DOF population estimates were derived by multiplying the number of occupied housing units by average persons per household.

Table 4.10-1: Population, 2023-2045

Jurisdiction	2023[1]	2045[2]	Change
County of Los Angeles	9,761,210	11,674,000	+1,912,790 +16.4%
City of Gardena	59,809	65,700	+5,891 (+9.0%)

Sources:
1. State of California, Department of Finance (2023). *E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2023*, Table 2: E-5 City/County Population and Housing Estimates.
2. Southern California Association of Governments. (2020). *Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Technical Report – Demographics and Growth Forecast*.

Table 4.10-1 also provides SCAG's forecast 2045 County and City populations, as presented in the RTP/SCS. The RTP/SCS provides population, household, and employment data for counties and

cities in the SCAG region for 2016 and 2045. SCAG's forecasts are based on a jurisdiction's existing land uses and General Plan land use designations. Population forecasts are calculated based on household growth and household size. The RTP/SCS forecasts that the County's population will grow to approximately 11.7 million persons by 2045, representing an increase of approximately 16.4 percent between 2023 and 2045; see **Table 4.10-1**. The RTP/SCS also forecasts that the City's population will grow to approximately 65,700 persons by 2045, representing an increase of approximately nine percent between 2023 and 2045; see **Table 4.10-1**. When compared to the County's population growth rate, Gardena's growth rate would be significantly less (approximately one-half).

Housing

Table 4.10-2: Dwelling Units and Households, 2023-2045, provides the DOF's estimated 2023 County and City households (occupied dwelling units (DU)) and SCAG's forecast 2045 households, as reported in the RTP/SCS. The DOF estimates the County's and City's existing 2023 households total 3,471,993and 21,781, respectively. Comparatively, the City's existing households are far less when compared to the County's.

To further inform the nearby available housing, **Table 4.10-2**, also presents the dwelling unit and 2045 forecast households within the nearby South Bay Region.

Table 4.10-2: Dwelling Units and Households, 2023-2045

Jurisdiction	2023[1] (Dwelling Units)	2045[2,3] (Households)	Change
County of Los Angeles	3,471,993	4,119,000	+647,007 +15.7%
South Bay Region[4]	276,860	297,000	+20,140 +6.8%
City of Gardena	21,781	23,700	+1,919 +8.1%

Notes:
1. Source: State of California, Department of Finance. (2022). *2022 Report E-5 Population and Housing Estimates for Cities, and Counties, and the State.*
2. Per SCAG Guidance, "household" refers to the number of occupied housing units while the DOF's "household" population estimates are derived by multiplying the number of occupied housing units by the current persons per household. This analysis uses SCAG's "household" methodology.
3. State of California, Department of Finance (2023). E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2023, Table 2: E-5 City/County Population and Housing Estimates.
4. The South Bay Region includes the cities of Carson, El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Lomita, Manhattan Beach, Palos Verdes Estates, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, and Torrance.

Table 4.10-3: Housing, 2023 provides the County's, South Bay Regions', and City's existing 2023 housing, housing types, vacancy rates, and average household size (persons per household) as reported by the DOF. 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.

Table 4.10-3: Housing, 2023

Description	County of Los Angeles	South Bay Region[1]	City of Gardena
Single-Family Homes: Attached and Detached	2,004,733	169,145	11,975
Multi-Family Homes: Two to more than Five Units	1,603,151	113,827	9,437
Mobile Homes	56,298	6,483	1,212
Total Housing Units	**3,664,182**	**289,455**	**22,624**
Vacancy Rate	5.2%	4.6%	3.7%
Persons per Household[2]	2.75	2.61	2.70

Note:
1. The South Bay Region includes the cities of Carson, El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Lomita, Manhattan Beach, Palos Verdes Estates, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, and Torrance.
2. Persons per household estimates are derived by dividing the household population by the occupied housing units.

Source: State of California, Department of Finance (2023). *E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2023*, Table 2: E-5 City/County Population and Housing Estimates.

As shown in **Table 4.10-3**, the DOF estimates that the County's housing stock totals 3,664,182 DU, with a vacancy rate of 5.2 percent and an average of 2.75 persons per household. As also shown in **Table 4.10-3**, the DOF estimates that the City's housing stock totals 22,624 DU, with a vacancy rate of 3.7 percent and an average of 2.70 persons per household. Refer to the *Regional Housing Needs Assessment Section* below for a discussion of the City's future housing needs.

The RTP/SCS forecasts that the County's households will grow to 4,119,000, an increase of approximately 15 percent between 2023 and 2045; see **Table 4.10-2**. Additionally, the RTP/SCS forecasts that the South Bay Region's households will grow from to 297,000, an increase of approximately 6.8 percent between 2023 and 2045; see **Table 4.10-2**. The RTP/SCS also forecasts that the City's households will grow to 23,700, an increase of approximately eight percent between 2023 and 2045; see **Table 4.10-2**. When compared to the South Bay Regions household growth rate, Gardena's growth rate would be significantly higher.

Employment

As shown in **Table 4.10-4: Employment, 2019-2045**, the County's 2019 employment totaled 4,767,204 jobs and is forecast to grow to 5,382,000 jobs by 2045, representing an increase of approximately 11 percent between 2019 and 2045. The City's 2019 employment totaled 29,405 jobs and is forecast to grow to 32,100 jobs by 2045, representing an increase of approximately eight percent between 2019 and 2045, see **Table 4.104**. Comparatively, the City's employment

growth is forecast to be approximately three percent higher than the County's. To further inform the employment that exists nearby, **Table 4.10-4** also presents the available employment in the nearby South Bay Region. The South Bay Regions' 2019 employment totaled 418,617 jobs and is forecast to grow to 461,900 jobs by 2045, representing an increase of approximately nine percent between 2019 and 2045, see **Table 4.10-4**.

Table 4.10-4: Employment, 2019-2045

Jurisdiction	2019[1]	2045[2]	Change
County of Los Angeles	4,767,204	5,382,000	+614,796 + 11.4%
South Bay Region[3]	418,617	461,900	+43,283 +9.4%
City of Gardena	29,405	32,100	+2,695+8.4%

Sources:
1. SCAG, *SCAG Local Profiles Data 2019*, April 2021.
2. Southern California Association of Governments. (2020). *Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Technical Report – Demographics and Growth Forecast*.
3. The South Bay Region includes the cities of Carson, El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Lomita, Manhattan Beach, Palos Verdes Estates, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, and Torrance.

Jobs to Housing Balance

The RTP/SCS states that the jobs to housing ratio is a "Comparison of median earnings for intra-county vs. intercounty commuters for each county; analysis of relative housing affordability and jobs throughout the region."[1] The jobs to housing ratio is considered in balance when a subregion has enough employment opportunities for most people who live there and enough housing opportunities for most people who work there. The jobs to housing ratio is one indicator of a project's effect on growth and quality of life in a project area. SCAG uses the jobs to housing ratio to assess the relationship between housing and employment growth. Further, the 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"[2]. According to SCAG, improvements in the balance of the jobs to housing ratio could result in a reduction to traffic congestion and related air quality problems. Communities with a jobs to housing ratio greater than 1.5 are considered "jobs rich" and those with a ratio less than 1.5 are considered "housing rich."

Table 4.10-5: Jobs to Housing Ratio, provides the County's jobs to housing ratio and indicates the County is considered "housing rich" with a ratio of 1.30, which is less than 1.5. **Table 4.10-5** also provides the City's jobs to housing ratio and indicates the City is also considered "housing rich" with a ratio of 1.30, which is less than 1.5. **Table 4.10-5** also provides the South Bay Region's jobs to housing ratio and indicates the South Bay is also considered "housing rich" with a ratio of

[1] Southern California Association of Governments. (2020). Connect SoCal 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy Plan, page 146.
[2] Southern California Association of Governments. (2020). Connect SoCal 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy Plan.

1.45, which is less than 1.5. However, the South Bay Region, while also considered housing rich, has an existing jobs-to-housing ratio that is higher than the City and County. Thus, the City would be providing housing that may be lacking in other areas of the South Bay Region where the jobs/housing ratio indicates a "jobs rich" community. Future predictions forecast the City gaining a higher proportion of jobs, but still remaining housing-rich, while the South Bay Region is forecast to gain a higher proportion of jobs to cross the threshold to be considered jobs rich. It is noted that despite the City's existing jobs to housing ratio (i.e., being housing rich), SCAG's RHNA allocated to the City 5,735 housing units for the 2021 – 2029 period; see the *Regional Housing Needs Assessment Section* below.

Table 4.10-5: Jobs to Housing Ratio

Jurisdiction	2022	2045[1]
County of Los Angeles		
Jobs	4,767,204[2]	5,382,000
Housing Units[3]	3,664,182[4,5]	4,119,000
County Jobs/Housing Ratio	**1.30**	**1.31**
South Bay Region[5]		
Jobs	418,617[2]	461,900
Housing Units[3]	289,455[4,5]	297,000
South Bay Region Jobs/Housing Ratio	**1.45**	**1.56**
City of Gardena		
Jobs	29,405[2]	32,100
Housing Units[3]	22,624[4,5]	23,700
City Jobs/Housing Ratio	**1.30**	**1.35**

Sources:
1. Southern California Association of Governments. (2020). *Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Technical Report – Demographics and Growth Forecast*.
2. SCAG, *SCAG Local Profiles Data 2019,* April 2021.
3. Per SCAG Guidance, "household" refers to the number of occupied housing units while the DOF's "household" population estimates are derived by multiplying the number of occupied housing units by the current persons per household. This analysis uses SCAG's "household" methodology.
4. State of California, Department of Finance. (2022). *2022 Report E-5 Population and Housing Estimates for Cities, and Counties, and the State*.
5. See **Table 4.10-2** and **Table 4.10-4**, above.
6. The South Bay Region includes the cities of Carson, El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Lomita, Manhattan Beach, Palos Verdes Estates, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, and Torrance.

4.10.2 REGULATORY SETTING

State

California State Housing Law

California State Housing Law (California Government Code [CGC] Article 10.6) establishes the requirements for the Housing Element of the General Plan, one of the seven mandatory General

Plan Elements. The General Plan 2006 (GGP) is the City's General Plan which will guide the physical development in the City for the next 15-20 years. State law requires that Housing Elements identify and analyze existing and projected housing needs and provide goals, policies, objectives, financial resources, and programs for the preservation, improvement, and development of housing (CGC §65580). The City's Housing Element identifies strategies and programs that focus on the following: 1) preserving and improving housing and neighborhood; 2) Providing adequate housing sites; 3) Assisting in the provision of affordable housing; 4) Removing governmental and other constraints to housing investment; 5) Promoting fair and equal housing opportunities; and 6) Promoting sustainable housing. The California Legislature has determined that one of the State's primary housing goals is to ensure every resident has a decent home and suitable living environment.

California Government Code §65588 requires that local governments review and revise the Housing Element of their comprehensive General Plans not less than once every eight years. For each review cycle, the California Department of Housing and Community Development (HCD) conducts a RHNA.

California Government Code §65583 sets forth the specific housing element content requirements. Included in these requirements are a jurisdiction's obligations to provide their "fair share" of regional housing needs; see *Regional Housing Needs Assessment Section* below.

Regional and local

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a Joint Powers Agency established under §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 South Bay Cities COG, one of the SCAG region's 14 subregional organizations.

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 RTP/SCS for 2020-2045. Major themes in the 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.

Connect SoCal includes a regional growth forecast that was developed by working with local jurisdictions using the most recent land use plans, policies, and assumptions. SCAG utilizes Connect SoCal's (Transportation Analysis Zone) TAZ-level growth projections for regional modeling purposes and the projections are not adopted as part of Connect SoCal nor included as part of the Forecasted Regional Development Pattern. The growth forecasts do not affect a local jurisdiction's authority or decision on future development projects or plans. When adopting Connect SoCal, SCAG recognized that cities and counties would foreseeably update their housing elements as part of General Plans and amend zoning to accommodate the 6th Cycle RHNA. For many cities and counties, SCAG acknowledged that the required RHNA and Housing Element may need to accommodate more housing units than reflected in Connect SoCal's household and population growth projections for the jurisdictions.

Regional Housing Needs Assessment

The RHNA is a 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 forecast of future statewide housing growth need, and the apportionment of this need to regional councils of governments throughout the State. SCAG is the agency responsible for developing an allocation methodology to allocate 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 6th RHNA cycle covers the planning period from October 2021 to October 2029. 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. **Table 4.10-6: City of Gardena RHNA Allocation** outlines the City's RHNA allocation for the October 2021 through October 2029 period (i.e., 6th Cycle). As shown in **Table 4.10-6**, the City's RHNA allocation totals 5,735 DU, with 26 percent designated for very low income, 13 percent for low income, 16 percent for moderate income, and 45 percent for above moderate income. 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 4.10-6: City of Gardena RHNA Allocation

Income Level	Percent of AMI[1]	Target (Units)	Percent
Very Low	0-50%	1,485	26%
Low	51-80%	761	13%
Moderate	81-120%	894	16%
Above Moderate	120%+	2,595	45%
	Total	**5,735**	**100%**

Notes:
[1] AMI = Area Median Income

Source: Southern California Association of Governments. (2021). *SCAG 6th Cycle Final RHNA Allocation*. Retrieved from: https://scag.ca.gov/sites/main/files/file-attachments/6th_cycle_final_rhna_allocation_plan_070121.pdf?1646938785, accessed May 2023.

Gardena General Plan 2006

The City adopted the comprehensive Gardena 2006 General Plan (GGP) in 2006. The GGP constitutes the City's overall plans, goals, and objectives for land use within the City's jurisdiction. The GGP Community Development Element provides a Land Use Plan with goals and policies associated with housing. The Land Use Plan has been updated several times since its adoption, with the most recent amendment in February 2023. 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 Housing Element provides the following goals and policies 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 specific plans, overlays, and other mechanisms to allow 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.
    - **Policy 4.3:** Encourage residential development within the new Housing Overlay.
    - **Policy 4.5:** Ensure the production of affordable units throughout the community to avoid over concentration in specific neighborhoods.
    - **Policy 4.6:** Facilitate the development of mixed income projects.
- **Goal 5.0:** Promote equal opportunity for all residents to reside in the housing of their choice.
    - **Policy 5.2:** Provide a range of housing options, locational choices, and price points to accommodate the diverse needs in Gardena and to allow for housing mobility.

4.10.3 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 4.10-1**).
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere (see **Section 7.0: Effects Found Not to be Significant**).

4.10.4 IMPACTS AND MITIGATION MEASURES

Impact 4.10-1:

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 Project proposes to remove all existing onsite structures and, in their place, construct a 403-DU multi-family residential development with two types of residential uses: an apartment building with 328 DU at the Project site's northeastern portion; and 75 townhome-style units within nine buildings at the Project site's southern portion and along the western site boundary; see **Exhibit 2-4: Conceptual Site Plan**. **Table 2-4: Land Use Summary – Proposed Apartment Building** summarizes the apartment building's proposed floor areas and various proposed apartment product types (i.e., 68 studio, 194 one-bedroom, and 66 two-bedroom). **Table 2-5: Land Use Summary – Proposed Townhomes** summarizes the townhome proposed floor areas and the various proposed townhome product types (i.e., 30 two-bedroom, 35 three-bedroom, and 10 four-bedroom). Additionally, the Project's Development Agreement (DA #2-21) would guarantee the City five percent (or 20 DU) affordable housing units for a period of 55 years.

The Project proposes 403 DU, thus, would induce population growth in the City directly through housing development. However, as concluded below, the Project's forecast population growth is not considered substantial. Additionally, the Project does not propose to extend roads or other infrastructure, thus, would not induce population growth in the City indirectly.

Existing Plus Project Conditions

As previously noted, the Project is a residential development, thus, would induce population growth in the City directly through new housing. **Table 4.10-7: Existing Plus Project Growth Forecast**, compares the Project's estimated population growth to existing 2023 population. As indicated in **Table 4.10-7**, the Project's forecast population growth of 1,088 persons is estimated to increase the City's existing 2023 population to 60,897 persons, representing an approximately 1.8 percent increase in population.

Table 4.10-7: Existing Plus Project Growth Forecast

Description	Housing (Dwelling Units)	Population (Persons)
City's 2022 Existing Conditions[1]	22,264	59,809
Proposed Project	403	1,088[2]
Existing + Project	**22,184**	**60,897**
Percent Change from Existing	**+1.8%**	**+1.7%**

Notes:
1. State of California, Department of Finance. (2022). *2022 Report E-5 Population and Housing Estimates for Cities, and Counties, and the State*.
2. Based on 403 DU, 100 percent occupancy, and 2.70 persons per household (State of California, Department of Finance. (2022). *2022 Report E-5 Population and Housing Estimates for Cities, and Counties, and the State.).*

General Plan Plus Project Conditions

The General Plan, which was adopted in 2006 and most recently updated in 2022, contains the City's housing and population forecasts at buildout in 2026.[3] **Table 4.10-8: General Plan Buildout Plus Project Growth Forecasts** presents the City's forecast housing capacity at buildout as 22,329 DU, with a forecast population of 63,799 persons. As indicated in **Table 4.10-8**, although the City's existing housing stock of 22,624 DU has exceeded the City's forecast housing capacity at buildout by approximately 295 DU, the City's existing population of 59,809 persons is approximately 3,990 persons less than the City's forecast population at buildout of approximately 63,799 persons.

The Project would require a General Plan amendment, zone change, as well as an adoption of a specific plan, to allow for development of up to 403 DUs on the Project site. However, given the Project site's existing land use designation (i.e., Housing Overlay 4 (HO-4) on the northerly portion (approximately 1.32 acres), some of the Project's forecast population growth was planned. As indicated in **Table 4.8-2: Existing General Plan Land Use Designations**, the Project site's maximum development capacity, based on the existing land use designations, is 40 DU (on the northerly portion) and/or approximately 228,690 SF of industrial floor area throughout the site. Therefore, approximately 10 percent of the Project's 403 proposed DU was previously planned. **Table 4.10-8** also presents the City's forecast housing capacity at buildout as 22,329 DU, with a population of 63,799 persons. **Table 4.10-8** also compares the Project's estimated population growth of 1,088 persons to the General Plan's forecast population at buildout.

3 City of Gardena. (2006). City of Gardena General Plan 2006 – Final Environmental Impact Report, Table 2 – Residential Capacity and Table 3 – Commercial, Industrial and Public Use Capacity.

Table 4.10-8: General Plan Buildout Plus Project Growth Forecasts

Description	Housing (Dwelling Units)	Population (Persons)
City's 2023 Existing Conditions[1]	21,781	59,809
2026 Forecast General Plan Buildout[1]	22,329	63,799
Proposed Project	+403	+1,088[2]
Previously Planned Residential[3]	-40	-108[4]
Proposed Net Project	**+363**	**+980**
2026 General Plan Plus Project	**22,692**	**64,779**
General Plan Plus Project % Change	**+1.6%**	**+1.5%**

Notes:
1. City of Gardena. (2006*). City of Gardena General Plan 2006 Draft EIR Table 2: Residential Capacity.* Gardena, CA.
2. Based on 403 DU, 100 percent occupancy, and 2.70 persons per household *(*State of California, Department of Finance. (2022). *2022 Report E-5 Population and Housing Estimates for Cities, and Counties, and the State.).*
3. See **Table 4.8-2: Existing General Plan Land Use Designations**.
4. Based on 40 DU, 100 percent occupancy, and 2.70 persons per household *(*State of California, Department of Finance. (2022). *2022 Report E-5 Population and Housing Estimates for Cities, and Counties, and the State.).*

As indicated in **Table 4.10-8,** when accounting for the previously planned 40 DU, the Project's proposed net residential development of 363 DU would increase the General Plan's forecast population at buildout by approximately 1.6 percent (980 persons). Therefore, the Project would induce unplanned population growth in the City directly through new housing based on General Plan buildout. However, the Project's forecast net population growth of 980 persons is not considered substantial based on the following factors:

- It would constitute a nominal 1.6percent increase over the forecast population at buildout;
- As indicated in **Table 4.10-1**, the City's existing population of 59,809 persons is approximately 3,990 persons less than the City's forecast population at buildout of approximately 63,799 persons. Thus, the Project would be well within the City's forecast population growth of 3,990 persons between 2023 existing conditions and buildout; and
- The GGP 6th Cycle Housing Element includes a housing needs assessment in which it outlines local and regional conditions that are limiting housing production. These conditions include:
    - 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 as most of Gardena's existing multi-family residential uses (i.e., apartment units) are older housing stock that do not provide the types of amenities that renters are currently seeking.
    - New housing is needed when vacancy rates are low to ensure reasonable levels of choice and mobility in the marketplace.

As shown in **Table 4.10-6**, the City's RHNA allocation totals 5,735 DU, of which 2,246 are designated for low/very low-income. The Project would provide approximately 7.0 percent of the City's total RHNA allocation. Additionally, the Development Agreement (DA #2-21) would guarantee the City five percent (or 20 DU) affordable housing units, which would be in furtherance of the City meeting their 6th Cycle RHNA allocation of 2,246 low/very low-income units.

Additionally, the Project would be in furtherance of various GGP goals. 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 further this goal by converting an industrial site into a residential one, which would contribute additional housing types in the City. Additionally, the Project would be in furtherance of meeting various GGP Housing Element Policies. GGP Housing Element Goal 3 which aims to "minimize the impact of governmental constraints on housing construction and cost" by "encouraging the use of special development zones and other mechanism to allow more flexibility in housing developments." 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 implementing land use policies which allow for a range of residential densities, encouraging development within the new Housing Overlay, especially production of affordable housing, and to facilitate development of mixed income projects Additionally, GGP Housing Element Goal 5 states "promote equal opportunity for all residents to reside in the housing of their choice" by providing "a range of housing options, locational chouses, and price points to accommodate the diverse needs in Gardena and to allow for housing mobility." See **Table 4.9-1: General Plan Consistency Analysis**, which provides a consistency analysis of the Project to the applicable GGP policies.

Therefore, although the Project would induce unplanned population growth in the City based on General Plan forecasts, the Project's population growth is not considered substantial given the factors discussed above. A less than significant impact would occur in this regard, and no mitigation is required.

SCAG RTP/SCS Plus Project Conditions

SCAG's RTP/SCS forecasts the City's population will increase by approximately 5,891 persons, or approximately 9.0 percent between 2023 and 2045; see **Table 4.10-2**. Similarly, SCAG's RTP/SCS forecasts the City's households will increase by approximately 1,919 households, or approximately 8.1 percent between 2023 and 2045. SCAG's RTP/SCS assumes 23,700 households in the City by 2045, with a population of 65,700 persons. **Table 4.10-9: SCAG RTP/SCS 2045 Plus Project Growth Forecast** evaluates the Project's contribution to 2045 growth forecasts. As indicated in **Table 4.10-9**, the Project's proposed residential development would increase the RTP/SCS' forecast 2045 population by approximately 1.6 percent (1,088 persons).

Table 4.10-9: SCAG RTP/SCS 2045 Plus Project Growth Forecast

Description	Households/Housing (Dwelling Units)	Population (Persons)
2045 Forecast RTP/SCS[1]	23,700	65,700
Proposed Project	+403	+1,088[2]
2045 Forecast RTP/SCS Plus Project	**24,103**	**66,788**
2045 Forecast RTP/SCS Plus Project % Change	**1.7%**	**1.6%**

Notes:
1. Southern California Association of Governments. (2021). SCAG 6th Cycle Final RHNA Allocation. Retrieved from: https://scag.ca.gov/sites/main/files/file-attachments/6th_cycle_final_rhna_allocation_plan_070121.pdf?1646938785, accessed May 2023.
2. Based on 403 DU, 100 percent occupancy, and 2.70 persons per household (State of California, Department of Finance. (2022). *2022 Report E-5 Population and Housing Estimates for Cities, and Counties, and the State.).*

The Project exceeds the 2045 RTP/SCS households and population growth projection estimates and would induce unplanned population growth directly. The RTP/SCS Growth Forecast is determined on the GGP land use designations and their potential for residential development within the City. The RTP/SCS was adopted prior to the adoption of the 2021 to 2029 Housing Element and RHNA Allocations, and the recently adopted Housing Element and land use designations have not been included in the RTP/SCS forecast. Therefore, the Project would induce unplanned population growth in the City directly through new housing based on 2045 RTP/SCS forecasts. However, the Project's forecast net population growth of 1,088 persons is not considered substantial concerning the RTP/SCS based on the following factors:

- It would constitute a nominal 1.6 percent increase over the forecast population in 2045;
- The Project site is partially within a Housing Overlay Area and was envisioned to be redeveloped from Industrial to Residential land uses with adoption of the 2021 Housing Element; and
- The Project would help the City meet its RHNA Allocation, including its low-income units.

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 existing jobs-to-housing ratio of 1.30 indicates the City is currently housing rich. Inclusive of the Project's proposed 403 DU, the City's jobs-to-housing ratio would decrease from 1.30 to 1.28, indicating the City would continue to be housing rich. The City's employment is forecast to increase by 8.4 percent between 2019 and 2045. The City's jobs-to-housing ratio is also forecast to increase from 1.30 to 1.35 between 2023 and 2045. Comparatively, **Table 4.10-5** indicates the South Bay Region is also considered "housing rich" with a ratio of 1.45. Future predictions forecast the City gaining a higher proportion of jobs, but remaining housing-rich, while the South Bay Region is forecast to gain a higher proportion of jobs to cross the threshold and be considered jobs rich. Thus, the City would be providing housing that may be lacking in other areas of the South Bay Region where the jobs/housing ratio indicates a "jobs rich" community. Additionally, by providing multi-family housing with amenities, the Project would encourage job growth in the area as employers look

to housing opportunities in developing areas to attract potential employees. Therefore, the Project would not induce substantial unplanned population growth in the area, either directly or indirectly, and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.10.5 CUMULATIVE IMPACTS

Potential cumulative population and housing impacts are assessed relative to the GGP and regional plans, including SCAG's 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 jurisdictions participate in the growth forecast development process.

As discussed above, the Project proposes 403 DU, which are forecast to increase the City's population by approximately 1,088 persons (approximately 1.8 percent growth over existing conditions). As concluded above, the Project's increase in dwelling units is within the RTP/SCS forecast values and would not exceed the estimated growth. The Project's forecast population of 1,088 persons is within the City's forecasted population growth and the additional housing would help the City meet its RHNA allocation. As indicated in **Table 4.10-10: Existing Plus Cumulative Growth Forecast**, the cumulative forecast population growth (proposed Project combined with the related projects) is 4,955 persons, or 8.3 percent over the City's existing population of 59,809 persons.

Table 4.10-10: Existing Plus Cumulative Growth Forecast

Description	Housing Units	Persons per Household	Population
Existing 2022[1]	22,623	2.7[1]	59,809
Proposed Project	403		1,088[2]
Related Projects	1,432[3]		3,866[2]
Cumulative (Project + Related Projects[6])	1,835		4,955
Existing 2023 + Cumulative	***24,458***	--	***64,764***
Existing 2023 Plus Cumulative % Change	***8.1%***	--	***8.3%***

Notes:
1. State of California, Department of Finance (2023). *E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2023*, Table 2: E-5 City/County Population and Housing Estimates.
2. Based on 403 DU, 100 percent occupancy, and 2.70 persons per household.
3. See **Table 3-1: List of Cumulative Projects**.

As indicated in **Table 4.10-11: SCAG RTP/SCS 2045 Plus Cumulative Growth Forecast**, the cumulative forecast population growth (proposed Project combined with the related projects) is 4,955 persons, or 8.3 percent over SCAG's forecast 2045 population for the City of 65,700

persons. Note this conservatively assumes that all related projects are not already accounted for in the existing adopted General Plan, which is the basis for SCAG's forecasts. Therefore, the Project and other cumulative projects would induce growth which is not accounted for in SCAG forecasts. However, as shown in **Table 4.10-6**, the City's RHNA allocation totals 5,735 DU. Cumulative development of 1,835 DU would provide approximately 32 percent of the City's total RHNA allocation. However, the RTP/SCS was adopted prior to the adoption of the 2021 to 2029 Housing Element and RHNA Allocations, and the recently adopted Housing Element and land use designations have not been included in the RTP/SCS forecast. As such, cumulative development would induce unplanned population growth in the City directly through new housing based on 2045 RTP/SCS forecasts. However, the cumulative forecast population growth is not considered substantial. Cumulative development would be subject to compliance with GGP Land Use Goals and the City's Housing Element, which identifies 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.

The related 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 related projects to be generally consistent with the population and housing policies. Therefore, when combined with cumulative development, the Project's impacts concerning unplanned population growth would not be cumulatively considerable.

Table 4.10-11: SCAG RTP/SCS 2045 Plus Cumulative Growth Forecast

Description	Households/Housing (Dwelling Units)	Population (Persons)
2045 Forecast RTP/SCS[1]	23,700	65,700
Cumulative (Project + Related Projects)[2]	1,835	4,955
2045 Forecast RTP/SCS Plus Cumulative	**25,535**	**70,655**
2045 Forecast RTP/SCS Plus Cumulative % Change	**+7.7%**	**+7.5%**

Notes:
1. Southern California Association of Governments (2020). *Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.*
2. See **Table 4.10-10**.

4.10.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning population and housing have been identified.

4.10.7 REFERENCES

California Employment Development Department, Labor Information Division. (2023). *Monthly Labor Force Data for Counties – Annual Average 2022 Employment.* Retrieved from: https://labormarketinfo.edd.ca.gov/file/lfhist/22aacou.pdf, accessed May 2023.

California Employment Development Department, Labor Information Division. (2023). *City of Gardena Unemployment Rates (Labor Force).* Retrieved from: https://data.edd.ca.gov/en/Labor-Force-and-Unemployment-Rates/Local-Area-Unemployment-Statistics-LAUS-for-Califo/53ai-w4j9, accessed May 2023. City of Gardena. (2021). *City of Gardena 2021-2029 Housing Element*. Gardena, CA.

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Southern California Association of Governments. (2001). *Employment Density Study Summary Report*, pages 4-16. Yorba Linda, CA: The Natelson Company, Inc.

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4.11 PUBLIC SERVICES

4.11 PUBLIC SERVICES

This section analyzes the Project's potential to 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 for any of the public services (i.e., fire protection, police protection, schools, and other (e.g., library) public facilities). Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's potentially significant environmental impacts.

Information in this section is based on readily available public resources.

4.11.1 EXISTING SETTING

Regional Setting

Fire Protection

The City contracts with Los Angeles County Fire Department (LACFD) to provide fire protection and emergency medical services. The LACFD protects 4.1 million residents in 60 cities and unincorporated County of Los Angeles (County) areas.[1] The LACFD is responsible for fire response, vehicle accidents, public assistance, medical emergencies, water rescue, and hazardous materials response.

Table 4.11-1: Fire Stations Serving the Project Site presents the two LACFD fire stations within the City that would serve the Project site, as well as their locations and distances from the Project site. The fire station nearest the Project site is Fire Station 158, which is approximately 0.9-mile northwest of the Project site.

Table 4.11-1: Fire Stations Serving the Project Site

Station Number	Address	Distance From Project Site (miles)
Fire Station 158	1650 West 162nd Street Gardena, CA 90247	0.9
Fire Station 159	2030 West 135th Street Gardena, CA 90249	3.1

Source: County of Los Angeles Fire Department. (No Date). *Fire Station Locator.* Retrieved from: https://locator.lacounty.gov/fire, accessed May 2023.

[1] County of Los Angeles Fire Department. (2021). *Annual Report*. https://fire.lacounty.gov/wp-content/uploads/2022/08/LACoFD-2020-Annual-Report_Final_081722.pdf. Accessed on September 30, 2022.

Police Protection

Police protection services to the Project site are provided by the Gardena Police Department (GPD). The GPD employs a personnel force of 120 employees, 88 of which are sworn police officers.[2] The GPD station nearest the Project site is at 1718 West 162nd Street, approximately 0.9 mile to the northwest.

Schools

The Project site is within the Los Angeles Unified School District (LAUSD) boundaries.[3] **Table 4.11-2: LAUSD School Facilities**, lists the public schools that serve the Project site, as well as their existing capacity and enrollment. There are also private schools serving Kindergarten through 12th grades in the Project area.

Table 4.11-2: LAUSD School Facilities

School[1]	Capacity[2]	Enrollment (2020-2021)[3]	Available Capacity
Denker Avenue Elementary School (K-5)	826	700[2]	126
Robert E. Peary Middle School (6-8)	1,376	1,217	159
Gardena Senior High School (9-12)	1,496	1,490	6

Note:
Capacity is based on 2018-2019 enrollment.

Sources:
[1] Los Angeles Unified Schools District. (No Date). *Resident School Identifier*. Retrieved from Resident School Identifier (lausd.net) e, accessed May 2023.
[2] California Department of Education. (2023). School Accountability Report Card; Reported Using Data from the 2020-2021 School Year. Retrieved from: https://www.cde.ca.gov/ta/ac/sa/, accessed July 2023.[3] California Department of Education. (2021). *School Accountability Report Card*, Retrieved from: https://sarconline.org/public/findASarc, accessed August 2023.

Other Public Facilities

The Project site is within the Los Angeles County Library service area. 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.[4] Los Angeles County Library is responsible for maintenance and library improvements to meet library service 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 library nearest the Project site is the Gardena Mayme Dear Library located at 1731 West Gardena Boulevard, approximately 0.8 mile to the northwest.

2 Gardena Police Department. (2022). History of Gardena Police Department. Retrieved from: http://www.gardenapd.org/history/, accessed May 2023.
3 Great Schools. (No Date). See What School District You Are In. Retrieved from: https://www.greatschools.org/school-district-boundaries-map/, accessed May 2023.
4 Los Angeles County Library. (2020). Library Locator. Retrieved from: https://lacountylibrary.org/library-locator/, accessed May 2023.

4.11.2 REGULATORY SETTING

State

California Code of Regulations Title 24 (California Building Standards Code)

CCR Title 24, also known as the California Building Standards Code (CBSC), includes regulations for how buildings are designed and constructed, and are intended to ensure the maximum structural integrity and safety of private and public buildings. The CBSC, which applies to all applications for building permits, consists of 12 parts that contain CBSC administrative regulations for all State agencies that implement or enforce building standards. Local agencies must ensure the development complies with the CBSC standards. Cities and counties can adopt additional standards beyond the CBSC including CBSC Part 2, named the California Building Code (CBC), which is based upon the 2020 International Building Code, and CBSC Part 11, named the California Green Building Standards Code, also known as the CalGreen Code.

California Code of Regulations Title 24 Part 2 - California Building Code

The CBC contains general building design and construction requirements relating to fire and life safety, structural safety, and access compliance. CBC provisions provide minimum standards to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures and certain equipment.

California Code of Regulations Title 24 Part 9 - California Fire Code

The California Fire Code (CFC) contains regulations consistent with nationally recognized accepted practices for safeguarding, to a reasonable degree, life and property from various hazards, including fire and explosion, among others. The CFC also contains provisions to assist emergency response personnel. The CFC is pre-assembled with the International Fire Code with necessary California amendments. The CFC is based on the 2021 adoption of the International Fire Code and integrates State amendments. The CFC contains fire safety-related building standards that are referenced in other parts of CCR Title 24. The CFC is updated once every three years; the 2022CFC took effect on January 1, 2023. The CFC 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. The CFC provides minimum standards to increase the ability of a building or structure to resist the intrusion of flame or burning embers being projected by a vegetation fire and contributes to a systematic reduction in fire losses through the use of performance and prescriptive requirements.

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 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.

Local

2023 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. The City of Gardena has adopted the Los Angeles Fire Code.

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.

Gardena Municipal Code

Gardena Municipal Code (GMC) Chapter 15.48 - Construction and Development Fees. This section outlines the development impact fees for multi-unit residential developments. These fees are imposed because "development and construction of new residential living units within the City creates an immediate and present danger to the existing quality of life and the ecology of the City and threatens to burden and overtax the existing public purposes of the City, such as the provisions of public services, utilities, water and drainage and the treatment and disposal of sanitary sewerage which affects the health, welfare, and safety of the community." All proceeds from the fees collected under this chapter are applied to the costs incurred by the City associated with the burden increased by the multi-unit residential facilities, open space, drainage and other public facilities and services related thereto.

4.11.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions pertaining to public services. 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 4.11-1),
    - Police Protection (see Impact 4.11-2),
    - Schools (see Impact 4.11-3),
    - Parks (see **Section 4.12: Recreation**), and
    - Other Public Facilities (see Impact 4.11-4).

4.11.4 IMPACTS AND MITIGATION MEASURES

Impact 4.11-1:

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 LACFD operates two fire stations in the City, but the fire station nearest the Project site is Station 158, which is approximately 0.9-mile northwest of the Project site.

The Project proposes a multi-family residential development comprised of a 328-unit apartment building and 75 townhome style units to replace the existing approximately 115,424 square feet (SF) of industrial buildings onsite. As concluded in **Section 4.10: Population and Housing**, the Project's forecast population growth is approximately 1,088 persons. The Project's forecast population growth would incrementally increase the demand for fire protection and emergency medical services to the Project site. However, because the Project site is currently served by fire protection services and is located in a suburban setting where fire protection services and equipment/infrastructure are already in place, the Project does not propose and would not require new or physically altered fire protection facilities to maintain service objectives. Therefore, the Project would not result in adverse physical impacts associated with the construction of fire protection facilities. A less than significant impact would occur in this regard, and no mitigation is required.

It is also noted, the Project would be constructed with fire safety features in compliance with applicable provisions of the adopted Los Angeles County Fire Code, ordinances, and standard conditions regarding fire prevention and suppression measures related to water improvement plans, fire hydrants, fire access, and water availability. Project development would also be subject to compliance with LACFD requirements for emergency access, fire-flow, fire protection standards, fire lanes, and other site design/building standards. Prior to Project approval, the Project building plans would undergo City and LACFD review to ensure the Project incorporates all applicable fire safety features. Prior to issuance of certificates of occupancy for the new buildings, the LACFD would inspect all new structures to ensure that all fire safety features have been implemented and installed correctly. Additionally, the Project would be subject to payment of development fees at the time of Building Permit or Certificate of Occupancy issuance, pursuant to GMC Chapter 15.48 to offset any increased costs for fire protection services. Compliance with this established regulatory framework would enhance fire and life safety, structural safety, and emergency access.

Mitigation Measures

No mitigation is required.

Impact 4.11-2:

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 would be served by the GPD. The GPD station nearest the Project site is at 1718 West 162nd Street, approximately 0.5-mile to the northwest.

The Project proposes a multi-family residential development comprised of a 328-unit apartment building and 75 townhome style units to replace the existing approximately 115,424 SF of industrial buildings onsite. As concluded in **Section 4.10: Population and Housing**, the Project's forecast population growth is approximately 1,088 persons. The Project's forecast population growth would incrementally increase the demand for police protection services to the Project site. However, because the Project site is currently served by police protection services and is located in a suburban setting where police protection services and equipment/infrastructure are already in place, the Project does not propose and would not require new or physically altered police protection facilities to maintain service objectives. Therefore, the Project would not result in adverse physical impacts associated with the construction of police protection facilities. A less than significant impact would occur in this regard, and no mitigation is required.

Additionally, through the City's Site Plan Review process, the GPD would review the Project concerning emergency access and site/facility security requirements and recommendations. GPD would review Project plans to ensure compliance with applicable City regulations to ensure adequate site signage, lighting and other crime safety preventative measures are implemented. GPD review would act to ensure that development would conform to GPD emergency access and thereby reducing demands on law enforcement services. Additionally, the Project applicant would be subject to compliance with GMC Chapter 15.48, which requires payment of development impact fees to help offset any increased costs for law enforcement services. Project compliance with the established regulatory framework would enhance the Project's police protection.

Mitigation Measures

No mitigation is required.

Impact 4.11-3:

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 403 dwelling units including 328 apartment units and 75 townhomes. **Table 4.11-3: Project Forecast Student Generation**, provides the student generation rates by grade level[5] and the Project's forecast student population growth. As shown in **Table 4.11-3**, the Project is forecast to generate a student population growth of approximately 151 new students within the LAUSD.

Table 4.11-3: Project Forecast Student Generation

Grade	Students per Dwelling/Household	Estimated Project Student Generation
Transitional Kindergarten – 6	0.195	79
7 – 8	0.054	22
9 – 12	0.107	44
Special Day Class	0.015	6
Total		151

Source: Los Angeles Unified School District. (2022). *2020 Developer Fee Justification Study*, Table 3: LA Unified Student Generation Factors.

The Project's forecast student population growth would incrementally increase the demand for school facilities and services. **Table 4.11-4: Project Forecast Student Generation by School** presents the school capacity with the Project included and indicates sufficient capacity exists at the existing elementary and middle school facilities to accommodate the Project's forecast student population, but insufficient capacity exists at the high school. However, 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…" Additionally, the Project does not propose and would not require new or physically altered school facilities to maintain service objectives. Therefore, the Project would not result in adverse physical impacts associated with the construction of school facilities. A less than significant impact would occur in this regard, and no mitigation is required.

[5] Los Angeles Unified School District. (2022). *2022 Developer Fee Justification Study*, Table 3: LA Unified Student Generation Factors.

Table 4.11-4: Project Forecast Student Generation by School

Schools Serving Project	Available Capacity[1]	Estimated Project Student Generation	Capacity with Project Included	Sufficient Capacity Exists?
Denker Avenue Elementary School (K-5)	126	79	47	Yes
Robert E. Peary Middle School (6-8)	159	22	137	Yes
Gardena Senior High School (9-12)	6	44	-38	No
Special Day Classes[1]	-	6[1]	-	Yes

Notes:
[1] See **Table 4.11-2**.
There is leftover capacity at the three schools serving the Project site that could accommodate the six students in Special Day Classes

Source: Los Angeles Unified School District. (2022). 2020 Developer Fee Justification Study, Table 3: LA Unified Student Generation Factors.

Mitigation Measures

No mitigation is required.

Impact 4.11-4: 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 Gardena Mayme Dear Library, which is the library facility nearest the Project site. 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; 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. It is also noted, there are four additional libraries within an approximately 2.0-mile radius of the Project site. Additionally, the County library system has expanded access to online e-books, audiobooks, movies, music, and newspapers. As such, the Project does not propose and would not require new or physically altered library facilities to maintain service objectives. Therefore, the Project would not result in adverse physical impacts associated with the construction of library facilities. A less than significant impact would occur and no mitigation is required.

Mitigation Measures

No mitigation is required.

4.11.5 CUMULATIVE IMPACTS

For purposes of the public services 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 concerning public services are considered less than significant, as the Project does not propose and would not require new or physically altered government facilities to maintain service objectives. The proposed Project, combined with cumulative development projects would result in incremental increases in public service demands as the number of people, buildings, businesses, roads, and utilities would increase.

Fire Protection

The geographic context for the cumulative analysis of fire protection services is the LACFD service area. The LACFD operates on a regional aid approach where emergency response units are dispatched as needed based on unit availability, rather than municipal or determined service boundaries. This regional response concept ensures that service levels are maintained throughout the entire LACFD service area. Further, as cumulative development would occur as redevelopment in a suburban area where government services and facilities are already provided, cumulative development would not result in adverse physical impacts associated with the provision of new/physically altered fire protection facilities, as new facilities would not be needed. Consequently, the Project combined with other cumulative development would result in less than significant cumulative environmental impacts concerning fire protection. Therefore, the Project would not cause a cumulatively considerable impact concerning fire protection services.

Police Protection

The geographic context for the cumulative analysis of police protection services is the Gardena Police Department service area. Through the City's Site Plan Review process, the Gardena Planning Department and Building Division would review the cumulative development projects on a project-by-project basis concerning access and other safety measures. Further, as cumulative development would occur as redevelopment in a suburban area where government services and facilities are already provided, cumulative development would not result in adverse physical impacts associated with the provision of new/physically altered police protection facilities, as new facilities would not be needed. Consequently, the Project combined with other cumulative development would result in less than significant cumulative environmental impacts

concerning police protection. Therefore, the Project would not cause a cumulatively considerable impact concerning police protection services.

Schools

The geographic context for the cumulative analysis of schools is the LAUSD jurisdiction. Construction of the Project, along with cumulative development of projects within LAUSD jurisdiction, would incrementally increase student population and thus demand for LAUSD facilities. The potential growth associated with cumulative development within the LAUSD would not require new or physically altered school facilities, as excess capacity currently exists the LAUSD, and each project would be evaluated to verify capacity exists on a project-by-project basis. Development fees would be assessed against cumulative residential, commercial, and industrial development, which would mitigate impacts resulting from the increased demand for school-related facilities services. Consequently, the Project combined with other cumulative development would not result in significant cumulative environmental impacts concerning school facilities. Therefore, the Project would not cause a cumulatively considerable impact concerning schools.

Other Public Facilities

The geographic context for the cumulative analysis of libraries is the County Library system. Development of the proposed Project, combined with other cumulative development, would create additional demand on the LACL system. Through the development review process, cumulative development would be evaluated on a project-by-project basis to determine their Library demands and the conditions for their establishment and operation. Further, as cumulative development would occur as redevelopment in a suburban area where government services and facilities are already provided, cumulative development would not result in adverse physical impacts associated with the provision of new/physically altered library facilities, as new facilities would not be needed. Consequently, the Project combined with other cumulative development would not result in significant cumulative environmental impacts concerning libraries. Therefore, the Project would not cause a cumulatively considerable impact concerning libraries.

4.11.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning public services have been identified.

4.11.7 REFERENCES

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4.12 RECREATION

4.12 RECREATION

This section analyzes the Project's potential to result in substantial adverse physical impacts associated with the provision of new or physically altered governmental park facilities, need for new or physically altered governmental park facilities, the construction of which could cause significant environmental impacts. Additionally, this section analyzes the Project's potential to 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 or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's potentially significant environmental impacts.

4.12.1 EXISTING SETTING

Similar to many cities in the County of Los Angeles ("County"), Gardena is a developed community with limited opportunities to expand its parks and recreation resources. **Table 4.12-1: Parks and Recreational Facilities in Gardena**, lists and describes the City's parks and recreational facilities and indicates Gardena has six public parks, one community center, one municipal pool, one parkette, and two gymnasiums.

Table 4.12-1: Parks and Recreational Facilities in Gardena

Facility	Address	Size (Acres)	Distance to Project Site
Bell Park	14708 South Halldale Avenue	1.9	1.6 miles N
Freeman Park	2100 West 154th Place	3.0	2 miles N/W
Mas Fukai Park	15800 South Brighton Avenue	4.9	0.8 mile N
Nakaoka Community Center	1670 West 162nd Street	-	0.9 mile N/W
Rush Gymnasium			
Rowley Park and Gymnasium	13220 South Van Ness Avenue	18.7	3.8 miles N/W
Arthur Johnson Park	1200 West 170th Street	6.8	0.4 mile S/E
Thornburg Park	2320 West 149th Street	2.5	2.5 miles N/W

Source: City of Gardena. (No Date). *Gardena Facilities*. Retrieved from: https://cityofgardena.org/gardena-facilities-2/, accessed May, 2023.

The City park nearest the Project site is Arthur Lee Johnson Memorial Park, located 0.4-mile to the southeast, at 1200 West 170th Street. The Arthur Lee Johnson Memorial Park offers several amenities such as a 7,000 square foot (SF) skate park and various sports fields.[1] The Gardena Recreation and Human Services Department also hosts various recreational and after-school

[1] Los Angeles County Regional Park and Open Space District. (2016). *Arthur Johnson Park*. Retrieved from: http://egis2.lacounty.gov/rposd/Details.aspx?id=36, accessed May 2023.

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 City's southeast portion.[2]

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 northwest. 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.

4.12.2 REGULATORY SETTING

Federal

There are no federal regulations concerning recreational facilities that are applicable to the Project.

State

Quimby Act

The Quimby Act (California Government Code §66477) states that "the legislative body of a City or county may, by ordinance, require the dedication of land or impose a requirement of the payment of fees in lieu thereof, or a combination of both, for park or recreational purposes as a condition to the approval of a tentative or parcel map." Quimby Act fees may be used for developing new or rehabilitating existing park or recreational facilities. The Quimby Act seeks to preserve open space needed to develop parkland and recreational facilities; however, the actual development of parks and other recreational facilities is subject to discretionary approval and is evaluated on a case-by-case basis with new residential development. Fees are only imposed on subdivisions.

State Public Park Preservation Act

The primary instrument for protecting and preserving parkland is the state Public Park Preservation Act. Under the Public Resource Code, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation or land, or both, are provided to replace the parkland acquired. This provides no net loss of parkland and facilities.

[2] City of Gardena. (2006). *City of Gardena General Plan 2006 Draft EIR*, Page 101. Retrieved from: https://cityofgardena.org/wp-content/uploads/2020/04/General-Plan-Update-2006-Final-EIR.pdf, accessed May 2023.

Landscaping and Lighting Act

The Landscaping and Lighting Act (California Streets and Highways Code §22500 et seq.) enables cities, counties, and special districts to acquire land for parks, recreation, and open space. A local government may also use the assessments to pay for improvements and maintenance to these areas. In addition to local government agencies (i.e., counties and cities), park and recreation facilities may be provided by other public agencies, such as community service districts, park and recreation districts, etc. If so empowered, such an agency may acquire, develop, and operate recreational facilities for the public.

State of California Open Space Standards

State planning law provides a structure for the preservation of open space by requiring every city and county in the state to prepare, adopt, and submit to the Secretary of the Resources Agency a "local open-space plan for the comprehensive and long-range preservation and conservation of open-space land within its jurisdiction" (Government Code §65560). The following open space categories are identified for preservation:

Open space for public health and safety, including, but not limited to, areas that require special management or regulation due to hazardous or special conditions.

Open space for the preservation of natural resources, including, but not limited to, natural vegetation, fish and wildlife, and water resources.

Open space for resource management and production, including, but not limited to, agricultural and mineral resources, forests, rangeland, and areas required for the recharge of groundwater basins.

Open space for outdoor recreation, including, but not limited to, parks, and recreational facilities, areas that serve as links between major recreation and open space reservations (such as trails, easements, and scenic roadways), and areas of outstanding scenic and cultural value.

Open space for the protection of Native American sites, including, but not limited to, places, features, and objects of historical, cultural, or sacred significance such as Native American sanctified cemeteries, places of worship, religious or ceremonial sites, or sacred shrines located on public property (further defined in California Public Resources Code §§5097.9 and 5097.993).

Local

Gardena 2006 General Plan

The Gardena 2006 General Plan (GGP) Community Resources Element provides goals and policies concerning recreational facilities in the Open Space Plan.

- **OS Goal 1: Maintain and upgrade the existing parks and recreation facilities to meet the needs of all residents.**
    - **Policy OS 1.3:** Encourage adequate funding and capital improvement program to promote the ongoing maintenance and rehabilitation of City facilities.
- **OS Goal 2: Increase the supply and quality of parkland, open space, and recreational programs.**

Gardena Municipal Code

Gardena Municipal Code (GMC) Chapter 15.48 - Construction and Development Fees. This section outlines the development impact license fees for multi-unit residential developments. These fees are imposed because "development and construction of new residential living units within the city creates an immediate and present danger to the existing quality of life and the ecology of the city and threatens to burden and overtax the existing public purposes of the city, such as the provisions of public services, utilities, water and drainage and the treatment and disposal of sanitary sewerage which affects the health, welfare, and safety of the community." All proceeds from the fees collected under this chapter shall be applied to the costs incurred by the city associated with the burden increased by the multi-unit residential facilities, open space, drainage and other public facilities and services related thereto. GMC §15.48.040 imposes a fee rate of $1,000 per dwelling unit, except for affordable units.

GMC Chapter 17.20 - Park and Recreation Dedication and Fees. This chapter specifies that the City requires either the dedication of land, the payment of fees, or a combination of both for park or recreational purposes as a condition of the approval of a tentative or parcel map for residential subdivisions. Gardena has set a fee that may be paid in lieu of land dedication in the amount of $10,000 per unit (Resolution No. 6433).

4.12.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions pertaining to 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:
    - Parks (see Impact 4.12-1),
- 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 4.12-2), 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 4.12-2).

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 governmental park facilities, need for new or physically altered governmental 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?

Level of Significance: Less Than Significant Impact

The Project does not propose to provide or physically alter a park facility. However, the Project could incrementally generate a demand for new or physically altered park facilities.

As mentioned above, under GMC Chapter 17.20, the developer is required to pay $10,000 per unit on a subdivision map. Under this requirement, the Project Applicant would pay $750,000 for recreational purposes. Additionally, under GMC Chapter 15.48, the Project Applicant would pay an additional $383,000, which may also be used for recreational purposes.

Any future development of new or rehabilitation of existing parkland or open space would be subject to review under CEQA to determine the potential adverse physical impacts associated with such improvements. Therefore, the Project would result in a less than significant impact concerning the need for new or physically altered governmental park facilities, the construction of which could cause significant environmental impacts.

Mitigation Measures

No mitigation is required.

Impact 4.12-2:

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 With Mitigation Incorporated

The Project's forecast population growth of approximately 1,088 persons could incrementally increase the use of existing neighborhood or regional parks or other recreational facilities; see **Table 4.10-7: Existing Plus Project Growth Forcast**. However, this incremental increase would not be such that substantial physical deterioration of an existing recreational facility would occur or be accelerated. To offset the use of existing neighborhood and regional parks, the Project proposes interior, exterior, and private open space uses. The Normandie Crossing Specific Plan (Section VI. Landscape and Open Space Plan) specifies that the Project must provide a minimum of 16,400 SF (50 SF per unit) of private open space and 22,698 SF of outdoor common open space for the proposed apartments and 3,750 SF (50 SF per unit) of private space and 7,645 SF of indoor and outdoor common open space for the proposed townhomes. The Project 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 distributed across the Project site and within the apartment building for use by residents and their guests. Overall, the Project proposes approximately 50,493 SF of open spaces, including approximately 20,150 SF of private open space and approximately 30,343 SF of common open space.

The Specific Plan separates the proposed open space and amenities by Subarea A (Apartment Building Area) and Subarea B (Townhome Area). Each Subarea A unit would be provided a minimum of 50 SF of private open space. The amenities proposed in Subarea A's public open space are as follows: roof deck with BBQs and seating areas; swimming pool with BBQ and seating areas; a dog park; fitness room; club houses; and a courtyard with seating area, and game tables. Each Subarea B unit would be provided 50 SF of private open space (i.e., balconies and roof decks). The amenities proposed in Subarea B's public open spaces are as follow: swimming pool with BBQ and seating areas; dog park; club house; and paseos with seating areas.

Therefore, considering the Project's proposed open spaces and recreational amenities, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. A less than significant impact would occur in this regard, and no mitigation is required.

The open spaces and recreational facilities discussed above are discussed as part of the overall environmental analyses in Sections 4.1 through 4.16 of this EIR. As concluded in these sections, the Project's environmental effects would be reduced to less than significant through compliance with the established regulatory framework and implementation of the specified mitigation measures, except concerning construction noise, which would be a significant and unavoidable impact. Given the proposed open spaces and recreational facilities' nature and scale, their construction-related noise impacts are not considered significant with mitigation incorporated. Therefore, with mitigation incorporated, the Project would result in less than significant

environmental effects associated with construction of the proposed open spaces and recreational facilities.

Mitigation Measures

See MM GEO-1, MM GEO-2, COA HAZ-1, COA HAZ-2, MM HAZ-1, MM HAZ-2, MM NOI-1, MM NOI-2, and MM NOI-3.

4.12.5 CUMULATIVE IMPACTS

For purposes of the 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**. The geographic context for the cumulative analysis of parks and recreation is the City of Gardena.

As concluded above, the Project would result in a less than significant impact concerning the need for new or physically altered governmental park facilities, the construction of which could cause significant environmental impacts. Additionally, considering the Project's proposed open spaces and recreational amenities, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated and a less than significant impact would occur in this regard. However, the adverse physical effects on the environment associated with construction of the Project's proposed open spaces and recreational facilities would be reduced to less than significant through compliance with the established regulatory framework and with mitigation incorporated.

As indicated in **Table 4.10-10: Existing Plus Cumulative Growth Forecast**, the Project's forecast population growth when combined with the related projects is 4,955 persons. Project development, when combined with other cumulative development, would generate additional demand on the existing City parks and recreational facilities due to population growth. Through the development review process, cumulative developments would be evaluated on a project-by-project basis to determine their parkland demands and the conditions for their establishment and operation. Payment of GMC fees and/or land dedications by cumulative developments would mitigate the impacts from cumulative demands for parkland and recreational facilities to less than significant levels. Consequently, the Project combined with other cumulative development would not result in significant cumulative environmental impacts concerning parks and recreational facilities. Therefore, the Project would not cause a cumulatively considerable impact concerning parks and recreational facilities.

4.12.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning park and recreational facilities have been identified.

4.12.7 REFERENCES

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4.13 TRANSPORTATION

4.13 TRANSPORTATION

This purpose of this section is to describe the existing regulatory and environmental conditions related to transportation, and analyze the Project's potential to conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; conflict or be inconsistent with State CEQA Guidelines §15064.3(b); substantially increase hazards due to a geometric design feature or incompatible uses; or result in inadequate emergency access. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's potentially significant environmental impacts.

Information in this section is based primarily on transportation data provided in the following resources:

- *CEQA Transportation Impact Assessment, 16911 Normandie Project* ("CEQA Transportation Impact Assessment") (Fehr & Peers, January 2023); see **Appendix 4.13-1: CEQA Transportation Impact Assessment.**
- *Normandie Crossing Specific Plan Local Transportation Assessment* ("Local Transportation Assessment") (Fehr & Peers, August 2023); see **Appendix 4.13-2: Local Transportation Assessment.**

It is noted, Kimley-Horn conducted a third-party review on behalf of the City of Gardena ("City") of the Project's CEQA Transportation Impact Assessment and Local Transportation Assessment; see **Appendix 4.13-1** and **Appendix 4.13-2**. The third-party review concluded the analyses meet the applicable provisions of the California Environmental Quality Act (CEQA) and State CEQA Guidelines.

4.13.1 EXISTING SETTING

Project Area Transportation System

Transit Facilities

The Project site is located less than a mile walking distance from five bus routes:

- **Line 1X (GTrans)**: Connects the LA Metro C Line Redondo Beach Station and Gardena to Downtown Los Angeles. Route 1X runs express service between Redondo Beach Boulevard and Harbor Freeway C (Green)/J (Silver) Line Station where connections can be made to Downtown Los Angeles. There are two bus stops within 0.25-mile of the Project site: both are located on 166th Street and Brighton Avenue (eastbound and westbound).
- **Line 2 (GTrans):** Circles Western, Imperial Highway, Vermont, Normandie and PCH up to just past the 105 freeway and south to Harbor UCLA Medical Center. The northbound stop is approximately 0.8 mile from the Project site at Vermont Avenue and Gardena

Boulevard and the southbound stop is approximately 0.6 mile at Vermont Avenue and 170th Street.

- **Line 1 (Torrance Transit):** This line goes from Del Amo Fashion Center at Carson and Hawthorne Boulevards to Figueroa Street located at the 105 Freeway. Both the northbound and southbound stops are at Vermont Avenue and Gardena Boulevard approximately 0.8 mile from the Project site.
- **Line 13 (Torrance Transit):** This line goes from Veteran's Park in Redondo Beach, north to Artesia Boulevard through Hermosa Beach to Vermont Avenue, past California State University Dominguez Hills, and ending in the City of Commerce across from the Crystal Casino. Both the eastbound and westbound stops are approximately 0.4 mile from the Project site at Artesia Boulevard and Normandie Avenue.
- **Line 344 (Metro):** This line goes from Palos Verdes Drive and Hawthorne Boulevard to Artesia Boulevard, and then along Vermont Avenue to the Harbor Gateway Transit Center. The bus stops are both approximately 0.4 mile from the Project site, also at Artesia Boulevard and Normandie Ave.
- **Harbor Gateway Transit Center:** The Transit Center, located at 731 West 182nd Street, is a large bus station that serves as a transport hub for the South Bay region of Los Angeles County, including the City of Gardena. The J line can be accessed from this station, which provides transit to both downtown Los Angeles and San Pedro. Numerous other lines can also be accessed from this station. The Transit Center also includes a 980-space park and ride. The Transit Center is approximately 0.9 mile from the Project site.

Roadway Facilities

Regional access to the Project site is provided via four major freeways: the Century freeway (I-105) to the north; the northern segment of the San Diego freeway (I-405) to the south and east; and the Harbor freeway (I-110) and the Gardena Freeway SR-91 (becomes West Artesia Boulevard) to the east. From I-105, access to the Project site is provided via Crenshaw Boulevard and Vermont Avenue, from I-405, access is provided via Normandie Avenue, from I-110, access is provided via Artesia Boulevard at the City's northern portion, which intersects with Normandie Avenue, and from SR-91, access is provided via Artesia Boulevard in the City's southern portion, which intersects with Normandie Avenue.

The key roadways providing local access to the Project site are described below. Overall, the roadway network surrounding the Project site is provided by a network of major, arterial, and collector streets. The following describes the key roadway facilities that serve the Project site and their classifications, as specified in Figure CI-1: Roadway Network in the Gardena General Plan Circulation element.

Normandie Avenue. Normandie Avenue is a north/south Major Collector with two lanes in each direction that runs through the City. Normandie Avenue is designated as a truck route within the City. Left-turn lanes are provided at major intersections. The posted speed limit is 35 miles per

hour (mph). On-street parking is prohibited on both sides of the street. The Union Pacific Torrance Branch railroad right of way (ROW) crosses Normandie Avenue and runs along the Project site's eastern frontage. Normandie Avenue is designated as a truck route within the City.

Artesia Boulevard. Artesia Boulevard is an east/west Arterial with three to four lanes in each direction that is under local jurisdiction. Artesia Boulevard transitions into SR-91 east of Vermont Avenue under Caltrans jurisdiction. Artesia Boulevard contains a raised median, and the posted speed limit is 45 mph. There are left-turn pockets at all intersections. On-street parking is prohibited on both sides of Artesia Boulevard.

Gardena Boulevard. Gardena Boulevard is an east-west Collector that runs through Gardena with a short jog at Normandie Avenue. Gardena Boulevard has one lane in each direction and a posted speed of 30 mph east of Normandie Avenue and 25 mph west of Normandie Avenue. On-street parking is permitted on both sides of the street, with angled parking provided east of Normandie Avenue.

West 166th Street. 166th Street is an east-west Collector that runs from Gramercy Place in Torrance to Berendo Avenue in Gardena. 166th Street is classified as a Local Street except for the segment between Western Avenue and Normandie Avenue, where it is classified as a Collector. On-street parking is permitted on both sides of the street, and the posted speed limit is 25 mph east of Normandie Avenue and 30 mph west of Normandie Avenue. A raised median is provided east of Normandie Avenue that contains the Union Pacific Railroad Torrance Branch railroad ROW and double tracks.

West 169th Street. 169th Street is an east/west Local Street that runs from Denker Avenue to Normandie Avenue with one lane in each direction. On-street parking is generally provided on both sides of 169th Street.

West 170th Street. 170th Street is an east/west Local Street that runs from Denker Avenue to Normandie Avenue where it dead ends and then picks up again on the other side of Normandie Avenue to Vermont Avenue with one lane in each direction. 170th Street west of Normandie Avenue does not connect to Normandie Avenue or the segment east of it. On-street parking is generally provided on both sides of 170th Street and the posted speed limit is 25 mph.

Brighton Way. Brighton Way is a north/south Local Street that runs from 169th Street to 170th street with a shared lane for each direction. Although classified as a Local Street, Brighton Way is currently a public alleyway. On-street parking is not provided.

Pedestrian Facilities

Existing sidewalks are provided along the Project frontage and within a continuous and complete pedestrian network in the surrounding area. Sidewalks along the south side of 169th Street are discontinuous for a short segment from just west of the Project site to the alley west of Brighton

Avenue. Sidewalks are also not present on Brighton Way. Marked crosswalks, curb ramps, and pedestrian signals are provided at the nearest signalized intersections along Normandie Avenue at 166th Street and 170th Street, which provide direct access to nearby bus transit stops (see Transit discussion above) and surrounding land uses.

Bicycle Facilities

There are no bicycle facilities (separated or protected) currently on Normandie Avenue, West 169th Street, or West 170th Steet along the Project site frontages. However, there are existing and proposed South Bay Bicycle Master Plan (SBBMP) bike routes near the Project site; see the *South Bay Bicycle Master Plan Section* below.

Railroad Facilities

The Project site includes a railroad spur from the adjacent Union Pacific Railroad (UPRR) northern track; see **Exhibit 2-2: Local Vicinity Map**. This spur is associated with the former onsite industrial operations but is no longer in use. The parcel immediately adjacent and east of the Project site is occupied by UPRR tracks. Additionally, Normandie Avenue contains public and private railroad tracks along the road's western boundary. The railroad tracks cross onto the roadway's eastern side along the Project's frontage.

4.13.2 REGULATORY SETTING

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

Senate Bill 375 - Sustainable Communities Strategies: 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 State 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 Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) 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 (SBBMP) 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 the following facilities in the Project site's vicinity:

Existing

- Class III bike route[1] exists along Normandie Avenue between West 170th Street and West 182nd Street. This bike route is near the Project site's southeastern corner.
- Class III bike route exists along West 166th Street between Brighton Avenue and Berendo Avenue, approximately 0.12-mile north of Project site.
- Class III bike route exists along Gardena Boulevard between Andrews Place and Brighton Avenue, approximately 0.25-mile north of the Project site.
- Class III bike route exists along West 170th Street between Normandie Avenue and Berendo Avenue, approximately 0.03 mile east of the Project site.

Proposed

- Bike Friendly Street[2] segment is proposed along the Project site's southern boundary along West 170th Street, between Denker Avenue and Vermont Avenue.

Local

City of Gardena 2006 General Plan

The Gardena 2006 General Plan (GGP) 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.

[1] Class III Bike Routes share the right-of-way between vehicles and bicyclists with signage and optional shared lane markings to indicate that the road is a shared use facility. (Los Angeles County Bicycle Coalition and South Bay Bicycle Coalition. (2011). *South Bay Bicycle Master Plan*. Retrieved from: https://bchd.org/docs/healthy-communities/South_Bay_BMP_Draft_Final_Plan.pdf, accessed June, 2023.)

[2] A Bike Friendly Streets are defined as local roads that have been enhanced with treatments that prioritize bicycle travel. These treatments include wayfinding signage, pavement markings and traffic calming. (Los Angeles County Bicycle Coalition and South Bay Bicycle Coalition. (2011). *South Bay Bicycle Master Plan*. Retrieved from: https://bchd.org/docs/healthy-communities/South_Bay_BMP_Draft_Final_Plan.pdf, accessed June, 2023.)

- **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 3.3:** 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.

City of Gardena Public Safety Plan

The Gardena Public Safety Plan (GPSP) outlines emergency response actions in the event of a large-scale disaster. The following policies are applicable to the Project:

- **PS Goal 1:** A community that is highly prepared and equipped to handle emergency situations in order to minimize loss of life, injury, property damage, and disruption of vital services.
    - **PS 1.7: Development Review.** 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 2:** A City that is adequately prepared for fire emergencies.
    - **PS 2.2: Building and Fire Codes.** Require that all buildings and facilities within Gardena comply with local, state, and federal regulatory standards such as the California Building and Fire Codes as well as other applicable fire safety standards.
    - **PS 2.7: New Development.** Require adequate fire protection services, fire protection plans, and emergency vehicle access for new development. Locate, design, and construct new development to minimize the risk of structural loss from fires.
- **PS Goal 3:** Protect the community from dangers associated with geologic instability, seismic hazards and other natural hazards.
    - **PS 3.1: California Building Code.** Require compliance with seismic safety standards in the California Building Code, as adopted and amended.

City of Gardena Municipal Code

Gardena Municipal Code (GMC) §17.08.170 - Improvements. This section requires any subdivider to improve, or agree to improve, all streets, highways, alleys, ways, or easements within or adjacent to the proposed subdivision. These improvements must be installed at lines and grades and in accordance with specifications approved by the City engineer.

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 State 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 PROJECT DESIGN FEATURES

The following Project design feature (PDF) was incorporated into the analysis:

- **PDF TR-1. Construction Traffic Management Plan:** Prior to the start of construction, a Construction Traffic Management Plan would be prepared and submitted to City for review and approval. The Construction Traffic Management Plan would minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, the Construction Traffic Management Plan will include, but not be limited to, the following measures:
  - Identified routes for vehicular traffic, bicyclists, and pedestrians around traffic lane, parking lane and/or sidewalk closures as they are required;
  - Provisions to ensure that access remains unobstructed for land uses near the Project site during construction;
  - Provisions to accommodate parking for construction workers either on-site or at off-site, off-street locations. Parking would be prohibited on streets in the vicinity of the Project site; and

- Prior to the start of construction, the Applicant would coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project site and neighboring businesses and residences.

4.13.5 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 4.8-4: Gardena General Plan 2006 Consistency**, which evaluates the Project's consistency with the GGP. The analysis finds that the Project is consistent with the applicable Community Development Element, Circulation Plan policies. Transit, roadway, bicycle, and pedestrian facilities are discussed further below:

Transit. As discussed above, public transit service to the Project area is provided by GTrans. Nearby bus routes provide service at the following locations:

- Line 1X (GTrans): Eastbound and westbound stops on 166th Street and Brighton Avenue.
- Line 2 (GTrans): Northbound stop on Vermont and Gardena Boulevard and the southbound stop on Vermont Avenue and 170th Street.
- Line 1 (Torrance Transit): Northbound and southbound stops on Vermont Avenue and Gardena Boulevard.
- Line 13 (Torrance Transit): Eastbound and westbound stops on Artesia Boulevard and Normandie Avenue.
- Line 344 (Metro): Northbound and southbound stops on Artesia Boulevard and Normandie Avenue.

Additionally, the western portion of the Project site is within 0.5-mile of a High-Quality Transit Corridor, which is a transit corridor with fixed route bus service frequency of no longer than 15 minutes during peak commute hours.[3]

The Project proposes a residential development with a forecasted population growth of approximately 1,088 persons, which has the potential to increase public transit ridership. Further, per the NCSP, new residents who sign a 12-month lease would be offered one free monthly Metro pass, providing more access to public transit opportunities. However, as concluded in **Table 4.8-4,** the Project is consistent with the GGP Circulation Plan Policies concerning transit facilities. Therefore, the Project would not conflict with a program plan,

[3] The morning and afternoon peak commute hours are defined at 6:00 to 9:00 AM and 3:00 to 6:00 PM, respectively.

ordinance, or policy concerning transit facilities, and a less than significant impact would occur in this regard.

Roadways. Vehicular access to the Project site would be provided by the following four driveways:

- Driveway 1 would serve the apartment building's parking garage from 169th Street west of Normandie Avenue,
- Driveway 2 would also serve the apartment building's parking garage from southbound Normandie Avenue,
- Driveway 3 would serve the townhomes from 170th Street, and
- Driveway 4 would also serve the townhomes from 169th Street.

Internal roadways would connect Driveways 3 and 4 to all townhomes but would not connect to the apartment building garage. Additionally, a continuous fire access lane (varying from 26 to 34 feet in width) is proposed through the townhome area to provide adequate emergency access. All roadway and driveway improvements would be constructed pursuant to Los Angeles County Fire Department requirements. There are no proposed offsite roadway improvements. Therefore, the Project would not conflict with a program, plan, ordinance, or policy concerning roadway facilities, and a less than significant impact would occur in this regard.

Bicycle facilities. As described above, there are four existing Class III bike lanes (along Normandie Avenue, along West 166th Street, along Gardena Boulevard, and along West 170th Street). However, there are no separated or protected bicycle facilities that currently exist along the Project site frontages. Additionally, there is one proposed Bike Friendly Street segment along the Project site's southern boundary along West 170th Street. The Project proposes a residential development with a forecasted population growth of approximately 1,088 persons, which has the potential to increase the use of existing bicycle facilities.

The Project does not propose any changes to the existing bicycle facilities surrounding the Project site and it would not impede or alter the installation of the SBBMP's -planned bicycle facilities, including the Bike Friendly Street segment planned along West 170th Street. Appropriate striping and signage would be installed at driveway approaches to meet Manual on Uniform Traffic Control Devices (MUTCD)[4] and City design standards and in accordance with roadway safety best practices. Additionally, the Project proposes 173 bicycle parking spaces, which supports GP Policy CI 3.4 to "maintain a citywide bicycle route and maintenance plan that promotes efficient and safe bikeways integrated with the Metropolitan Transportation Authority's (MTA's) regional bicycle system" by providing bicycle amenities and parking on-site for residents, visitors, and

[4] The MUTCD defines the standards used by road managers nationwide to install and maintain traffic control devices on all public streets, highways, bikeways, and private roads open to public travel. The MUTCD is published by the Federal Highway Administration (FHWA) under 23 Code of Federal Regulations, Part 655, Subpart F.

employees. Therefore, the Project would not conflict with a program, plan, ordinance, or policy concerning bicycle facilities, and a less than significant impact would occur in this regard.

Pedestrian Facilities. As discussed above, sidewalks are provided in the area surrounding the Project site, except the sidewalk on the south side of West 169th Street is not complete between the Project site and the alley to the west of Brighton Avenue, and on north side of West 170th Street and east side of Brighton Way. To provide a complete pedestrian path for residents, the Project proposes to construct sidewalks along the Project site frontage: on the south side of West 169th Street (between Brighton Way and Normandie Avenue), on the north side of West 170th Street (between Brighton Way and Normandie Avenue), on the west side of Normandie Avenue (between West 169th Street and West 170th Street), and on the east side of Brighton Way (between West 169th Street and West 170th Street). Additionally, the Project proposes to construct approximately 266 linear feet of offsite sidewalk improvements along the south side of West 169th Street, just west of the Project site, between Brighton Way and the alley to the west of Brighton Avenue. With the incorporation of these proposed sidewalk improvements, the Project would create a continuous and complete pedestrian network in the area surrounding the Project site. The sidewalk improvements would be constructed pursuant to GMC §17.08.170: Improvements and designed to be consistent with the GGP Circulation Element requirements for a Local Street. Therefore, the Project would not conflict with a program, plan, ordinance, or policy concerning pedestrian facilities, and a less than significant impact would occur.

As evidenced by the analyses presented above, and as concluded in **Table 4.8-4**, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The project would result in a less than significant impact in this regard, and no mitigation is required.

Mitigation Measures

No mitigation is required.

Impact 4.13-2:

Would the Project conflict or be inconsistent with State CEQA Guidelines §15064.3, subdivision (b)?

Level of Significance: Less Than Significant Impact

The Project has been analyzed below to evaluate consistency with State CEQA Guidelines §15064.3(b) concerning VMT based on the Project's **Transportation Impact Assessment**; see **Appendix 4.13-1**.

Baseline VMT

The VMT methodology employed in this analysis is consistent with the screening methodologies and impact criteria adopted by the City in their SB 743 Implementation Transportation Analysis Updates Per the City's adopted criteria, the baseline VMT for the City is calculated using the 2016 Regional Transportation Plan (RTP) Travel Demand Forecasting (TDF) model developed by SCAG. The methodology includes vehicle trips within the SCAG model to generate the following metric as applicable for the Project's proposed residential uses:

- 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.

VMT Impact Thresholds

The City adopted a 15 percent below the baseline regional average VMT (as defined by the SCAG six-county region) 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 the project would generate VMT lower than the threshold, then it would be expected to have a less than significant VMT impact. The regional baseline VMT and City's VMT impact thresholds are summarized in **Table 4.13-1: Baseline Regional VMT and City of Gardena VMT Impact Thresholds.**

Table 4.13-1: Baseline Regional VMT and City of Gardena VMT Impact Thresholds

VMT Metrics – Regional Home-Based VMT per Capita	Baseline VMT	City VMT Impact Threshold
2020	14.35	12.20
2040	12.97	11.02
Notes: [1] The VMT Impact Threshold is 15% below the respective Baseline VMT.		
Source: **Appendix 4.13-1**, Table 1.		

VMT Screening

The first step of a VMT analysis is to determine what type of analysis, if any, is needed. The City identified three screening criteria to assess if a VMT analysis would be required for a project. The three screening criteria are detailed below and applied to the Project to determine if it would have 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, are presumed to have less

than significant VMT impact, 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 Engineer's (ITE) Trip Generation Manual (11th Edition) provides trip rate for multi-family land use types (i.e., mid-rise and 4.54 trips per unit, and low-rise and 6.74 trips per unit), the Project's proposed 403 residential units are expected to generate approximately 1,715 average daily trips (ADT), which would be more than 110 ADT threshold. Also, the Project is not 100 percent affordable. Therefore, the Project is not screened out from VMT analysis based on project type screening criterion.

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 City's VMT impact threshold, 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 Regional Home-Based VMT per Capita. In the City, a low VMT area for residential projects generates no more than 12.20 Home-Based VMT per Capita in 2020 and 11.02 VMT per Capita in 2040; see **Table 4.13-1**. The traffic analysis zones (TAZ) contained in the SCAG model can be used to identify the City's low VMT areas.

The Project is in a TAZ estimated to generate 11.01 VMT per capita, which is 23.3 percent below the 2020 SCAG regional baseline VMT of 14.35. When compared to the 2040 SCAG regional baseline VMT of 12.97, the Project's VMT per capita is 15 percent below the 2040 SCAG regional baseline VMT. Therefore, the Project is in an area with low residential VMT, which means the Project can be presumed to have a less than significant VMT impact and can be screened out from further VMT analysis based on low VMT area screening.

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 in the areas surrounding the Project site, including the multi-family residential development to the north. Therefore, the Project has similar characteristics as development in the vicinity.

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. OPR's Technical Advisory defines Transit Priority Areas (TPAs) as a 0.5-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.

Public Resources Code (PRC) §21155, which states in a portion not excerpted in the City's Guidance, "A project shall be considered to be within one-half mile of a major transit stop or high-quality transit corridor if all parcels within the project have no more than 25 percent of their area farther than one-half mile from the stop or corridor and if not more than 10 percent of the residential units or 100 units, whichever is less, in the project are farther than one-half mile from the stop or corridor." The Project has more than 25 percent of its area farther from Gardena's High-Quality Transit Areas. Therefore, the Project is not screened out from VMT analysis under this screening criterion.

Conclusions

Table 4.13-2: VMT Screening Options for Land Use Projects, summarizes the findings of the Project's analysis concerning the three screening criteria discussed above and notes the Project meets the City's low VMT screening criteria. Therefore, based on the City'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 concerning VMT under the low VMT screening criteria.

Table 4.13-2: 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 50,000 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.	No
Source: Kimley-Horn and Associates.		

Mitigation Measures

No mitigation is required.

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

As previously mentioned in Impact 4.13-1, vehicular access to the Project Site would be provided by the following four driveways:

- Driveway 1 would serve the apartment building's parking garage from 169th Street west of Normandie Avenue.
- Driveway 2 would also serve the apartment building's parking garage from southbound Normandie Avenue.
- Driveway 3 would serve the townhomes from 170th Street.
- Driveway 4 would also serve the townhomes from 169th Street.

Internal roadways would link Driveways 3 and 4 to all townhomes but would not connect to the apartment building garage. As depicted in **Exhibit 2-4: Conceptual Site Plan**, the Project's driveways are perpendicular to the public ROW and spaced from existing intersections pursuant to GMC §17.08.170 and City standards.

The Project proposes Driveway 2 on Normandie Avenue that is near the Union Pacific Torrance Branch railroad. Train travel on this branch is relatively light and slow due to track curvature, at-grade crossings, and in-street train operations. Driveway 2 is proposed to be right-in/right-out only on southbound Normandie Avenue and would intersect the roadway at a right-angle outside of the railroad tracks. Additionally, a 125-foot median along Normandie Avenue would be installed that would surround the railroad tracks to prevent left-turns to and from Driveway 2. If train traffic is blocking egress from Driveway 2, Driveway 1 is available for ingress and egress associated with the apartment building.

As previously noted, Normandie Avenue contains railroad tracks along the road's western boundary. The railroad tracks cross onto the roadway's eastern side along the Project's frontage. To assess the Project's potential to increase transportation hazards associated with the existing railroad facilities, the City and Applicant consulted with the California Public Utilities Commission (CPUC) and Union Pacific Railroad (UPRR). Through the consultation process, various railroad improvements were identified as being required along Normandie Avenue pursuant to current CPUC standards and UPRR guidelines. As such, the Project proposes railroad track improvements along Normandie Avenue, which are designed pursuant to current CPUC standards and UPRR guidelines, and include the following:

- Removing approximately 170 linear feet of the spur track, which enters the Project site and serves the southernmost industrial building (16911 Normandie Avenue);

- Removing approximately 830 linear feet of railroad spur track which enters the Project site and serves the central industrial building (16907 Normandie Avenue);
- Constructing a new median both north and south of the track alignment,
- Installing new warning devices and tactile warning strips on the Normandie Avenue east and west sidewalks,
- Refreshing railroad crossing pavement markings immediately north and south of the track alignment.

Therefore, the Project would not increase transportation hazards due to an incompatible use near a railroad, and impacts would be less than significant in this regard.

It is noted, the UPRR Parcel immediately adjacent and east of the Project site is currently occupied by UPRR tracks. The Project proposes to redesignate the property from Industrial to Public/Institutional, and rezone from General Industrial Zone (M-2) to Official (O) consistent with the existing railroad land use; see **Section 4.9: Land Use**.

Finally, the Project does not introduce incompatible vehicles or onsite equipment, such as farm equipment that could create a transportation hazard. The Project proposes construction and operation of a 403-DU multi-family residential development adjacent to other residential uses. These land uses are typical of suburban areas, such as the City, and would not create a transportation hazard due to an incompatible use. Therefore, the Project would not increase transportation hazards due to an incompatible use and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Impact 4.13-4:
Would the Project result in inadequate emergency access?

Level of Significance: Less Than Significant Impact

Construction

Project construction may require traffic lane, parking lane, and/or sidewalk closures, including along Normandie Avenue, but would not result in the complete closure of any public or private street. The Project would implement PDF TR-1, which requires a Construction Traffic Management Plan, approved by the City, to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction, as well as ensure adequate emergency access.

With implementation of the Construction Traffic Management Plan, the temporary construction activities would not impede use of the streets for emergencies or access for emergency response

vehicles. Therefore, Project construction would not result in inadequate emergency access. A less than significant impact would occur, and no mitigation is required.

Operation

As described above, primary vehicular access to the Project site would be provided by four driveways; see Impact 4.13-1. Additionally, a fire access lane (varying from 26 to 34 feet in width) is proposed throughout the townhome portion of the Project site, which would provide emergency access. The LACFD requires fire lanes to be a minimum of 26 feet wide and include fire lane signage. Painted red curbs would delineate the limits of the fire lanes. Signage for the fire department with direction to units would be placed pursuant to LACFD requirements. The Project is also located approximately 1.0 mile from Los Angeles County Fire Department (LACFD) Station 158, which serves the City. While the Project is expected to increase the number of vehicles on local roadways, emergency responders have sirens and are able to bypass intersection queues, utilize two-way left-turn lanes, and use the opposite side of streets. The Project also does not propose any features that would inhibit emergency access to nearby areas.

Further, the Project site is located in an urbanized area where adequate circulation and access are provided to facilitate emergency response. The Project would be subject to compliance with GPSP[5] policies, specifically PS 1.7, PS 2.2, PS 2.7 and PS 3.1.

Therefore, the Project would have a less than significant impact concerning emergency access during operation and no mitigation is required.

Mitigation Measures

No mitigation is required.

4.13.6 CUMULATIVE IMPACTS

The context for assessing cumulative environmental impacts associated with transportation in the City is as follows: for transit facilities it is the GTrans, Torrance Transit, and Metro service areas; for roadway, bicycle, and pedestrian facilities and VMT, it is the City of Gardena.

Consistency with Applicable Plans, Ordinances, and Policies

As described above, the Project's Circulation Plan would be consistent with the GGP elements pertaining to the circulation system, concerning transit, roadways, bicycle, and pedestrian facilities, resulting in a less than significant impact. As with the proposed Project, each related project would be expected to demonstrate consistency with existing programs, plans, ordinances, and policies that address the City's circulation system (such as the General Plan

5 City of Gardena. (2022). Public Safety Plan. Retrieved from https://cityofgardena.org/wp-content/uploads/2022/04/Gardena_Public-Safety-Element_FINAL-FOR-ADOPTION.pdf.

Circulation and Mobility Sub-Element). Additionally, each related project would be expected to show consistency with SCAG's Connect SoCal. No significant cumulative impacts would occur for the proposed Project and the related projects concerning compliance with City circulation policies or standards adopted to protect the environment and support multimodal transportation options. Therefore, when combined with cumulative development, the Project's potential impacts concerning consistency with applicable plans, ordinances, and policies would not be cumulatively considerable.

Vehicle Miles Traveled

For baseline conditions, the Project is screened out from further VMT analysis based on its location in a low VMT area. 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, provided it complies 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. The Project is also aligned with the SCAG RTP/SCS because the Project is partially within a HQTA and provides housing development in a TAZ with downward trending VMT per capita, which is consistent with the RTP/SCS goals. Therefore, when combined with cumulative development, the Project's potential impacts concerning VMT and consistency with State CEQA Guidelines §15064.3(b), would not be cumulatively considerable.

Hazardous Geometric Design Features

The Project does not propose any geometric design features or incompatible uses that would substantially increase hazards. A potentially cumulative impact would occur if the Project would combine with a related project to create or substantially increase hazards due to geometric design features or incompatible uses. There are no related projects adjacent to where the Project's proposed railroad improvements are proposed. Additionally, the related projects would be required to provide their respective on-site and site-adjacent improvements and driveways, which would be subject to review/approval prior to construction, thereby reducing the potential for the improvements to create hazardous geometric features. Additionally, the Project's residential use is typical of the surrounding suburban area and would not introduce incompatible uses. Therefore, when combined with cumulative development, the Project's potential impacts concerning hazardous geometric design features would not be cumulatively considerable.

Emergency Access

The proposed Project would not result in inadequate emergency access. Primary vehicular access to the Project site would be provided via multiple driveways and a fire access lane throughout the townhome portion of the Project site, which would provide emergency access. The related projects would be required to show that they would not propose any features that would inhibit emergency access to nearby areas and would be subject to review/approval prior to construction

on a site-by-site basis. Further, subsequent projects would be required to comply with Gardena Public Safety Plan policies. Therefore, when combined with cumulative development, the Project would not cause a considerable impact concerning emergency access.

4.13.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning transportation have been identified.

4.13.8 REFERENCES

City of Gardena. (2020). *Gardena General Plan 2006, updated 2022*. Circulation Plan Update.

City of Gardena. (2022). *Public Safety Plan*. Retrieved from https://cityofgardena.org/wp-content/uploads/2022/04/Gardena_Public-Safety-Element_FINAL-FOR-ADOPTION.pdf.

Fehr and Peers. (2022). *South Normandie Avenue Specific Plan Project (16911 South Normandie Avenue) CEQA Transportation Impact Assessment*. San Diego, CA; see **Appendix 4.13-1: CEQA Transportation Impact Assessment**.

Fehr and Peers. (2023). *Normandie Crossing Specific Plan Local Transportation Assessment*. San Diego, CA; see **Appendix 4.13-2: Local Transportation Assessment**.

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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 in the following sources:

- *Archaeological Resources Assessment* for the Proposed Development at 16911 South Normandie Avenue Project, City of Gardena, Los Angeles County, California (Archeological Assessment); see **Appendix 4.2-1: Archaeological Resources Assessment**.
- *Tribal Cultural Resources Review* for the 16911 South Normandie Avenue Project, City of Gardena, Los Angeles County, California (Tribal Cultural Resources Assessment); see **Appendix 4.14-1: Tribal Cultural Resources Assessment**.

BRC Consulting LLC conducted a third-party review of the Project's tribal cultural resources analysis on behalf of the City; see **Appendix 4.14-1**. The third-party review concluded the analysis meets the applicable provisions of CEQA and the State CEQA Guidelines.

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 1.0-1: Initial Study, Notice of Preparation and Comment Letters,** provides guidance on Assembly Bill (AB) 52 and Senate Bill (SB) 18 compliance.

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 EXISTING SETTING

Ethnographic Overview

See also *Tribal Cultural Resources Review for the 16911 South Normandie Avenue Project, City of Gardena, California* (SWCA 2022 [**Appendix 4.14-1**]) for the Cultural Resources Setting, and as summarized in this EIR section.

The Project site is in an area historically occupied by the Gabrielino. Surrounding Native groups included the Chumash and Tatataviam/Alliklik to the north, the Cahuilla to the east, Serrano to the northeast, and the Luiseño/Juaneño to the south and southeast. 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), although there is evidence that these terms originally referred to local places or smaller groups of people within the larger group that we now call Gabrielino. Nevertheless, many present-day descendants of these people have taken on Tongva as a preferred group name because it has a Native American rather than Spanish origin. The term Gabrielino is used in the remainder of this report to designate Native American 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 took advantage of resources in the mountains, foothills, valleys, deserts, riparian, estuarine, and open and rocky coastal eco-niches. 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 oceangoing 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 hammer stones 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.

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. The religion spread 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.

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.

Native American Communities in Greater Los Angeles

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. Even with archaeological evidence, it can be difficult to conclusively establish whether any given assemblage represents the remains of the former village site.

Existing Tribal Cultural Resources

Native American Heritage Commission Sacred Lands File (NAHC)

The NAHC Sacred Lands File (SLF) search conducted December 2021 indicated negative results **(no tribal resources at the Project site)**; see Appendix B of the *Tribal Cultural Resources Review for the 16911 South Normandie Avenue Project, City of Gardena, California*, in **Appendix 4.2-2**.

California Historical Resources Information System (CHRIS)

No tribal cultural resources were identified within the Project site as a result of the CHRIS records search. Although the precise location of any given village is subject to speculation, it is clear the greater Los Angeles area once contained many Gabrielino villages, including several concentrated along the banks of major waterways.

The closest ethnographically documented village to the Project site may be Amupubit, which is estimated to have been located approximately 1.5 miles southeast of the site. Jautibit, another named ethnographic Native American settlement, has been mapped approximately 1.7 miles northeast and east-northeast of the Project site. Aside from the ethnographic evidence suggesting the location of these villages, little direct, indisputable archaeological evidence for the location of Native American villages has been produced to date. The Project site is in the vicinity of at least one previous Native American trade route (named “New Salt Road 1848–1878”) to the north of the site. A portion of the 1769 Portolá Expedition route is located approximately 10.7 miles north of Project site.

Historical land uses at the Project site and surrounding area consisted primarily of ranching associated with the operation of Rancho San Pedro during the Spanish, Mexican, and Early American Periods. Ranching transitioned to agricultural land uses by the end of the 19th century, which included development of irrigation infrastructure. No evidence for specific intensive land uses at the Project site were identified in archival sources before the 1920s. By 1927, aerial photographs show the site developed with structures in the north and south that appear associated with agricultural land uses. The central portions of the site appear to have been subject to plow agriculture. These land uses are all likely to have disturbed the surface and near-surface sediments, which would have destroyed or displaced Native American objects that may have once been present. Between the 1940s and 1960s, the Project site was more intensively developed as buildings, structures, and various hardscaping elements were constructed, further altering the physical setting and reducing the likelihood of any tribal cultural resources being preserved in the near-surface.

Archaeological remains associated with prehistoric or historic-era Native Americans can exist below paved surfaces within developed urban settings. While the CHRIS records search results did not identify any such Native American archaeological resources within the Project site or its immediate vicinity, most of the site was not inspected for archaeological resources because of the developed nature of the property. The site has been subject to multiple episodes of ground disturbance. As a result, archaeological material once located on the surface or in shallow deposits is unlikely to have been preserved, and although more deeply buried deposits could exist, the sensitivity for prehistoric and historic Native American archaeological resources is low to moderate.

Deeply buried archaeological deposits can exist within alluvium below historic period disturbances and may also be intermixed with historic period debris. Alluvial deposits in the Los Angeles Basin can be massive, extending hundreds of feet below the surface and containing sediments deposited long before human presence in North America. Most accumulations of alluvial sediments were formed by a combination of high- and low-energy depositional events. High-energy events are less likely to have preserved any material remains left on the surface by Native Americans, whereas low-energy floods tend to produce more favorable environments for the preservation of cultural materials. There is no absolute measure of depth below the surface in which sediments with these properties occur and site-specific conditions must be considered.

Although such soil conditions are an indicator of a setting favorable for preservation, the presence of such soils alone is not an absolute indicator of the presence of tribal cultural resources. Qae alluvium, dating to greater than 12,500 years BP, is mapped within the Project site. Given the age of this formation, intact, naturally buried archaeological resources are not expected. Additionally, site disturbance associated with historic period developments and the fact that most of the Los Angeles Basin is composed of alluvium from this time period, suggest decreased levels of sensitivity. Based on the above, the sensitivity for tribal cultural resources at the Project site is considered low to moderate.

See **Section 4.2: Cultural Resources** for further information on Non-Native American Resources.

4.14.2 REGULATORY SETTING

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

Pursuant 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."

PRC §21074(a) defines "tribal cultural resources" as either:

"(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

(B) Included in a local register of historical resources as defined in subdivision (k) of § 5020.1.

(2) 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 § 5024.1. In applying the criteria set forth in subdivision (c) of § 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe."

PRC §21074(b) states that a "cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

A unique archaeological resource (PRC §21083.2(g) or a nonunique archaeological resource (PRC §21083.2(h) may also be a tribal cultural resource if it conforms with the criteria of PRC §21074(a).

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 §§ 6254(r) and 6254.10

California Government Code § 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." § 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 § 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 § 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 Gardena 2006 General Plan (GGP) 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 the following: 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 § 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 § 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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 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

Tribal Cultural Sites

No tribal cultural resources were identified at the Project site as a result of the CHRIS records search or the NAHC's SLF search. The closest ethnographically documented village to the Project site is located approximately 1.5 miles southeast of the site. Aside from the ethnographic evidence suggesting the location of this village, little direct, indisputable archaeological evidence for the location of Native American villages has been produced to date. The Project site is in the vicinity of at least one previous Native American trade route (named "New Salt Road 1848–1878") to the north and a portion of the 1769 Portolá Expedition route is located approximately 10.7 miles to the north.

Therefore, the Project would not cause a substantial adverse change in the significance of a known tribal cultural resource site, feature, place, or cultural landscape as no such resources have been identified within the Project site. Additionally, the Project would not cause a substantial adverse change in the significance of a known tribal cultural resource which is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources or a resource determined by the lead agency as no such resources have been identified within the Project site.

However, archaeological remains associated with prehistoric or historic-era Native Americans can exist below paved surfaces within developed urban settings. While the CHRIS records search results did not identify any such Native American archaeological resources within the Project site or its immediate vicinity, most of the site was not inspected for archaeological resources due to the developed nature of the property. The site has been subject prior ground disturbance such that any archaeological material once located on the surface or in shallow deposits is unlikely to have been preserved. More deeply buried deposits could exist; the sensitivity for prehistoric and historic Native American archaeological resources is considered low to moderate.

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 March 9, 2022, 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.

The following tribal contacts were informed:

- Andrew Salas, Chairperson of the Gabrieleno Band of Mission Indians - Kizh Nation
- Mr. Charles Alvarez of the Gabrielino-Tongva Tribe
- Mr. Sam Dunlap 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 30 days should they wish to consult under AB 52.

On August 17, 2022, the City received one request for consultation under AB 52 from the Gabrieleno Band of Mission Indians-Kizh Nation (Kizh Nation). 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 1.0-1** of this EIR.

During the consultation, the Kizh Nation representatives did not identify any known tribal cultural resources (as defined in PRC §21074) at the Project site, nor did they provide substantial evidence to support an impact. Notwithstanding, the Applicant agreed to the imposition of a mitigation measure requiring monitoring during construction. In subsequent correspondence dated August 17, 2022, the Kizh Nation provided mitigation recommendations. On June 15, 2023, 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 Prior to Commencement of Ground Disturbing Activities (MM TCR-1), procedures in the event of an unanticipated discovery of human remains and associated funerary objects (MM TCR-2), and procedures for burials and funerary remains (MM TCR-3). Following compliance with MMs TCR-1 through TCR-3, 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 March 9, 2022, 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 by certified mail and email to the following:

- Mrs. Lovina Redner, Tribal Chair of the Santa Rosa Band of Cahuilla Indians
- Mr. Andrew Salas, Chairperson of the Gabrieleno Band of Mission Indians - Kizh Nation
- Mr. Isaiah Vivanco, Chairperson of the Soboba Band of Luiseno Indians
- Mr. Joseph Ontiveros of the Soboba Band of Luiseno Indians
- Mr. Charles Alvarez of the Gabrielino-Tongva Tribe
- Mrs. Christina Conley, Tribal Consultant and Administrator of the Gabrielino Tongva Indians of California Tribal Council
- Mr. Robert Dorame, Chairperson of the Gabrielino Tongva Indians of California Tribal Council
- Mr. Sam Dunlap of the Gabrielino-Tongva Tribe
- Ms. Sandonne Goad, Chairperson of the Gabrielino/Tongva Nation
- Mr. Anthony Morales, Chairperson of the Gabrieleno/Tongva San Gabriel Band of Mission Indians

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 requesting consultation. As previously noted, consultation was conducted with the Kizh Nation as a part of AB 52 consultation.

Therefore, with incorporation of mitigation, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource site, feature, place, or cultural landscape. Additionally, with incorporation of mitigation the Project would not cause a substantial adverse change in the significance of a tribal cultural resource which is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources or a resource determined by the lead agency.

Mitigation Measures

MM TCR-1 Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities:

A. The Applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject Project at all Project locations (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). "Ground-disturbing activity" shall include, but is

not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground- disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Applicant/lead agency upon written request to the Tribe.

D. On-site tribal monitoring shall conclude upon the latter of the following: (1) written confirmation to the monitor from a designated point of contact for the Applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project site or in connection with the Project are complete; or (2) a determination and written notification by the monitor to the Applicant/lead agency that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact TCRs.

E. Upon discovery of any TCRs or archaeological resources, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the monitor and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983).

- If the resources are Native American in origin, the Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.
- If the archaeologist determines that the resource contains a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures or appropriate mitigation shall be made available. The treatment plan shall

be in accordance with CEQA Guidelines §15064.5(f) for historical resources and Public Resources Code §21083.2(b) for unique archaeological resources. If not left in place, any historic or archaeological material that is not Native American in origin shall be curated at a public, nonprofit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum at the University of California Los Angeles, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society for educational purposes.

MM TCR-2 Unanticipated Discovery of Human Remains and Associated Funerary Objects

A. 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 Public Resources Code § 5097.98, are also to be treated according to this statute.

B. If human remains and/or grave goods are discovered or recognized on the Project site, then all construction activities shall immediately cease within 200 feet of the discovery. Health and Safety Code § 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code § 5097.98 shall be followed.

C. Human remains and grave/burial goods found with such remains shall be treated alike per California Public Resources Code § 5097.98(d)(1) and (2).

D. Construction activities may resume in other parts of the Project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the monitor determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the Project manager express consent of that determination (along with any other mitigation measures the monitor and/or archaeologist deems necessary). (CEQA Guidelines § 15064.5(f).)

E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

MM TCR-3 **Procedures for Burials and Funerary Remains.** This mitigation measure shall only apply if the Gabrielino Band of Mission Indians-Kizh Nation is designated the Most Likely Descendant ("MLD") by the NAHC:

A. 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.

B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.

C. 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. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.

D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will 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 should be posted outside of working hours. The Tribe will 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 will be removed.

E. In the event preservation in place is not possible despite good faith efforts by the Applicant/developer and/or landowner, before ground-disturbing activities may resume on the Project site, the landowner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects.

F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should 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.

G. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data

recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall 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.

4.14.5 CUMULATIVE IMPACTS

For purposes of the tribal cultural resources impact analysis, cumulative impacts are considered for cumulative development within a 0.5-mile radius for tribal cultural resources, according to the related projects; see **Table 3-2: Geographic Context for Cumulative Analysis**. As indicated in **Table 3-1: List of Cumulative Projects** and depicted in **Exhibit 3-1: Cumulative Project Locations**, there are five related projects within the geographic context for the cultural resources analysis: Related Project No. 2 (a multi-family condominium approximately 0.14 mile to the northeast); Related Project No. 3 (a small lot subdivision with three-story dwelling units approximately 0.08 mile to the northeast); Related Project No. 12 (a self-storage/warehouse development approximately 0.30 mile to the south); Related Project No. 15 (a townhome development approximately 0.50 mile to the south); and Related Project No. 16 (a mixed use development, including apartments and commercial retail and office space, approximately 0.30 mile to the north). As concluded above, the Project would not cause an adverse change in the significance of a tribal cultural resource defined in PRC §21074, as none are present on the Project site. Therefore, no cumulative impact concerning tribal cultural resources would occur.

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 3, 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, A. (2022). Personal communication, August 17, 2022.

SWCA. (2022). *Archaeological Resources Assessment* for the Proposed Development at 16911 South Normandie Avenue Project, City of Gardena, Los Angeles County, California; see **Appendix 4.2-1: Archeological Resources Assessment**.

SWCA. (2022). *Tribal Cultural Resources Review for the 16911 South Normandie Avenue Project,* City of Gardena, California; see **Appendix 4.14-1: Tribal Cultural Resources Assessment**.

4.15 UTILITIES AND SERVICE SYSTEMS

4.15 UTILITIES AND SERVICE SYSTEMS

The purpose of this section is to describe the existing utility and service system-related environmental and regulatory settings and evaluate the Project's potential to result in significant environmental effects due to relocation or construction of new or expanded utilities or service systems (i.e., water, wastewater, wastewater treatment, electric power, natural gas, and telecommunications facilities), the relocation or construction of which could cause significant environmental effects; have sufficient water supplies available to serve the Project and reasonably foreseeable future development; result in a determination by the wastewater treatment provider that it has inadequate wastewater treatment capacity to serve the Project; generate solid waste in excess of state or local standards or in excess of the capacity local infrastructure; and/or conflict with solid waste management and reduction strategies and regulations. Where significant impacts remain despite compliance with the existing regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Project's potentially significant environmental impacts.

Information in this section is based on utilities and service systems data provided in the following documents:

- Water and Wastewater Technical Report (Fuscoe Engineering, April 4, 2023); see **Appendix 4.15-1: Water and Wastewater Technical Report**.
- Water Resources Technical Report (Fuscoe Engineering, April 4, 2023); see **Appendix 4.7-1: Water Resources Technical Report,** and
- Energy Assessment (Kimley-Horn, May 17, 2023); see **Appendix 4.3-1: Energy Assessment.**

Information in this section is also based on readily available public resources, including among others, annual reports, and average usage information from utility providers whose service area includes the Project site.

It is noted that Kimley-Horn conducted a third-party review on behalf of the City of Gardena ("City") of the Project's Water and Wastewater Technical Report and Water Resources Technical Report on behalf of the City; see **Appendix 4.15-1** and **Appendix 4.7-1**, respectively. The third-party review concluded the analyses meet the applicable provisions of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines.

4.15.1 EXISTING SETTING

Water

Golden State Water Company (GSWC) supplies water to the Project site. The Project site is within GSWC's Southwest system service area (GSWC Southwest). GSWC Southwest serves the cities of Gardena and Lawndale, as well as portions of the cities of Carson, Compton, El Segundo, Redondo Beach, Hawthorne, and Inglewood and unincorporated County of Los Angeles (County).

Water Supply and Demand

Various water supply sources are available to GSWC to serve GSWC Southwest: adjudicated groundwater supplies, leased or purchased groundwater supplies, purchased water from Central Basin Municipal Water District ("CBMWD") and West Basin Municipal Water District ("WBMWD"), and recycled water. GSWC Southwest also maintains emergency connections with neighboring agencies that allow it access to additional water sources or water in emergency conditions.

Adjudicated Groundwater Supplies

The Project site and 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. The Project site is within the West Coast Subbasin. The Southwest System is supplied by two active, GSWC-owned Central Subbasin wells, and 12 active, GSWC-owned West Coast Subbasin wells. The West Coast [Sub]Basin was adjudicated in 1961 (Superior Court, County of Los Angeles, Case No 506806). The West Coast Basin Judgment (West Judgment) limits the amount of groundwater each party can extract annually from the West Coast [Sub]Basin. Groundwater producers held by the West Judgment have the right to annually pump the volume of water as decided in the adjudication. These limits are monitored by a court-appointed Watermaster.

Leased or Purchased Groundwater Supplies

GSWC purchases water from Central Basin Municipal Water District (CBMWD) and West Basin Municipal Water District (WBMWD). CBMWD is a wholesale water agency that purchases potable water supplies from the Metropolitan Water District of Southern California and recycled water supplies from Los Angeles County Sanitation Districts (LACSD) to distribute both within and outside the CBMWD service area. The WBMWD imports water from Metropolitan Water District of Southern California and delivers these supplies to investor-owned utilities, municipalities, a county waterworks district, and a groundwater agency to supplement locally available supplies.

Recycled Water Supplies

The GSWC Southwest system service area currently receives recycled water from the WBMWD as part of the district's West Basin Recycled Water Project. The recycled water produced by WBMWD is used throughout the region for uses such as landscape irrigation, industrial applications, and other purposes such as groundwater injections to control seawater intrusion. WBMWD owns all of the existing recycled water pipelines that fall within the boundaries of the GSWC Southwest service area, and WBMWD is planning to expand its distribution system to continue offsetting potable water demands.

Existing Onsite Water Demand

The Project site is fully developed with six industrial buildings, asphalt surface parking lots, hardscapes, and minimal landscaping **Table 4.15-1: Estimated Existing Water Demand** presents the Project site's estimated existing water demand and indicates it totals 12,732 gallons per day (gpd).

Table 4.15-1: Estimated Existing Water Demand

Land Use	Building Square Footage[1]	Average Daily Water Demand Factor[2] (gpd per 1,000 SF)[3]	Total Average Daily Water Demand (gpd)
Industrial[4]	106,100	120	12,732
		Total Existing Water Demand	***12,732***

Notes:
1 See **Table 2-1: Existing Onsite Structure Summary**.
2 Based on 120% of the wastewater generation factors from the "Estimated Average Daily Sewage Flows for Various Occupancies" document from LA County Public Works as the water meter records from the water purveyor (GSWC) was unable to provide this data.
3 Gpd = gallons per day; SF = square feet.
4 The specific industrial/warehouse occupancy type does not exist within the "Estimated Average Daily Sewage Flows for Various Occupancies" document; therefore, the "Commercial Shops and Stores" factor was used as the basis of design.

Source: **Appendix 4.15-1,** Table 1.

Future Water Demands and Supplies

GSWC's *Final Urban Water Management Plan – Southwest 2020* (UWMP) is written as a water resource planning tool to effectively manage water supply, reliability, and demand. The UWMP draws on local, regional, and statewide inputs presents data and analyses as required by the California Department of Natural Resources and the CWC since 2015.[1] **Table 4.15-2: Normal and Single Dry Year Water Supply and Demand Through 2045 (AFY)** and

Table 4.15-3: Five Consecutive Dry Years Water Supply and Demand Through 2045 (AFY) present the Southwest System's normal year, single dry-year, and multiple dry-year water demands through 2045. UWMP water demand forecasts are based on adopted general plans. UWMP Tables 5-2 and 5-3 show that water supplies would meet the service area's water demands for normal, single-dry, and multiple dry-year conditions through 2045. GSWC would meet future water demand through purchasing water from CBMWD and WBMWD.

[1] Golden State Water Company. (2020). *2020 Urban Water Management Plan Southwest Service Area*. Page 1-2.

Table 4.15-2: Normal and Single Dry Year Water Supply and Demand Through 2045 (AFY)

	2025	2030	2035	2040	2045
Normal Year					
Service Area Supply	26,939	27,347	27,761	28,181	28,608
Service Area Demand	26,939	27,347	27,761	28,181	28,608
Difference	0	0	0	0	0
Single Dry Year					
Service Area Supply	5,620	5,668	5,716	5,764	5,813
Service Area Demand	5,620	5,668	5,716	5,764	5,813
Difference	0	0	0	0	0

Source: Golden State Water Company. (2021). *Southwest Service Area 2020 Urban Water Management Plan*, Table 5-2.

Table 4.15-3: Five Consecutive Dry Years Water Supply and Demand Through 2045 (AFY)

		2025	2030	2035	2040	2045
Year 1	Service Area Supply	29,633	30,082	30,537	31,000	31,469
	Service Area Demand	29,633	30,082	30,537	31,000	31,469
	Difference	0	0	0	0	0
Year 2	Service Area Supply	29,722	30,172	30,629	31,093	31,469
	Service Area Demand	29,722	30,172	30,629	31,093	31,469
	Difference	0	0	0	0	0
Year 3	Service Area Supply	29,812	30,263	30,721	31,187	31,469
	Service Area Demand	29,812	30,263	30,721	31,187	31,469
	Difference	0	0	0	0	0
Year 4	Service Area Supply	29,902	30,354	30,814	31,280	31,469
	Service Area Demand	29,902	30,354	30,814	31,280	31,469
	Difference	0	0	0	0	0
Year 5	Service Area Supply	29,992	30,446	30,907	31,375	31,469
	Service Area Demand	29,992	30,446	30,907	31,375	31,469
	Difference	0	0	0	0	0

Source: Golden State Water Company. (2021). *Southwest Service Area 2020 Urban Water Management Plan*, Table 5-3.

Water Infrastructure

GSWC-Southwest is located in southwestern Los Angeles County and serves the Cities of Gardena and Lawndale; parts of the cities of Carson, Compton, El Segundo, Redondo Beach, Hawthorne, and Inglewood; and the adjacent unincorporated communities of Athens, Del Aire, El Camino Village, Lennox, and Gardena Heights.

The Project site is currently served by a public GSWC 8-inch water line that runs within the South Normandie Avenue right-of-way (ROW), east of the Project site. There is also an existing 8-inch water line along West 170th Street, south of the Project site and an existing 4-inch water line on Brighton Way, west of the Project site.

There are two fire hydrants in the Project's vicinity: one hydrant is near the West 169th Street at South Normandie Avenue intersection; and the second hydrant is along South Normandie Avenue, approximately 245 feet north of West 170th Street. These two existing fire hydrants are serviced by the 8-inch main water line in South Normandie Avenue.

Wastewater

Local Wastewater Facilities. The City provides sewer services to its residential, commercial, and industrial customers within City limits. The City's wastewater collection system includes over 88 miles of gravity sewer lines, among other facilities. The City's local sewers discharge at over 100 locations along various LACSD interceptors. City of Gardena Sewer Master Plan Figure ES.1: Existing Collection System depicts and Table ES.3: Detailed Capital Improvement Program describes the existing wastewater collection system within City limits. As indicated, there are two sewer lines within the South Normandie Avenue ROW along the Project site's eastern frontage: an 8.0-inch diameter City/local sewer gravity main pipeline; and a LACSD regional trunk sewer (i.e., Gardena Pump Trunk Sewer). Additionally, there are three existing sewer house laterals at the Project site, which connect to the Gardena Pump Trunk Sewer,[2] but not to the City's 8.0-inch diameter local sewer gravity main pipeline. See also *LACSD Wastewater Facilities Section* below.

LACSD Wastewater Facilities. The Project site is within the jurisdictional boundaries of LACSD, which consist of 24 districts that encompass 78 cities, including Gardena, and unincorporated County areas. The Project site is within LACSD District No. 5. LACSD operates and maintains facilities that collect and treat domestic and industrial wastewater (i.e., sewage). LACSD operates and maintains the regional wastewater collection system, which includes approximately 1,400 miles of sewers, 49 pumping plants, and 11 wastewater treatment plants.[3]

As previously mentioned, there are three existing sewer house laterals connecting from the Project site to LACSD's Gardena Pump Trunk Sewer, which has a 17.1-inch diameter, with total capacity of 2.2 million gallons per day (mgd) and a peak flow of 1.7 mgd when last measured in 2017.[4] The Gardena Pump Trunk Sewer continues underneath South Normandie Avenue to the south and then connects to a network of sewer lines that ultimately convey wastewater to LACSD's Joint Water Pollution Control Plant (JWPCP).

The JWPCP, which is in the City of Carson approximately 5.8 miles south of the Project site, currently processes an average wastewater flow of 243.1 mgd and has a total permitted capacity

[2] Fuscoe Engineering. (April 2023). *Water And Wastewater Technical Report: Normandie Crossing Specific Plan Project at 16911 S Normandie Ave, Gardena, California 90247*. Page 8; see **Appendix 4.15-1**.
[3] Los Angeles County Sanitation Districts. (No Date). *Our Agency*. Retrieved from: https://www.lacsd.org/about-us/who-we-are/our-agency , accessed May 2023.
[4] Huffman, Mandy, Los Angeles County Sanitation District, personal communication, June 7, 2023.

of 400 mgd.[5] LACSD's 2019 Annual Report notes that a pilot project to provide up to 500,000 mgd day of recycled water for indirect potable reuse was implemented at the JWPCP, with plans for full implementation in the future.

Existing Wastewater Generation

Table 4.15-4: Estimated Existing Wastewater Generation identifies the Project site's estimated existing wastewater generation and indicates it totals approximately 10,610 gpd, with an estimated daily peak flow that totals 26,525 gpd.

Table 4.15-4: Estimated Existing Wastewater Generation

Land Use	Building Square Footage: 2030	Estimated Average Daily Sewage Flow Factor (gal/1000 SF gross area)[1]	Total Wastewater generation (gpd)	Estimated Daily Peak Flow (gpd)[2]
Industrial	106,100	100	10,610	26,525
Total Existing Wastewater Generation			***10,610***	***26,525***

Note:
1 Based on the wastewater generation factors from the "Estimated Average Daily Sewage Flows for Various Occupancies" document from LA County Public Works. Because the Estimated Average Daily Sewage Flows for Various Occupancies document does not specifically identify "warehouse" as an occupancy type, the Commercial Shops and Stores occupancy type was used as the basis of design.
2 Estimated Daily Peak Flow (gpd) = Average Daily Flow * 2.5

Source: **Appendix 4.15-1**, Table 2.

Stormwater and Drainage

See **Section 4.8: Hydrology and Water Quality**, for existing conditions concerning stormwater and drainage facilities.

Electric Power, Natural Gas, and Telecommunications

Southern California Edison (SCE) provides Electric power to the Project area and Southern California Gas Company (SoCalGas) provides natural gas. Various companies provide telecommunications including AT&T, Direct TV, Dish Network, Time Warner Cable, Verizon, and ViaSat. SCE, SoCalGas, and local telecommunications companies operate and maintain transmission and distribution infrastructure in the Project area, inclusive of the Project site.

Electric Power – Existing Demand and Infrastructure

The site is currently served by overhead power lines on the west side of South Normandie Avenue, West 170th Street, and Brighton Way that are owned and maintained by SCE.

Table 4.15-5: Estimated Existing Electrical Demand presents the Project site's estimated existing electrical power demand and indicates it totals 875,071 Kilowatt hours (kWh) per year.

[5] Ibid.

Table 4.15-5: Estimated Existing Electrical Demand

Land Use	Electricity (kWh/year)[1,2]
Refrigerated Warehouse Rail	147,806
Unrefrigerated Warehouse Rail	323,613
Unrefrigerated Warehouse No Rail	84,173
Operational Water	319,479
Total Estimated	***875,071***

Notes:
[1] CalEEMod was used to calculate the electrical power demand based on the existing industrial land use.
[2] Kilowatt hours (kWh)

Source: **Appendix 4.3-1.**

Natural Gas – Existing Demand and Infrastructure

The Project site is currently served by natural gas and there is existing infrastructure owned and maintained by SoCalGas on the Project site. There is a 20-inch transmission line in West 190th Street approximately 1.3 miles south of the Project site.[6] **Table 4.15-6: Estimated Existing Natural Gas Usage** presents the Project site's estimated existing natural gas demand and indicates it totals 392,942 thousand British thermal units per year (kBTU/yr).

Table 4.15-6: Estimated Existing Natural Gas Usage

Land Use	Natural Gas (kBTU/yr)[1,2]
Refrigerated Warehouse Rail	6,042
Unrefrigerated Warehouse Rail	307,038
Unrefrigerated Warehouse No Rail	79,862
Total Estimated	***392,942***

Notes:
[1] CalEEMod was used to calculate the natural gas demand based on the existing industrial land use.
[2] Thousand British thermal units per year (kBTU/yr)

Source: **Appendix 4.3-1.**

Solid Waste

Waste Resources of Gardena (Waste Resources) provides solid waste and recycling services for the City's residential, commercial, and industrial customers, including the existing onsite land uses. Waste Resources uses the Chiquita Canyon Sanitary Landfill for non-recyclable municipal solid waste disposal 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.[7] The solid waste is disposed of at the Chiquita Canyon Sanitary Landfill (Chiquita).

[6] Southern California Gas Company. (2023). *Gas Transmission Pipeline Interactive Map – Los Angeles*. Retrieved from: Gas Transmission Pipeline Interactive Map - Los Angeles (arcgis.com) , accessed May 2023.

[7] City of Gardena. (2022). *Amended and Restated Agreement Between City of Gardena and Waste Resources of Gardena for Integrated Solid Waste Management Services*

The Chiquita Canyon Sanitary Landfill is a 639-acre landfill 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.[8] CalRecycle reports Chiquita has a maximum permitted throughput of 12,000 tons per day (tpd) and a maximum permitted capacity of 110,366,000 cubic yards.[9] Chiquita's remaining capacity was estimated to total 60,408,000 cubic yards, as of August 24, 2018.

4.15.2 REGULATORY SETTING

Water Supply

Federal

Safe Drinking Water Act

The U.S. EPA administers the Safe Drinking Water Act (SDWA), the primary federal law that regulates drinking water quality and establishes standards to protect public health and safety. The Water Resources Control Board's Division of Drinking Water State Department of Health Services (DHS) implements the SDWA and oversees public water system quality statewide. The DHS State Water Resources Control Board (SWRCB) establishes legal drinking water standards for contaminants that could threaten public health. Title 40 Code of Federal Regulations (CFR) Part 503, Standards for the Use or Disposal of Sewage Sludge establishes standard for the final use or disposal of sewage sludge generated during the treatment of domestic sewage in a treatment works. Title 23 California Code of Regulations (CCR), and standards established by the Regional Water Boards coordinate to regulate the disposal of biosolids. RCRA Title 42 of the United States Code §6901 et seq. contains regulations for municipal solid waste landfills.

State

Water Conservation Act of 2009

The Water Conservation Act of 2009 (often referred to as "SB X7-7" or the "20 by 2020 law") requires all water suppliers to increase water use efficiency. The legislation sets an overall goal of reducing per capita water use by 20 percent by 2020, with an interim goal of a 10 percent reduction in per capita water use by 2015. Effective in 2016, urban retail water suppliers who do not meet the water conservation requirements established by this bill are not eligible for state water grants or loans. SB X7-7 requires that urban water retail suppliers determine baseline water use and set reduction targets according to specified standards; it also requires that agricultural water suppliers prepare plans and implement efficient water management practices.

[8] Waste Connections, Inc. (2019). *About Chiquita Canyon*. Retrieved from: https://chiquitacanyon.com/about/, accessed May 2023.
[9] California Department of Resources Recycling and Recovery. (2019). *Estimated Solid Waste Generation Rates*. Retrieved from: https://www2.calrecycle.ca.gov/wastecharacterization/general/rates, accessed May 2023.

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 2020 UWMP, which was adopted on July 15, 2021.

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).[10] 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.[11]

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 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 exempt 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 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 implements the

[10] State Water Resources Control Board. (2023). *Sustainable Groundwater Management Act Development*. Retrieved from What is SGMA? | California State Water Resources Control Boardl , accessed May 2023.

[11] California Department of Water Resources. (2020). *Basin Prioritization Dashboard*. Retrieved from https://gis.water.ca.gov/app/bp-dashboard/final/ , accessed May 2023.

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.

California Code of Regulations Title 20 (Public Utilities and Energy)

California Code of Regulations (CCR) Title 20 includes federal and state minimum efficiency requirements for energy and water use in regulated appliances. These appliances include, but are not limited to, water heaters, furnaces, heat pumps, air conditioners, refrigerators, pumps, lamps and ballasts, computers, spray sprinkler bodies and showerheads. In addition, the following Title 20 regulations require water-efficient plumbing fixtures in structures:

CCR Title 20 §1604(h) – Plumbing Fittings. This regulation establishes efficiency standards that give the maximum flow rate of all new showerheads, lavatory faucets, sink faucets, and tub spout diverters.

CCR Title 20 §1606(i) – Plumbing Fixtures. This regulation prohibits the sale of fixtures that do not comply with established efficiency regulations.

California Code of Regulations Title 24 (California Building Standards Code)

CCR Title 24, also known as the California Building Standards Code (CBSC), includes regulations for how buildings are designed and constructed, and are intended to ensure the maximum structural integrity and safety of private and public buildings. The CBSC is comprised of 12 "Parts." The CBSC Parts relevant to utilities and service systems are described below.

Title 24 Part 3 - California Electrical Code. The California Electrical Code (CEC) contains electrical design and construction standards.

Title 24 Part 5 - California Plumbing Code. The California Plumbing Code (CPC) contains plumbing design and construction standards. The CPC also) promotes water conservation.

Title 24 Part 6 - California Energy Code. The California Energy Code contains energy conservation standards applicable to all residential and non-residential buildings throughout California, including schools and community colleges.

Title 24 Part 11 - California Green Building Standards (CALGreen Code). The CALGreen Code contains standards applicable to residential and non-residential buildings throughout California, including schools and community colleges. The CALGreen Code) is intended to improve public health, safety, and public welfare through sustainable construction practices. The sustainable practices are applied to planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code provides a waste reduction requirement of 65 percent of nonhazardous C&D waste.

California Health and Safety Code

California Health and Safety Code §17921.3(b) requires: (1) All water closets sold or installed in California to use no more than an average of 1.6 gallons per flush. On and after January 1, 2014, all water closets, other than institutional water closets, sold or installed in California are required to be high-efficiency water closets; and (2) All urinals sold or installed in California to use no more than an average of one gallon per flush. On and after January 1, 2014, all urinals, other than blow-out urinals, sold or installed in California are required to be high-efficiency urinals.

Assembly Bill 1668 and Senate Bill 606

AB 1668 and SB 606 created a new foundation for long-term improvements in water conservation and drought planning. SB 606 and AB 1668 establish guidelines for efficient water use and a framework for implementation and oversight of the new standards, which was required to be in place by 2022. The two bills include the following provisions:

- Establishing water use objectives and long-term standards for efficient water use that apply to urban retail water suppliers, composed of indoor residential water use; outdoor residential water use; commercial, industrial, and institutional irrigation with dedicated meters; water loss; and other unique local uses;
- Providing incentives for water suppliers to recycle water;
- Identifying small water suppliers and rural communities that may be at risk of drought and water shortage vulnerability and providing recommendations for drought planning; and
- Requiring both urban and agricultural water suppliers to set annual water budgets and prepare for drought.

Senate Bill 610

Senate Bill 610 codified in California Public Resources Code (PRC) §21151.9, requires the preparation of “water supply assessments” (WSA) for large developments to ensure that long-term water supplies are sufficient to meet the project’s demands in normal, single dry, and multiple dry years for a period of 20 years for all projects that propose at least the following:

- A proposed residential development of more than 500 dwelling units (DU);
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area; or
- A mixed-use project that includes one or more of the projects specified in the above bullets.

These assessments, prepared by public water systems responsible for service, address whether adequate existing or projected water supplies are available to serve proposed projects, in addition to urban and agricultural demands and other anticipated development in the service area in which the project is located.

Where a WSA concludes that insufficient supplies are available, it must describe steps that would be required to obtain the necessary supply. The content requirements for the WSA include identification of existing and future water suppliers and quantification of water demand and supply by source in five-year increments over a 20-year projection. This information must be provided for average normal, single-dry, and multiple-dry years. The absence of an adequate current water supply does not preclude project approval but does require a lead agency to address a water supply shortfall in its project approval findings.

Local

Gardena General Plan 2006

The Gardena 2006 General Plan (GGP) Community Resources Element provides a Conservation Plan with the following goal and policies for enhancement and maintenance of water supply.

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) §8.70 – Stormwater and Runoff Pollution Control

Gardena Municipal Code (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.[12]

Wastewater

Federal

Clean Water Act/National Pollutant Discharge Elimination System

The 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 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, nine RWQCBs. The Project is within jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB). The City operates under Municipal Regional Stormwater NPDES Permit (Order No. R4-2012-0175-A01, NPDES Permit No. CAS004001). This Permit provides the discharge requirements for the MS4 discharges within the Los Angeles County watersheds.

Clean Water Act Section 402

Section 402 of the Clean Water Act authorizes the SWRCB to issue NPDES Construction Stormwater General Permit (Water Quality Order 99-08-DWQ), referred to as the "Construction Stormwater General Permit." Construction activities can comply with and be covered under the Construction Stormwater General Permit provided they:

1. Develop and implement a Stormwater 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 off-site into receiving waters;

[12] City of Gardena. (2020). *Gardena Municipal Code, Chapter 8.70 Stormwater Runoff and Pollution Control.* Retrieved from https://www.codepublishing.com/CA/Gardena/#!/html/Gardena08/Gardena0870.html, accessed May 2023.

2. Eliminate or reduce non-stormwater 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 2022 Construction Stormwater 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)

CWA Section 303(d) (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 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, California is divided into nine RWQCBs, governing implementation and enforcement of the CWC and CWA. The Project site is 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. The Basin 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 conducted by the SWRCB. 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 Clean Water Act Section 303(c)(2)(B), 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

In 2014, California adopted the SGMA to help manage its groundwater. The SGMA requires that local Groundwater Sustainability Agencies (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, which 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 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 §10750 et seq.

Senate Bill x7-7 - Water Conservation Bill of 2009

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.

State Water Resources Control Board

The State Water Resources Control Board (SWRCB) preserves, enhances, and restores the quality of California's water resources. Wastewater generators must obtain a permit to discharge their wastewater. Pursuant to the federal CWA and California's Porter-Cologne Water Quality Control Act, the SWRCB and LRWQCB regulates wastewater discharges to surface waters through the National Pollutant Discharge Elimination System (NPDES) program. Some wastewater discharges are exempt from federal NPDES requirements, but California law may will still apply. Under California law, the SWRCB and LRWQCB require waste discharge requirements for some discharges, in addition to those subject to NPDES permits. Permits contain specific requirements that limit the pollutants in discharges. They also require dischargers to monitor their wastewater to ensure that it meets all requirements. Wastewater dischargers must maintain their treatment facilities, and treatment plant operators must be certified. The SWRCB and LRWQCB routinely inspect treatment facilities and strictly enforce permit requirements.

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 (WDRs) contained in Order No. R4-2012-0175 (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. The MS4 Permit Order provides the revised WDRs 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. 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 square feet (SF) or greater impervious surface area.

County of Los Angeles Hydrology Manual

The Project site is within a watershed that the County classifies as the Dominguez Watershed. The Los Angeles County Flood Control District (LACFCD) is responsible for providing flood protection, water conservation, recreation, and aesthetic enhancement within this entire watershed. The Los Angeles County Department of Public Works (LACDPW) developed the "Hydrology Manual" (January 2006) ("2006 Hydrology Manual"), which establishes the LACDPW hydrologic design procedures based on historic rainfall and runoff data collected within the County. The Project is required to utilize the 2006 Hydrology Manual and accompanying hydrologic tools including the HydroCalc Calculator to calculate existing and proposed Project discharges and volumes.

County of Los Angeles Department of Public Works Low Impact Development Standards Manual

The County's Department of Public Works prepared the Low Impact Development Standards Manual (February 2014)[13] (LID Standards Manual) to comply with NPDES MS4 Permit requirements for stormwater and non-stormwater discharges from the MS4 within the County's coastal watershed (CAS004001, Order No. R42012-0175). The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment projects in unincorporated areas of the County with the intention of

[13] County of Los Angeles Department of Public Works. (2014). Low Impact Development Standards Manual. Retrieved from: Los Angeles County Low Impact Development (LID) Manual.pdf (lacounty.gov) , Accessed May 2023.

improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges. The City has adopted the County LID standards.

Local

City of Gardena General Plan

The GGP Community Resource Element provides a Conservation Plan with the following goals and policies concerning hydrology and water quality:

- **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.

City of Gardena Municipal Code

City of Gardena Municipal Code (GMC) Chapter 8.70 - Stormwater and Runoff Pollution Control. This section 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 This section 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 [Construction Stormwater General Permit] from the SWRCB.

GMC §8.70.110.B.2 - Standard Urban Stormwater Mitigation. This section 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) LID BMPs; (b) source control BMPs; and (c) structural and nonstructural BMPs for specific types of uses.

City of Gardena Sewer Master Plan

The City's Sewer Master Plan, which was adopted May 2023, provides a plan to operate and improve the City's sewer system through 2045. The Sewer Master Plan provides guidance for collection system operations, existing pipelines and pump stations, and rehabilitation and replacement projects through implementation of the City's capital improvement program. Additionally, the Plan identifies short- and long-term wastewater flow management measures to meet increased wastewater flows created from future development and population growth in the City. See the *Environmental Setting – Wastewater Section* above for further discussion concerning existing wastewater facilities in the Project area.

The City's Sewer Master Plan capacity analysis identifies lines which do not meet the specified performance criteria; these are depicted on Sewer Master Plan Figure ES.2: Recommended Improvements, and listed in Sewer Master Plan Table ES.3: Detailed Capital Improvement Program. None of the City gravity main pipelines near the Project site shown in Sewer Master Plan Figure ES.2 where capacity-related improvements are proposed connect with the Project site. As previously noted, the three existing sewer house laterals at the Project site connect to the LACSD Gardena Pump Trunk Sewer, but not to any City pipeline.

Sewer Master Plan Figure 2.4: Planned Developments depicts the planned developments that the Sewer Master Plan assumes will be developed by 2045 and identifies the Project site as a planned development at 16911 South Normandie Avenue.

Electric Power, Natural Gas, and Telecommunications

Federal

There are no federal regulations concerning electricity, natural gas, or telecommunications that are applicable to the Project.

State

Renewables Portfolio Standard Program

The Renewables Portfolio Standard Program requires retail sellers of electricity to increase their purchases of electricity generated by renewable sources and establishes a goal of having 20 percent of California's electricity generated by renewable sources by 2017. In 2010, the CARB extended this target for renewable energy resource use to 33 percent of total use by 2020 (CARB 2010). Subsequent legislation requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from renewable energy resources by 2030. Increasing California's renewable supplies is anticipated to diminish the state's heavy dependence on natural gas as a fuel for electric power generation.

100 Percent Clean Energy Act

Senate Bill (SB) 100, the 100 Percent Clean Energy Act of 2018, makes it a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045.

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

Gardena Municipal Code (GMC) Chapter 15.04 - General Building Provisions. This chapter adopts the California Electrical Code in its entirety.

Solid Waste

Federal

Resource Conservation and Recovery Act of 1976

The Resource Conservation and Recovery Act of 1976 (Title 40, Part 258 of the Code of Federal Regulations), contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design (liners, leachate collection, run-off control, etc.), groundwater monitoring, and closure of landfills

State

Assembly Bill 75

Assembly Bill (AB) 75 was passed in 1999, and the State Agency Model Integrated Waste Management Act (Chapter 764, Statutes of 1999, Strom-Martin) took effect on January 1, 2000. The State Agency Model Integrated Waste Management Act requires state agencies to develop and implement an integrated waste management plan. The Act also mandates community service districts to provide solid waste services report disposal and diversion information to the city, county, or regional agency in which the community service district is located. Additionally, the Act requires all state agencies and large state facilities to divert at least 50 percent of solid waste from landfills after 2004, and that each state agency and large facility submit an annual report to California Department of Resources Recycling and Recovery (CalRecycle) summarizing its yearly progress in implementing waste diversion programs.

Assembly Bill 939 – 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.

Diversionary actions required by AB 939 were continued through subsequent legislation including SB 1322, which established state programs and further reinforced the state's procurement of recyclable materials. Assembly Bill 1826 further increases recycling efforts by requiring the contract or work agreement between a business and a gardening or landscaping service to require the organic waste generated by those services to comply with the requirements of this act.

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).[14] 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 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 four cubic yards (CY) of commercial solid waste per week or a multifamily residential dwelling of 5 DU 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 2022 CALGreen Code went into effect statewide on January 1, 2023.

Local

Gardena General Plan 2006

The GGP Community Resources Element provides a Conservation Plan with the following goals and policies concerning 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

[14] CalRecycle.(2020). *Construction and Demolition (C&D) Diversion Informational Guide*. Retrieved from https://www.calrecycle.ca.gov/lgcentral/library/canddmodel , accessed May 2023.

Gardena Municipal Code (GMC) Chapter 8–20 - Solid Waste And Recyclable Collection And Disposal. This chapter 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 GMC §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."

4.15.3 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G: Environmental Checklist Form, includes questions concerning utilities and service systems. The issues presented in the Environmental Checklist have been used as thresholds of significance in this section. Accordingly, the Project would 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 4.15-5);
    - 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 4.15-6);
    - 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 4.15-7);
    - Fails to comply with federal, state, and local management and reduction statutes and regulations related to solid waste (see Impact 4.15-8)

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?

Level of Significance: Less Than Significant With Mitigation Incorporated

Construction and Operations

GSWC would supply water to the Project site via the existing public GSWC 8-inch water main that runs underneath South Normandie Avenue. The Project would connect a domestic water line, a fire line, and irrigation line to the existing water main within the South Normandie Avenue ROW. The existing water main within South Normandie Avenue would not need to be upsized to accommodate the Project. The Project would be subject to all pertinent local, regional, and state-level regulations concerning any new connections, laterals, or trenching. Additionally, the Project would utilize two existing fire hydrants along the eastern property line on South Normandie Avenue. The existing fire hydrants are served by the 8.0-inch water main within the South Normandie Avenue ROW.

The Project would require construction of new onsite water facilities, as well as limited connections to existing offsite/adjacent infrastructure. As such, the Project would result in construction of water facilities, which could cause significant environmental effects. Although the Project would require relocation or construction of new onsite water facilities, these improvements would be limited to connections to existing facilities near the Project site, thus, their construction would not cause significant environmental effects. Further, the environmental effects associated with construction of the proposed water facility improvements are discussed as part of the overall environmental analyses in **Sections 4.1** through **4.16** of this EIR. As concluded in these EIR sections, the Project's environmental effects would be reduced to less than significant through compliance with the established regulatory framework and with mitigation incorporated, except concerning construction noise, which would be a significant and unavoidable impact. Given the proposed water facilities' nature and scale, their construction-related noise impacts are not considered significant. Therefore, with mitigation incorporated, the Project would result in less than significant environmental effects associated with construction of the proposed water facilities.

Mitigation Measures

See MM GEO-1, MM CUL-1, MM HAZ-1, MM HAZ-2, MM NOI-1, MM NOI-2, MM NOI-3, MM TCR-1, MM TCR-2, and MM TCR-3.

Impact 4.15-2:

Would the Project require or result in the relocation or construction of new or expanded wastewater conveyance/wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects?

Level of Significance: Less Than Significant With Mitigation Incorporated

Construction and Operations

The Project's estimated wastewater generation would be approximately 86,500 gpd, or approximately 75,890 gpd (0.08 mgd) over existing conditions; see **Table 4.15-7: Estimated Project Wastewater Generation**.

Wastewater flow originating from the Project site would discharge to the three existing sewer house laterals that connect from the Project site to LACSD's Gardena Pump Trunk Sewer within South Normandie Avenue. From the Gardena Trunk Pump Sewer, the Project's wastewater would be conveyed to the JWPCP for treatment; see Impact 4.15-6 below

Table 4.15-7: Estimated Project Wastewater Generation

Land Use	Dwelling Units	Average Generation Factor (gpd/DU)[1]	Total Wastewater Generation (gpd)
Apartments	68 Units – (Studio)	150	10,200
	194 Units – (1-BR)	200	38,800
	66 Units – (2-BR)	250	16,500
Townhomes	10 Units – (4-BR)	300	3,000
	35 Units – (3-BR)	300	10,500
	30 Units – (2-BR)	250	7,500
		Total Project	***86,500***
		Total Existing[2]	***-10,610***
		Net Project	***+75,890 (0.08 mgd)***

Note:
[1] Based on the sewer generation factors from the "Estimated Average Daily Sewage Flows for Various Occupancies" document from LA County Public Works.
[2] See **Table 4.15-4**.

Source: **Appendix 4.7-1**, Table 4.

The Gardena Pump Trunk Sewer has an existing total capacity of 2.2 mgd and conveyed a peak flow of 1.7 mgd (when last measured in 2017). Inclusive of the Project, the Gardena Pump Trunk Sewer would convey a peak flow of 1.78 mgd, with a remaining capacity of 0.42 mgd. As such, sufficient capacity exists in the Gardena Pump Trunk Sewer to serve the Project and County sewer lines would not need to be upsized to accommodate the Project. The Project would be subject to compliance with all pertinent local, regional, and state-level regulations concerning any new connections, laterals, or trenching. The California Health and Safety Code (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 LACSD may require payment of a connection fee before the Project is permitted to discharge to the LACSD's

sewerage system. It is also noted, the Project does not propose to connect to the City's existing local sewer line within the South Normandie Avenue ROW along the Project site's eastern frontage.

The Project would require construction of new onsite wastewater conveyance facilities, as well as limited connections to existing offsite/adjacent infrastructure. As such, the Project would result in construction of wastewater conveyance facilities, which could cause significant environmental effects. Although the Project would require relocation or construction of new onsite wastewater conveyance facilities, these improvements would be limited to connections to existing LACSD facilities near the Project site, thus, their construction or relocation would not cause significant environmental effects. Further, the environmental effects associated with construction of the proposed wastewater improvements are discussed as part of the overall environmental analyses in **Sections 4.1** through **4.16** of this EIR. As concluded in these EIR sections, the Project's environmental effects would be reduced to less than significant through compliance with the established regulatory framework and with mitigation incorporated, except concerning construction noise, which would be a significant and unavoidable impact. Given the proposed wastewater facilities' nature and scale, their construction-related noise impacts are not considered significant. Therefore, with mitigation incorporated, the Project would result in less than significant environmental effects associated with construction of the proposed wastewater facilities.

As concluded in Impact 4.15-6, adequate capacity exists to serve the Project's wastewater treatment demand in addition to the provider's existing commitments at JWPCP. Therefore, the Project would not result in construction of wastewater treatment facilities, which could cause significant environmental effects. A less than significant impact would occur in this regard, and no mitigation is required.

Mitigation Measures

See MM GEO-1, MM GEO-2, COA HAZ-1, COA HAZ-2, MM HAZ-1, MM HAZ-2, MM NOI-1, MM NOI-2, and MM NOI-3.

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 With Mitigation Incorporated

Construction and Operations

The Project proposes onsite drainage improvements by diverting existing stormwater flows and increasing the site's permeability. The Project proposes landscaped areas throughout the site that would result in a decrease in the existing impervious surfaces from 99.7 percent to 85.9 percent. Stormwater would be captured by a series of drains and discharged directly to

ground level, where they join surface-level sheet flows and discharge to a catch basin on Brighton Way. From Brighton Way, stormwater runoff would flow to the public storm drain system. The Project was analyzed under 10-year, 25-year, and 50-year design storm peak flow and demonstrated that the Project would not impact the Capital Flood conveyance capabilities of any drainage systems.[15] The Project's proposed drainage patterns are further discussed in **Section 4.7: Hydrology and Water Quality**.

The Project would require construction of new onsite stormwater facilities, as well as limited connections to existing offsite/adjacent infrastructure. Any new connections, laterals, or trenching required as a part of Project construction would be subject to compliance with Los Angeles County Department of Public Works (LACDPW) requirements, as detailed in the Los Angeles County Hydrology Manual (January 20026) and the Low Impact Development Standards Manual (February 2014)[16] (LID Standards Manual). The Project would also be subject to compliance with GMC Title 8 Chapter 7: Stormwater and Runoff Pollution Control requirements. As such, the Project would result in construction of stormwater facilities, which could cause significant environmental effects. Although the Project would require relocation or construction of new stormwater 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. Further, the environmental effects associated with construction of the proposed stormwater facility improvements are discussed as part of the overall environmental analyses in **Sections 4.1** through **4.16** of this EIR. As concluded in these EIR sections, the Project's environmental effects would be reduced to less than significant through compliance with the established regulatory framework and with mitigation incorporated, except concerning construction noise, which would be a significant and unavoidable impact. Given the proposed stormwater facilities' nature and scale, their construction-related noise impacts are not considered significant. Therefore, with mitigation incorporated, the Project would result in less than significant environmental effects associated with construction of the proposed stormwater drainage facilities.

Mitigation Measures

See MM GEO-1, MM GEO-2, COA HAZ-1, COA HAZ-2, MM HAZ-1, MM HAZ-2, MM NOI-1, MM NOI-2, and MM NOI-3.

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

[15] **Appendix 4.7-1.**

[16] County of Los Angeles Department of Public Works. (2014). Low Impact Development Standards Manual. Retrieved from: Los Angeles County Low Impact Development (LID) Manual.pdf (lacounty.gov) , Accessed May2023.

Construction and Operations

Electric Power Facilities. **Table 4.15-8: Estimated Project Electric Power Demand** provides the Project's estimated electric power demand and indicates it totals 4,017,999 kWh per year (approximately 11,008 kWh per day), or approximately 3,142,928 kWh/yr over existing conditions.

Table 4.15-8: Estimated Project Electric Power Demand

Land Use	Dwelling Units	Electricity (kWh/year)[1,2]
Apartment Mid Rise	328	2,092,880
Townhome Style Units	75	645,198
Enclosed Parking with Elevator		754,120
Water Energy		525,801
Total Project		***4,017,999***
Total Existing		***-875,071***
Net Project		***+3,142,928***

Notes:
[1] CalEEMod was used to calculate the electricity demand based on land use.
[2] Kilowatt hours (kWh)

Source: **Appendix 4.3-1.**

SCE provides electric power to the Project site and operates and maintains transmission and distribution infrastructure in the Project area. Although the Project's estimated electricity demand would increase by approximately 3,142,928 kWh/yr over existing conditions, this demand comprises less than 0.005 percent of the typical annual electricity usage in the County and SCE has confirmed they have sufficient capacity to accommodate the Project.[17]

The Project would require construction of new onsite electric power facilities, as well as limited connections to existing offsite/adjacent infrastructure. As such, the Project would result in construction of electric power facilities, which could cause significant environmental effects.

Natural Gas Facilities. The Project site is currently served by natural gas and there is existing infrastructure owned and maintained by SoCalGas. However, pursuant to the 2022 Energy Code, the Project would be all-electric and would not include connections to natural gas supply. Project construction would also not use natural gas. As such, the Project would not construct natural gas facilities or cause environmental effects in this regard.

Telecommunication Facilities. Various companies provide telecommunications including AT&T, Direct TV, Dish Network, Time Warner Cable, Verizon, and ViaSat. The Project proposes to connect to the existing telecommunication infrastructure at the Project site. The Project would require construction of new onsite telecommunication facilities, as well as limited connections to existing offsite/adjacent infrastructure. As such, the Project would result in construction of telecommunication facilities, which could cause significant environmental effects.

[17] **Appendix 4.3-1.**

Conclusion. Although the Project would require relocation or construction of new electric power and telecommunication 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. Further, the environmental effects associated with construction of the proposed electric power and telecommunication facility improvements are discussed as part of the overall environmental analyses in **Section 4.1** through **Section 4.16** of this EIR. As concluded in these EIR sections, the Project's environmental effects would be reduced to less than significant through compliance with the established regulatory framework and with mitigation incorporated, except concerning construction noise, which would be a significant and unavoidable impact. Given the nature and scale of the proposed electric power and telecommunication facilities, their construction-related noise impacts are not considered significant. Therefore, with mitigation incorporated, the Project would result in less than significant environmental effects associated with construction of the proposed electric power and telecommunication facilities.

Concerning natural gas, the Project would not require relocation or construction of new or expanded natural gas facilities. Therefore, the Project would not cause significant environmental effects from construction of natural gas facilities. A less than significant impact would occur in this regard, and no mitigation is required.

Mitigation Measures

See MM GEO-1, MM GEO-2, COA HAZ-1, COA HAZ-2, MM HAZ-1, MM HAZ-2, MM NOI-1, MM NOI-2, and MM NOI-3.

Impact 4.15-5:

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

The Project's estimated water demand would total approximately 158,211 gpd, or approximately 145,479 gpd over existing conditions; see **Table 4.15-9: Estimated Project Water Demand**. The Project would include all state-mandated water-saving features, including water-efficient faucets, shower heads, and toilets.

Table 4.15-9: Estimated Project Water Demand

Land Use	Units	Average Demand Factor (gpd/DU)[1]	Total Water Demand (gpd)
Apartments	68 Units – (Studio)	180	12,240
	194 Units – (1-BR)	240	46,560
	66 Units – (2-BR)	300	19,800
Townhomes	10 Units – (4-BR)	360	3,600
	35 Units – (3-BR)	360	12,600
	30 Units – (2-BR)	300	9,000
Pool(s)[2]	1 Unit @ - L1 Courtyard	13,614	13,614
	1 Units @ - L1 Courtyard	2,693	2,693
	1 Unit @ - L3 Courtyard	35,904	35,904
Landscaping	30,891 SF	ETWU Method[3, 4]	2,200
		Total Project	***158,211 (177.2 AFY)***
		Total Existing[5]	***-12,732***
		Net Project	***+145,479 (+163 AFY)***

Note:
[1] Based on 120% of the sewer generation factors from the "Estimated Average Daily Sewage Flows for Various Occupancies" document from LA County Public Works. See Golden State Water Company 2020 Urban Water Management Plan Southwest Service Area, page 1-2.
[2] Pools vary in size: therefore, pools have different water consumption values per unit.
[3] Demand based on Estimated Total Water Use equation: (Eto*plant factor*landscaped area* 0.62)/irrigation efficiency. Utilizing CIMIS Reference Evapotranspiration Zones Map ET of 46.6 in/yr, and a conservative plant factor of 0.7 and irrigation efficiency of 0.81 proposed condition.
[4] The Project's proposed landscaping was updated to total 30,205 SF (See **Section 3.0: Project Description**) after completion of this analysis. Because the Project's updated landscaping would generate less water demand, this analysis conservatively assumes 30,891 SF of proposed landscaping for purposes of determining water demand.
[5] See **Table 4.15-1**.

Source: **Appendix 4.15**, Table 3.

UWMP water demand forecasts are based on adopted general plans. The General Plan's assumed existing land use for the Project site is "Industrial," with an estimated maximum development capacity of approximately 228,690 SF; see **Table 4.8-2: Existing General Plan Land Use Designations**. Therefore, the UWMP assumed industrial uses for the Project site. Because the Project proposes a General Plan Amendment to change the Project site's land use designation from Industrial to Specific Plan, and the Project's estimated water demand would exceed the UWMP's assumed water demand for the Project site, the Project's water demand was not accounted for in the UWMP. However, GSWC analyzed the Project to determine if sufficient water supplies would be available to serve the Project from existing entitlements and resources. GSWC confirmed water service would be available to serve the Project from GSWC's Southwest System.[18] The UWMP projects that the service area's water demands will increase from 37,318 AFY in 2025 to 39,840 AFY in 2045 for both normal and dry years representing an increase in demand of 2,522 AFY. The Project's increase in water demand of 145,479 gpd (163 AFY) represents approximately 6.5% of the UWMP's forecast increase in demand between 2025 and

[18] Zhao, Joseph, Golden State Water Company, personal communication, December 7, 2021.

2045. 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. The UWMP also projects adequate supplies to meet all future demands.[19] The GSWC's UWMP indicates water supplies would meet the service area's water demands for normal, single-dry, and multiple dry-year conditions through 2045; see **Table 4.15-2.**

Therefore, GSWC would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. A less than significant impact would occur in this regard, and no mitigation is required.

Mitigation Measures

No mitigation required.

Impact 4.15-6:

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

As discussed above, the Project's estimated wastewater generation would be approximately 86,500 gpd, or approximately 75,890 gpd (0.08 mgd) over existing conditions; see **Table 4.15-7**. The Project's wastewater flow would be conveyed to the JWPCP for treatment. The JWPCP currently processes an average wastewater flow of 243.1 mgd and has a total permitted capacity of 400 mgd. JWPCP's capacity is based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG).

The Project's estimated wastewater generation of 75,890 gpd (0.076 mgd) comprises less than 0.06 percent of JWPCP's remaining available capacity of 156.9 mgd. As such, sufficient capacity exists at JWPCP to serve the Project and no JWPCP expansion/modification would be required to accommodate the Project. Therefore, the JWPCP has adequate capacity to serve the Project's estimated wastewater treatment demand in addition to the provider's existing commitments. A less than significant impact would occur in this regard, and no mitigation is required.

Mitigation Measures

No mitigation required.

[19] Golden State Water Company. (2021). *Southwest Service Area 2020 Urban Water Management Plan*.

Impact 4.15-7: 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?

Impact 4.15-8: 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

The Project proposes to remove all existing onsite structures and surface parking lot and construct/operate a 403 DU (i.e., 328 DU apartment building and 75 townhome) multi-family residential development. State law requires a 65 percent diversion rate for Construction and Demolition (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.

Waste Resources of Gardena would provide the Project's solid waste pickup services. The trash pickup locations would be coordinated with Waste Resources. CalRecycle provides multi-family residential solid waste generation rates from various sources (i.e., five sources), which range from 3.6 pounds per DU per day (lbs/DU/day) to 8.6 lbs/DU/day, and average 5.1 lbs/DU/day.[20] Based on 403 DU and 5.1 lbs/DU/day, the Project would generate approximately 2,056 lbs/day (approximately 1.03 tons per day). Project implementation would increase solid waste disposal demands over existing conditions. As previously noted, Chiquita's maximum permitted throughput is 12,000 tons per day.[23] The Project's estimated solid waste generation of approximately 1.03 tons per day comprises less than one-tenth percent of Chiquita's maximum permitted daily throughput. Chiquita's remaining and maximum capacities are approximately 60.4 million cubic yards and approximately 110.4 million cubic yards, respectively. The Project would be served by a landfill with sufficient remaining permitted capacity to accommodate the Project's solid waste disposal needs. Therefore, Chiquita could accommodate the Project's solid waste disposal needs. 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.

The Project would not generate solid waste in excess of state or local standards, in excess of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, the Project would result in less than significant impacts concerning solid waste, and no mitigation is required.

[20] California Department of Resources Recycling and Recovery. (2019). *Estimated Solid Waste Generation Rates*. Retrieved from: https://www2.calrecycle.ca.gov/wastecharacterization/general/rates, accessed May 2023.

Mitigation Measures

No mitigation required.

4.15.5 CUMULATIVE IMPACTS

The context for assessing cumulative environmental impacts associated with utilities is the service area associated with each of the utility and service system (i.e., water, wastewater, wastewater treatment, electric power, telecommunications, and solid waste) service providers to the Project. The cumulative analysis regarding electric power and natural gas demands is included in **Section 4.3: Energy**. The cumulative impacts analysis evaluates whether the provision of utilities and service systems for the growth projected to occur in the future, along with the proposed 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.

Water

The geographic context for the cumulative analysis of water is the GSWC Southwest service area. The Project would result in an increased demand for water supplies. There would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Also, the Project would require relocation/ construction of new water facilities, but these would not cause significant environmental effects. Related projects also could result in water supply impacts, and incrementally increase the long-term demand for water supply, similar to the Project. Further, all cumulative projects would be required to assess whether adequate water infrastructure and supply exist to serve their demand, and whether additional or expanded water infrastructure would be required. All projects would be required to construct water infrastructure improvements in order to adequately serve the projects, if necessary. Individual assessments of water services would be prepared, and mitigation would be provided if necessary to reduce a potential impact. Further, SB 610 requires a Water Supply Assessment (WSA) for all cumulative projects that are both subject to CEQA and considered a project under the California Water Code §10912.[21] Any relocated/new water facilities for cumulative projects would undergo separate environmental review to determine if they would cause environmental effects, and require compliance with all applicable County and City water supply ordinances, laws, and regulations. Each applicant also must fund the cost of the water-related infrastructure needed to serve the particular site. Consequently, the Project combined with other cumulative development would not result in significant cumulative environmental impacts concerning water. Therefore, the Project would not cause a cumulatively considerable impact concerning water supply and facilities.

[21] A project under the California Water Code §10912 means any of the following: (1) A proposed residential development of more than 500 dwelling units. (2) A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.

Wastewater

The geographic context for the cumulative analysis of wastewater is the LACSD service area, as except three existing sewer house laterals, the Project would not connect to City sewer facilities. The proposed Project could be adequately served by existing LACSD facilities. The Project would require relocation/construction of new wastewater facilities, but these would not cause significant environmental effects.

Other cumulative projects within the LACSD's service area could result in increased wastewater generation and demand for wastewater treatment services. There are seven related projects (i.e., Related Project Nos. 2, 3, 4, 12, 15, 16, and 22) within one mile of the proposed Project. There is the potential for these seven project to also connect to the Gardena Pump Trunk Sewer in South Normandie Avenue. However, inclusive of the proposed Project, the trunk sewer has a remaining capacity of 0.42 mgd. Additionally, the JWPCP plant currently operates below its design capacities and has a remaining capacity of approximately 157 mgd. Thus, cumulative development would not exceed JWPCP's capacity. To further ensure development would not exceed the capacity of the wastewater treatment system, all cumulative development projects would be required to obtain a Will Serve Letter from LACSD, or equivalent, to ensure there is available trunk sewer and treatment plant capacities for the proposed development project. LACSD has confirmed the Project could be adequately served by existing facilities; see **Appendix 4.15-1**. All relocated/new sewer facilities proposed or necessitated by cumulative projects would be subject to applicable CEQA review to determine if they would cause environmental effects, and all projects would be required to comply with the other applicable laws and regulations protecting environmental resources. Adherence to the regulatory framework would ensure that cumulative projects would result in demand for wastewater treatment services that exceed the existing entitlements and resources for wastewater services. Therefore, when combined with cumulative development, the Project's potential impacts from relocation or construction of new or expanded wastewater facilities would not be cumulatively considerable.

Stormwater Drainage

See **Section 4.7: Hydrology** for cumulative impacts to stormwater drainage facilities.

Electric Power, Natural Gas, and Telecommunications

The geographic context for the cumulative analysis of electric power, natural gas, and telecommunications is the service area of the various service providers. The proposed Project would not use natural gas nor construct natural gas facilities and thus, would not cause an environmental effect in this regard. Although the Project would require relocation or construction of new electric power and telecommunications facilities, these improvements would be limited to connections to existing facilities near the Project site, thus, their relocation/construction would not cause significant environmental effects.

Because the Project would not cause significant environmental effects from construction of natural gas facilities, no cumulative impact would occur in this regard. The Project and cumulative

projects would result in an increase in the construction of additional electric and telecommunications equipment, all of which are readily available. The equipment would be installed on each related site. 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. All new electric power and telecommunication facilities proposed or necessitated by cumulative projects would undergo separate environmental review to determine if their construction or relocation would cause significant environmental effects. Therefore, when combined with cumulative development, the Project's potential impacts concerning electric power and telecommunication facilities would not be cumulatively considerable.

Solid Waste

The geographic context for the cumulative analysis of solid waste is County of Los Angeles and Chiquita Canyon Landfill service area. The Project would not generate solid waste in excess of state or local standards, in excess of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. The projections of future landfill capacity based on the entire projected waste stream going into these landfills is used for cumulative impact analysis. The 2,056 lbs, or 1.03 tons, of solid waste per day generated by the Project is less than one-tenth percent of the daily capacity of the landfills. Due to this small percentage, the increase in solid waste from the proposed Project would be less than cumulatively considerable and would be less than significant.

4.15.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts concerning utilities and service systems have been identified.

4.15.7 REFERENCES

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4.16 AESTHETICS

4.16 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.

Information in this section is based primarily on information obtained from available public resources, including the Gardena General Plan 2006 (GGP) and the Normandie Crossing Specific Plan (NCSP).

4.16.1 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.

Lighting effects are associated with the use of artificial light during the evening and nighttime hours. There are two primary sources of light: light emanating from building interiors passing through windows and light from exterior sources (i.e., street lighting, architectural building illumination, security lighting, parking lot lighting, landscape lighting, and signage). Light introduction can be a nuisance. Uses such as residences and hotels are considered light sensitive, since occupants have expectations of privacy during evening hours and may be subject to disturbance by bright light sources. Light spill is typically defined as the presence of unwanted light on properties adjacent to the property being illuminated. With respect to lighting, the degree of illumination may vary widely depending on the amount of light generated, height of the light source, presence of barriers or obstructions, type of light source, and weather conditions.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light on highly polished surfaces such as window glass or reflective materials and, to a lesser degree, from broad expanses of light-colored surfaces. Perceived glare is the unwanted and potentially objectionable sensation as observed by a person as they look directly into the light source of a luminaire. Daytime glare generation is common in urban areas and is typically associated with buildings with exterior facades largely or entirely comprised of highly reflective glass. Glare can

also be produced during evening and nighttime hours by the reflection of artificial light sources such as automobile headlights. Glare generation is typically related to either moving vehicles or sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Glare-sensitive uses include residences, hotels, transportation corridors, and aircraft landing corridors.

4.16.2 EXISTING SETTING

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 City park– and the natural Willows Wetland, a protected natural habitat that occupies eight acres in the City's southeast portion.[2] The City is bordered by existing development in the cities of Hawthorne, Torrance, and Los Angeles, and unincorporated Los Angeles County.

Scenic Vistas

Appendix A: NOP and Initial Study of the Gardena General Plan's (GGP) Final EIR (FEIR) states that the City is not located within an area known to be a "scenic vista."[3]

Scenic Highway

GGP's FEIR Appendix A 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 cityscapes and landscapes, no potential exists within the foreseeable future for satisfying the criteria necessary for scenic highways."[4]

[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, updated 2022*. 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.

[4] Ibid.

Visual Character

The approximately 5.25-acre Project site is comprised of four parcels (APN: 6106-030-011, 6106-030-015, 6106-030-016, 6106-030-017) generally bordered by West 169th and West 170th Streets on the north and south, and South Normandie Avenue and Brighton Way on the east and west. The Project site is fully developed with six industrial buildings, asphalt surface parking lots, hardscapes, and minimal pervious areas. The existing industrial buildings are blighted, and the property is inadequately maintained and devoid of landscaping. The Project site is framed by contorted slatted, barbed wire fencing that is in disrepair on all sides, except for the site's northeastern portion. Additionally, a portion of one of the six industrial buildings is in a dilapidated condition and is not unoccupiable or currently being used.

The greater Project area is fully developed, and generally bordered by single- and multi-family residential uses (see **Table 2-3: Surrounding Land Uses and Zoning**). A three-story multi-family structure is located north of West 169th Street. A UPRR track borders the Project site to the east. East of South Normandie Avenue there are one- and two-story single-family residences and two- and three-story condominiums. One-story single-family residences are located along West 170th Street to the south and Brighton Way to the east. Limited ornamental trees are provided on the east side of South Normandie Avenue and adjacent to the Project site on West 170th Street and West 169th Street. There are no landforms, open space, landscaped corridors, or viewsheds within the Project area.

Light and Glare

The Project site and surrounding area is primarily built out and is typical of that found in urban environments. Ambient light from urban uses in the area includes building lighting (exterior and interior), streetlights, parking lot lights, and night lighting for recreational uses. Another source of nighttime light is vehicle headlights along surrounding roadways.

The Project site is adjacent sensitive use on all sides. The distance from the Project site's northern property line to the nearest adjacent sensitive use is 76 feet. The distance from the Project site's southern property line to the nearest sensitive use line is 50 feet. The distance from the Project site's eastern property line to the nearest sensitive use property line is 80 feet. Excluding the abutting single-family residential structure, the distance from the Project site's western property line to the nearest sensitive use property line is 25 feet.

As discussed above, existing uses still occur on the site. Glare from daytime operations from mobile sources (cars and trucks) and nighttime sources such as security lights, streetlights, and mobile sources occur on a normal basis. In addition, there are two onsite billboards by the site entrance on South Normandie Avenue; however, based on desktop research, both are unlighted and therefore, do not contribute to any substantial light or glare at night.

4.16.3 REGULATORY SETTING

State

California Department of Transportation

The California Department of Transportation (Caltrans) manages the 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 Project site vicinity.

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 § 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, § 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 at and surrounding the Project site and along South Normandie Avenue, West 169th Street, Brighton Way, and 170th Street 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.

Local

City of Gardena General Plan

The GGP Community Development Element provides a Community Design Plan that 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.
  - **Policy DS 1.4:** Provide a sense of arrival to Gardena through entry monument signs, landscaping features, architectural and motifs at key gate-way locations.
  - **Policy DS 1.8:** Encourage neighborhood district identity.
- **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.

- **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.
- **Policy DS 2.3:** Encourage a variety of architectural styles, massing, floor pans, 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.
- **Policy DS 2.8:** Ensure that new single-family residential buildings or additions are designed and constructed with sensitivity for the privacy of adjacent residential properties and the value and quality of existing homes.
- **Policy DS 2.9:** Integrate new residential developments with the surrounding built environment. In addition, encourage a strong relationship between the swelling 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.
- **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.
- **Policy DS 2.12:** Provide well-designed and safe parking areas that maximize security, surveillance and efficient access to building entrances.
- **Policy DS 2.13:** Encourage lot consolidation for multi-family development projects in order to produce larger sites with greater project amenities.
- **Policy DS 2.14:** Require design standards to 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 **Gardena Municipal Code (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 GMC Titles 17 and 18, the Gardena General Plan, 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 alterations of existing landforms 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.

4.16.4 SIGNIFICANCE CRITERIA AND THRESHOLDS

State CEQA Guidelines Appendix G, Environmental Checklist Form, includes questions concerning 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: Effects Found Not to be Significant**)
- 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 4.16-1); and/or
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area (see Impact 4.16-2)

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 existing conditions and impact analyses are based on a desktop review[5] including review of Project maps and drawings; Specific Plan design guidelines and development standards, 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). 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 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.

[5] A "desktop review" is a limited-scope evaluation that does not include a site inspection visit.

4.16.5 IMPACTS AND MITIGATION MEASURES

Impact 4.16-1:

If an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

Level of Significance: Less Than Significant Impact

Discussion/Analysis

The Project site is in an urbanized area. The Project site is in the City's southeast portion and is bordered by roadways, a railroad spur, and single- and multi-family residential uses. The Project site is fully developed with six industrial buildings constructed and remodeled between 1952 and 1979. The existing industrial buildings are blighted and a portion of one of the six industrial buildings is in a dilapidated condition and is not unoccupiable or currently being used. The property is inadequately maintained, devoid of landscaping, and is framed by contorted slatted, barbed wire fencing that is in disrepair on all sides, except the site's northeastern portion. The onsite UPRR spur is no longer in use. The Project proposes to remove all existing on-site improvements and construct a 7-story apartment building with 403 multi-family dwelling units: 328 units and 75 townhomes. The apartment building's maximum height would be 90 feet as measured from the finished floor (i.e., the level of the finished floor on the ground level) of the roof's highest point, including non-habitable projections (including without limitation, architectural features, elevator shafts mechanical equipment, stairwells, canopies, or shade structures). The townhomes would be three-stories at a maximum height of 40 feet as measured from the finished floor of the roof's highest point, including non-habitable projections.

The existing zoning for the Project site is identified in **Table 4.8-3: Existing Zoning** in **Section 4.8: Land Use and Planning**. The regulations specified in **Table 4.8-3** do not include standards governing scenic quality. While the GMC does not include regulations specifically regarding scenic quality, the City does have a standard for urban design for residential uses set forth in GMC §18.42.120.

Of the 5.25-acre site, approximately 1.32 acres (Parcels 1, 2, and 3) are zoned General Industrial Zone (M-1) and 3.93 acres (Parcel 4) are zoned General Industrial Zone (M-2). Parcels 1, 2, and 3 have a Housing Overlay 4 (HO-4), which allows a density of 21-30 dwelling unit per acre (DU/AC).

Project implementation requires the following zone changes:

- A zoning map amendment to change the zones from (1) Industrial (M-1) with a High Density 30 Overlay and (2) General Industrial (M-2) to Normandie Crossing Specific Plan Zone;
- At 16964 West 179th Street, rezone from General Industrial (M-2) Zone to Single-Family Residential (R-1) Zone;

- Concerning the Union Pacific Railroad parcel immediately adjacent and east of the Project site, rezone from General Industrial (M-2) to Official (O); and
- A GMC zoning text amendment to add Normandie Crossing Specific Plan.

NCSP Chapter 6: Design Guidelines includes architecture, landscape, and streetscape design standards per GMC §18.39.010(b), which would govern Project development and promote aesthetic quality. Therefore, the Project would not conflict with applicable zoning governing scenic quality.

Further, as determined in **Table 4.8-4: Gardena General Plan 2006 Analysis**, the Project would not conflict with Policy LU 1.1, Policy LU 1.2, Policy LU 1.5, Policy DS 1.4, Policy DS 2.1, Policy DS 2.2, Policy DS 2.3, Policy DS 2.7, Policy DS 2.9, Policy DS 2.10, Policy DS 2.11, Policy DS 2.12, Policy DS 2.14, and Policy DS 2.15, all of which govern scenic quality. Therefore, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Impact 4.16-2:

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

Discussion/Analysis

The seven-story buildings would be visible from surrounding areas that also create lighting. The proposed Project would create lighting from two primary sources: lighting from building interiors that would pass through windows and lighting from exterior sources (e.g., street lighting associated with offsite improvements, parking lot lighting, building illumination, security lighting, and landscape lighting). Future development within the NCSP area would be subject to the light and glare regulations specified in GMC §18.42.150: Security and Lighting Plan, which the City requires to ensure that safety and security issues are addressed in the development's design, and that an average of one footcandle is provided for all the public/common areas. NCSP Section 6.3: Lighting Standards requires that open spaces and pedestrian areas be illuminated. The Project's outdoor lighting would be subject to compliance with GMC §18.42.150.

The City would also review new lighting for conformance with the California Green Building Standards (CALGreen) (2022 Standards) (CCR Title 24 Part 11) in effect at the time that building plans are submitted, such that only the minimum amount of lighting is used, and no light spillage occurs. Additionally, NCSP Section 6.3 requires that light fixtures be designed and located in a manner that does not allow spillover onto adjacent properties. Consistent with City

requirements, required landscaping may also help buffer and minimize light effects on adjacent land uses.

With respect to materials used for the construction of the apartment and townhome buildings, reflective or shiny materials would not be used. The materials that would be used for Project construction would not create any significant light or glare within the Project area.

Because the Project site and surrounding area are developed, the Project's proposed lighting would not substantially increase light and glare within the site or its surroundings. With adherence to GMC standards, the NCSP, and California's Building Energy Efficiency Standards for Residential and Nonresidential Buildings, the Project's lighting and glare impacts would be less than significant and potential light spill would not occur on surrounding land uses or roadways. Light and glare impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.16.6 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 GGP and GMC. 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.

Therefore, compliance with policies and regulations set out by the proposed NCSP, the GGP, and GMC would not cumulatively contribute to the cumulative impacts related to aesthetics and visual resources. Impacts would be less than significant.

4.16.7 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts to tribal cultural resources have been identified.

4.16.8 REFERENCES

City of Gardena. (2006). *Gardena General Plan 2006, updated 2022*. Retrieved from https://www.cityofgardena.org/wp-content/uploads/2016/04/generalplan7.pdf.

City of Gardena. (2023). *Gardena Municipal Code*. Retrieved from Chapter 18.42 GENERAL PROVISIONS (codepublishing.com).

City of Gardena. (2022). *Normandie Crossing Specific Plan*.

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 **4.16** of this EIR. Project implementation would result in potentially significant impacts for the following topical issues: cultural resources, geology, hazards and hazardous materials, noise, recreation, tribal cultural resources, and utilities and service systems. Implementation of the City's standard Conditions of Approval (COA) and specified mitigation measures (MMs) provided in **Sections 4.1** through **4.16** would reduce these potential impacts to levels considered less than significant, except concerning construction-related noise impacts, which would remain significant and unavoidable, as discussed below.

5.0.1 NOISE

As specified in Gardena Municipal Code §8.36.080: Exemptions, construction activities are exempt from the City's 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 Saturdays, or any time on Sundays and federal holidays. Project construction activities would be subject to compliance with GMC §8.36.080, thus, would not take place during the restricted hours. Therefore, the Project's construction activities would be exempt from the City's noise standards. Notwithstanding, the Project's estimated construction noise levels have been conservatively analyzed.

Project construction activities would result in a temporary significant 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 more than 10 dBA despite **MM NOI-1** and **MM NOI-2**. As such, it is conservatively concluded that the Project's construction-related noise impacts would remain significant and unavoidable.

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, and fossil fuels for vehicle and delivery trips.

The Project site is fully developed with industrial uses and would require demolition activities to accommodate the proposed residential development. The demolition activities would be subject to compliance with the established regulatory requirements to ensure that any asbestos-containing materials, lead-based paints, 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 a commercial or industrial development and new population from a 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.

5.0.1 DIRECTLY OR INDIRECTLY FOSTER ECONOMIC OR POPULATION GROWTH, OR THE CONSTRUCTION OF ADDITIONAL HOUSING

The Project site is developed with six industrial buildings, asphalt surface parking lots, hardscapes, and landscaping. The Project would remove all onsite uses to develop a 403-DU multi-family residential development with two types of residential uses: an apartment building with 328 DU at the Project site's northern portion; and 75 townhome-style units within nine buildings at the Project site's southern portion and along the western site boundary. When implemented, the Project would increase population in the City. The Project's forecast population growth of 1,088 persons is anticipated to increase the City's existing 2023 population to 60,897 persons, representing an approximately 1.8 percent increase in population; see **Table 4.10-7: Existing Plus Project Growth Projections**. 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 the City's population, this growth is not considered substantial. Therefore, although the Project would induce unplanned direct population growth in the City through new homes, this impact is considered less than significant.

5.0.1 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 residential uses and roadways. 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 uses. 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.

5.0.1 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 and provide a new customer base to help existing businesses. **Section 4.1** through **Section 4.16** of this EIR address the specific and potential cumulative Project impacts.

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 the Mandatory Findings of Significance, as described below.

5.0.1 DEGRADATION OF THE ENVIRONMENT AND POTENTIAL IMPACTS ON HABITAT OR WILDLIFE SPECIES, AND CALIFORNIA HISTORY OR PREHISTORY

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

Degradation of the Environment. State CEQA Guidelines §15065(a)(1) 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 State CEQA Guidelines §15382 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."

As discussed throughout this EIR, the Project has the potential to degrade the environment's quality/result in significant environmental impacts concerning construction noise that would not be reduced to less than significant, despite compliance with the established regulatory framework (i.e., local, state, and federal regulations), Project COA, and with mitigation incorporated. This EIR in its entirety addresses and discloses all known potential environmental effects associated with Project development, including direct, indirect, and cumulative impacts. A summary of all potential environmental impacts, level of significance, and mitigation measures is provided in **Section 1.0: Executive Summary**.

Impacts on Habitat or Species. State CEQA Guidelines §15065(a)(1) 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." Because the Project site is fully developed and devoid of any natural habitats, the Project would not have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal. As such, the Initial Study prepared for the Project found that the Project would have no impact or a less than significant impact to biological resources. Therefore, biological resources are not evaluated in this EIR.

Impacts on California History and Prehistory. **Section 4.2: Cultural Resources** analyzed the Project's potential impacts to historic and prehistoric cultural resources. Analysis found no recorded historic resources on the Project site. Analysis found that the existing onsite structures are not historically significant resources pursuant to State CEQA Guidelines §15064.5. However, the archaeological assessment determined the Project site has a moderate sensitivity for containing historic period (non–Native American) archaeological resources, which could be discovered during construction. Although such a discovery is unlikely, any previously unidentified archaeological resources, if present, have the potential to be significant under CEQA.

Additionally, as determined in the Project's preliminary geotechnical investigation, the Project site's surface area consists of weakly consolidated alluvial sediments dating back to the late Pleistocene, which are of an age to preserve fossil resources and therefore the Project would also

have high paleontological potential. As such, mitigation proposed within these sections, **Section 4.2: Cultural Resources**, **Section 4.4: Geology, Soils, and Paleontological Resources,** and **Section 4.14: Tribal Cultural Resources,** identifies the retention of a professional archaeologist (**MM CUL-1**), Native American tribal representative (**MM TCR-1**), and paleontologist (**MM GEO-1**) to monitor any ground disturbing activities. **MM TCR-2** in **Section 4.2: Cultural Resources** identifies steps to be taken in the event of an inadvertent discovery of an archaeological resource. **MM TCR-3** in **Section 4.2: Cultural Resources** identifies steps to be taken in the event of an inadvertent discovery of human remains where the NAHC resource designates the Gabrieleno Band of Mission Indians-Kizh Nation the Most Likely Descendent ("MLD"). 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.

5.0.1 SHORT-TERM VS. LONG-TERM GOALS

State CEQA Guidelines §15065(a)(2) 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 in **Section 5.2: Significant Irreversible Environmental Changes**, 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, **Section 1.0: 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, generate population growth in the City. However, the Project would not remove obstacles to population growth through the construction or extension of major infrastructure facilities.

5.0.1 CUMULATIVELY CONSIDERABLE IMPACTS

Would the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable

when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects.)

State CEQA Guidelines §15065(a)(3) 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." As discussed throughout this EIR, the Project the Project could have impacts that are individually limited, but cumulatively considerable. This EIR in its entirety addresses and discloses all known potential cumulative environmental impacts. Cumulative impacts are addressed in **Section 4.1** through **Section 4.16**.

5.0.1 SUBSTANTIAL ADVERSE EFFECTS ON HUMAN BEINGS

Would the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

As required by State CEQA Guidelines §15065(a)(4), "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 identified in the Initial Study, those that could directly affect human beings are aesthetics, air quality, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, land use and planning, public services and utilities, transportation, 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: Project construction activities would result in a temporary significant 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 more than 10 dBA despite **MM NOI-1** and **MM NOI-2**.

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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 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 significant 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

[1] State CEQA Guidelines §15126.6(b).

[2] State CEQA Guidelines §15126.6(f).

[3] State CEQA Guidelines §15126.6(e)(2).

§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 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 Normandie Crossing Specific Plan Project site is in the County of Los Angeles, approximately 12 miles southwest of downtown Los Angeles, in the southeast portion of the City of Gardena ("City"), at 16829, 16835, and 16907 South Normandie Avenue. The approximately 5.25-acre Project site is comprised of four parcels (APN: 6106-030-011, 6106-030-015, 6106-030-016, 6106-030-017) generally bound by West 169th and West 170th Streets on the north and south, and South Normandie Avenue and Brighton Way on the east and west.

The Project proposes a 403-dwelling unit (DU) multi-family residential development with two types of residential uses: an apartment building with 328 DU at the Project site's northern portion; and 75 townhome-style units within nine buildings at the Project site's southern portion and along the western site boundary. The Project also proposes offsite sidewalk and railroad improvements**.** The offsite sidewalk improvements are proposed along the south side of 169th Street, west of the Project site**,** between Brighton Way and the alley just west of Brighton Avenue. The offsite track and other railroad improvements are proposed on South Normandie Avenue along the Project site's eastern boundary, pursuant to California Public Utilities Commission (CPUC) standards and Union Pacific Railroad (UPRR) guidelines. To allow the proposed development, the Applicant is proposing the Normandie Crossing Specific Plan (NCSP) (SP #1-21), which would establish the site-specific zoning regulations and development standards for this area. The NCSP 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. In addition to requiring a Specific Plan, the Project requires various other approvals, including the following: General Plan/General Plan Map Amendment (GPA #3-21), Zone Change and Zone Map Amendment (ZC #4-21), Zoning Text Amendment (ZTA #6-21), Normandie Crossing Specific Plan (NCSP) (SP #1-21), Site Plan Review (SPR #11-21), Vesting Tentative Tract Map (TTM #4-21), Development Agreement (DA #2-21), and CPUC General Order 88-B Permit). 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 the City of Gardena's existing housing options, by providing a range of housing types and sizes, to serve the region's growing and evolving technology and creative sectors and aid in recruiting and retaining talent for local companies.
2. Support the expanding technology and creative sector with newly constructed, high-quality housing opportunities, enabling local employees to live close to where they work.
3. Cluster urban residential development near technology firms, other large employment centers, and commercial corridors providing City residents with the opportunity to live, work, and shop with less reliance on automobiles.
4. Establish housing development that meets high standards of design and pursues environmental sustainability.
5. Redevelop a blighted site, increase tax revenues to the City, provide affordable housing to support the City's Regional Housing Needs Assessment goals, and create a catalyst for future development in this part 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 impacts.

6.3.2 IMPACTS THAT CAN BE MITIGATED BELOW A LEVEL OF SIGNIFICANCE

Impacts associated with the following topics would be significant without incorporation of mitigation measures, but would be reduced to a less-than-significant level with incorporation of the mitigation measures identified in the EIR:

- Cultural Resources – cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15065.5; disturb human remains.
- Geology and Soils (Paleontological Resources) – directly or indirectly destroy a unique paleontological resource or site or unique geological feature.
- Hazards and Hazardous Materials – create a significant hazard through reasonably foreseeable upset and accident conditions involving the release of hazardous materials.
- Recreation – include recreational facilities which might have an adverse effect on the environment.
- Tribal Cultural Resources – cause a substantial adverse change in the significance of a tribal cultural resource.

- Utilities - result in the relocation or construction of new or expanded water, wastewater conveyance, stormwater drainage, electric power, and telecommunication facilities, the construction or relocation of which could cause significant environmental effects.

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;
- "Reduced Density" Alternative.

Throughout the following analysis, the alternatives' impacts are analyzed for each environmental issue area, as examined in **Sections 4.1: Air Quality** through **4.16: Aesthetics**. In this manner, each Alternative can be compared to the Project on an issue-by-issue basis. **Table 6-3: Comparison of Alternatives**, 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" ALTERNATIVES

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 were 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 (the "No Project/No Construction" Alternative); 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) (the "No Project/Existing Land Use Designation" Alternative).

6.4.2 "NO PROJECT/NO CONSTRUCTION" ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The Project site is within a fully urbanized area and is generally surrounded by single- and multi-family residential uses. As depicted in **Exhibit 2-2: Local Vicinity Map**, the Project site is fully developed with six industrial buildings, asphalt surface parking lots, hardscapes, and minimal landscaping. Approximately 115,424 square feet (SF) of industrial floor area is present on the Project site. One of the buildings on Parcel 4 contains approximately 9,324 SF of industrial floor area that is in a dilapidated condition and is not occupiable, therefore, only 106,100 SF of industrial uses are currently operational. Additionally, the Project site includes a railroad spur from the adjacent UPRR northern track. The spur is associated with former onsite industrial operations but is no longer in use. **Table 2-1: Existing Onsite Land Uses**, summarizes the land uses that are present within the Project site and surrounding area.

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 and the approximately 106,100 SF of industrial uses would continue to operate. None of the proposed Project improvements would be implemented. Further, the Project's requested entitlement (i.e., General Plan/General Plan Map Amendment (GPA #3-21), Zone Change and Zone Map Amendment (ZC #4-21), Zoning Text Amendment (ZTA #6-21), Normandie Crossing Specific Plan (NCSP) (SP #1-21), Site Plan Review (SPR #11-21), Vesting Tentative Tract Map (TTM #4-21), Development Agreement (DA #2-21), and CPUC General Order 88-B Permit) would not be granted. 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

Air Quality

The Project's short-term air quality impacts from demolition, grading, and construction activities would be less than significant. Under the No Project/No Construction Alternative because there would be no development, and no construction-related air pollutant emissions would be generated. This Alternative would also not expose sensitive receptors to substantial pollutant concentrations, which is concluded to be less than significant for the Project through compliance with the established regulatory framework.

The Project's operational emissions would not exceed significance thresholds, thus would be less than significant. 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, operational impacts would be less than significant under this Alternative.

The No Project/No Construction Alternative would result in less impact than the proposed Project regarding air quality, because although the Project would not exceed short- or long-term air emissions thresholds, the existing conditions (this Alternative) 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 potentially discovered 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 result in less impact than the proposed Project regarding cultural resources. Under this Alternative, there would be no potential for impacting resources since no ground disturbing activities would occur.

Energy

The Project would result in construction-related energy consumption from water, diesel fuel, and gasoline usage; see **Table 4.3-5: Project and Countywide Energy Consumption**. However, the Project would result in less than significant impacts concerning construction-related energy usage since wasteful, inefficient, or unnecessary consumption of energy resources would not occur following compliance with Title 24 requirements. Under the No Project/No Construction Alternative, construction-related energy consumption would not occur because no development would occur. Therefore, the No Project/No Construction Alternative would have no impact concerning energy demand, whereas the Project would result in a less than significant impact.

The Project's operational energy consumption would occur from building energy use, water use, and transportation-related fuel use. The Project would be subject to compliance with applicable energy standards. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in a less than significant impact concerning energy. Further, the Project would not conflict with/obstruct a State or local plan for renewable energy or energy efficiency. Under the No Project/No Construction Alternative, no change in existing operational electricity, natural gas, gasoline, or diesel fuel consumption would occur, as would occur with the proposed Project. Although this Alternative would generate less electric power demand than the Project (see **Table 4.15-8: Estimated Project Electric Power**

Demand), the existing use consists of industrial buildings initially constructed between 1952 and 1976, which are not operating under the latest CALGreen standards as would the Project. For this reason, and since the Project would not generate a natural gas demand, this Alternative is assumed to result in inefficient energy consumption.

The No Project/No Construction Alternative would result in greater impacts than the proposed Project regarding energy consumption because although no construction-related energy consumption would occur, this Alternative would not operate under the latest CALGreen standards, thus, is assumed to result in inefficient energy consumption and would continue to consume natural gas, whereas the Project would not consume any.

Geology, Soils, and Paleontological Resources

Project construction-related impacts (i.e., ground disturbing activities) on paleontological resources are concluded to be less than significant, with mitigation incorporated. Since the No Project/No Construction Alternative would not involve construction, this Alternative would avoid the Project's potential for impacting unique paleontological resources. This Alternative would have no impact on paleontological resources, whereas the Project's impacts would be less than significant with mitigation incorporated.

The No Project/No Construction Alternative would result in less impacts than the proposed Project regarding paleontological resources. There would be no potential for impacting resources since no ground disturbing activities would occur.

Greenhouse Gas Emissions

The Project would result in less than significant construction-related greenhouse gas (GHG) emissions and direct and indirect operational GHG emissions, as concluded in **Section 4.5: Greenhouse Gas Emissions**. Direct operational emissions include GHG emissions from operational vehicular traffic, onsite combustion of natural gas, and landscaping equipment. Indirect operational emissions include GHG emissions from offsite generation of electrical power and the energy required to convey water to and wastewater from the Project site. Under the No Project/No Construction Alternative, there would be no construction activities or new development, thus there would be no short-term GHG emissions nor long-term direct and indirect operational GHG emissions. This Alternative would not generate additional GHG emissions, whereas the Project's GHG emissions would be less than significant.

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 result in less impact than the proposed Project regarding GHG emissions.

Hazards and Hazardous Materials

The proposed Project would require demolition of onsite buildings which could expose construction workers to concentrations exceeding federal and state thresholds. Additionally, Project construction activities could 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. Implementation of COA HAZ-1 and COA HAZ-2, and MM HAZ-1, would reduce impacts to less than significant. These impacts would be avoided with the No Project/No Construction Alternative since no construction would occur. This Alternative would result in no impact concerning construction activities, whereas the Project's impact would be less than significant with mitigation incorporated.

The Project's operational-related impacts concerning tetrachloroethene (PCE) concentrations that exceed Department of Toxic Substance Control (DTSC) screening levels for residential applications, which was considered less than significant with mitigation incorporated, would be avoided with this Alternative, as no residential uses would be developed. However, under this Alternative, existing operations which consist of the use, storage, and transportation of hazardous materials associated with industrial uses, would continue. As discussed in **Section 4.6: Hazards and Hazardous Materials**, the existing industrial uses involved materials (e.g., paints and oils), which were found to be properly labeled and stored at the time of the assessment, and there were no signs of leaks, stains, or spills. Thus, the existing use was not considered a recognized environmental concern. This Alternative would result in less than significant operational impacts, as would the Project.

The No Project/No Construction Alternative would result in less impacts than 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 Project would result in less than significant short-term water quality impacts following compliance with National Pollutant Discharge Elimination System (NPDES) and GMC requirements. 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.

Following compliance with NPDES and GMC requirements, which include implementation of water quality best management practices (BMPs), the Project's operational activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. The last building permit on the Project site was issued in approximately 1987. Therefore, the No Project/No Construction Alternative would involve continued operations, which do not include water quality facilities compliant with current NPDES and GMC requirements. As such, this Alternative is assumed to result in potentially greater operational water quality impacts, than the Project.

The Project would not impede or redirect flood flows and would decrease the existing peak flow rates due to a decrease in impervious surface coverage. The Project would not result in substantial erosion, increase the rate or amount of surface runoff, or create runoff that would exceed the capacity of existing stormwater drainage systems. The No Project/No Construction

Alternative's long-term hydrology impacts would be greater than the proposed Project since the decrease in 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 with mitigation incorporated. The Project 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. As with the Project, this Alternative's impacts concerning demand for groundwater supplies would be less than significant. Under the No Project/No Construction Alternative, less groundwater recharge would occur than with the Project due to the existing condition's larger impervious surface area and lesser infiltration rate.

The No Project/No Construction Alternative would result in greater impacts 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 apartment building and townhomes, the Project would remove the approximately 115,424 SF of industrial buildings. The Project would replace the Project site's existing General Plan Industrial and Industrial, High Density 30 Overlay land use designations to Specific Plan, and Industrial (M-1), General Industrial (M-2), and Housing Overlay 4 (HO-4) zoning with Normandie Crossing Specific Plan (NCSP). To implement the Project, the Applicant would require several discretionary permits/approvals, including General Plan/General Plan Map Amendments, a Zone Change and Zone Map Amendment, Zoning Text Amendment, and Normandie Crossing Specific Plan (NCSP), among others; see **Section 2.6: Agreements, Permits, and Approvals**. 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 the apartment building and townhomes would not be constructed. The No Project/No Construction Alternative would not require any discretionary permits/approvals.

The No Project/No Construction Alternative would result in less impact than the proposed Project concerning land use and planning because it would avoid the Project's proposed General Plan/General Plan Map Amendments, Zone Change and Zone Map Amendment, Zoning Code Text Amendment, and Normandie Crossing Specific Plan (NCSP), among others.

Noise

The Project's construction-related noise impacts would be significant and unavoidable despite implementation of mitigation concerning construction equipment and requiring a temporary noise barrier. The Project's construction-related vibration impacts would be less than significant with mitigation. 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 4.9-11: Composite Noise Impacts identifies the existing ambient noise levels (L_{eq}) and the Project's composite noise levels. As shown in **Table 4.9-11**, 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 significance thresholds, resulting in a less than significant impact. Noise associated with industrial uses is generally considered higher than residential uses. Thus, under the No Project/No Construction Alternative, existing noise levels, which are likely higher than the proposed Project's, would continue. See **Section 4.9: Noise**, for existing noise levels surrounding the Project site.

The Project would result in less than significant impacts from operational off-site traffic noise sources. Under this Alternative, mobile-source noise associated with trucks from the existing industrial uses, would continue. The No Project/No Construction Alternative could generate greater mobile source noise than the Project since this Alternative involves truck traffic.

The No Project/No Construction Alternative would result in less impacts than the proposed Project regarding noise. Although the Project's increase in offsite roadway traffic noise would be negligible and the operational noise would be less than existing conditions, 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

The Project proposes 403 DUs. As indicated in **Table 4.10-7: Existing Plus Project Growth Forecast**, the Project is forecast to generate a population growth of approximately 1,088 persons. The Project would induce unplanned population growth in the City directly through new housing, but the Project's forecast population growth is not considered substantial. Under the No Project/No Construction Alternative, the Project site would remain in its present condition, - no housing would be developed, and no population growth would occur. Unlike the proposed Project, this Alternative would not induce unplanned population growth. Like the Project, this Alternative would not displace existing housing.

The 2021-2029 (6th Cycle) Housing Element Update (HEU) identified a total of 122 opportunity housing sites, which includes a portion of the Project site (Sites A and B). As shown in **Table 4.10-6: City of Gardena RHNA Allocation**, the City's RHNA allocation is 5,735 units. The Project would meet approximately 7 percent of the City's 6th Cycle RHNA allocation, including providing 20 units of affordable housing. Thus, the Project would be in furtherance of meeting the City's 6th Cycle RHNA allocation. Under this Alternative, no DUs would be constructed, thus, this Alternative would not be in furtherance of meeting the City's RHNA allocation. However, Housing Elements include a housing buffer in the sites inventory to avoid violating the No Net Loss requirement. The HEU sites inventory provides for a total (including ADUs) of 6,586 housing units, a 13 percent buffer above the City's RHNA allocation. Therefore, given the 13 percent buffer in housing units included in the HEU, this Alternative's exclusion of housing would not preclude the City from meeting their RHNA obligation.

The No Project/No Construction Alternative would result in greater impacts than the proposed Project regarding housing and population because this Alternative would not be in furtherance of the City meeting its 6th Cycle RHNA allocation.

Public Services

The Project would generate an incremental increase in demand for fire and police protection, and library services. However, because the Project site is in a developed area where these services and equipment/infrastructure are already in place, the Project would not require construction of new or physically altered fire and police protection, or library facilities, resulting in a less than significant impact. 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 Project is forecast to generate a student population growth of approximately 151 students at the Los Angeles Unified School District (LAUSD), which would incrementally increase the demand for school facilities and services. Although, insufficient capacity exists at the high school, with payment of school impact fees in accordance with Senate Bill (SB) 50, Project impacts would be fully mitigated and no physical impacts concerning school facilities would occur. The No Project/No Construction Alternative would retain the existing land uses, with no increase in student population or demand for school facilities.

The No Project/No Construction Alternative would result in less impact than the proposed Project regarding public services, since increases in demands for police, fire, medical, schools, and library services would not occur, although neither would require construction of new or physically altered facilities.

Recreation

The Project's forecast population growth would incrementally increase the use of existing neighborhood and regional parks and/or other recreational facilities, but it would not be such that substantial physical deterioration of existing facilities would occur or be accelerated given the Project would provide onsite open space and recreational facilities. Because the No Project/No Construction Alternative does not involve residential uses, this Alternative would not increase the use of existing facilities.

Neither this Alternative nor the Project would result in adverse physical impacts associated with park facilities, since neither proposes to provide or physically alter a park facility. The Project does propose onsite open space and recreational amenities, which would result in a less than significant physical effect on the environment with mitigation incorporated. The environmental effects of the Project's proposed open spaces and recreational amenities would be avoided with this Alternative, as no recreational uses would be developed.

The No Project/No Construction Alternative would result in less impact than the proposed Project regarding recreational facilities since increases in demand for recreational facilities and construction of new facilities would not occur under this Alternative.

Transportation

The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The No Project/No Construction Alternative would retain the existing land uses and would also not conflict with a program, plan, ordinance, or policy addressing the circulation system.

The Project is located within a low vehicle miles traveled (VMT) generating area, one of the three screening criteria for VMT. Therefore, the Project would result in a less than significant impact concerning VMT. Under the No Project/No Construction Alternative, the existing industrial use would continue to operate and is assumed to involve fewer cars and light trucks, but more heavy-duty trucks, than the Project. Because VMT refers to the amount and distance of automobile (cars and light trucks) travel and does not include heavy-duty truck travel, this Alternative is anticipated to generate less VMT than the Project, although the Project would result in a less than significant impact.

Project construction would require traffic lane, parking lane and/or sidewalk closures, but would not result in the complete closure of any public or private streets and would implement a Construction Traffic Management Plan (PDF TR-1), approved by the City, to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction, as well as ensure adequate emergency access. Temporary Project construction activities would not impede the use of road for emergencies or emergency response vehicles. Therefore, the Project would result in less than significant impacts concerning emergency access. The No Project/No Construction Alternative would not result in any construction activities; thus, emergency access would remain unchanged.

The No Project/No Construction Alternative would result in less impact than the Project regarding VMT. Under this Alternative, fewer VMT would be generated.

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 result in less impact than the proposed Project regarding tribal cultural resources. There would be no potential for impacting tribal cultural resources under this Alternative since no ground disturbing activities would occur.

Utilities and Service Systems

As shown in Table 4.15-7: Estimated Project Wastewater Generation, Table 4.15-8: Estimated Project Electric Power Demand, and Table 4.15-9: Estimated Project Water Demand, Project operations would increase wastewater generation, and electricity and water demand compared to the existing industrial land uses. However, the Project would decrease solid waste generation,

as industrial uses have higher solid waste generation rates than residential.[4] The Project would require construction of new connections to nearby existing water, wastewater conveyance, stormwater, electric power, and telecommunication facilities. Notwithstanding, with mitigation incorporated, the Project would result in less than significant environmental effects associated with construction of these facilities. Under this Alternative, no utility and service system facilities would be constructed, therefore, the Project's environmental effects associated with construction of proposed utilities and service systems would be avoided.

The No Project/No Construction Alternative would result in less impact than the proposed Project regarding utilities and service systems since the Project's environmental effects associated with construction of utilities and service systems would be avoided.

Aesthetics

Under this Alternative, the site's visual character/quality would not be altered, as the proposed apartment building and townhomes would not be developed, and the existing land use would not be removed. The existing landscape, including the blighted industrial buildings and associated onsite parking, would not be removed, or replaced with the proposed multi-family residential structures. A portion of one existing building is dilapidated, and the property is inadequately maintained and devoid of landscaping. Although the existing uses conform to the current land use, the subject property is surrounded by single- and multi-family residential development, and the property is an eyesore in the neighborhood. The lighting associated with the existing use would continue. Removal of the existing buildings and replacement with the multi-family residential structure that would occur with the Project, would not occur under this Alternative. The Project's generation of light and glare, which was concluded to be a less than significant impact, would not occur with this Alternative, but the existing industrial lighting would continue.

The No Project/No Construction Alternative would result in more impact than the proposed Project regarding aesthetics because the site's existing light and glare would remain under this Alternative and the existing dilapidated structure and industrial uses would remain adjacent to residential uses.

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

This Alternative consists of a "No Project" condition whereby the Project site is redeveloped pursuant to the existing General Plan land use designation. **Table 2-2: Existing Land Use**

[4] California Department of Resources Recycling and Recovery (CalRecycle). (2019). *Estimated Solid Waste Generation Rates*. Retrieved from: https://www2.calrecycle.ca.gov/wastecharacterization/general/rates, accessed July 2023.

Designations and Zoning identifies the GGP land use designations for the Project site and indicates the Project site is designated Industrial, which provides for a wide range of industries, technology-related uses and supporting facilities, and business parks. Additionally, the GGP assigns a High Density 30 Overlay to the northern approximately 1.4 acres of the Project site. Based on the existing Industrial land use designation, the Project site's maximum development capacity is approximately 228,690 SF of industrial floor area; see **Table 4.8-2: Existing General Plan Land Use Designations**. It is noted, although the High Density 30 Overlay on the Project site's northerly 1.4 acres would allow development of residential uses, only industrial uses would be allowed on the site's southerly portion. Also, because no roadway or other buffer would exist between these two areas, this Alternative assumes no residential development on the Project site. Therefore, this Alternative assumes demolishing the existing 115,424 SF of industrial uses and in their place constructing up to 228,690 SF of industrial uses. Given that the Industrial land use designation is intended for a wide range of industrial uses, and since the Project site is surrounded by residential uses, this Alternative assumes development of an industrial business park, which could include any uses permitted within the Industrial zone; see GMC §18.36.020. Because the proposed access driveways under this Alternative are unknown, it is unknown whether it, like the Project, would require offsite railroad improvements pursuant to California Public Utilities Commission (CPUC) standards and Union Pacific Railroad (UPRR) guidelines.

Table 6-1: Comparison Between Proposed Project and No Project/Existing Land Use Designation Alternative compares development under the Project and the No Project/Existing Land Use Designation Alternative.

Table 6-1: Comparison Between Proposed Project and No Project/Existing Land Use Designation Alternative

Description	Apartment Building (DU)[1]	Townhomes (DU)[1]	Density (DU/AC)[1]	Floor Area (SF)[1]
Proposed Project	328	75	77	429,000 (Residential)
No Project/Existing Land Use Designation Alternative				228,690 (Industrial)
Difference	*-328*	*-75*		*-200,310*
% Difference	*-100%*	*-100%*		*-47%*

Note:
1. DU = dwelling units; AC = acre; SF = square feet.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Air Quality

The Project's short-term air quality impacts from demolition, grading, and construction activities would be less than significant. The No Project/Existing Land Use Designation Alternative proposes approximately half as much floor area as the Project; thus, this analysis assumes this Alternative would result in less construction emissions as presented in **Table 4.1-5: Construction Air Pollutant Emissions**. Like the Project, this Alternative would not expose sensitive receptors to

substantial pollutant concentrations, which is concluded to be less than significant for the Project through compliance with the established regulatory framework.

As shown in **Table 4.1-6: Operational Air Pollutant Emissions**, the Project's operational criteria pollutant emissions would be below the SCAQMD's mass daily significance thresholds resulting in a less than significant air quality impact. As also shown in **Table 4.1-6**, the approximately 106,100 SF of existing industrial land uses also generate emissions well below the SCAQMD's mass daily significance thresholds. This Alternative would involve approximately 228,690 SF of industrial land uses, or approximately double the industrial floor area (approximately 115 percent more) as under existing conditions. As such, it can be reasonably inferred that this Alternative's operational criteria pollutant emissions would be approximately double the existing emissions shown in **Table 4.1-6** but would still be below the SCAQMD's mass daily significance threshold, and significantly less than the proposed Project's operational criteria pollutant emissions. Thus, under the No Project/Existing Land Use Designation Alternative, there would be less emissions than with the Project. As with the proposed Project, this Alternative's operational air quality emissions would be less than significant.

The No Project/Existing Land Use Designation Alternative would result in less impact than the proposed Project regarding air quality because although the Project would not exceed short- or long-term air emissions thresholds, this Alternative 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. Also, the Project's potential to disturb as yet undiscovered human remains is concluded to be less than significant through compliance with the established regulatory framework and with mitigation incorporated. The No Project/Alternative Land Use Designation Alternative would also involve demolition and ground disturbing construction activities; thus, similar impacts would occur, with mitigation incorporated under this Alternative.

The No Project/Existing Land Use Designation Alternative would result in similar impacts as the proposed Project regarding cultural resources. Under this Alternative, ground disturbing activities would occur within a similar footprint as the Project.

Energy

As shown in **Table 4.3-5: Project and Countywide Energy Consumption**, the Project would result in construction-related energy consumption from water, diesel fuel, and gasoline usage. However, the Project would result in less than significant impacts concerning construction-related energy consumption since wasteful, inefficient, or unnecessary consumption of energy resources would not occur following compliance with Title 24 requirements. Under the No Project/Existing Land Use Designation Alternative, construction-related energy consumption would be less than the Project, given this Alternative proposes approximately half as much floor

area as the Project. However, both the Project and this Alternative would not result in wasteful, inefficient, or unnecessary consumption of energy resources during construction, resulting in a less than significant impact concerning energy.

The Project's operational energy consumption would occur from building energy use, water use, and transportation-related fuel use; see **Table 4.3-5**. The Project would be subject to compliance with applicable energy standards; therefore, Project operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in a less than significant impact concerning energy. Further, the Project would not conflict with/obstruct a State or local plan for renewable energy or energy efficiency. Under the No Project/Existing Land Use Designation Alternative, operational energy consumption would be less than the Project, given this Alternative would involve approximately half as much floor area as the Project. As also shown in **Table 4.3-5**, the approximately 106,100 SF of existing industrial land uses consume a nominal amount of total energy consumption in the County. This Alternative would involve approximately 228,690 SF of industrial land uses, or approximately double the industrial floor area (approximately 115 percent more) as under existing conditions. As such, it can be reasonably inferred that this Alternative's operational energy consumption would be approximately double the energy consumption shown in **Table 4.3-5**, but would still be nominal, and significantly less than the proposed Project's operational energy consumption. The Project would not generate a natural gas demand and it is unknown whether this Alternative would do so. Notwithstanding, both the Project and this Alternative would operate under the latest CALGreen standards, and would not result in wasteful, inefficient, or unnecessary consumption of energy resources during operations, resulting in a less than significant impact concerning energy.

Geology, Soils, and Paleontological Resources

Project construction-related impacts (i.e., ground disturbing activities) on paleontological resources are concluded to be less than significant, with mitigation incorporated. Since the No Project/Existing Land Use Alternative would also involve demolition and ground disturbing construction activities, similar impacts would occur with mitigation incorporated.

The No Project/Existing Land Use Designation Alternative would result in similar impacts as the proposed Project regarding paleontological resources. Under this Alternative, ground disturbing activities would occur within a similar footprint as the Project.

Greenhouse Gas Emissions

The Project would result in less than significant construction-related GHG emissions and direct and indirect operational GHG emissions, as concluded in **Section 4.5**. Under the No Project/Existing Land Use Designation Alternative, less construction-related GHG emissions would occur than with the Project because this Alternative proposes approximately half the floor area.

As shown in **Table 4.5-3: Summary of Operational GHG Emissions**, the approximately 106,100 SF of existing industrial land uses would generate GHG emissions well below the proposed

Project's emissions. This Alternative would involve approximately 228,690 SF of industrial land uses, or approximately double the industrial floor area (approximately 115 percent more) as under existing conditions. As such, it can be reasonably inferred that this Alternative's operational GHG emissions would be approximately double the existing GHG emissions shown in **Table 4.5-3** but would still be approximately half of the Project's operational GHG emissions. Thus, under the No Project/Existing Land Use Designation Alternative, there would be approximately half the GHG emissions as the proposed Project. Like the proposed Project, this Alternatives operational GHG emissions would be less than significant.

Hazards and Hazardous Materials

The proposed Project would require demolition of onsite buildings which could expose construction workers to concentrations exceeding federal and state thresholds. Additionally, Project construction activities could 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. Implementation of COA HAZ-1 and COA HAZ-2, and MM HAZ-1, would reduce impacts to less than significant. The No Project/Existing Land Use Designation Alternative would also involve construction activities, thus this Alternative, like the Project, would result in a less than significant impact with mitigation incorporated.

The Project's operational-related impacts concerning PCE concentrations that exceed DTSC screening levels for residential applications, which was considered less than significant with mitigation incorporated, would be avoided with this Alternative, as no residential uses would be developed. However, under this Alternative, it is unknown whether mitigation would be required for PCE concentrations that exceed DTSC screening levels for industrial business park applications. Project operations would involve the use of typical hazardous materials/chemicals associated with residential uses, whereas this Alternative could involve transport, handling, storage, and disposal of hazardous substances associated with industrial business park uses. As such, although operations under this Alternative must adhere to federal, state, and local regulations, an industrial use is considered to have greater potential for accidental upset or accident conditions concerning hazardous materials.

The No Project/Existing Land Use Designation Alternative would result in greater impacts than the Project regarding hazards and hazardous materials because it proposes an industrial business park use with greater potential for accidental upset or accident conditions concerning hazardous materials, as compared to the Project which proposes residential uses.

Hydrology and Water Quality

Like the Project, the No Project/Existing Land Use Designation Alternative construction activities would result in less than significant short-term water quality impacts following compliance with NPDES and GMC requirements. However, this Alternative's impacts would be less than the Project's since the Alternative proposes approximately half the floor area.

Following compliance with NPDES and GMC requirements, which include implementation of water quality BMPs, the Project's operational activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Similarly, the No Project/Existing Land Use Designation Alternative would result in less than significant operational water quality impacts following compliance with current NPDES and GMC requirements. As such, this Alternative is assumed to result in similar operational water quality impacts as the Project.

The Project would not impede or redirect flood flows and would decrease the existing peak flow rates due to a decrease in impervious surface coverage. The Project would not result in substantial erosion, increase the rate or amount of surface runoff, or create runoff that would exceed the capacity of existing stormwater drainage systems. This Alternative is also anticipated to decrease the site's impervious surface coverage, although to a lesser degree than the Project given industrial business parks are not required to provide minimum open space areas, as are residential uses. Like the Project, this Alternative would not impede or redirect flood flows or modify peak flow rates, since a no net increase in flows would be expected. Also, similar to the Project, this Alternative would not result in substantial erosion, increase the rate or amount of surface runoff, or create runoff that would exceed the capacity of existing stormwater drainage systems.

The Project's potential construction-related impacts to groundwater would be less than significant with mitigation incorporated. The Project would decrease potential impacts to groundwater resources through a decrease in impervious surfaces and increase in infiltration of stormwater runoff. As with the Project, this Alternative's impacts concerning demand for groundwater supplies would be less than significant. The No Project/Existing Land Use Designation Alternative proposes approximately half as much floor area as the Project. Assuming more area devoted to the industrial business park and impervious surfaces, this Alternative would have more impervious surfaces compared to the Project, given industrial business parks are not required to provide minimum open space areas, and therefore less groundwater infiltration. Under the No Project/Existing Land Use Designation Alternative, less groundwater recharge would occur than with the Project.

The No Project/Existing Land Use Designation Alternative would result in greater impacts than the proposed Project regarding hydrology and water quality, since less infiltration of stormwater runoff or decrease in impervious surfaces would occur under this Alternative.

Land Use and Planning

To accommodate the proposed apartment building and townhomes, the Project would remove the approximately 115,424 SF of industrial buildings. The Project would replace the Project site's existing General Plan Industrial and Industrial, High Density 30 Overlay land use designations with Specific Plan, and the Industrial (M-1), General Industrial (M-2), and Housing Overlay 4 (HO-4) zoning with Normandie Crossing Specific Plan (NCSP). To implement the Project, the Applicant would require several discretionary permits/approvals, including General Plan/General Plan Map Amendments, Zone Change and Zone Map Amendment, Zoning Text Amendment, and

Normandie Crossing Specific Plan (NCSP), among others; see **Section 2.6: Agreements, Permits and Approvals**. The No Project/Existing Land Use Designation Alternative would not change the Project site's existing land uses designations or zoning but would demolish the existing onsite land uses and construct 228,690 SF of industrial business park land uses. The No Project/Existing Land Use Designation Alternative would likely require fewer discretionary permits/approvals than the Project, depending on the proposed Site Plan.

The No Project/Existing Land Use Designation Alternative would result in less impact than the proposed Project concerning land use and planning because it would avoid the Project's proposed General Plan/General Plan Map Amendments, Zone Change and Zone Map Amendment, Zoning Text Amendment, and Normandie Crossing Specific Plan (NCSP).

Noise

The Project's construction-related noise impacts would be significant and unavoidable, despite implementation of mitigation concerning construction equipment and a temporary noise barrier, based on exceedance of noise standards, the proposed building height (seven stories), and extended construction period. The Project's construction-related vibration impacts would be less than significant with mitigation. Although the No Project/Existing Land Use Designation Alternative's construction activities would occur over a shorter time period and involve less building height and approximately half the floor area as the Project, this Alternative's construction activities would take place within a similar footprint and distance from sensitive receptors, and thus are likely to exceed noise standards. Therefore, like the Project, this Alternative is anticipated to result in a significant and unavoidable construction noise impact.

As shown in **Table 4.9-11**, the Project's composite stationary source noise level would be below the significance thresholds, resulting in a less than significant impact. Noise associated with industrial business park uses is generally considered higher than residential uses. Noise-producing equipment typical of industrial business park uses includes rooftop mechanical ventilation units, truck deliveries, truck loading/unloading, trash compactors, forklifts, and generators. The cumulative noise level from industrial business park equipment would vary at the property line depending on the location and orientation of the equipment, the amount of each type of equipment, and the size of each type of equipment. Thus, under the No Project/Existing Land Use Alternative, the operational noise levels would likely be higher than the Project's, although this Alternative would also be subject to compliance with the City's noise standards.

The Project 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, as it is not anticipated to double existing traffic levels. However, given this Alternative would involve an industrial business park, which would likely involve truck traffic, greater mobile source noise impacts could occur as this Alternative than the Project.

Like the Project, the No Project/Existing Land Use Designation Alternative would result in a significant unavoidable construction noise impact, therefore, this Alternative would result in similar impacts as the proposed Project regarding construction noise and vibration. However, this Alternative would result in greater operational impacts than the proposed Project.

Population and Housing

The Project proposes 403 DUs. As indicated in **Table 4.10-7**, the Project is forecast to generate a population growth of approximately 1,088 persons. The Project would induce unplanned population growth in the City directly through new housing, but the Project's forecast population growth is not considered substantial. Under the No Project/Existing Land Use Designation Alternative, approximately 228,690 SF of industrial business park uses would be constructed, no housing would be developed, and no population growth would occur. Unlike the proposed Project, this Alternative would not induce unplanned population growth. Like the Project, this Alternative would not displace existing housing. Since the No Project/Existing Land Use Designation 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 regarding unplanned population growth.

The 6th Cycle HEU identified a total of 122 opportunity housing sites, which includes a portion of the Project site (Sites A and B). As shown in **Table 4.10-6**, the City's RHNA allocation is 5,735 units. The Project would meet approximately 7 percent of the City's 6th Cycle RHNA allocation, including providing 20 units of affordable housing. Thus, the Project would be in furtherance of meeting the City's 6th Cycle RHNA allocation. Under this Alternative, no DUs would be constructed, thus, this Alternative would not be in furtherance of meeting the City's RHNA allocation. However, Housing Elements include a housing buffer in the sites inventory to avoid violating the No Net Loss requirement. The HEU sites inventory provides for a total (including ADUs) of 6,586 housing units, a 13 percent buffer above the City's RHNA allocation. Therefore, given the 13 percent buffer in housing units included in the HEU, this Alternative's exclusion of housing would not preclude the City from meeting their RHNA obligation and the City would be able to make the findings required under Government Code §65863.

The No Project/Existing Land Use Designation Alternative would result in greater impacts than the proposed Project regarding population and housing because this Alternative would not be in furtherance of the City meeting its 6th Cycle RHNA allocation.

Public Services

The Project would generate an incremental increase in demand for fire and police protection, and library services. However, because the Project site is in a developed area where these services and equipment/infrastructure are already in place, the Project would not require construction of new or physically altered fire and police protection, or library facilities, resulting in a less than significant impact. Like the proposed Project, the No Project/Existing Land Use

Designation Alternative would generate an incremental increase in demand for fire and police protection, but none for library services. However, because the Project site is in a developed area where these services and equipment/infrastructure are already in place, like the Project, this Alternative would not require construction of new or physically altered fire and police protection facilities, resulting in a less than significant impact.

The Project is forecast to generate a student population growth of approximately 151 students at the LAUSD, which would incrementally increase the demand for school facilities and services. Although, insufficient capacity exists at the high school, with payment of school impact fees in accordance with Senate Bill (SB) 50, Project impacts would be fully mitigated and no physical impacts concerning school facilities would occur. The No Project/Existing Land Use Designation Alternative would involve an industrial business park, with no increase in student population or demand for school facilities.

The No Project/Existing Land Use Designation Alternative would result in similar impacts as the proposed Project regarding public services. Incremental increases in demands for public services would occur, but like the Project, this Alternative would not result in the need for construction of new or physically altered facilities.

Recreation

The Project's forecast population growth would incrementally increase the use of existing neighborhood and regional parks and/or other recreational facilities, but it would not be such that substantial physical deterioration of existing facilities would occur or be accelerated given the Project would provide onsite open space and recreational facilities. Because the No Project/Existing Land Use Designation Alternative does not involve residential uses, this Alternative would not increase the use of existing facilities.

Neither this Alternative nor the Project would result in adverse physical impacts associated with park facilities, since neither proposes to provide or physically alter a park facility. The Project proposes onsite open space and recreational amenities, which would result in a less than significant physical effects on the environment with mitigation incorporated. The environmental effects of the Project's proposed open spaces and recreational amenities would be avoided with this Alternative, as no recreational uses would be developed. The No Project/Existing Land Use Designation Alternative would result in less impact than the proposed Project regarding recreational facilities since increases in demand for recreational facilities and construction of new facilities would not occur under this Alternative.

Transportation

The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The No Project/Existing Land Use Designation Alternative would be subject to compliance with the applicable programs, plans, ordinances, or policies, thus, is also not anticipated to result in a conflict in this regard.

The Project is located within a low VMT generating area, one of the three screening criteria for VMT. Therefore, the Project would result in a less than significant impact concerning VMT. Under the No Project/Existing Land Use Designation Alternative, the industrial business park would operate on the Project site, which is assumed to involve fewer cars and light trucks, but more heavy-duty trucks, than the Project. Because VMT refers only to the amount and distance of automobile (cars and light trucks) travel and does not include heavy-duty truck travel, this Alternative is anticipated to generate less VMT than the Project, although the Project would result in a less than significant impact.

Project construction would require traffic lane, parking lane and/or sidewalk closures, but would not result in the complete closure of any public or private streets and would implement a Construction Traffic Management Plan (PDF TR-1), approved by the City, to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction, as well as ensure adequate emergency access. Temporary Project construction activities would not impede the use of road for emergencies or emergency response vehicles. Therefore, the Project would result in less than significant impacts concerning emergency access. Because the proposed access driveways under the No Project/Existing Land Use Designation Alternative are unknown, it is unknown whether it, like the Project, would require traffic lane, parking lane and/or sidewalk closures. It is also unknown whether UPRR improvements would be required under this Alternative. If this Alternative required the partial or full closure of streets or sidewalks, it would be required to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction, as well as ensure adequate emergency access.

Although the Project's transportation impacts would be less than significant, the No Project/Existing Land Use Designation Alternative would result in less impact than the Project regarding VMT because under this Alternative, fewer VMT would be generated.

Tribal Resources

The Project would result in less than significant impacts to as yet undiscovered tribal cultural resources, with mitigation incorporated. The No Project/Alternative Land Use Designation Alternative would also involve demolition and ground disturbing construction activities; thus, similar impacts would occur, with mitigation incorporated.

The No Project/Existing Land Use Designation Alternative would result in similar impacts as the proposed Project regarding tribal cultural resources similar ground disturbing activities would occur within the same footprint as the Project.

Utilities and Service Systems

As shown in **Table 4.15-7**, **Table 4.15-8**, and **Table 4.15-9** Project operations would increase wastewater generation, electricity demand, and water demand as compared to existing conditions. However, the Project would decrease solid waste generation, as industrial uses have higher solid waste generation rates than residential. The Project would require construction of

new connections to nearby existing water, wastewater conveyance, stormwater, electric power, and telecommunication facilities. Notwithstanding, with mitigation incorporated, the Project would result in less than significant environmental effects associated with construction of the proposed utilities and service systems. Under the No Project/Existing Land Use Designation Alternative, operations would increase wastewater generation, electricity demand, water demand, and solid waste generation compared to the existing industrial land uses, however, to a lesser degree than the Project since residential land uses typically generate greater demand. As also shown in **Table 4.15-7, Table 4.15-8,** and **Table 4.15-9**, the approximately 106,100 SF of existing industrial land uses' wastewater generation, electricity demand, water demand, and solid waste generation is far less than the proposed Project's. This Alternative would involve approximately 228,690 SF of industrial land uses, or approximately double the industrial floor area (approximately 115 percent more) as under existing conditions. As such, it can be reasonably inferred that this Alternative's operational wastewater generation, electricity demand, water demand, and solid waste generation would be approximately double the generations/demands under existing conditions, but significantly less than the proposed Project's generations/demands. Notwithstanding, with mitigation incorporated, this Alternative would also result in less than significant environmental effects associated with construction of utilities and service systems given the area's built out conditions.

The No Project/Existing Land Use Designation Alternative would result in less demands concerning utilities and service systems than the Project, but similar impacts concerning environmental effects associated with construction of the proposed utilities and service systems.

Aesthetics

The Project proposes an apartment building approximately 90 feet tall and nine townhome buildings approximately 40 feet tall, as measured from the finished floor (i.e., the level of the finished floor on the ground level) of the roof's highest point. This Alternative assumes redevelopment of the existing blighted industrial use; the existing 106,100SF industrial use and associated surface parking would be removed and replaced with a 228,690 SF industrial business park development. With this Alternative, the degree of visual alteration would be less than the Project since this Alternative proposes a land use similar in scale and mass to existing conditions, and approximately half as much floor area as the Project. Further, per GMC § 18.32.050, this Alternative would not propose structures exceeding 35 feet since the site is within 100 feet of a zone R-1 and R-2 zone. Although this Alternative would involve less change from existing conditions concerning scale and mass, the Project would introduce residential uses, which would be more compatible with the surrounding residential uses.

The existing urbanized area is comprised primarily of residential land uses. The Project would not result in a significant source of light or glare. This Alternative would introduce new sources of light and glare as well, but to a lesser degree than with the Project since this Alternative involves approximately half as much floor area of development. Although both the Project and this

Alternative would not cause a significant source of light or glare, this Alternative would result in less impact than the Project.

Therefore, this Alternative would result in less impacts as the proposed Project regarding aesthetics/light and glare.

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 "REDUCED DENSITY" ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The "Reduced Density" Alternative assumes development of the Project site similar to the proposed Project. The townhomes would remain unchanged; however, for purposes of this Alternative, the apartment building would be reduced to 192 DUs (from 328) and the building height would be reduced to five stories (from seven stories). This Alternative proposes a total of 267 DU, or approximately 34 percent fewer DU than the Project, and would reduce the density to 51 DU/AC. However, with fewer units, the Applicant would not be able to provide the affordable housing. It is assumed that the access driveways would be the same under this Alternative, thus, similarly to the Project, this Alternative would require offsite railroad improvements pursuant to CPUC standards and UPRR guidelines. **Table 6-2: Comparison Between Proposed Project and Reduced Density Alternative** compares development under the Project and the Reduced Density Alternative.

Table 6-2: Comparison Between Proposed Project and Reduced Density Alternative

Description	Apartment Building (DU)[1]	Townhomes (DU)[1]	Density (DU/AC)	Height of Building (Stories)	Floor Area (SF)
Proposed Project	328	75	77	7	429,000
Reduced Density Alternative	192	75	51	5	253,110
Subtotal Difference	*-136*	*-0*			
Total Difference	*-136*			*-2*	*-175,890*
% Difference	*-34%*				*-41%*
Note: DU = dwelling units; and AC = acre.					

IMPACT COMPARISON TO THE PROPOSED PROJECT

Air Quality

The Project's short-term air quality impacts from demolition, grading, and construction activities would be less than significant. The Reduced Density Alternative proposes approximately 34 percent fewer DU than the Project and less floor area (approximately 253,110 SF compared to

approximately 429,000 SF), thus, proportionately fewer construction emissions as presented in **Table 4.1-5** would occur. This Alternative would also not expose sensitive receptors to substantial pollutant concentrations, which is concluded to be less than significant for the Project through compliance with the established regulatory framework.

As shown in **Table 4.1-6**, the Project's operational criteria pollutant emissions would be below the SCAQMD's mass daily significance thresholds and would result in a less than significant air quality impact. Under the Reduced Density Alternative, proportionately less operational emissions would occur compared to the Project, as there would be fewer DUs developed. Therefore, like the Project, less than significant operational emissions would occur.

The Reduced Density Alternative would result in less impacts than the proposed Project regarding air quality. Less short-term construction emissions and long-term operational emissions would occur than the Project, as fewer DU would be developed.

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. The Reduced Density Alternative would also involve demolition and ground disturbing construction activities; thus, similar impacts would occur, with mitigation incorporated.

The Reduced Density Alternative would result in similar impacts as the proposed Project regarding cultural resources since the ground disturbing activities would occur within a similar footprint.

Energy

As shown in **Table 4.3-5**, the Project would result in construction-related energy consumption from water, diesel fuel, and gasoline usage. However, the Project would result in less than significant impacts concerning construction-related energy consumption since wasteful, inefficient, or unnecessary consumption of energy resources would not occur following compliance with Title 24 requirements. Under the Reduced Density Alternative, less construction-related energy consumption would occur, given this Alternative proposes approximately 34 percent fewer DU. Further, this Alternative would also be subject to compliance with Title 24 requirements. Like the Project, this Alternative's construction would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in a less than significant impact concerning energy.

The Project's operational energy consumption would occur from building energy use, water use, and transportation-related fuel use; see **Table 4.3-5**. The Project would be subject to compliance with applicable energy standards. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in a less than significant

impact concerning energy. Further, the Project would not conflict with/obstruct a State or local plan for renewable energy or energy efficiency. Under the Reduced Density Alternative, operational energy consumption would be proportionately less as the Project, as fewer DU would be developed, but this Alternative would also operate under the latest CALGreen standards. Like the Project, this Alternative would not result in wasteful, inefficient, or unnecessary consumption of energy resources during operations, resulting in a less than significant impact concerning energy.

The Reduced Density Alternative would result in less energy consumption than the proposed Project. Notwithstanding, like the Project, this Alternative would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in less than significant impacts concerning energy.

Geology, Soils, and Paleontological Resources

Project construction-related impacts (i.e., ground disturbing activities) on paleontological resources are concluded to be less than significant, with mitigation incorporated. Since the Reduced Density Alternative would involve demolition and ground disturbing construction activities in a similar footprint, similar impacts would occur as the Project, with mitigation incorporated.

The Reduced Density Alternative would result in similar impacts as the proposed Project regarding paleontological resources. Under this Alternative, ground disturbing activities would occur within a similar footprint as the Project.

Greenhouse Gas Emissions

The Project would result in less than significant construction-related GHG emissions and direct and indirect operational GHG emissions, as explained in **Section 4.5**. Under the Reduced Density Alternative, less construction-related GHG emissions would occur than with the Project because fewer DU would be constructed.

The Reduced Density Alternative would result in less GHG emissions than the proposed Project since fewer DU would be developed. Notwithstanding, like the Project, GHG emissions would not exceed significance thresholds, thus would be less than significant under this Alternative.

Hazards and Hazardous Materials

The proposed Project would require demolition of onsite buildings which could expose construction workers to concentrations exceeding federal and state thresholds. Additionally, Project construction activities could 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. Implementation of COA HAZ-1 and COA HAZ-2, and MM HAZ-1, would reduce impacts to less than significant. The Reduced Density Alternative would also involve construction activities, thus this Alternative, like the Project, would result in a less than significant impact with mitigation incorporated.

The Project's operational-related impacts concerning PCE concentrations that exceed DTSC screening levels for residential applications, which was considered less than significant with mitigation incorporated, would be similar with this Alternative, as residential uses are also proposed.

The Reduced Density Alternative would result in similar impacts as the proposed Project regarding hazards and hazardous materials, because like the Project, this Alternative proposes development of residential uses within a similar footprint.

Hydrology and Water Quality

Like the Project, the Reduced Density Alternative construction activities would result in less than significant short-term water quality impacts following compliance with NPDES and GMC requirements. However, this Alternative's impacts would be less than the Project's since this Alternative proposes less floor area.

Following compliance with NPDES and GMC requirements, which include implementation of water quality BMPs, the Project's operational activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Similarly, the Reduced Density Alternative would result in less than significant operational water quality impacts following compliance with current NPDES and GMC requirements. As such, this Alternative is assumed to result in similar operational water quality impacts as the Project.

The Project would not impede or redirect flood flows and would decrease the existing peak flow rates due to a decrease in impervious surface coverage. The Project would not result in substantial erosion, increase the rate or amount of surface runoff, or create runoff that would exceed the capacity of existing stormwater drainage systems. This Alternative would also decrease the site's impervious surface coverage similar to the Project, as this Alternative proposes a similar site plan but only five stories of apartments, rather than seven. Like the Project, this Alternative would not impede or redirect flood flows or modify peak flow rates, since a no net increase of flows would be expected. Also, similar to the Project, this Alternative would not result in substantial erosion, increase the rate or amount of surface runoff, or create runoff that would exceed the capacity of existing stormwater drainage systems. The Project's potential construction-related impacts to groundwater would be less than significant with mitigation incorporated. The Project would decrease potential impacts to groundwater resources through a decrease in impervious surfaces and increase in infiltration of stormwater runoff. Given similar development footprints and impervious surfaces, this Alternative would also result in less than significant impacts with mitigation incorporated. As with the Project, this Alternative's impacts concerning demand for groundwater supplies would be less than significant. The Reduced Density Alternative would have a similar footprint as the Project and would therefore have a similarly sized area devoted to pervious surfaces, and therefore increased levels of groundwater infiltration. The Reduced Density Alternative would result in similar impacts as the proposed Project regarding hydrology and water quality, since the same reductions to runoff, impervious surface, and improvements to water quality during operations would occur.

Land Use and Planning

To accommodate the proposed apartment building and townhomes, the Project would remove the approximately 115,424 SF of industrial buildings. The Project would replace the Project site's existing General Plan Industrial and Industrial, High Density 30 Overlay land use designations with Specific Plan, and Industrial (M-1), General Industrial (M-2), and Housing Overlay 4 (HO-4) zoning with Normandie Crossing Specific Plan (NCSP). To implement the Project, the Applicant would require several discretionary permits/approvals, including General Plan/General Plan Map Amendments, Zone Change and Zone Map Amendment, and Zoning Text Amendment, and Normandie Crossing Specific Plan (NCSP), among others; see **Section 2.6**. The Reduced Density Alternative assumes similar entitlements and development as the Project; however, this Alternative proposes 136 fewer DU, as indicated in **Table 6-2**. Comparatively, this Alternative proposes approximately 34 percent fewer DU. 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 Reduced Density Alternative's impacts involving land use consistency would be similar to the Project, as the same land use type would be developed.

The Reduced Density Alternative would result in similar impacts as 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 and GMC standards.

Noise

The Project's construction-related noise impacts would be significant and unavoidable, despite implementation of mitigation concerning construction equipment and a temporary noise barrier, based on exceedance of noise standards, the proposed building height (seven stories), and extended construction period. The Project's construction-related vibration impacts would be less than significant with mitigation. Although the Reduced Density Alternative's construction activities would occur over a shorter time period, involve less building height, and approximately 41 percent fewer square feet, construction activities would take place within a similar footprint and distance from sensitive receptors, and thus will also exceed noise standards. Therefore, like the Project, this Alternative would still result in a significant unavoidable impact concerning construction noise, but to a slightly lesser degree than the Project.

As shown in **Table 4.9-11**, the Project's composite stationary source noise level would be below the significance thresholds, resulting in a less than significant impact. The Reduced Density Alternative would have similar noise sources as the Project, but slightly less impacts would occur since this Alternative proposes 34 percent fewer DU.

The Project 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 than the Project as this Alternative would generate fewer trips. The Reduced Density Alternative would result in slightly less impacts than the proposed

Project regarding noise, given less construction and operational noise would occur compared to the Project, although the Project's significant unavoidable construction impacts would also occur under this Alternative.

Population and Housing

The Project proposes 403 DUs. As indicated in **Table 4.10-7**, the Project is forecast to generate a population growth of approximately 1,088 persons. The Project would induce unplanned population growth in the City directly through new housing, but the Project's forecast population growth is not considered substantial. Under this Alternative, population growth would be approximately 34 percent less, as 136 fewer DUs would be constructed. And due to economies of scale, this Alternative would not be able to provide any affordable units. As with the proposed Project, this Alternative would induce unplanned population growth, but it would not be significant. Like the Project, this Alternative would not displace existing housing.

The 2021-2029 Housing Element Update identified a total of 122 opportunity housing sites, which includes a portion of the Project site (Sites A and B). As shown in **Table 4.10-6**, the City's RHNA allocation is 5,735 units. The Project would meet approximately 7 percent of the City's 6th Cycle RHNA allocation, including providing 20 units of affordable housing. Thus, the Project would be in furtherance of meeting the City's 6th Cycle RHNA allocation.

Under this Alternative, 136 fewer DUs would be constructed, and no affordable housing units would be provided. Thus, this Alternative would be in furtherance of meeting the City's RHNA allocation, however, to a lesser degree than the Project. However, Housing Elements include a housing buffer in the site inventory to avoid violating the No Net Loss requirement. The HEU sites inventory provides for a total (including ADUs) of 6,586 housing units, a 13 percent buffer above the City's RHNA allocation. Therefore, given the 13 percent buffer in housing units included in the HEU, this Alternative's provision of fewer housing units and no affordable units would not preclude the City from meeting their RHNA obligation and the findings under Government Code §65863 can be made.

The Reduced Density Alternative would result in greater impacts than the proposed Project regarding population and housing, as this Alternative would be in furtherance of the City's efforts to meet the 6th Cycle RHNA allocation, but to a much lesser degree than the Project given this Alternative would provide fewer above-market rate units and exclude the affordable units.

Public Services

The Project would generate an incremental increase in demand for fire and police protection, and library services. However, because the Project site is in a developed area where these services and equipment/infrastructure are already in place, the Project would not require construction of new or physically altered fire and police protection, or library facilities, resulting in a less than significant impact. Like the proposed Project, this Alternative would incrementally increase demands on fire and police protection services, and library facilities, but to a lesser degree than the Project given fewer DUs would be developed. Notwithstanding, neither this

Alternative nor the Project would result in a significant impact concerning fire and police protection services, or library facilities as neither would result in an adverse physical impact associated with the provision of new or physically altered facilities.

The Project is forecast to generate a student population growth of approximately 151 students at the LAUSD, which would incrementally increase the demand for school facilities and services. Although, insufficient capacity exists at the high school, with payment of school impact fees in accordance with Senate Bill (SB) 50, Project impacts would be fully mitigated and no physical impacts concerning school facilities would occur. The Reduced Density Alternative would involve approximately 34 percent fewer DU, with proportionately less student population increase and demand for school facilities as the Project. Like the Project, payment of school impact fees would fully mitigate potential impacts and no physical impacts concerning school facilities would occur.

The Reduced Density Alternative would result in less demand for public services, as the Project since fewer DUs would be constructed. But, like the Project, would not result in an adverse physical impact associated with the provision of new or physically altered facilities.

Recreation

The Project's forecast population growth would incrementally increase the use of existing neighborhood and regional parks and/or other recreational facilities, but it would not be such that substantial physical deterioration of existing facilities would occur or be accelerated given the Project would provide onsite open space and recreational facilities. Under the Reduced Density Alternative, fewer DUs would be developed, but it would also incrementally increase the use of existing neighborhood and regional parks and/or other recreational facilities, although to a lesser degree than the Project. Neither the Alternative nor the proposed Project would result in an adverse physical impact associated with the construction or expansion of recreational facilities.

Neither this Alternative nor the Project would result in adverse physical impacts associated with park facilities, since neither proposes to provide or physically alter a park facility. The Project proposes onsite open space and recreational amenities, which would result in a less than significant physical effects on the environment with mitigation incorporated. The environmental effects of the Project's proposed open spaces and recreational amenities would occur also with this Alternative, as recreational uses would also be developed.

The Reduced Density Alternative would result in similar impacts as the proposed Project regarding recreational facilities, although slightly less demand for recreational facilities would occur. Like the Project, less than significant physical effects on the environment would occur with mitigation incorporated from open space and recreational amenities.

Transportation

The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The Reduced Density Alternative proposes a similar residential development; therefore, it would also not

conflict with a program, plan, ordinance, or policy addressing the circulation system and would result in less than significant impacts.

The Project is located within a low VMT generating area, one of the three screening criteria for VMT. Therefore, the Project would result in a less than significant impact concerning VMT. This Alternative is on the same site, thus, would also be screened from further VMT, resulting in a less than significant impact concerning VMT.

Project construction would require traffic lane, parking lane and/or sidewalk closures, but would not result in the complete closure of any public or private streets and would implement a Construction Traffic Management Plan (PDF TR-1), approved by the City, to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction, as well as ensure adequate emergency access. Temporary construction activities would not impede the use of road for emergencies or emergency response vehicles. Therefore, the Project would result in less than significant impacts concerning emergency access. The Reduced Density Alternative would involve similar construction activities and it would be required to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction, as well as ensure adequate emergency access, similar to the Project. Assuming similar traffic management measures are implemented as a part of this Alternative's construction, less than significant impacts would also occur.

The Reduced Density Alternative would result in similar impacts as the proposed Project regarding transportation. This Alternative would also be within a Low VTM generating area and would minimize potential circulation impacts through traffic management measures.

Tribal Resources

The Project would result in less than significant impacts to as yet undiscovered tribal cultural resources, with mitigation incorporated. The Reduced Density Alternative would also involve demolition and ground disturbing construction activities; thus, similar impacts would occur with mitigation incorporated.

The Reduced Density Alternative would be result in similar impacts as the proposed Project regarding tribal cultural resources. Under this Alternative, ground disturbing activities would occur within the same footprint as the Project.

Utilities and Service Systems

As shown in **Table 4.15-7**, **Table 4.15-8**, and **Table 4.15-9**, Project operations would increase wastewater generation, electricity demand, and water demand, but would decrease solid waste generation. Thus, the Project would require construction of new connections to nearby existing water, wastewater conveyance, stormwater, electric power, and telecommunication facilities. Notwithstanding, with mitigation incorporated, the Project would result in less than significant environmental effects associated with construction of the proposed utilities and service systems. The Reduced Density Alternative would result in an overall increase in wastewater generation,

electricity demand, and water demand, but proportionately less than the Project since this Alternative would propose 34 percent fewer DUs.

The Reduced Density Alternative would result in less demands concerning utilities and service systems than the Project, but similar impacts concerning environmental effects associated with construction of the proposed utilities and service systems.

Aesthetics

The Project proposes a 403-unit apartment building and 75 townhomes. The maximum height of the apartment building and townhomes would be seven stories and three stories, respectively. Under this Alternative, the site's visual character/quality would be altered similar to the Project since the existing industrial use would be removed and replaced with residential uses (a 192 DU apartment building and 75 townhomes). With this Alternative, the apartment building would be only five stories, thus, shorter than the Project.

The Project would not result in a significant source of light or glare. This Alternative proposes 136 fewer DU, thus aesthetic impacts from light and glare would be proportionately less under this Alternative compared to the Project. As with the Project, this Alternative would result in less than significant light and glare impacts.

The Reduced Density Alternative would result in less impacts than the proposed Project regarding aesthetics/light and glare. This Alternative proposes fewer DUs and fewer stories, thus, proportionately less visual alteration would occur than the Project. Like the Project, impacts would be less than significant under this Alternative.

ABILITY TO MEET PROJECT OBJECTIVES

The Reduced Density Alternative would fulfill most of the Project objectives but would not provide as much housing and would fail to provide any affordable housing. This Alternative would not provide as much diversity for Gardena's existing multi-family housing options, but would still support the expanding technology and creative sector with newly constructed high-quality housing opportunities, cluster urban residential development near technology firms and large employment centers, establish housing development that meets high standards of design and pursues environmental sustainability, and redevelop a blighted site while increasing tax revenues to the City and supporting the City's above-market rate RHNA goals. However, because this Alternative proposes 136 fewer DUs (41 percent fewer apartments, 34 percent fewer overall DU) than the Project, this Alternative would not accomplish these objectives to the same degree as the Project. In addition, the tax revenues to the City would be proportionately reduced and the City's RHNA goals would be supported to a lesser degree. This Alternative would not avoid the Project's unavoidable significant impact of construction-related noise impacts but would slightly lessen the construction noise impact given a reduced construction period and reduced building height.

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 three 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 indicated in **Table 4.9-6: Estimated Construction Noise Levels,** the Project's estimated construction noise levels would exceed the City's significance thresholds at all noise-sensitive receptor locations except R3 despite incorporation of mitigation achieving an approximately 12-dBA attenuation (i.e., noise reduction). Further, the City's significance thresholds are exceeded for all noise-sensitive receptor locations except R3 during every phase of construction, including demolition. Accordingly, unless demolition is avoided (and the existing structures remain), no modification of the Project would avoid the Project's significant unavoidable construction noise impacts. Therefore, the Avoid Construction Noise Impact Alternative was rejected because, to avoid the Project's significant unavoidable construction noise impact, demolition would have to be completely avoided. 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 that is currently not already being developed.

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** 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 result in similar or less impacts for all resources areas except population and housing, for which it would result in greater impacts than 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 degree as the proposed Project.

Table 6-3: Comparison of Alternatives

Sections	Alternative 6.4.2: No Project/No Construction	Alternative 6.4.3: No Project/Existing Land Use Designation	Alternative 6.4.4: Reduced Density
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	⮟	=	=
Aesthetics	⮝	⮟	⮟

⮝ 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).
** Impact would still be significant and unavoidable.

Table 6-4: Alternatives Ability to Meet Project Objectives

Would the Alternative:	Alternative 6.4.2: No Project/No Construction	Alternative 6.4.3: No Project/Existing Land Use Designation	Alternative 6.4.4: Reduced Density
Diversify the City of Gardena's existing housing options, by providing a range of housing types and sizes, to serve the region's growing and evolving technology and creative sectors and aid in recruiting and retaining talent for local companies?	No	No	Yes – but to a lesser degree
Support the expanding technology and creative sector with newly constructed, high-quality housing opportunities, enabling local employees to live close to where they work?	No	No	Yes – but to a lesser degree
Cluster urban residential development near technology firms, other large employment centers, and commercial corridors providing City residents with the opportunity to live, work, and shop with less reliance on automobiles?	No	No	Yes – but to a lesser degree
Establish housing development that meets high standards of design and pursues environmental sustainability?	No	No	Yes
Redevelop a blighted site, increase tax revenues to the City, provide affordable housing to support the City's Regional Housing Needs Assessment goals, and create a catalyst for future development in this part of Gardena.	No	No	Partially, it would not provide affordable housing.

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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 a project's 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 a 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 (Environmental Checklist) determined the 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 Initial Study (Environmental Checklist) thresholds are provided below followed by an explanation supported by cited information sources of all "no impact" and "less than significant impact" responses. The sequence and numbering of the below thresholds are consistent with the sequence and numbering provided in the Initial Study (Environmental Checklist); see **Appendix 1.0-1: Initial Study, Notice of Preparation, and Comments Letters**.

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 GGP does not specifically address scenic vistas. Therefore, the Project would not have an adverse effect on a scenic vista.

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 present. There are no State- or County-designated scenic highways

in the Project site vicinity.[1] Therefore, the Project would not damage scenic resources within a State scenic highway.

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. No Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance is mapped in the City.[2] Further, the Project site is not the subject of a Williamson Act Contract.[3] The Project site is zoned M-1, M-2, and HO-4.[4] No agricultural, forest land, or timberland zoning exists in the City. Therefore, the Project would result in no impact concerning mapped farmlands, Williamson Act contracts, or agricultural, forest, or timber land zoning.

The Project site is fully developed with approximately 106,100 SF of industrial land uses. No farmland, forest land, or timberland exist in the City. Therefore, the Project would not result in the conversion or loss of Farmland, forest land or timberland.

[1] California Department of Transportation. (2019). *California State Scenic Highway System Map.* Retrieved from https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.

[2] California Department of Conservation. (2016). *California Important Farmland Finder.* Retrieved from https://maps.conservation.ca.gov/dlrp/ciff/.

[3] California Department of Conservation. (2016). *Williamson Act/Land Conservation Act.* Retrieved from http://www.conservation.ca.gov/dlrp/lca.

[4] City of Gardena. (2020). *Zoning Map*. Gardena, CA: City of Gardena Planning Division. Retrieved from https://cityofgardena.org/wp-content/uploads/2020/11/Gardena_Zonning_2020.pdf.

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?

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 fully developed with approximately 106,100 SF of industrial land uses. No natural habitats are present on-site, with only landscaping (i.e., ornamental vegetation) present. The Project site is bordered by single- and multi-family residential uses. No natural habitats are present within these adjacent areas, with only landscaping (i.e., ornamental vegetation) present. Based on review of the existing and adjacent 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. The nearest wetlands to the Project site are the Gardena Willows Wetland Preserve, which is approximately 0.5 mile from the Project site, at 1202 West 170th Street in the City of Gardena. 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. The Project site is fully developed and contains no natural habitats, with only minimal landscaping. The Project site is also bounded by single- and multi- family residential uses on all sides. No natural habitats are present on these adjacent areas, and only landscaping (i.e., ornamental vegetation) is present.

The Dominguez Channel is located 0.4 mile south of the Project site. There are no established wildlife movement corridors that traverse this segment of the Dominguez Channel.[5] Because this drainage is concrete lined, its habitat values in this urban area are low. The Channel does not necessarily include habitat capable of supporting all requirements of a species, but it could be

[5] Environmental Sciences Associates, *LA County Flood Control District Enhanced Watershed Management Programs Draft Program Environmental Impact Report*, January 2015.

used for wildlife movement. However, because Project construction activities would occur entirely within Project site boundaries and would be restricted to daytime hours, in accordance with the GMC, the Project's potential impacts concerning interference with an established wildlife movement would be less than significant.

As previously noted, the Project site is fully developed and contains only ornamental vegetation, no natural habitats, with only landscaping. The on-site vegetation and trees could provide suitable nesting habitat for birds. The Project would clear and grade the Project site including the vegetation with the potential to support nesting migratory birds. The Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) are intended to protect migratory birds. Under MBTA provisions, it is unlawful "by any means or manner to pursue, hunt, take, capture (or) kill" any migratory birds except as permitted by regulations issued by the USFWS. The term "take" is defined by USFWS regulation to mean to "pursue, hunt, shoot, wound, kill, trap, capture or collect" any migratory bird or any part, nest or egg of any migratory bird covered by the conventions, or to attempt those activities. In addition, the CFGC extends protection to non-migratory birds identified as resident game birds (CFGC §3500) and any birds in the orders Falconiformes or Strigiformes (birds-of-prey) (CFGC §3503). To address potential impacts to migratory birds from construction activities during the nesting season, the Project would be subject to compliance with GMC §18.42.210E: Migratory Bird Protection,[6] which includes provisions concerning construction activities both within and outside the nesting season to avoid effects to migratory birds. Therefore, following compliance with the relevant regulatory framework (MBTA, CFGC, and GMC §18.42.210E), the Project's potential impacts to nesting migratory birds would be mitigated to a less than significant level.

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 in the City. The 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.

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

[6] City of Gardena, California, Municipal Code Ordinance No. 1848. Retrieved from https://cityofgardena.org/wp-content/uploads/2023/03/ORD-NO-1848-Establishment-of-Housing-Overlays-and-Devlopment-Standards.pdf.

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 within an Alquist-Priolo Earthquake Fault Zone.[7] Additionally, the potential for surface fault rupture at the Project site during the design life of onsite structures is considered low.[8] The Project would not expose people or structures to adverse effects involving rupture of a known earthquake fault. Therefore, no impact would occur in this regard.

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, Palos Verdes Fault, and Compton Blind Thrust Fault.[9] The zoned fault nearest the Project site is the Newport-Inglewood Fault Zone, located approximately 0.6 miles to the west. 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 1994 Northridge Earthquake, with an epicenter approximately 33.6 miles northwest of the Project site.[10] Historic earthquakes with magnitudes of greater than or equal to 6.0 and have been epicentered within approximately 30 miles of the Project site.

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[7] California Department of Conservation. (2015). Earthquake Zones of Required Investigation Inglewood Quadrangle. Retrieved from http://gmw.consrv.ca.gov/SHP/EZRIM/Maps/INGLEWOOD_EZRIM.pdf.

[8] Hamilton & Associates. (2022). *Preliminary Geotechnical Investigation.* page 8.

[9] Ibid., page 7-6.

[10] Southern California Earthquake Data Center. (2019). Significant Earthquakes and Faults. Retrieved from https://scedc.caltech.edu/significant/index.html.

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 2022 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 Gardena Building Services Division will review construction plans to verify compliance with standard engineering practices, the GMC/CBSC, and the Preliminary Geotechnical Investigation's[11] recommendations for Project design and construction, including concerning seismic design parameters. Following compliance with standard engineering practices, the established regulatory framework (i.e., GMC and CBSC), and the Preliminary 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 State's Seismic Hazards Maps[12] do 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. Additionally, onsite soils consist predominantly of very stiff fine-grained soils (clays and silts), with one layer of borderline stiff to very stiff fine-grained soil, and occasional layers or lenses of dense sands. Deeper soils are mostly

[11] Hamilton & Associates. (2022). *Preliminary Geotechnical Investigation*; **Appendix 4.4-1: Preliminary Geotechnical Investigation.**
[12] California Department of Conservation. Seismic Hazard Zones, Map Data Viewer. Retrieved from Maps and Data (ca.gov).

very stiff fine-grained soils with dense to very dense sand layers or lenses. Liquefaction potential of these soil types is characteristically nil to low.[13] Analysis was also performed to evaluate potential seismically induced settlement of onsite earth materials during a seismic event, considering historic high groundwater depth of approximately 15 feet below existing grade. Results of the liquefaction analysis further support that liquefaction potential at the site is considered nil to low;[14] see Appendix B of **Appendix 1.0-1**. 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 4.7aii, the Gardena Building Services Division will review construction plans to verify compliance with standard engineering practices, the GMC/CBSC, and the Preliminary Geotechnical Investigation's recommendations for Project design and construction.

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.[15] 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 in this regard.

7.4b 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. 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 the 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 also Response 4.9a. GMC §8.70.110.B.1 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 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.

[13] Hamilton & Associates. (2022). *Preliminary Geotechnical Investigation;* **Appendix 4.4-1**.
[14] Ibid.
[15] Ibid.

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 4.7aiii) or landslides (see Response 4.7aiv). The Gardena Building Services Division would review construction plans to verify compliance with standard engineering practices, the GMC/CBSC, and the Preliminary 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 Preliminary 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 in this regard.

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 Responses 4.19aii and 4.19aiii. The Project would not utilize septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur in this regard.

7.5 HAZARDS AND HAZARDOUS MATERIALS

7.5a Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Project construction would involve the routine transport, storage, use and/or disposal of limited quantities of hazardous materials, such as fuels, solvents, degreasers, and paints. Examples of such activities include fueling and servicing construction equipment and applying paints and other coatings.

The Project proposes a residential development, which is not anticipated to involve the routine transport, use, or disposal of large quantities of hazardous materials that could create a significant hazard to the public or environment. The maintenance materials would be stored, handled, and disposed of in accordance with applicable regulations and the City's programs to control and safely dispose of hazardous materials and wastes. Specifically, the City's Hazardous Materials Release Response Plans and Inventory Program requires the owner or operator of any business that handles or stores hazardous materials equal to or above the reportable quantities to submit a Hazardous Materials Inventory and Contingency Plan. Compliance with these regulations would ensure that all hazardous wastes would be properly handled, recycled, treated, stored, and disposed.

Therefore, following compliance with standard City practices and federal and State regulations, the Project would result in a less than significant impact concerning its potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

7.5c Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The school nearest the Project site, Peary Middle School, is at 1415 West Gardena Boulevard, City of Gardena, which is approximately 0.4 mile north of the Project site. Therefore, the Project site is more than 0.25 mile from this existing school. Notwithstanding, the routine transport, use, and disposal of hazardous materials during Project construction would be subject to federal, state, and local regulations for transport, handling, storage, and disposal of hazardous substances. Compliance with the regulatory framework would ensure Project construction activities would not create a significant hazard to nearby schools.

Additionally, 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 impact surrounding schools. The types of hazardous materials that would be routinely handled during Project operations would be limited to household cleaners, paints, solvents, and fertilizers and pesticides for site landscaping. The routine transport, use, and disposal of hazardous materials during operations would be subject 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.

7.5d 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?

No Impact. Government Code §65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the DTSC. The Cortese list contains hazardous waste and substance sites including public drinking water wells with detectable levels of contamination, sites with known underground storage tanks (USTs) having a reportable release, solid waste disposal facilities from which there is a known migration, hazardous substance sites selected for remedial action, historic Cortese sites, and sites with known toxic material identified through the abandoned site assessment program. The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5.[16] Therefore, the Project would result in no impact in this regard.

[16] California Department of Toxic Substances Control. *Department of Toxic Substances Control EnviroStor.* Retrieved from: https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29, accessed November 2023.

7.5e 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. The Project site is not located within an airport land use plan or within two miles of a public airport or public use airport. The airport located nearest the Project site is Hawthorne Municipal Airport/Jack Northrop Field ("Airport"), approximately 3.4 miles to the northwest. This Airport is an FAA-designated general aviation reliever airport owned by the City of Hawthorne. Therefore, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. No impact would occur in this regard.

7.5f Would the project impair implementation of or physically interfere with an emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Project Site is located in an urbanized area where adequate circulation and access are provided to facilitate emergency response. The Gardena Public Safety Plan [17] outlines emergency response actions in the event of a large-scale disaster, such as a hazardous materials emergency. Further, while Project construction would likely require traffic lane, parking lane, and/or sidewalk closures, it would not require the complete closure of any public or private street. The Project would implement PDF TR-1 (see **Section 4.13: Transportation**), which requires a Construction Traffic Management Plan, approved by the City, to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction, as well as ensure adequate emergency access. Temporary construction activities would not impede use of the streets for emergencies or access for emergency response vehicles. Further, Project construction would be subject to compliance with the following Public Safety Plan Policies:

- **PS 1.7: Development Review**. Ensure that law enforcement, crime prevention, and fire safety concerns are considered in the review of planning and development proposals in the City.
- **PS 2.2: Building and Fire Codes**. Require that all buildings and facilities within Gardena comply with local, state, and federal regulatory standards such as the California Building and Fire Codes as well as other applicable fire safety standards.
- **PS 2.7: New Development**. Require adequate fire protection services, fire protection plans, and emergency vehicle access for new development. Locate, design, and construct new development to minimize the risk of structural loss from fires.
- **PS 3.1: California Building Code**. Require compliance with seismic safety standards in the California Building Code, as adopted and amended.

[17] City of Gardena. (2022). Public Safety Plan. Retrieved from https://cityofgardena.org/wp-content/uploads/2022/04/Gardena_Public-Safety-Element_FINAL-FOR-ADOPTION.pdf.

Therefore, following compliance with City policies, as specified above, the Project's potential impacts concerning impairing implementation of or physically interfering with an emergency response plan or related policies would be less than significant.

4.9g 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 in this regard.

7.6 HYDROLOGY AND WATER QUALITY

7.6d In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. Federal Emergency Management Agency's (FEMA's) Flood Insurance Rate Map (FIRM) indicates the Project Site is within Zone X, which depicts areas determined to be outside of the 0.2-1.0% (500-year) annual chance floodplain.[18]

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, which 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. Therefore, the Project site is not within a tsunami or seiche zone.

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 is not within a flood hazard, tsunami, or seiche zone. Therefore, no risk of release of pollutants due to Project inundation by these hazards would occur.

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 residential infill development. The Project replaces the existing industrial use and does not propose any new roadways or other physical barriers. Given its nature and scope, the Project would not physically divide an established community. No impact would occur in this regard.

[18] 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.

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.[19] 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[20] mineral deposits are present, or it is judged that little likelihood exists for their presence.[21] Further, the GGP does not identify the Project site as a locally important mineral resource recovery site. Therefore, the proposed Project would have no impact concerning mineral resources.

7.9 NOISE

7.9c 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?

No Impact. The Project site is not located within the vicinity of a private airstrip or an airport land use plan, or within two miles of a public airport or public use airport. The airport located nearest the Project site is Hawthorne Municipal Airport/Jack Northrop Field ("Airport"), approximately 3.4 miles to the northwest. This Airport is an FAA-designated general aviation reliever airport owned by the City of Hawthorne. Therefore, the Project would not expose people residing or working in the Project area to excessive airstrip- or airport-related noise levels. No impact would occur in this regard.

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 remove the existing onsite industrial uses and, in their place, construct residential uses. The Project would not displace existing housing or people or require construction of replacement housing elsewhere. Therefore, no impact would occur in this regard.

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[19] California Department of Conservation. (2018). *California Statutes and Regulations for the California Geological Survey.* Sacramento, CA: California Geological Survey.

[20] 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.

[21] 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/.

7.11 WILDFIRE

7.11a Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

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?

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?

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 in a local responsibility area and classified as Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ).[22] Because the Project is not located in or near a State responsibility area or lands classified as VHFHZ, the Project would result in no impact concerning wildfire.

[22] CalFire. (September 2011). *Los Angeles County FHSZ Map.* Retrieved from https://osfm.fire.ca.gov/media/7280/losangelescounty.pdf.

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REVISED AND UPDATED FINAL
ENVIRONMENTAL IMPACT REPORT
SCH # 2023050241

NORMANDIE CROSSING SPECIFIC PLAN PROJECT

LEAD AGENCY

CITY OF GARDENA
Greg Tsujiuchi - Community Development Director
Amanda Acuna – Community Development Manager
Community Development Department
1700 West 162nd Street
Gardena, California 90247
310.217.9593

APPLICANT

SAIKO INVESTMENT CORP.

NEXTGEN APARTMENTS

CONSULTANT

KIMLEY-HORN AND ASSOCIATES, INC.
Rita Garcia – Project Manager
1100 W Town and Country Road, Suite 700
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714.786.6116

NOVEMBER 2024

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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 Normandie Crossing Specific Plan Project (SCH No. 2023050241). 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 December 4, 2023 and January 20, 2024. The DEIR was also made available directly to State agencies through the State Clearinghouse, Office of Planning and Research.

The Project was heard before the Planning Commission at the March 19, 2024, public hearing. As a result of input received from the community through the public hearing and public review processes, as well as from a follow-up meeting the Applicant had with neighborhood residents following the Planning Commission hearing, the Applicant proposed plans for a revised project which is now included as the Community Input Alternative. This new Alternative addresses the following primary concerns that were raised by the community and neighborhood residents: density; and apartment building height and mass, parking and the alignment of the driveway on 170th Street. This revised and Updated Final Environmental Impact Report (FEIR) includes the Community Input Alternative in addition to responses to comments received after the public comment period closed on January 20, 2024.

1.2. FINAL ENVIRONMENTAL IMPACT REPORT

Before approving a project, CEQA requires that the Lead Agency prepare and certify an 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 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 not part of the FEIR, but can be found in the Resolution certifying the EIR. 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 below 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, one organization, and three residents.

Table 2-1: List of Commenting Public Agencies And Persons And Organizations

No.	Date	Author	Author Title	Agency/Organization
Public Agencies				
A1	01/04/24	Ronald M. Durbin	Chief, Forestry Division, Prevention Services Bureau	County of Los Angeles Fire Department
A2	01/17/24	Frances Duong	Acting LDR/CEQA Branch Chief	State of California Department of Transportation District 7
A3	01/23/24	Curtis M. Welty, PG	Associate Oil and Gas Engineer	State of California Department of Conservation Geologic Energy Management Division
Persons and Organizations				
A4	01/19/24	Stephanie Papayanis	Attorney	Western States Regional Council of Carpenters
A5	02/25/24	Tish McCauley	Resident	N/A
A6	02/18/24	Keren Hwang	Resident	N/A
A7	02/01/24	Kevin Collier	Resident	N/A
A8	03/13/24	Donnetta Jalomo	Resident	N/A
A9	03/04/24	Kevin Collier	Resident	N/A
A10	3/18/24	Mitchell M. Tsai	Attorney	Western States Regional Council of Carpenters
A11	03/19/24	Brenda Rodriguez	Resident	N/A
A12	03/19/24	Dalia R. Juarez	Resident	N/A
A13	03/19/24	Terri C.	Resident	N/A
A14	03/19/24	Yvonne & Arthur Acosta	Residents	N/A
A15	03/19/24	Ace Rose	Resident	N/A

Table 2-1: List of Commenting Public Agencies And Persons And Organizations

No.	Date	Author	Author Title	Agency/Organization
A16	03/20/24	Brandon Smith	Residents	N/A
A17	03/20/24	Gloria Mazzocco	Homeowner	N/A
A18	03/20/24	Liliana Arreguin	Resident	N/A
A19	04/02/24	Various	Residents	N/A
A20	03/19/24	Layne Fajeau	Attorney	Supporters Alliance for Environmental Responsibility
A21	03/27/24	Bryan Flynn	Attorney	Supporters Alliance for Environmental Responsibility
A22	10/23/24	Note to File	N/A	N/A

2.2 COMMENT LETTERS AND RESPONSES

In compliance with State CEQA Guidelines § 15132, this Section includes all 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~~ <u>Added DEIR text</u>

DEIR text revisions are also presented in **FEIR Section 3.0: Errata to the Draft EIR**.

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Comment Letter 1

COUNTY OF LOS ANGELES FIRE DEPARTMENT

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

ANTHONY C. MARRONE
FIRE CHIEF
FORESTER & FIRE WARDEN

"Proud Protectors of Life, the Environment, and Property"

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FIRST DISTRICT

HOLLY J. MITCHELL
SECOND DISTRICT

LINDSEY P. HORVATH
THIRD DISTRICT

KATHRYN BARGER
FIFTH DISTRICT

January 4, 2024

Amanda Acuna
1700 West 162nd Street Unit: 101
Gardena, CA 90247

Dear Ms. Acuna:

THE NOTICE OF PREPARATION, "THE NORMANDIE CROSSING SPECIFIC PLAN PROJECT", PROPOSES THE CONSTRUCTION AND OPERATION OF A RESIDENTIAL DEVELOPMENT COMPRISED OF 403 DWELLING UNITS. THE PROJECT CONSTRUCTS TWO SUBAREAS THAT INCLUDE AN APARTMENT PORTION AND A TOWNHOME PORTION CONNECTED BY INTERNAL STREETS, CITY OF GARDENA, FFER2023006487

The Environmental Impact Report 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:

Fire protection serving the area appears to be adequate for the existing development/land use; however, each additional development creates greater demands on existing resources. A1-1

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

LAND DEVELOPMENT UNIT:

The proposed development was submitted for review and approval to the County of Los Angeles Fire Department Fire Prevention Division Land Development Unit for review and approval of Vesting Tentative Tract Map 83922 (FLDU2023003466). At this time, there are outstanding corrections that shall be addressed prior to clearance of the Vesting Tentative Map. A submittal for a REQUEST FOR MODIFICATIONS OR ALTERNATIVE MATERIALS AND A1-2

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS, ARTESIA, AZUSA, BALDWIN PARK, BELL, BELL GARDENS, BELLFLOWER, BRADBURY, CALABASAS, CARSON, CERRITOS, CLAREMONT, COMMERCE, COVINA, CUDAHY, DIAMOND BAR, DUARTE, EL MONTE, GARDENA, GLENDORA, HAWAIIAN GARDENS, HAWTHORNE, HERMOSA BEACH, HIDDEN HILLS, HUNTINGTON PARK, INDUSTRY, INGLEWOOD, IRWINDALE, LA CANADA-FLINTRIDGE, LA HABRA, LA MIRADA, LA PUENTE, LAKEWOOD, LANCASTER, LAWNDALE, LOMITA, LYNWOOD, MALIBU, MAYWOOD, NORWALK, PALMDALE, PALOS VERDES ESTATES, PARAMOUNT, PICO RIVERA, POMONA, RANCHO PALOS VERDES, ROLLING HILLS, ROLLING HILLS ESTATES, ROSEMEAD, SAN DIMAS, SANTA CLARITA, SIGNAL HILL, SOUTH EL MONTE, SOUTH GATE, TEMPLE CITY, VERNON, WALNUT, WEST HOLLYWOOD, WESTLAKE VILLAGE, WHITTIER

Letter A1 – County of Los Angeles Fire Department
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METHODS REVIEW, was provided the the Land Development Unit Supervising FPEA on September 29, 2023. The proposed access widths as indicated in the Initial Study, Notice of Preparation and Normandie Crossing Specific Plan do not comply with the access requirements as noted in the County of Los Angeles Fire Code Chapter 5.

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

When involved with subdivision in a city contracting fire protection with the County of Los Angeles Fire Department, Fire Department requirements for access, fire flows and hydrants are addressed during the subdivision tentative map stage.

Every building constructed shall be accessible to Fire Department apparatus by way of access roadways, with an all-weather surface of not less than 28 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.
The proposed development shall comply with the following County of Los Angeles Fire Code Sections: 503.1, 503.1.1, 503.2.1, 503.2.1.2.2, 503.2.1.2.2.1, 503.2.1.2.2.2, 503.2.2.1, 503.2.4, 503.2.8, 503.2.9, 503.3, 503.4, 503.4.1, 503.6, 504.1, 503.3. Additional Fire Code requirements will apply at the County of Los Angeles Fire Department Fire Prevention Division Engineering Section Building Plan Check Unit review for building permit issuance

A1-2

Every building constructed shall provide an adequate water supply for fire protection purposes. The fire hydrant spacing shall be 300 feet with a fire flow requirement of 4,000 gpm at 20 psi residual pressure for 4 hours. 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 B105.1 of the County of Los Angeles Fire Code.

Required fire flow for private on-site fire hydrants, 2,500 gpm @ 20 psi for 2 hours.

See Site Plan Mark Updated 08/04/2023 for specific information regarding the requirement for 1 new public fire hydrant and 4 new private on-site fire hydrant(s).

Specific fire and life safety requirements for the construction phase will be addressed at the Fire Department building plan check review. There may be additional fire and life safety requirements during this time.

The County of Los Angeles Fire Department, Land Development Unit appreciates the opportunity to comment on this project. Should any questions arise, please contact Nancy Rodeheffer at (323) 890-4243 or nancy.rodeheffer@fire.lacounty.gov.

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FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

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

A1-3

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

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department has reviewed the draft EIR and associated environmental reports prepared by Partner Engineering and Science, Inc (Partner) and the associated Vapor Intrusion Risk Evaluation, dated August 11, 2023, prepared by Hillmann Consulting, LLC. In addition to the proposed mitigation measures included in the draft EIR, HHMD also recommends that a soil management plan (SMP) be implemented at the project site prior to site grading. The SMP should also address potential discoveries of underground storage tanks (USTs) and the associated role of the Los Angeles Regional Water Quality Control Board if contaminated soil and/or groundwater were to be associated with past UST releases. HHMD has no additional requirements or comments at this time.

A1-4

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

Very truly yours,

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

RMD:pg

RESPONSE TO COMMENT LETTER NO. A1

Ronald M. Durbin, Chief, Forestry Division, Prevention Services Bureau
County of Los Angeles Fire Department
January 4, 2024

A1-1 This comment from the Planning Division states that the fire protection for the area appears to be adequate for existing development. This comment also notes that each development (including this Project) would increase the demand on existing resources.

As noted in **DEIR Section 4.11: Public Services**, the Project would result in population growth that would incrementally increase the demand for fire protection in the area. However, as the Project site is currently served by fire protection services and is in a suburban setting where fire protection services and equipment/infrastructure are already in place, the Project does not propose and would not require new or physically altered fire protection facilities to maintain fire service objectives. Therefore, impacts concerning fire protection would be less than significant. No further discussion is necessary.

A1-2 This comment provides the Land Development Unit's comments on the DEIR. The comment states that the 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 4.11**, the Project would be constructed with fire safety features in compliance with applicable provisions of the adopted Los Angeles County Fire Code, ordinances, and standard conditions regarding fire prevention and suppression measures related to water improvement plans, fire hydrants, fire access, and water availability (DEIR Page 4.11-6). The Los Angeles County Fire Department (LACFD) Fire Prevention Division has reviewed the Project, including the 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 during the Fire Prevention Engineering Section's Building Plan Check Review. It is noted, LACFD also reviewed the Project's NOP and provided Conditions of Approval, which the Project would be required to comply with. The comment also provides contact information for further communication. This comment does not address the DEIR's adequacy or raise a significant environmental issue.

The Applicant had several meetings with LACFD to address its concerns and revised the Conceptual Site Plan. According to the Applicant, these plans have been reviewed and approved by the LACFD Fire Prevention Division. As such, no further response is necessary.

A1-3 This comment provides the Forestry Division's comments on the DEIR and details the Division's responsibilities within the LACFD. The comment requests that potential impacts within their responsibilities be addressed. Watershed management and erosion control are discussed in **DEIR Section 4.7: Hydrology and Water Quality** and archeological and cultural resources are discussed in **DEIR Section 4.2: Cultural Resources**. Impacts concerning these resources are addressed and, where a potential impact would occur, mitigation is incorporated. Therefore, with mitigation incorporated, impacts concerning issues would be less than significant. Regarding impacts to oak trees, fire hazards, and endangered species, as discussed in **DEIR Section 7.0: Effects Found Not to be Significant**, there are no trees, fire hazards, or endangered species on or adjacent to the Project site. No further discussion is necessary.

A1-4 This comment provides the Health Hazardous Materials Division's comments on the DEIR and recommends that a soil management plant (SMP) be implemented at the Project site prior to grading as an additional mitigation measure. As discussed in **DEIR Section 4.6: Hazards and Hazardous Materials**, MM HAZ-1 requires a Construction Management Plan to be prepared prior to issuance of demolition permits which would address potential undocumented contaminated soil. MM HAZ-1 sufficiently addresses the Health Hazardous Materials Division's request for a SMP. Thus, no modifications to MM HAZ-1 are required. No further discussion is necessary.

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Comment Letter 2

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 269-1124
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life

January 17, 2024

Amanda Acuna
City of Gardena
1700 West 162nd Street
Gardena, CA 90247

RE: Normandie Crossing Specific Plan Project
SCH # 2023050241
Vic. LA-405/PM 13.86, LA-110/PM 9.84, LA-91/PM 6.16
GTS # LA-2023-04396-DEIR

Dear Amanda Acuna:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Project proposes to remove all existing onsite structures (approximately 115,424 square feet (SF) of industrial uses) and, in their place, construct up to 403 multi-family DU, including 328 apartment units in one building and 75 townhomes in nine buildings. The apartment building would provide approximately 39,098 SF of private/public open spaces, 399 vehicle parking spaces, and 173 bicycle parking spaces. The townhomes would provide approximately 11,395 SF of open space, and 160 vehicle parking spaces (150 resident spaces in two-car garages and 10 guest spaces). Additionally, the Project proposes two offsite improvements: 266 linear feet of sidewalk improvements along 169th Street and various railroad track and roadway improvements along South Normandie Avenue.

A2-1

Transit
The project site is situated within a quarter-mile of multiple bus stops and is accessible through transit service provided by the City of Gardena's Transit Service, Route 1X and Route 4 (GTrans).

A2-2

"Provide a safe and reliable transportation network that serves all people and respects the environment"

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January 17, 2024
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Pedestrian and Bicycle Facilities
Existing sidewalks along the project frontage form part of a continuous pedestrian network, with a brief gap on the south side of 169th Street. Sidewalks are absent on Brighton Way, a public alley. Marked crosswalks and pedestrian facilities are available at signalized intersections along Normandie Avenue.

Currently, there are no separated or protected bicycle facilities along Normandie Avenue at the project site. The South Bay Bicycle Master Plan designates Normandie Avenue as a bike route (Class III) from 182nd Street to 170th Street, with adjacent streets also designated. A future Bicycle Friendly Street segment on 170th Street is proposed in the plan.

A2-3

VMT Screening
The City uses three screening criteria to determine if a VMT analysis would be required for this project. 1) The project's proposed 403 residential units are expected to generate approximately 1,715 average daily trips (ADT), which would be more than 110 ADT threshold. Also, the Project is not 100 percent affordable. The Project is not screened out from VMT analysis based on project type screening criterion. 2) The Project is in a TAZ estimated to generate 11.01 VMT per capita, which is 23.3 percent below the 2020 SCAG regional baseline VMT of 14.35. When compared to the 2040 SCAG regional baseline VMT of 12.97, the Project's VMT per capita is 15 percent below the 2040 SCAG regional baseline VMT. Therefore, the Project is in an area with low residential VMT, which means the Project can be presumed to have a less than significant VMT impact and can be screened out from further VMT analysis based on low VMT area screening. 3) The Project has more than 25 percent of its area farther from Gardena's High-Quality Transit Areas. Therefore, the Project is not screened out from VMT analysis under the Transit Proximity screening criterion.

A2-4

Based on the City'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 concerning VMT under the low VMT screening criteria. However, the DEIR does not show why the other criteria are not considered. For this sizable development of 403 multi-family units, we recommend a conservative approach by including a Vehicle Miles Traveled (VMT) analysis. This will help preempt any potential environmental challenges from third parties, ensuring a thorough evaluation of transportation impacts.

TDM
Because of the size of the project, we encourage the City to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand*

A2-5

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Management into the Transportation Planning Process: A Desk Reference (Chapter 8). This reference is available online at:

http://ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf

Post VMT Analysis
After this development is completed, a post-development VMT analysis to validate and justify Project VMT and future VMT threshold setting should be considered and prepared. Additional mitigation measures should be implemented when the post-development VMT analysis discloses any traffic significant impact. This analysis, which may include interviews with and surveys of project occupants, will provide new traffic data to help validate the City's VMT traffic model results.

A2-6

The collected data can include, among other things, where the trips are coming from, when the trips are taking place, what transportation mode is used, and why those transportation modes were selected. This survey data would be useful 1) to validate existing VMT threshold, 2) to assist in setting future VMT threshold, and 3) to identify suitable TDM to apply as minimization or mitigation measures for the future. These measures could be implemented in the event the post-development VMT analysis discloses any significant traffic impacts.

Traffic Safety Analysis
On Caltrans' June 7, 2023 letter (see attached), we asked for a safety analysis for Caltrans off-ramps. Traffic safety is a CEQA matter and should be considered by the City. We are not able to identify the safety analysis in Appendix 4.13-1: CEQA Transportation Study nor Appendix 4.13-2: Local Transportation Assessment.

A2-7

Others
As a reminder to address Caltrans concerns in preparing VMT and safety analysis, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020, and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared on December 18, 2020. You can review those documents at the following link:

https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf

A2-8

https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf

Any transportation of heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. Any large-size truck trips be limited to off-peak commute periods.

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Letter A2 – State of California Department of Transportation District 7
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If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2023-04396-DEIR.

Sincerely,

Frances Duong

FRANCES DUONG
Acting LDR/CEQA Branch Chief

email: State Clearinghouse

"Provide a safe and reliable transportation network that serves all people and respects the environment"

RESPONSE TO COMMENT LETTER NO. A2
Frances Duong, Acting LDR/CEQA Branch Chief
State of California Department of Transportation, District 7
January 17, 2024

A2-1 This comment introduces the California Department of Transportation (Caltrans) response and summarizes the Project. This comment does not address DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary.

A2-2 This comment provides the Project's environmental setting within the context of transit services. This comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary.

A2-3 This comment provides the Project's environmental setting within the context of pedestrian and bicycle facilities. This comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary.

A2-4 This comment summarizes vehicle miles travelled (VMT) screening criteria under Senate Bill (SB) 743 and notes that the Project can be screened out from a full VMT analysis based on the City's transportation guidelines and impact thresholds. The commenter further notes the DEIR does not show why other criteria are not considered (specifically, Criteria 1 and 3). Therefore, the comment recommends a VMT analysis be performed to "preempt any potential environmental challenges from third parties, ensuring a thorough evaluation of transportation impacts."

City VMT guidelines do not require a project to meet multiple criteria to screen out from a VMT analysis. The Project meets a criterion in the City guidelines and therefore would have a less than significant impact concerning VMT. However, **DEIR Appendix 4.13-1: CEQA Transportation Study**, specifically states that Criterion 1 does not apply because the Project would generate more than 110 daily trips based on the 11th Edition ITE Trip Generation Manual. Additionally, **DEIR Appendix 4.13-1** specifies that Criterion 3 does not apply because the Project is not located in proximity to high quality transit. Therefore, additional analysis concerning VMT is not required or warranted. No further response is necessary.

A2-5 This comment encourages the City to evaluate transportation demand management (TDM) strategies and intelligent transportation system (ITS) applications to better manage its transportation network. The Project implements TDM strategies and ITS applications via features such as unbundled parking, additional bicycle parking, and a

one-month free transit pass to help renters become acquainted with public transit and pre-leasing for area employees. No further response is necessary.

A2-6 This comment recommends a mitigation measure concerning VMT which would require a VMT analysis to be done after development is completed to help validate the City's VMT traffic model results. CEQA's purpose is to inform government decisionmakers and the public of the potential environmental effects and to prevent significant, avoidable environmental damage. CEQA does not require a project to "look back" or "prove itself" after approval. Additionally, the Project would result in a less than significant impact concerning VMT, therefore, no mitigation is required; see **DEIR Impact 4.13-2**. Therefore, no mitigation measures are required under CEQA. No further response is necessary.

A2-7 The comment expresses concern concerning the DEIR's adequacy in addressing a previous comment requesting a safety analysis for highway off-ramps near the Project as neither transportation appendices (i.e., **DEIR Appendix 4.13-1** or **DEIR Appendix 4.13-2: Local Transportation Study**) appear to address their previous comment. The comment reminds the Applicant that traffic safety is a CEQA matter and therefore should be considered in the analysis.

Additional discussion has been added to the Local Transportation Assessment (**DEIR Appendix 4.13-2**); see below. The Project would not result in safety impacts to Caltrans facilities due to the small number of trips to these facilities and distance to these facilities.

DEIR Appendix 4.13-2: Local Transportation Assessment

DEIR Page 9

3.3.1 Freeway Ramp & Intersection Queueing at State Facilities

As detailed below in section 3.7, based on the Project's estimates, trip generation and distribution, few trips are expected at the I-405 off-ramps to Normandie/190th or the I-110 off-ramps to Redondo Beach Boulevard (<25 peak hour trips at each location). Therefore, the Project is not expected to add two or more car lengths to these off-ramp queues during peak hours, exacerbate potentially unsafe ramp conditions at these locations (if such conditions exist or are projected to occur in the opening year of the Project), and analysis is not needed. At the intersection of SR-91 and Vermont Avenue, Project traffic is expected to primarily be eastbound and westbound through movements since primary Project access is from Normandie Avenue, where most turning movements would

occur. As such, the Project is not expected to add substantial traffic to any left or right-turning movements at the intersection of SR-91 and Vermont Avenue, and the Project is not expected to materially affect the utilization of turn pocket storage that would lead to an impedance of through traffic. Therefore, no further analysis is needed related to queueing at these locations.

3.3.2 Pedestrian & Bicycle Volumes at State Facilities

As detailed below in section 3.7, 5% of the Project's net new trips are expected to be walking or biking in nature, which may also include a subsequent trip on transit. This amounts to less than 10 trips during either peak hour in total. Most of these non-transit biking and walking trips are expected to be local in nature, accessing nearby schools and businesses within 0.5 miles of the Project Site. Substantial bicycle and pedestrian trips generated by the Project are not expected to occur at the SR-91 and Vermont Avenue, I-405 off-ramps at Normandie/190th, or I-110 off-ramps at Redondo Beach Boulevard intersections given how far away they are from the Project Site. SR-91 and Vermont Avenue is located 0.8 miles from the Project Site, while the other two intersections are located over one mile from the Project Site. Because these locations are outside of the Project Study Area, Multi-Modal Conflict Analyses and/or Complete Street Access considerations should not be necessary.

A2-8 This comment provides resources for guidance on performing VMT safety analysis and notes that use of oversized transport vehicles on State highways would require a Caltrans permit. This comment does not address the adequacy or raise a significant environmental issue. As such, no further response is necessary.

Letter A3 – State of California Department of Conservation Geologic Energy Management Division

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Comment Letter 3

California
Department of Conservation
Geologic Energy Management Division

Gavin Newsom, Governor
David Shabazian, Director

January 23, 2024

VIA EMAIL

Amanda Acuna, Senior Planner
City of Gardena
1700 West 162nd Street
Gardena, CA 90247
Email: AAcuna@cityofgardena.org

Dear Ms. Acuna:

NORMANDIE CROSSING SPECIFIC PLAN PROJECT
DRAFT EIR
CITY OF GARDENA
SCH: NO. 2023050241

The Department of Conservation's Geologic Energy Management Division (Division) has reviewed the above-referenced project for impacts with Division jurisdictional authority. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California. The Division offers the following comments for your consideration. A3-1

The project area is in Los Angeles County and lies outside any administrative oil field. On Page 4.6-9 of the Draft EIR, the author states, "*According to California Division of Oil, Gas and Geothermal Resources (CalGEM), no oil or gas wells are located on or immediately adjacent to the site. The closest well was identified to be located approximately 480 feet south of the site and is reported as "abandoned."* In fact, Division mapping shows an abandoned "wildcat" well, the "Gardena E.H." 1 well shown on our "Well Finder" online app as along Brighton Way between 169th and 170th. Upon our review of the 1967 well abandonment documents for this "dry hole," it appears that this well was more precisely located, "From the intersection of 170th Street and Brighton Way, 121' north and 55' east." This would place this well in the parking area behind the southernmost building currently shown on the project property. Division information can be found at: www.conservation.ca.gov. Individual well records are also available on the Division's web site, or by emailing CalGEMSouthern@conservation.ca.gov. A3-2

The scope and content of information that is germane to the Division's responsibility are contained in Section 3000 et seq. of the Public Resources Code, and administrative

State of California Natural Resources Agency | Department of Conservation
Southern District, 3780 Kilroy Airport Way, Suite 400, Long Beach, CA 90806
conservation.ca.gov | T: (562) 637-4400 | F: (562) 424-0166

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City of Gardena
January 23, 2024
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regulations under Title 14, Division 2, Chapters 2, 3 and 4 of the California Code of Regulations. A3-2

If any wells, including any plugged, abandoned, or unrecorded wells, are damaged or uncovered during excavation, grading or other project operations, remedial plugging operations may be required. If such damage or discovery occurs, the Division's district office must be contacted to obtain information on the requirements and approval to perform remedial operations. A3-3

The possibility for future problems from oil and gas wells that have been plugged and abandoned, or reabandoned, to the Division's current specifications are remote. However, the Division recommends that a diligent effort be made to avoid building over any plugged and abandoned well.

Questions regarding the Division's Construction Site Well Review Program can be addressed to the local Division's office in Long Beach by emailing CalGEMSouthern@conservation.ca.gov or by calling (562) 637-4400.

Sincerely,

Curtis M. Welty, PG
Associate Oil and Gas Engineer

cc: Governor's Office of Planning and Research, State Clearinghouse Unit
Email: state.clearinghouse@opr.ca.gov

Office of Legislative and Regulatory Affairs
Email: OLRA@conservation.ca.gov

Jan Perez, CalGEM CEQA Unit
Email: Jan.Perez@conservation.ca.gov

Environmental CEQA File

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RESPONSE TO COMMENT LETTER NO. A3
Curtis M. Welty PG, Associate Oil and Gas Engineer
State of California Department of Conservation Geologic Energy Management Division
January 23, 2024

A3-1 This comment introduces the California Department of Conservation – Geologic Energy Management Division (CalGEM) and summarizes the department's jurisdictional authority. This comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary.

A3-2 This comment provides a revision to the DEIR's existing setting concerning nearby existing wells and notes the adjacent plugged well (an abandoned "wildcat" well identified as "Gardena E.H.") mapped outside the Project is within the Project site (approximately 121 feet north, 55 feet east). This comment is noted, and a minor revision to the existing setting and impact analysis in **DEIR Section 4.6: Hazards and Hazardous Materials** is included as shown below.

DEIR Section 4.6: Hazards and Hazardous Materials

DEIR Page 4.6-9

According to California Division of Oil, Gas and Geothermal Resources (CalGEM), ~~no oil or gas wells are located on~~ one abandoned "dry hole" "wildcat" well, identified as "Gardena E.H," exists 121 feet north and 55 feet east from the intersection of 170th Street and Brighton Way thereby placing the well within the parking area east of the southernmost building. There are no oil or gas wells located ~~or~~ immediately adjacent to the site. ~~The closest well was identified to be located approximately 480 feet south of the site and is reported as "abandoned".~~

DEIR Page 4.6-21

As previously addressed, the Phase I ESAs identified various onsite RECs associated with past uses of the Project site. As discussed in **Section 4.6.1: Existing Setting**, there is an existing abandoned well within the Project site where townhomes are proposed. This well is already abandoned and would be capped during Project construction in coordination with CALGEM.

A3-3 This comment reiterates the requirement to contact the Division's district office to obtain information on the requirements and approval of remedial operations if any well is damaged or uncovered during Project operations. Further, the comment recommends that "a diligent effort be made to avoid building over any plugged and

abandoned well." This comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary.

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Comment Letter 4

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Mitchell M. Tsai
Law Firm

139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

January 19, 2024

Amanda Acuna, Senior Planner
City of Gardena
1700 West 162nd Street
Gardena, CA 90247
Em: aacuna@cityofgardena.org

RE: City of Gardena, Normandie Crossing Specific Plan Project

Dear Amanda Acuna,

On behalf of the Western States Regional Council of Carpenters ("**Western Carpenters**" or "**WSRCC**"), my Office is submitting these comments for the City of Gardena's ("**City**") Draft Environmental Impact Report ("**DEIR**" or "**Draft EIR**") for the Normandie Crossing Specific Plan ("**SP**") Project ("Project"), SCH No. 2023050241.

According to the DEIR,

> The Project proposes to establish a maximum allowable development within the approximately 5.25-acre [Normandie Crossing Specific Plan ("NCSP")] area of up to 403 DU. Because the City does not have any zone which would accommodate the proposed development, the Applicant is proposing the NCSP, which would establish the site-specific zoning regulations and development standards for this area. The NCSP 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. In addition to requiring a Specific Plan, the Project requires various other approvals, including a Development Agreement

(DEIR, p. 2-11.)

The Western Carpenters is a labor union representing almost 90,000 union carpenters in 12 states, including California, and has a strong interest in well-ordered land use planning and in addressing the environmental impacts of development projects.

A4-1

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Individual members of the Western Carpenters live, work, and recreate in the City and surrounding communities and would be directly affected by the SP's environmental impacts. A4-1

The Western Carpenters expressly reserves the right to supplement these comments at or prior to hearings on the SP, and at any later hearing and proceeding related to this SP. Gov. Code, § 65009, subd. (b); Pub. Res. Code, § 21177, subd. (a); see *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199-1203; see also *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121. A4-2

The Western Carpenters incorporates by reference all comments raising issues regarding the Environmental Impact Report (EIR) submitted prior to certification of the EIR for the SP. See *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal.App.4th 173, 191 (finding that any party who has objected to the project's environmental documentation may assert any issue timely raised by other parties).

Moreover, the Western Carpenters requests that the City provide notice for all notices referring or related to the SP issued under the California Environmental Quality Act (**CEQA**) (Pub. Res. Code, § 21000 *et seq.*), and the California Planning and Zoning Law ("**Planning and Zoning Law**") (Gov. Code, §§ 65000–65010). California Public Resources Code Sections 21092.2, and 21167(f) and California Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body. A4-3

I. THE CITY SHOULD INCORPORATE LANGUAGE THAT REQUIRE THE USE OF A LOCAL WORKFORCE TO BENEFIT THE COMMUNITY'S ECONOMIC DEVELOPMENT AND ENVIRONMENT

The City should incorporate language into the proposed SP requiring residential, commercial and mixed-use developments within the SP area to be built using local workers who have graduated from a Joint Labor-Management Apprenticeship Program approved by the State of California, have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state-approved apprenticeship training program, or who are registered apprentices in a state-approved apprenticeship training program. A4-4

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Community benefits such as local hire can also be helpful to reduce environmental impacts and improve the positive economic impact of the SP. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of projects within the SP area can reduce the length of vendor trips, reduce greenhouse gas emissions, and provide localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

> [A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

A4-5

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the University of California, Berkeley Center for Labor Research and Education concluded:

> [L]abor should be considered an investment rather than a cost and investments in growing, diversifying, and upskilling California's workforce can positively affect returns on climate mitigation efforts. In other words, well-trained workers are key to delivering emissions reductions and moving California closer to its climate targets.[1]

A4-6

Furthermore, workforce policies have significant environmental benefits given that they improve an area's jobs-housing balance, decreasing the amount and length of job commutes and the associated greenhouse gas (GHG) emissions. In fact, on May 7, 2021, the South Coast Air Quality Management District found that that the "[u]se of a local state-certified apprenticeship program" can result in air pollutant reductions.[2]

A4-7

[1] California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf.

[2] South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve

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Locating jobs closer to residential areas can have significant environmental benefits. As the California Planning Roundtable noted in 2008:

> People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.[3]

A4-7

Moreover, local hire mandates and skill-training are critical facets of a strategy to reduce vehicle miles traveled (VMT). As planning experts Robert Cervero and Michael Duncan have noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions given that the skill requirements of available local jobs must match those held by local residents.[4] Some municipalities have even tied local hire and other workforce policies to local development permits to address transportation issues. Cervero and Duncan note that:

> In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing. The city's First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

A4-8

Recently, the State of California verified its commitment towards workforce development through the Affordable Housing and High Road Jobs Act of 2022,

A4-9

Supporting Budget Actions, *available at* http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10.

[3] California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, *available at* https://cproundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf

[4] Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? Journal of the American Planning Association 72 (4), 475-490, 482, *available at* http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf.

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otherwise known as Assembly Bill No. 2011 ("**AB2011**"). AB2011 amended the Planning and Zoning Law to allow ministerial, by-right approval for projects being built alongside commercial corridors that meet affordability and labor requirements.

The City should consider utilizing local workforce policies and requirements to benefit the local area economically and to mitigate greenhouse gas, improve air quality, and reduce transportation impacts.

A4-9

II. THE CITY SHOULD INCORPORATE LANGUAGE IMPOSING TRAINING REQUIREMENTS FOR CONSTRUCTION ACTIVITIES TO PREVENT COMMUNITY SPREAD OF COVID-19 AND OTHER INFECTIOUS DISEASES INTO THE GP.

Construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupations Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.[5]

Western Carpenters recommend that the City adopt additional requirements to mitigate public health risks from various residential, commercial and mixed-use development construction activities. Western Carpenters requests that the City require safe on-site construction work practices as well as training and certification for any construction workers on residential, commercial and mixed-use developments within the SP area.

A4-10

In particular, based upon Western Carpenters' experience with safe construction site work practices, Western Carpenters recommends that the City require that while construction activities are being conducted within the SP area ("**Project Site**"):

Construction Site Design:

- The Project Site will be limited to two controlled entry points.
- Entry points will have temperature screening technicians taking temperature readings when the entry point is open.

[5] Santa Clara County Public Health (June 12, 2020) COVID-19 CASES AT CONSTRUCTION SITES HIGHLIGHT NEED FOR CONTINUED VIGILANCE IN SECTORS THAT HAVE REOPENED, *available at* https://www.sccgov.org/sites/covid19/Pages/press-release-06-12-2020-cases-at-construction-sites.aspx.

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- The Temperature Screening Site Plan shows details regarding access to the Project Site and Project Site logistics for conducting temperature screening.
- A 48-hour advance notice will be provided to all trades prior to the first day of temperature screening.
- The perimeter fence directly adjacent to the entry points will be clearly marked indicating the appropriate 6-foot social distancing position for when you approach the screening area. Please reference the Apex temperature screening site map for additional details.
- There will be clear signage posted at the project site directing you through temperature screening.
- Provide hand washing stations throughout the construction site.

Testing Procedures:

A4-10

- The temperature screening being used are non-contact devices.
- Temperature readings will not be recorded.
- Personnel will be screened upon entering the testing center and should only take 1-2 seconds per individual.
- Hard hats, head coverings, sweat, dirt, sunscreen or any other cosmetics must be removed on the forehead before temperature screening.
- Anyone who refuses to submit to a temperature screening or does not answer the health screening questions will be refused access to the Project Site.
- Screening will be performed at both entrances from 5:30 am to 7:30 am.; main gate [ZONE 1] and personnel gate [ZONE 2]
- After 7:30 am only the main gate entrance [ZONE 1] will continue to be used for temperature testing for anybody gaining entry to the project site such as returning personnel, deliveries, and visitors.

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- If the digital thermometer displays a temperature reading above 100.0 degrees Fahrenheit, a second reading will be taken to verify an accurate reading.
- If the second reading confirms an elevated temperature, DHS will instruct the individual that he/she will not be allowed to enter the Project Site. DHS will also instruct the individual to promptly notify his/her supervisor and his/her human resources (HR) representative and provide them with a copy of Annex A.

Planning

- Require the development of an Infectious Disease Preparedness and Response Plan that will include basic infection prevention measures (requiring the use of personal protection equipment), policies and procedures for prompt identification and isolation of sick individuals, social distancing (prohibiting gatherings of no more than 10 people including all-hands meetings and all-hands lunches) communication and training and workplace controls that meet standards that may be promulgated by the Center for Disease Control, Occupational Safety and Health Administration, Cal/OSHA, California Department of Public Health or applicable local public health agencies.[6]

A4-10

The United Brotherhood of Carpenters and Carpenters International Training Fund has developed COVID-19 Training and Certification to ensure that Carpenter union members and apprentices conduct safe work practices. The City should require that all construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at the Project Site.

Western Carpenters has also developed a rigorous Infection Control Risk Assessment ("**ICRA**") training program to ensure it delivers a workforce that understands how to identify and control infection risks by implementing protocols to protect themselves

[6] *See also* The Center for Construction Research and Training, North America's Building Trades Unions (April 27 2020) NABTU and CPWR COVIC-19 Standards for U.S Constructions Sites, *available at* https://www.cpwr.com/sites/default/files/NABTU_CPWR_Standards_COVID-19.pdf; Los Angeles County Department of Public Works (2020) Guidelines for Construction Sites During COVID-19 Pandemic, *available at* https://dpw.lacounty.gov/building-and-safety/docs/pw_guidelines-construction-sites.pdf.

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and all others during renovation and construction projects in healthcare environments.[7]

ICRA protocols are intended to contain pathogens, control airflow, and protect patients during the construction, maintenance and renovation of healthcare facilities. ICRA protocols prevent cross contamination, minimizing the risk of secondary infections in patients at hospital facilities.

A4-10

The City should incorporate language requiring the residential developments related to the SP be built using a workforce trained in ICRA protocols.

III. THE PROJECT WOULD BE APPROVED IN VIOLATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

A. Background Concerning the California Environmental Quality Act

The California Environmental Quality Act is a California statute designed to inform decision-makers and the public about the potential significant environmental effects of a project. 14 California Code of Regulations ("**CEQA Guidelines**"), § 15002, subd. (a)(1).[8] At its core, its purpose is to "inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made." *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.

1. Background Concerning Environmental Impact Reports

A4-11

CEQA directs public agencies to avoid or reduce environmental damage, when possible, by requiring alternatives or mitigation measures. CEQA Guidelines, § 15002, subds. (a)(2)-(3); see also *Berkeley Keep Jets Over the Bay Committee v. Board of Port Comes* (2001) 91 Cal.App.4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553; *Laurel Heights Improvement Assn.*, 47 Cal.3d at p. 400. The EIR serves to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to "identify ways that environmental damage can be avoided or significantly reduced." CEQA Guidelines, § 15002, subd. (a)(2). If the project has a significant effect on the

[7] For details concerning Western Carpenters' ICRA training program, *see* https://icrahealthcare.com/.

[8] The CEQA Guidelines, codified in Title 14 of the California Code of Regulations, section 15000 et seq., are regulatory guidelines promulgated by the state Natural Resources Agency for the implementation of CEQA. Cal. Pub. Res. Code, § 21083. The CEQA Guidelines are given "great weight in interpreting CEQA except when . . . clearly unauthorized or erroneous." *Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 217.

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environment, the agency may approve the project only upon finding that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns" specified in Public Resources Code section 21081. See CEQA Guidelines, § 15092, subds. (b)(2)(A)-(B).

While the courts review an EIR using an 'abuse of discretion' standard, the reviewing court is not to *uncritically* rely on every study or analysis presented by a project proponent in support of its position. *Berkeley Jets*, 91 Cal.App.4th at p. 1355 (quoting *Laurel Heights Improvement Assn.*, 47 Cal.3d at pp. 391, 409 fn. 12) (internal quotations omitted). A clearly inadequate or unsupported study is entitled to no judicial deference. *Id.* Drawing this line and determining whether the EIR complies with CEQA's information disclosure requirements presents a question of law subject to independent review by the courts. *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 515; *Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal.App.4th 48, 102, 131. As the court stated in *Berkeley Jets*, prejudicial abuse of discretion occurs if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process. 91 Cal.App.4th at p. 1355 (internal quotations omitted).

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. *Communities for a Better Environment v. Richmond* (2010) 184 Cal.App.4th 70, 80 (quoting *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 449-450). The EIR's function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been considered. *Id.* For the EIR to serve these goals it must present information so that the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. *Id.*

A4-11

A strong presumption in favor of requiring preparation of an EIR is built into CEQA. This presumption is reflected in what is known as the "fair argument" standard under which an EIR must be prepared whenever substantial evidence in the record supports a fair argument that a project may have a significant effect on the environment. *Quail*

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Botanical Gardens Found., Inc. v. City of Encinitas (1994) 29 Cal.App.4th 1597, 1602; *Friends of "B" St.* v. *City of Hayward* (1980) 106 Cal.3d 988, 1002.

The fair argument test stems from the statutory mandate that an EIR be prepared for any project that "may have a significant effect on the environment." PRC, § 21151; see *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.App.3d 68, 75; accord *Jensen v. City of Santa Rosa* (2018) 23 Cal.App.5th 877, 884. Under this test, if a proposed project is not exempt and may cause a significant effect on the environment, the lead agency must prepare an EIR. PRC, §§ 21100 (a), 21151; CEQA Guidelines, § 15064 (a)(1), (f)(1). An EIR may be dispensed with only if the lead agency finds no substantial evidence in the initial study or elsewhere in the record that the project may have a significant effect on the environment. *Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 785. In such a situation, the agency must adopt a negative declaration. PRC, § 21080, subd. (c)(1); CEQA Guidelines, §§ 15063 (b)(2), 15064(f)(3).

"Significant effect upon the environment" is defined as "a substantial or potentially substantial adverse change in the environment." PRC, § 21068; CEQA Guidelines, § 15382. A project may have a significant effect on the environment if there is a reasonable probability that it will result in a significant impact. *No Oil, Inc.*, 13 Cal.3d at p. 83 fn. 16; see *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 309. If any aspect of the project may result in a significant impact on the environment, an EIR must be prepared even if the overall effect of the project is beneficial. CEQA Guidelines, § 15063(b)(1); see *County Sanitation Dist. No. 2 v. County of Kern* (2005) 127 Cal.App.4th 1544, 1580.

A4-11

This standard sets a "low threshold" for preparation of an EIR. *Consolidated Irrigation Dist. v. City of Selma* (2012) 204 Cal.App.4th 187, 207; *Nelson v. County of Kern* (2010) 190 Cal.App.4th 252; *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928; *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572, 580; *Citizen Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 754; *Sundstrom*, 202 Cal.App.3d at p. 310. If substantial evidence in the record supports a fair argument that the project may have a significant environmental effect, the lead agency must prepare an EIR even if other substantial evidence before it indicates the project will have no significant effect. See *Jensen*, 23 Cal.App.5th at p. 886; *Clews Land & Livestock v. City of San Diego* (2017) 19 Cal.App.5th 161, 183; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150; *Brentwood Assn. for No Drilling, Inc. v. City of*

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Los Angeles (1982) 134 Cal.App.3d 491; *Friends of "B" St.*, 106 Cal.App.3d 988; CEQA Guidelines, § 15064(f)(1).

A4-11

B. The Project May Have a Significant Hazards Impact

The Project may have a significant hazards impact. The DEIR provides two Phase I Environmental Site Assessments ("**ESA**" or "**Phase I ESA**") prepared by Partner Engineering and Science, Inc., with a January 7, 2021 ESA included in Appendix 4.6-2 concerning the Project Site's *southern* portion (APN 6106-030-017) ("**South Phase I ESA**"), and a July 13, 2021 ESA included in Appendix 4.6-1 concerning the Project Site's *northern* portion (APNs 6106-030-011, 6106-030-015, and 6106-030-016) ("**North Phase I ESA**"). (DEIR, 4.6-1.) However, the Phase I ESAs are outdated and manifestly incomplete.

1. *Background on Phase I, II, and III Environmental Site Assessments*

The preparation of a Phase I ESA is "to research the current and historical uses of a property as part of a commercial real estate transaction" and "to assess if current or historical property uses have impacted the soil or groundwater beneath the property and could pose a threat to the environment and/or human health."[9]

A4-12

As explained by experts in the field of ESA:

> The primary difference between Phase I and Phase II site assessment lies in the scopes of work of the assessment. A Phase I primarily assesses the likelihood that a site is contaminated through visual observations, historical use reviews and regulatory records, while a Phase II assesses whether contamination is in fact present. Here are the components of each.
>
> **Phase I Environmental Site Assessment**
>
> Review of records, to discover whether the site has been used for potentially hazardous purposes in the past.
>
> Visual inspection of the property's current condition, with comparison to site plans.

[9] Jenny Redlin, REPA, Partner Engineering and Science, Inc., *What is a Phase I Environmental Site Assessment* (Apr. 9, 2018), *available at* https://www.partneresi.com/resources/articles/what-is-a-phase-i-environmental-site-assessment/#:~:text=A%20Phase%20I%20Environmental%20Site%20Assessment%2C%20commonly%20referred%20to%20as,a%20commercial%20real%20estate%20transaction. (accessed on Jan. 18, 2024).

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Visual inspection of adjoining properties.

Interviews with current property owners, operators, occupants, and local government officials.

Goal: Assess likelihood that property has been contaminated.

Phase II Environmental Site Assessment

Soil and water sampling for signs of contamination.

Comparison of lab results with local, state, and federal regulatory guidelines.

May include inspection of interior spaces for mold, radon, or lead paint.

May include identification of wetlands, ecological resources, or endangered species that may prevent certain land uses.

Goal: Assess actual presence of environmental contaminants.

Phase III Site Assessment

A Phase III Site Assessment is called for only when contamination has been identified. A Phase III Assessment determines the extent of the contamination, both horizontally and vertically, and forms the basis for preparing a remediation plan, and estimation of the cost for remediation. Buyers and lenders use the Phase III Assessment as a negotiating tool with the sellers to ensure the property they purchase yields the benefit they expect.[10]

A4-12

Standards for performing a Phase I ESA have been established by the US Environmental Protection Agency ("**EPA**") and the American Society for Testing and Materials Standards ("**ASTM**").[11]

2. The Phase I ESAs are Inadequate and Outdated

As a preliminary matter, the Phase I ESAs were prepared in January and July of 2021, approximately three (3) years ago. In addition, given that the conditions of the Project Site and its surrounding area may have changed since 2021, the ESAs are now outdated.

A4-13

[10] Robert B. Greene, Phase I versus Phase II Environmental Site Assessment *available at* https://www.gleassociates.com/phase-i-versus-phase-ii-environmental-site-assessments/ (accessed on Jan. 18. 2024.)
[11] *See*, https://www.astm.org/e1527-21.html (last updated on Dec. 21, 2021.)

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Even further, and as detailed further below, the ESAs were conducted in 2021, which was prior to the EPA's subsequent adoption of the newer ASTM E1527-21 ("**ASTM E1527-21**"), thereby replacing the older and less stringent ASTM E1527-13 ("**ASTM E1527-13**"). Accordingly, the Phase I ESAs rely upon E1527-13 (DEIR Appendix 4.6-1, p. 4, Appendix 4.6-2, p. 3). However, it is critical that the Phase I ESAs implement the newer ASTM E1527-13 standard for identifying Recognized Environmental Conditions ("**REC**"), as discussed further below.

Therefore, the DEIR must be revised and recirculated to include new Phase I ESAs and, moreover, a new Phase II ESA, that adequately evaluate the Project's potential hazards impact and that apply the more recent and more stringent E1527-21 standard.

3. The Phase I ESA Improperly Relies on ASTM 1527-13 While the EPA Recently Adopted and Validated ASTM 1527-21

As noted above, the Phase I ESAs are incomplete and inaccurate for purposes of CEQA because they only use the obsolete ASTM E1527-13, while the nonprofit organization ASTM International, founded as the American Society for Testing and Materials, has long adopted its more stringent ASTM Standard Practice E1527-21, which is in fact more rigorous than its predecessor E1527-13. Because Phase I ESAs rely upon the E1527-13 methodology recommended by ASTM International to identify Recognized Environmental Conditions in connection with the Project Site, they fail to adequately disclose the potential RECs on the Project Site and, as related, the Project-specific potential hazards and hazardous impacts and adverse impacts on human beings.

A4-13

Specifically,

- "Under **ASTM E1527-13**, a REC is defined as the **presence** or **likely presence** of any **hazardous substances** or petroleum products in, on, or at a property: (1) due to **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.
- Under **ASTM E1527-21**, a REC means (1) the **presence** of hazardous substances or petroleum due to a release to the environment; (2) the ***likely* presence** of hazardous substances or petroleum products due to a ***likely* release** to the environment; or

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> (3) the presence of hazardous substances or petroleum products under conditions that pose a material threat of a future release to the environment. Further, the new standard provides clarifying discussion notes and examples to assist the environmental professional in applying the definition. Together, the new definition and interpretations direct a consultant to rely on the environmental professional's experience regarding the ***likelihood*** of certain conditions resulting in releases, such as the long term operation of a dry cleaner, instead of discounting that professional experience based on the lack of current "indications of a release."[12] (ital. original, bold emphasis added.)

Accordingly, as shown above in the E1527-21 definition of a REC, the use of phrases, "likely presence" or "likely release" are more stringent than the REC definition in E1527-13, which leaves out the potential impact for purposes of CEQA. The newer E1527-21, on the other hand, encompasses those concerns. Since the Phase I ESAs do not implement E1527-21, they could fail to account for other potential RECs at the Project Site.

A4-13

Here, for example, the North Phase I ESA directly admits the Project Site is currently occupied by three (3) buildings, Buildings A-C, which were constructed in 1963, 1978, and 1957, respectively (DEIR Appendix 4.6-1, p. ii.) and that, based on the historical and regulatory sources, the property was occupied by "various light-industrial tenants," which included "two machine shops, an auto body repair operation, an engine repair business (FM Engine), a cabinet maker, and several manufacturing entities, all operations that would have used or stored hazardous substances." (*Id.* at p. iii.) The North Phase I ESA further notes that because some of the manufacturing tenant listings predated 1980, there is no documentation regarding "historical hazardous substance use, storage, or disposal practices." (*Id.*) The North Phase I ESA even further notes that there were some paint booths historically identified in connection with prior tenants and usage of solvents. (Id.)

[12] Quarles, *EPA Approves ASTM E1527-21 Phase I ESA Standard for All Appropriate Inquiry* (Mar. 29, 2022), *available at* https://www.quarles.com/publications/epa-approves-astm-e1527-21-phase-i-esa-standard-for-all-appropriate-inquiry/ (accessed on Jan. 18, 2024.)

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Finally, the North Phase I ESA concludes that

> Partner understands the subject property is planned for residential redevelopment. Based on the plan to redevelop this site with a sensitive receptor (i.e. residential), the long-term duration of use/occupancy by businesses that used, stored and disposed of hazardous substances (60+ years), and lack of any subsurface data, the long-term light-industrial usage of the subject property is considered to be a REC.

(Appendix 4.6-1, *supra.*)

A4-13

Therefore, the North Phase I ESA identifies a REC at the Project Site and acknowledges that there will be residential use at the Project Site. Accordingly, it is imperative that the City adequately addresses this in the EIR and mitigates the significant hazards impacts. As such, the DEIR should be revised and recirculated to include updated Phase I ESAs using the more stringent ASTM E1527-21 standard to account for any other potential RECs at the Project Site that might not have been accounted for under the previous ASTM E1527-13 standard.

4. *The Project May Have Significant Hazards Impacts, as Well as Adverse Impacts on Human Beings Requiring Mandatory Findings of Significance*

Under CEQA Guidelines section 15065, subdivision (a)(1)(4), 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 […] (4) The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly."

A4-14

The North Phase I ESA expressly confirms that, due to the age of the buildings situated on the Project Site, there is potential for the presence of asbestos-containing materials ("**ACM**") and/or lead-based paint ("**LBP**") (DEIR Appendix 4.6-1, p. iv.)

It is undisputed that both *lead* and *asbestos* are dangerous to people's health. While intact asbestos by itself may not be hazardous, damaged or disturbed asbestos may release asbestos fibers and become a health hazard.[13] Per Occupational Health and Safety Administration's ("**OSHA**") description:

[13] *See*, https://www.cpsc.gov/safety-education/safety-guides/home/asbestos-home; *see also*, medical conditions associated with asbestos: https://www.atsdr.cdc.gov/asbestos/health_effects_asbestos.html

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What are the hazards of asbestos?

Asbestos is well recognized as a health hazard and its use is now highly regulated by both OSHA and EPA. Asbestos fibers associated with these health risks are too small to be seen with the naked eye. Breathing asbestos fibers can cause a buildup of scar-like tissue in the lungs called asbestosis and result in loss of lung function that often progresses to disability and death. Asbestos also causes cancer of the lung and other diseases such as mesothelioma of the pleura which is a fatal malignant tumor of the membrane lining the cavity of the lung or stomach. Epidemiologic evidence has increasingly shown that all asbestos fiber types, including the most commonly used form of asbestos, chrysotile, causes mesothelioma in humans.

OSHA's Definition of "Asbestos" on its Official Website.[14]

Similarly, *lead* is dangerous to people and their families. Per OSHA's report:

Lead has been poisoning workers for thousands of years. Lead can damage the central nervous system, cardiovascular system, reproductive system, hematological system, and kidneys. When absorbed into the body in high enough doses, lead can be toxic.

In addition, workers' lead exposure can harm their children's development. Short-term (acute) overexposure–as short as days--can cause acute encephalopathy, a condition affecting the brain that develops quickly into seizures, coma, and death from cardiorespiratory arrest.

Short-term occupational exposures of this type are highly unusual but not impossible. Extended, long-term (chronic) overexposure can result in severe damage to the central nervous system, particularly the brain. It can also damage the blood-forming, urinary, and reproductive systems. There is no sharp dividing line between rapidly developing acute effects of lead and chronic effects that take longer to develop.[15]

A4-14

[14] *See,* United States Department of Labor, *Asbestos, available at* https://www.osha.gov/asbestos (accessed on Jan. 18, 2024.)
[15] See, OSHA Report, *Lead in Construction* (2004) p. 3, *available at* https://www.osha.gov/sites/default/files/publications/osha3142.pdf (accessed on Jan. 18, 2024.)

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OSHA also documents the adverse effects of lead on people's reproductive health:

> REPRODUCTIVE RISKS
>
> Lead is toxic to both male and female reproductive systems. Lead can alter the structure of sperm cells and there is evidence of miscarriage and stillbirth in women exposed to lead or whose partners have been exposed. Children born to parents who were exposed to excess lead levels are more likely to have birth defects, mental retardation, or behavioral disorders or to die during the first year of childhood.
>
> Workers who desire medical advice about reproductive issues related to lead should contact qualified medical personnel to arrange for a job evaluation and medical followup--particularly if they are pregnant or actively seeking to have a child. Employers whose employees may be exposed to lead and who have been contacted by employees with concerns about reproductive issues must make medical examinations and consultations available.[16]

A4-14

Therefore, the Project may also cause a significant hazard impact due to the demolition hazards, including impacts to human beings and sensitive receptors, air, and water quality. Thus, under CEQA Guidelines section 15065(a)(1)(4), the City shall make mandatory findings of significance and order that the EIR be revised and recirculated to thoroughly assess the potential hazards impact of the Project and its required demolition activities and potential handling of asbestos and lead-based paint and mitigate those impacts to a level of insignificance.

C. The Project May Have a Significant Noise Impact

There is substantial evidence the Project will have a significant noise impact. The DEIR directly admits that "[t]he Project's construction-related noise impacts would be significant and unavoidable, despite implementation of mitigation concerning equipment and a temporary noise barrier . . ." (DEIR, p. 6-19.) The DEIR further proposes various noise mitigation measures, including implementation of a temporary and impermeable sound barrier of ten feet (10) high with a minimum 12dBA noise reduction and minimum Sound Transmission Class rating of STC-25, along with use of large brass construction equipment a minimum of forty-five (45) feet away from the

A4-15

[16] *Id.* at p. 4.

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off-site residence adjacent to the Project Site (i.e. MM NOI-1 and MM NOI-2), however, the DEIR still concludes that even with implementation of the noise mitigation measures, there will be a significant and unavoidable impact. (*Id.* at ES-16.) However, given that the DEIR identifies numerous noise-sensitive receptors near the Project Site, including the residential uses to the north, south, and west, it is imperative that the City require further mitigation be implemented to reduce the impacts to a level of insignificance. A4-15

Accordingly, the City should require that the DEIR be revised and recirculated to adequately mitigate the Project's significant noise impacts.

IV. CONCLUSION

Based on the foregoing, the City should require that the DEIR be revised and recirculated pursuant to CEQA to address the comments and issues identified in this letter. Similarly, the City should require additional environmental studies be performed to comply with CEQA and other state laws. A4-16

Sincerely,

Stephanie Papayanis

Stephanie Papayanis
Attorneys for Western States
Regional Council of Carpenters

Attached:

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A); A4-17

Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B); and

Air Quality and GHG Expert Matt Hagemann CV (Exhibit C).

RESPONSE TO COMMENT LETTER NO. A4

Stephanie Papayanis, Attorney
Western States Regional Council of Carpenters
January 19, 2024

A4-1 This comment is introductory in nature and states that the Law Office of Mitchell M. Tsai has submitted comments on behalf of the Western States Regional Council of Carpenters. No further response is necessary.

A4-2 The comment states that the commenter reserves the right to supplement the comments and incorporates by reference all comments regarding the EIR. The comment is noted. No further response is necessary.

A4-3 The commenter requests receipt of further notices referring to or related to the Project. The City acknowledges the commenter's request and will include the commenter on the mailing list for future Project-related CEQA notices. No further response is necessary.

A4-4 The commenter requests that the City require the Project to be built using local workers who have graduated from a specified apprenticeship program.

The Project includes approval of a Development Agreement which includes a requirement that the Applicant implement a local hiring policy as specified in Development Agreement Exhibit D as a public benefit. The commenter does not explain or provide any evidence, let alone substantial evidence, as to how using labor that has graduated from a state-approved apprenticeship training program, or who are registered apprentices in such a program, creates any environmental benefits. The commenter's request does not address the DEIR's adequacy or identify an environmental issue. As such, no further response is necessary.

A4-5 The commenter suggests that using local workers (i.e., residing within 10.0 miles of the Project site) would reduce VMT, reduce greenhouse gas emissions (GHG), improve jobs/housing balance, and the Project's economic performance. See Response A4-4, noting that the Development Agreement already requires utilizing a local workforce where possible as a public benefit. Additionally, see Responses A4-6 thru A4-8. The commenter also suggests that local hire provisions can improve the positive economic impact of the Specific Plan. Economics are not a CEQA issue. Nonetheless, it is noted that Development Agreement Exhibit D also includes a "buy local" provision.

A4-6
Thru
A4-8

The commenter references an attachment to the comment letter from Soil Water Air Protection Enterprise (SWAPE) ("SWAPE Letter"; March 8, 2021) and refers the reader to the SWAPE Letter for commentary and analysis related to local hire requirements related to GHG modeling. This commenter alleges that workforce requirements promote the development of skilled trades that yield sustainable economic development. The comment states that labor should be considered an investment and well-trained workers are key to delivering emissions reductions and moving California closer to its climate targets.

This commenter also alleges that workforce policies have significant environmental benefits and that they improve an area's jobs-housing balance, and decrease the amount and length of job commutes and the associated greenhouse gas emissions. The commenter refers to a 2021 South Coast Air Quality Management District statement that the use of a local state-certified apprenticeship program can result in air pollutant reductions. This comment alleges that local hire mandates and skill training are critical facets of a strategy to reduce VMT. The commenter also references a 2006 article from the Journal of the American Planning Association to note the approach to balancing jobs and housing is to create local jobs rather than to develop new housing.

See Response A4-4, noting that the Development Agreement already requires utilizing a local workforce where possible as a public benefit. Additionally, as mentioned above, sustainable economic development is not an environmental issue, as such no further response is necessary.

The commenter included a letter from SWAPE dated March 8, 2021 (which predates the NOP's release), which discusses GHG emissions associated with trip lengths for construction workers traveling to a job site. The SWAPE letter provided calculations for GHG emissions reductions resulting from local hire provisions being applied to the referenced project's construction. The SWAPE letter concludes that if a local hire provision with a 10.0-mile radius were implemented, the GHG emissions associated with the Project's construction would decrease. The SWAPE letter states that it ran a model "reducing all worker trip lengths to 10 miles…." Therefore, the SWAPE letter assumes that a local hire program would produce 100 percent local residents as a project's construction workforce while being located within 10.0 miles of a project site. It is noted that the SWAPE letter and the calculations provided used data related to a different project in a separate jurisdiction, the Village South Specific Plan in the City of Claremont, respectively. The calculations also use prior versions of CalEEMod

and EMFAC. Therefore, the calculations do not pertain to the Project and are not based on correct modeling.

The commenter also relies on a 2008 California Roundtable discussion noting that people who live and work in the same jurisdiction could include potential reductions in VMT and vehicle hours traveled.

The DEIR concluded that the Project would result in less than significant impacts concerning GHG emissions and VMT and therefore no further mitigation would be required; see **DEIR Section 4.5: Greenhouse Gas Emissions** and **DEIR Section 4.13: Transportation**, respectively. As impacts related to GHG and VMT are less than significant, there is no obligation pursuant to CEQA to further reduce these potential impacts. Additionally, the commenter does not provide any substantial evidence (only conclusory opinions) to dispute the DEIR's analysis to demonstrate that local hire mandates and skill-training policies would specifically reduce VMT. These comments do not relate to the DEIR's adequacy or content, do not provide new information or evidence related to the DEIR's analysis, and do not affect the DEIR's completed analysis or conclusions.

A4-9 This comment provides background information concerning the Affordable Housing and High Road Jobs Act of 2022 and reiterates its comments that the City should consider utilizing local workforce policies to benefit the local area economically and to mitigate GHG emissions, improve air quality, and reduce transportation impacts. The commenter's opinions are noted; see Response A4-4 thru A4-8.

A4-10 The comment suggests the incorporation of training requirements for construction activities to prevent community spread of COVID-19 and other infectious diseases during Project construction and notes that such requirements include construction site design requirements, testing procedures, and infectious disease preparedness and response timing.

COVID-19 is a public health issue, not a Project-related CEQA effect. State and local governments implement regulations and enforce safe working conditions for construction sites. Project construction activities would be subject to compliance with all applicable safety regulations if COVID-19 persists at the commencement of construction of any Project phase. Construction workers would be required to comply with any guidelines and requirements issued by the State of California, the County of Los Angeles, and the City of Gardena, as well as any additional safety measures required by the Project site's construction manager. This comment does not relate to the DEIR's adequacy or content, does not provide new information or evidence

related to the DEIR's analysis, and does not affect the DEIR's completed analysis or conclusions. No further response is necessary.

A4-11 This comment provides background to CEQA and the fair argument test regarding an EIR's analysis. No further response is necessary.

A4-12 This comment provides a background to the standards and purposes of Phase I, II, and III ESAs and questions the adequacy of the DEIR's analysis of hazardous materials due to the Phase I ESA's using an older assessment standard.

ASTM E1527-13 already includes "likely presence" as a test, as the commenter notes on page 13. Furthermore, the use of older ASTM standard would not change conclusion. As the commenter notes, the site was identified as a REC, so the analysis and conclusion (and thus mitigation) would remain unchanged with an updated Phase I. As analyzed in **DEIR Impact 4.6-1**, the Project would comply with COA HAZ-1, which requires an asbestos survey prior to demolition and COA HAZ-2 which requires independent evaluation for lead-based paint (LBP) to address potential impacts to construction workers during demolition of structures which could include asbestos or LBP. Furthermore, the Project would be required to prepare a Construction Management Plan per MM HAZ-1, which would mitigate construction impacts from undocumented contaminants to less than significant.

A4-13 This comment questions the relevancy of the DEIR's Phase I ESA analysis as they are outdated and use older, less stringent standards rather than the newer and current standard (ASTM-E1627-13 vs. ASTM E1527-21).

Please see Response A4-12 above.

A4-14 This comment notes that there is potential for the presence of asbestos-containing materials (ACM) and/or LBP citing the North Phase I ESA (**DEIR Appendix 4.6-1**). The comment further discusses the harms of ACM and LBP to human health and concludes that these risks should be considered significant and concludes that the DEIR should be revised and recirculated "to thoroughly assess the potential hazards impact of the Project and its required demolition activities and potential handling of asbestos and lead-based paint and mitigate those impacts to a level of insignificance."

As discussed in **DEIR Section 4.6**, the Phase I ESA notes the potential presence of ACM and LBP and designates existing buildings as a REC. However, as discussed in **DEIR Section 4.6**, these potential impacts would be addressed by COA HAZ-1 and COA HAZ-2, which would require an asbestos survey prior to demolition and LBP testing if paint

is separated from building materials during demolition, thereby reducing the potential impacts to less than significant. No further response is necessary.

A4-15 The comment cites the DEIR's construction nose analysis and alleges MM NOI-1 and NOI-2 are insufficient in addressing noise impacts concerning the Project. The comment suggests the City revise and recirculate the DEIR to "adequately mitigate the Project's significant noise impacts," but provides no suggestions or mitigation measures to reduce the impact to less than significant.

As discussed in **DEIR Section 4.9: Noise**, noise impacts from construction would be considered significant and unavoidable. As noted in **DEIR Section 4.9**, the Project's construction activities would be exempt from the City's noise standards with certain restrictions pursuant to Gardena Municipal Code (GMC) § 8.336.080 (construction activities would not take place during City-set days/hours). However, construction noise levels have been conservatively analyzed to the City's operational noise standards. Mitigation measures NOI-1 and NOI-2 would reduce construction noise by establishing a temporary sound barrier and requiring all power construction equipment (including combustion engines), fixed or mobile to be equipped and maintained with state-of-the-art noise shielding and muffling devices. Nonetheless, impacts would remain significant and unavoidable. The commenter does not provide any suggested mitigation measures which could reduce construction noise below the operational noise standards. As discussed in **DEIR Section 6.5: Alternatives Considered but Rejected**, unless demolition is avoided (and the existing structures remain), no modification of the Project would avoid the Project's significant unavoidable construction noise impacts. This was rejected as infeasible, as it would preclude development throughout the majority of the Project site.

A4-16 The comment summarizes and concludes the letter by suggesting the City should revise and recirculate the DEIR to address "comments and issues identified in this letter." Further, the comment suggests the City "should require additional environmental studies be performed to comply with CEQA and other state laws."

Please see Responses A4.4 - A4.15 above. No further response is necessary.

A4-17 This comment includes attachments referenced in the comment letter, including a March 8, 2021 SWAPE letter to Mitchem M. Tsai RE: Local Hire Requirements and Considerations for Greenhouse Gas Modeling and the professional work experiences for two experts (on unrelated projects). As such, no further response is necessary.

Letter A5 – Tish McCauley
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Normandie Crossing Objection

Tish McCauley <tishmccauley@gmail.com>
Sun 2/25/2024 12:26 PM
To:Amanda Acuna <AAcuna@cityofgardena.org>

Caution! This message was sent from outside your organization.

Hi Angela,
I'm sorry for accidentally sending the incomplete email a minute ago.

Thanks for accepting and presenting these concerns on my behalf.
While I understand the need to add housing and provide for low-income housing, I am vehemently opposed to this project for the following reasons: A5-1

1) I live off Normandie and 170th and can attest that the traffic on Normandie is almost gridlocked between 182nd and Redondo Beach Blvd.
A) It is particularly difficult to travel during school drop-off and pickup times M-F.
B) 170th has become a speedway shortcut for locals to avoid Artesia on the way out of Gardena, and adding 403 residences will only increase the short-cut traffic on a residential street.
C) There is another residential construction project that was not considered in the traffic study, (since it isn't completed yet), traffic at Normanie and Magnolia. A5-2

2) Allowing for a 7-story residential building within an established, quiet neighborhood sets a dangerous precedent for future development. We are talking about a building that is as tall as Gardena Memorial Hospital! Even the new townhomes at 168th and Normandie staggered their 2-and3-story homes to "fit" into the style of the surrounding neighborhood. A5-3

3) Most homes that will be east of the 7-story building don't need air-conditioning due to the ocean breeze's benefit. A wall of apartments will eliminate that breeze for long-term homeowners. A5-4

4) Residential parking is already congested, and adding hundreds of additional cars will only exacerbate the frustration that current residents feel, especially on street-sweeping days! A5-5

5) The map on the planning site shows that the project is bordered by "Brighton Way" - which is an alley, not an actual street. At the developer's meeting, they mentioned that the alley would be used as an entrance/exit. A5-6

I'm looking forward to being notified of the planning and council meetings that will address this

project. Thanks

Tish McCauley

RESPONSE TO COMMENT LETTER NO. A5
Tish McCauley, Resident
February 25, 2024

A5-1 This comment is introductory in nature and does not address an environmental topic. As such, no response is required.

A5-2 This comment notes concerns with existing traffic volumes on South Normandie Avenue and how Project trips would affect these traffic volumes. Specifically, the commenter notes existing traffic congestion during school drop-off and pick-up times Monday through Friday. The Project would increase trips on South Normandie Avenue. However, the Project has been designed to minimize increased trips through TDM strategies and ITS applications. These include features such as unbundled parking, additional bicycle parking, and a one-month free transit pass to help renters become acquainted with public transit and pre-leasing for area employees.

The commenter is concerned that Project traffic would use West 170th Street to avoid congestion on South Normandie Avenue. The townhome component has an entry/exit onto West 170th Street as well as West 169th Street. The apartment component does not have access to West 170th Street. Thus, it is likely only townhome residents would use West 170th Street. Additionally, the townhome component also has an entry/exit on West 169th Street, thus, only the townhomes closer to West 170th Street would use this entry/exit.

This comment also notes another residential development on South Normandie Avenue and Magnolia Avenue. As shown on **DEIR Appendix 4.13-2** Figure 3 and listed in **DEIR Appendix 4.13-2** Table 4, this future development is analyzed as Related Project #6.

A5-3 This comment notes concerns with mass and height. The Project has been designed to buffer surrounding land uses from the apartment component by including three-story townhomes at the perimeter of the Project site, adjacent to existing residential uses. There are already two-story residential uses and a multi-family development on West 169th Street north of the Project site, thus, the Project would be similar in character and use to surrounding land uses.

Additionally, in response to community feedback, the "Community Input" Alternative, which would reduce the apartment building height from seven to five above ground

stories, has been analyzed in **DEIR Section 6.0: Alternatives**; see **FEIR Section 3.0: Errata to the Draft EIR** for a complete description of the Community Input Alternative.

A5-4 This comment notes concerns with the apartment building height and breeze to residential uses east of the Project site. It is noted that South Normandie Avenue is east of the Project site and the apartment building would be more than 80 feet away from the residences to the east. Additionally, a single building is unlikely to interfere with breeze. Furthermore, breeze and air conditioning are not an environmental concern. Therefore, no further response is necessary.

A5-5 This comment notes concerns with street parking by Project residents on surrounding streets. The Project proposes 399 parking spaces for the apartment building and 160 parking spaces for the townhomes. Based on the provided parking and connection to surrounding public transit, it is not anticipated that Project residents would park on surrounding streets. Furthermore, regular street parking by Project residents would also be inconvenient, as Project residents would need to carry belongings to and from the Project site. Finally, parking is not an environmental concern, therefore, no further response is necessary.

A5-6 This comment notes the classification of Brighton Way as an alley. The DEIR already refers to this street as an alley throughout (see DEIR Page 2-1). Therefore, no further response is required. The comment also says that the alley would be used as an entrance/exit. However, the Conceptual Site Plan clearly shows the entrance and exits to the Project site are not through the alley.

Letter A6 – Keren Hwang

Page 1 of 1

Normandie Crossing/16911 Normandie

Keren Hwang <kerenhwang@yahoo.com>
Sun 2/18/2024 5:36 PM
To:City Council.web <CityCouncil.web@cityofgardena.org>;Amanda Acuna <AAcuna@cityofgardena.org>

Caution! This message was sent from outside your organization.

Hello City of Gardena,

A6-1 I am concerned about the development of the complexes on 16911 Normandie in Gardena. I understanding we need housing and I am concerned about increased traffic on Normandie which is only 2 lanes. However, I don't understand A6-2 why the buildings need to be such a behemoth. 7 stories high?! Are there any buildings in Gardena and/or surrounding cities with over 3 stories high? There should be a law against building so high in this neighborhood. And A6-3 let's not forget we still have earthquakes.

I oppose building something so high in Gardena.

Thank you.
Keren Hwang
Home Owner in Gardena, CA.

RESPONSE TO COMMENT LETTER NO. A6
Keren Hwang, Resident
February 18, 2024

A6-1 This comment states concern over traffic on South Normandie Avenue. As shown in **DEIR Appendix 4.13-2** Table 7, all intersections operate at acceptable levels of service except for the South Normandie Avenue at West 169th Street intersection. It is typical for minor street stop-controlled intersections to operate at lower levels of service. The commenter incorrectly states that South Normandie Avenue is two lanes. South Normandie Avenue is a four-lane street with left turn pockets to turn west at West 169th Street and to turn east at West 170th Street.

A6-2 This comment states concern over the apartment building height. A building of similar height is under construction at 12850 Crenshaw Boulevard, at the City's northwestern extent. Given the blighted condition of the existing site, redevelopment would improve the site's visual condition. Additionally, the Project's building heights would be consistent with the development standards in the proposed Normandie Crossing Specific Plan. For further discussion on building height, see Response A8-1.

A6-3 This comment states concern over earthquakes. As discussed in **DEIR Section 7**, the Project site is not within an Alquist-Priolo fault zone. Additionally, Project's Preliminary Geotechnical Investigation; see **DEIR Appendix 4.4-1: Preliminary Geotechnical Investigation**) was prepared and found that risk of surface fault rupture was low. The geotechnical report contains recommendations which the Applicant is required to follow in accordance with GMC § 18.42.200A. Therefore, no impact would occur and no mitigation was required.

Letter A7 – Kevin Collier
Page 1 of 1

From: Kevin Collier <kevin.collier@envieta.com>
Sent: Thursday, February 1, 2024 9:18 AM
To: Amanda Acuna <AAcuna@cityofgardena.org>
Subject: Comments on Normandie Crossing Specificc Plan

Caution! This message was sent from outside your organization.

Please clarify the details regarding EV charging parking spaces. The Draft EIR states that there are 40 vehicle charging spaces. The EIR also states that regulations require 10% of parking stalls to be EV capable, 25% to be EV ready, and 5% to be equipped with Level 2 EV chargers. Please clarify if the 40 spaces allocated for EV charging are just EV capable, or are the planned to have chargers installed and available.

A7-1

Please clarify the detailed information in the EIR regarding the number of parking spaces. The EIR states 195 spaces are provided in level 1, but lists only 135 standard spaces, 20 EV spaces, and 8 accessible spaces. The EIR states 204 spaces are provided in level 2, but lists 150 standard spaces and 20 EV spaces.

A7-2

During the Jan 31 community meeting the developers stated that parking spaces would be leased. The EIR only states that the parking spaces are not bundled with a specific apartment. The stated motivation for leasing parking spaces is to encourage the use of public transportation rather than using a personal vehicle. I am skeptical that leasing spaces would have this incentive, but rather would encourage tenants to park on surrounding streets. I think my skepticism is shared by many in the community. Please consider options to mitigate the incentive to park on local streets, such as:

- Issue street parking permits to residents of the surrounding neighborhood.
- Provide free garage parking to apartment tenants.
- Increase the number of parking spots with installed EV chargers to encourage off-street parking for owners of EVs.

A7-3

Kevin Collier

RESPONSE TO COMMENT LETTER NO. A7
Kevin Collier, Resident
February 1, 2024

A7-1 This comment requests clarification on the electric vehicle (EV) charging provided by the Project. In conformance with the Specific Plan standards and the latest Title 24 requirements, the apartment building would provide 20 stalls with EV chargers installed, 40 spaces that are EV capable with electrical panel space and load capacity, and 100 spaces that are EV ready with branch circuit, raceway, and receptacles. Each townhome unit would have one EV ready space within each garage.

A7-2 This comment requests clarification on the total parking provided by the Project. The Project includes four types of parking: standard, accessible (for compliance with the Americans with Disabilities Act [ADA] requirements), EV parking as described above, and tandem parking (tandem refers to two spaces that in front of each other, rather than side by side). Each tandem space can accommodate two vehicles. The Project proposes the following parking:

- Level 1: 195 spaces, 155 of which would be standard, 8 of which would be handicapped, and 32 of which would be tandem;
- Level 2: 204 spaces, 170 of which would be standard and another 34 would be tandem. The EV spaces referred to in Response A7-1 would be spread between the two floors.

A7-3 This comment suggests alternative means to incentivize public transit. The commenter begins by suggesting issuing street parking permits to surrounding residents. The Applicant cannot issue parking permits to surrounding residents, however, this suggestion will be passed on to the City Council. Regular street parking by Project residents would also be inconvenient, as Project residents would need to carry belongings to and from the apartment component daily.

The next alternative offered is to provide free garage parking to apartment residents. Providing free garage parking to residents would not incentivize use of public transport, thus, this suggestion is not feasible. Furthermore, Assembly Bill (AB) 1317 requires all residential parking to be unbundled from rent for any residential use of 16 or more units that are issued a certificate of occupancy after January 1, 2025. The Project apartment component includes 328 units and would be issued a certificate of occupancy after January 1, 2025; thus, the Project would be required to comply with AB 1317 and prohibited from providing free garage parking.

The final alternative offered is to increase the number of EV chargers to incentivize EV owners to park off-street. As discussed in Responses A7-1 and A7-2, the Project provides EV parking, which is consistent with State regulatory requirements. As the Project does not have any significant air quality or GHG impacts, it is not necessary to install more chargers at this time to mitigate impacts. However, the comment about installing more chargers has been passed on to the Applicant.

Letter A8 – Donnetta Jalomo
Page 1 of 6

Comment Letter 8

From: AT&T COMMUNICATIONS <demja1@sbcglobal.net>
Sent: Wednesday, March 13, 2024 3:34 PM
To: publiccomment@cityofgardena.org
Subject: PLANNING COMMISSION COMMENT

Caution! This message was sent from outside your organization.

I am writing this email in protest to the proposed Project by the 16911 Normandie Associates, LLC and their ridiculous plans to build a 7 STORY APARTMENT BUILDING along with 75 THREE STORY TOWNHOME UNITS in an area that consists of a little over 5 acres.

There are red flags about the number of dwellings in such a small area as well as the fact that how can you even consider a 7 STORY APARTMENT BUILDING in an area where most of the dwellings are single family homes? Really? Is this development trying to compete with Gardena Memorial Hospital as one of the tallest buildings in Gardena? At least at the hospital there is ample parking and access for the 7 story building.

A8-1

How do the developers propose the amount of traffic, cars, access to this building which it would generate with such a monstrosity? Are they going to provide the right number of stalls per apartment for say at least two cars per unit? That would mean there are at least 600 spaces that must be available. Should I presume that the two bottom

A8-2

Letter A8 – Donnetta Jalomo
Page 2 of 6

stories are going to be set aside for parking? Then there is the issue of how to access the parking of said units. Are they proposing that the entrance be on 168th directly across from Cocoon 63? Ever since Cocoon 63 has opened the entire street area is filled with automobiles from residents even those this project included a parking structure within the complex. Apparently, most of the residents are not keen on utilizing the electronic garage as was proposed by those builders and would rather use the convenience of parking on the street (which I might add is narrow). When one turns right off Normandie onto 168th there is always a blind spot because of the sharpness of the turn and any good driver knows to take the turn slowly as you never know if a car or delivery van is blocking the street. Are they proposing that the entrance will be off the little alley way that is currently there. Nice for the people who live in the housing right next to the alley isn't it?

A8-2

As far as the proposal for the 75 THREE STORY TOWHOMES where is the entrance going to be for these dwellings? I have heard that it will be off 170th and I can assure you that once the existing neighbors along 170th as well as Brighton find out I doubt they will be happy about the amount of additional traffic they will have to endure on the daily. There is an existing light off of Normandie Avenue that could be utilized for access to this proposed townhome area and would keep most of the traffic away from the neighborhood. Anyone on the planning commission think about this?

A8-3

Letter A8 – Donnetta Jalomo
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Look, I am all for capitalism, but it always comes at a price, and I do not believe that anyone on the planning commission has thought this one totally through. If this proposed project is approved, then it NEEDS TO BE SHAVED DOWN to a reasonable size especially as most of the people who have lived in this particular residential area of Gardena have done so for 25+ years. And by residential I do mean single family dwellings with a scattering of apartments and condos but none higher than 3 stories!

A8-4

I happened to look up the LLC that is proposing this project as well as one of its applicants. Apparently one of the applicants is part of a property management company. When looking up this company I saw they offer rentals in the range of mid $2000 to over $4000 per month! When the Cocoon was first on the books it was touted as an affordable place to live but as the actual facts were finally placed on the table, they were small 300 to 450 square foot units that range in price from $1900 to $2000 per month! Doesn't sound too reasonable to me. Now there are the Townhomes being finished off Normandie Avenue just south of Redondo that apparently have already sold out. That too was touted as affordable and yet those units, narrow and 3 stories high were selling in the mid $700k's. How can the City of Gardena say that this type of residential growth is affordable?

A8-5

I also noticed a sentence in the

A8-6

Letter A8 – Donnetta Jalomo
Page 4 of 6

proposed project about the creation of condominiums as well. Think people THINK. The area this proposed project is considering already has been impacted by the growth of the townhomes on Western north of the Albertsons shopping center as well as the Cocoon apartments. We have traffic in the area when there is a traffic jam at the corner of Western and Artesia as well as when the train blocks Western Avenue at the Crenshaw Lumber facility.

A8-6

I live on the corner of 169th Place and Denker and I invite anyone on the commission to sit on my front porch around commute time am and pm or when there is a traffic jam or accident or when the train blocks Western Avenue to hear and count just how many cars utilize the neighborhood as a detour. It is not peaceful nor tranquil to hear. I can only imagine how the residents on 170th as well as those living on Dalton are going to feel about the additional and excessive noise level that will manifest if you allow this project to commence as it currently is.

Why is the planning commission trying to make the

A8-7

Letter A8 – Donnetta Jalomo
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City of Gardena look like the City of Carson along Carson Blvd or Avalon Blvd? Why is the planning commission trying to make the City of Gardena look like the City of Torrance along Crenshaw near Wilson Park? You do realize that both of those areas I just mentioned have way too much traffic in both the morning and afternoon hours because of the density of housing in the area.

A8-7

I would hope that most of my fellow neighbors will attend the meeting this coming Tuesday, March 19 at 7:00 pm to voice their concerns but more so I hope that the planning commission will be cognizant of their concerns and LISTEN TO THEIR CONSTIUENTS. Last time I checked we are still living in a democracy (little d) where voices are heard, and ideas considered and placed on the table. Until we live in an Autocracy which could be a reality unless Americans wake up, I hope that the planning commission as well as the city council will listen to their constituents.

We are all in this together to come to a consensus of what the surrounding neighborhood can withstand and accept. A SEVEN STORY APARTMENT BUILDING AND 75 TOWNHOMES and possible condominiums in such a SMALL

A8-8

Letter A8 – Donnetta Jalomo
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AREA OF 5 ACRES is not the answer. A8-8

Thank you,
Donnetta Jalomo

RESPONSE TO COMMENT LETTER NO. A8
Donnetta Jalomo, Resident
March 13, 2024

A8-1 This comment questions the Project's compatibility with the existing surrounding uses concerning the development's density and apartment building's height.

The Project site would be developed at a density of approximately 77 dwelling unit per acre (DU/AC). Higher density residential uses were already anticipated for the northerly portion of the Project, which is designated High Density 30 Overlay and zoned Housing Overlay 4 (HO-4), allowing 21-30 dwelling unit per acre (DU/AC). The Project would remove six circa 1952-1979 industrial buildings, which are in a blighted condition, and fully improve a property that is currently inadequately maintained and devoid of landscaping with residential uses and landscaping. The Project would also comply with City Policy DS 2.7, which requires appropriate setbacks, massing, articulation, and height limits to provide privacy and compatibility where multiple-family housing is developed adjacent to single-family housing. The apartment building's design and access is oriented towards Normandie Avenue and away from the nearest single-family housing located to the south and west of the Project site. Further, the Project appropriately transitions building massing from a single- to multi-family scale by locating the townhomes along the Project boundary that borders single-family housing (south and west) and the apartment building near the multi-family apartments (north) and Normandie Avenue (east). Additionally, the Project's building heights would be consistent with the development standards in the proposed Normandie Crossing Specific Plan. This comment does not address DEIR's adequacy or raise a significant environmental issue.

Additionally, in response to community feedback, the "Community Input" Alternative, which would reduce the apartment building height from seven to five above ground stories, has been analyzed in **DEIR Section 6.0: Alternatives**; see **FEIR Section 3.0: Errata to the Draft EIR** for a complete description of the Community Input Alternative.

This comment also suggests that the proposed Project does not provide adequate parking spaces and requests clarification about access to the parking areas. Parking is not an environmental issue pursuant to CEQA, and this comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary. Notwithstanding, as noted in **DEIR Section 2.0: Project Description**, the Project proposes 399 parking spaces for the apartment building and 160 parking spaces for the townhomes. Additionally, the Project further promotes use of multi-modal transportation networks through its proximity to such networks. The

Project site is less than one mile from five different bus routes and the Harbor Gateway Transit Center; see **DEIR Section 4.13: Transportation**. Existing GTrans bus stops are located less than 600 feet to the north of the Project site along 166th Street. Additional Torrance Transit and Metro services are located approximately 0.25 mile to the south of the Project site, at the intersection of Artesia Boulevard and South Normandie Avenue. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9-mile to the south, providing more access to public transit opportunities. The Project would also implement TDM strategies such as unbundled parking, additional bicycle parking, and a one-month free transit pass to help renters become acquainted with public transit and pre-leasing for area employees. These strategies provide alternative transportation options, reducing parking demand. Given these factors, it is not anticipated that Project residents would park on surrounding streets.

Concerning access to the Project, vehicular access to the proposed Project site would be provided by the following four driveways:

- Driveway 1 would serve Subarea A and provide access to the apartment building's parking garage from 169th Street west of South Normandie Avenue.
- Driveway 2 would serve Subarea A and provide a right-in/right-out only driveway that would also serve the apartment building's parking garage from southbound South Normandie Avenue.
- Driveway 3 would serve Subarea B and provide access to the townhomes from 170th Street. This driveway would also serve as fire truck access for both Subareas A and B.
- Driveway 4 would serve Subarea B and provide access to the townhomes from 169th Street. This driveway would also serve as fire truck access for both Subareas A and B.

There would be adequate access to the Project's parking areas Therefore, this comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is necessary.

A8-2 This comment expresses concern about the Project's proposed parking areas and requests clarification if there would be two parking spaces per unit and where parking would be located. As noted above in Response A8-1, parking is not considered an environmental issue per CEQA, and this comment does not address the DEIR's

adequacy or raise a significant environmental issue. As such, no further response is necessary. Notwithstanding, the Project proposes 399 parking spaces for the apartment building and 160 parking spaces for the townhomes. Parking for the apartment complex is proposed to be in the apartment building's first two levels. Parking for the townhomes would be in attached garages and would have an additional 10 surface parking spaces for guests.

This comment also requests clarification about the Project's driveways and whether there would an entrance point on 168th Street and Brighton Way. As shown on **DEIR Exhibit 2-4: Conceptual Site Plan**, no driveways or access points for the proposed Project are proposed on 168th Street or on Brighton Way. Vehicular access to the proposed Project site is described in Response A8-1. As described in Response A8-1, there would be a proposed access driveway for the Apartment building's parking garage from 169th Street west of South Normandie which is located across the street from the multifamily development located at 16819 Normandie Avenue. The commenter notes that the multifamily development located at 16819 Normandie Avenue utilizes parking on the local streets to avoid utilizing the electronic garage. Parking is not an environmental issue pursuant to CEQA, as such, no further response is necessary. Notwithstanding, please refer to Response A8-1 for a discussion concerning parking. All roadway and driveway improvements would be constructed pursuant to Los Angeles County Fire Department requirements. Therefore, this comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is necessary.

A8-3 This comment requests clarification about the access driveways for the proposed townhomes and whether they would be located on 170th Street. The comment also suggests that access to the proposed townhomes should utilize the existing signal at Normandie Avenue to reduce traffic impacts in the neighborhood. As mentioned above in Response A8-2, Driveway 3 would provide access to the townhomes from 170th Street and Driveway 4 would provide access to the townhomes from 169th Street. No access to the townhomes is proposed on Normandie Avenue near the existing signal, however, an access driveway to the proposed apartment building is proposed on Normandie Avenue. The apartment building would utilize the driveway at Normandie Avenue to access the parking lot rather than using the other Project access points. Finally, with the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by "level of service" (LOS) and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3)). Notwithstanding, the Project has been designed to minimize traffic through TDM strategies and ITS applications. These include features such as unbundled parking, additional bicycle parking, and a one-

month free transit pass to help renters become acquainted with public transit and pre-leasing for area employees. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is necessary.

A8-4 This comment expresses concern about neighborhood compatibility and suggests that residential developments be limited to three stories high. Please refer to Response A8-1 concerning neighborhood compatibility and Project building height. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is necessary.

A8-5 This comment discusses housing affordability and expresses dissatisfaction with the high rental prices at nearby developments. As this comment does not address the adequacy of the EIR or raise a significant environmental issue, no further response is required.

A8-6 This comment expresses dissatisfaction with current traffic congestion in the Project area and concern that the Project would worsen traffic conditions. As mentioned above in Response A8-3, with the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by "level of service" (LOS) and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3).). Also, the Project has been designed to minimize traffic through TDM strategies and ITS applications. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.

This comment also expresses concern about mobile source noise generated by Project traffic. As noted in **DEIR Section 4.9: Noise**, Project traffic would result in a maximum noise level increase of 1.8 dBA CNEL along West 170th Street (west of Normandie Avenue). In addition, the estimated noise level increases along Normandie Avenue and West 169th Street (west of Normandie Avenue) would be 0.2 dBA CNEL and 0.3 dBA CNEL, respectively. 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 Project's estimated traffic noise level increases are considered negligible. The comment does not address the DEIR's adequacy or provide any evidence to support the assertion of additional and excessive noise.

A8-7 This comment expresses concern that the Project would increase housing density in Gardena and result in traffic congestion similar to the neighboring cities of Carson and Torrance. Please refer to Response A8-3 for a discussion concerning traffic congestion.

This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.

A8-8 This comment notes its opposition to the Project and encourages the public and lead agency to oppose it as well. This comment is noted, and no further response is required.

Letter A9 – Kevin Collier
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Comment Letter 9

From: kitdcollier@aol.com <kitdcollier@aol.com>
Sent: Thursday, March 14, 2024 12:48 PM
To: Public Comment <publiccomment@cityofgardena.org>
Subject: PLANNING COMMISSION COMMENT

Caution! This message was sent from outside your organization.

I oppose the Normandie Crossing Specific Plan as currently defined. My objection concerns the density of the apartment component and its impact on on-street parking and traffic congestion. Please consider the "Reduced Density" alternative described in the Draft Environmental Impact Report. A9-1

During the Jan 31 community meeting the developers stated that parking spaces would be leased. I am concerned that leasing spaces would discourage renters from using the parking garage, and rather provide an incentive to park on the street. There is very limited street parking surrounding the proposed development. A9-2

Please clarify how leased parking is consistent with Gardena Climate Action Plan's Policy LUT E2 - "unbundle parking and eliminate assignment of specific stalls." A9-3

I am skeptical that the number of parking spaces, and the plan to lease the spaces, does not conflict with the General Plan policy LU 1.5, specifically the policy of providing adequate off-street parking. The EIR states that the project does not conflict with the General Plan policy C1.11 since "providing less parking spaces per unit encourages residents to carpool or seek alternative modes of transportation." I am concerned that rather than encouraging alternative modes of transportation the project will encourage more on-street parking in an area that is already lacking adequate on-street parking. A9-4

I am extremely skeptical that a traffic study performed in March 2022 reflects current traffic conditions. March 2022 was just two months after LAUSD reopened, and just nine months after LA county reopened. Traffic did not immediately return to "normal" levels, but rather very slowly increased to current levels. A9-5

Since Gardena is obligated to make progress towards its RHNA obligations, please consider the "Reduced Density" alternative described in the Draft Environmental Impact Report. Though this is a "Reduced Density" alternative, the density is still a high density project. The density of 51 du/ac would put the project in the highest Housing Overlay category, HO-06, as defined by the Gardena 2021-2029 Housing Element plan. There is already a completed H0-06 development adjacent to the proposed project (16819 Normandie with a density of 57 du/ac). I am opposed to A9-6

Letter A9 – Kevin Collier
Page 2 of 2

adding a development with a density of 77 du/ac adjacent to an existing development with a density of 57 du/ac. A9-6

If some development must be approved to make progress towards the RHNA obligations, please consider requiring developer to provide more than 20 parking spots installed with EV chargers, and require the developer to provide more that just 20 additional spots that are EV Ready. Perhaps providing EV chargers will provide an incentive to use the parking garage as we transition to more electric vehicles. A9-7

Thank you,
Kevin Collier
1332 W 169th Pl, Gardena 90247

RESPONSE TO COMMENT LETTER NO. A9
Kevin Collier, Resident
March 14, 2024

A9-1 This comment notes its opposition to the Project due to its density and the resulting potential impacts on local street parking and traffic congestion. This comment also notes its support of the Reduced Density Alternative. Please refer to Response A8-1 for a discussion concerning Project density. Regarding parking, parking is not an environmental issue pursuant to CEQA, and this comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary. Notwithstanding, please refer to Response A8-1 for a discussion concerning parking. Finally, please refer to Response A8-3 for a discussion concerning traffic congestion.

A9-2 This comment expresses concern regarding a statement made at the January 31, 2024 community meeting regarding leasing parking spaces and how this could potentially lead to Project tenants parking in the surrounding streets. Parking is not an environmental issue pursuant to CEQA, and this comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary. Notwithstanding, Assembly Bill (AB) 1317 requires all residential parking to be unbundled from rent for any residential use of 16 or more units that are issued a certificate of occupancy after January 1, 2025 in Los Angeles County. The proposed apartment building includes 328 units and would be issued a certificate of occupancy after January 1, 2025. Therefore, pursuant to AB 1317 requirements, the proposed Project would not provide free garage parking. As noted above in Response A9-1, it is not anticipated that Project residents would park on surrounding streets.

A9-3 This comment requests clarification for Project consistency with Gardena Climate Action Plan Policy LUT E2. Gardena Climate Action Plan Policy LUT E2 is as follows:

Measure LUT: E2 – Unbundle Parking Costs From Property Costs. Unbundling separates parking from property costs, allowing individuals who wish to purchase parking spaces to do so and those that don't, to save money. Parking can be priced separately from home rents/purchase prices or office leases. This measure can help reduce the number of vehicles per household.

Refer to Response A9-2 for a discussion concerning unbundled parking. Therefore, the project would be consistent with Gardena Climate Action Plan Policy LUT E2 by providing unbundled parking. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.

A9-4 This comment questions the Project's consistency with General Plan Policy LU 1.5 stating that rather than encourage alternative transit modes, the Project would encourage on-street parking. As stated in **DEIR Table 4.8-4: Gardena General Plan 2006 Analysis**, the Project would not conflict with General Plan Policy LU 1.5 as it would provide adequate residential amenities including off-street parking (i.e., approximately 399 off-street vehicle and 173 bicycle parking spaces). The parking proposed by the Project is consistent with the Normandie Crossing Specific Plan but less than the City's parking requirements, providing 1.2 parking spaces per apartment unit. Refer to Response A8-1 for a discussion concerning parking demand. Further, new residents who sign a 12-month lease would be offered one free monthly Metro pass. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.

A9-5 This comment questions the adequacy of the Project's traffic study (**DEIR Appendix 4.13-2: Local Transportation Assessment**) and claims the study date is not representative of typical traffic conditions. With the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by "level of service" (LOS) and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3).) Notwithstanding, the analysis of existing traffic conditions in **Appendix 4.13-2** was based on 2022 intersection traffic counts. As stated in **Appendix 4.13-2**, the analysis assumes that traffic levels around the Los Angeles region that were affected by the COVID-19 Pandemic stabilized in 2022 since schools resumed in-person instruction and remaining restrictions were lifted. Although the COVID-19 Pandemic resulted in both temporary and permanent shifts in traffic patterns, pandemic-related restrictions that could affect travel largely expired/stabilized in 2022. Therefore, the traffic counts that were collected are considered adequate and appropriate for use in the Project's analysis. No further response is required.

A9-6 This comment expresses support for the Reduced Density Alternative. This comment is noted, and no further response is required.

A9-7 This comment requests that the City require the Applicant to provide more than 20 EV charging stalls and more than 20 EV ready charging stalls to encourage Project tenants to use parking spaces in the garage rather than street parking. The Project complies with the Normandie Crossing Specific Plan standards and the latest Title 24 requirements regarding EV parking spaces. The apartment building would provide 20 stalls with EV chargers installed, 40 spaces that are EV capable with electrical panel space and load capacity, and 100 spaces that are EV ready with branch circuit,

raceway, and receptacles. Each townhome would have one EV ready space within each garage. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.

Letter A10 – Western States Regional Council of Carpenters

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Comment Letter 10

P: (626) 314-3821
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E: info@mitchtsailaw.com

Mitchell M. Tsai
Law Firm

139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

March 18, 2024

Amanda Acuna, Senior Planner
City of Gardena
1700 West 162nd Street
Gardena, CA 90247
Em: aacuna@cityofgardena.org

RE: Western States Regional Council of Carpenters' Comments Regarding the City of Gardena's Planning Commission Review of the Normandie Crossing Specific Plan Project and Draft Environmental Impact Report

Dear Amanda Acuna,

On behalf of the Western States Regional Council of Carpenters ("**Western Carpenters**" or "**WSRCC**"), my Office is submitting these comments for the City of Gardena's ("**City**") Draft Environmental Impact Report ("**DEIR**" or "**Draft EIR**") for the Normandie Crossing Specific Plan ("**SP**") Project ("Project"), SCH No. 2023050241.

According to the DEIR:

> The Project proposes to establish a maximum allowable development within the approximately 5.25-acre [Normandie Crossing Specific Plan ("NCSP")] area of up to 403 DU. Because the City does not have any zone which would accommodate the proposed development, the Applicant is proposing the NCSP, which would establish the site-specific zoning regulations and development standards for this area. The NCSP 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. In addition to requiring a Specific Plan, the Project requires various other approvals, including a Development Agreement

A10-1

Letter A10 – Western States Regional Council of Carpenters
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(DEIR, p. 2-11.)

The Western Carpenters is a labor union representing roughly 90,000 union carpenters in 12 states, including California, and has a strong interest in well-ordered land use planning and in addressing the environmental impacts of development projects. Individual members of the Western Carpenters live, work, and recreate in the City and surrounding communities and would be directly affected by the SP's environmental impacts. A10-1

The Western Carpenters expressly reserves the right to supplement these comments at or prior to hearings on the SP, and at any later hearing and proceeding related to this SP. Gov. Code, § 65009, subd. (b); Pub. Res. Code, § 21177, subd. (a); see *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199-1203; see also *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121. A10-2

The Western Carpenters incorporates by reference all comments raising issues regarding the Environmental Impact Report (EIR) submitted prior to certification of the EIR for the SP. See *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal.App.4th 173, 191 (finding that any party who has objected to the project's environmental documentation may assert any issue timely raised by other parties).

Moreover, the Western Carpenters requests that the City provide notice for all notices referring or related to the SP issued under the California Environmental Quality Act (**CEQA**) (Pub. Res. Code, § 21000 *et seq.*), and the California Planning and Zoning Law ("**Planning and Zoning Law**") (Gov. Code, §§ 65000–65010). California Public Resources Code Sections 21092.2, and 21167(f) and California Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body. A10-3

I. THE CITY SHOULD INCORPORATE LANGUAGE THAT REQUIRE THE USE OF A LOCAL WORKFORCE TO BENEFIT THE COMMUNITY'S ECONOMIC DEVELOPMENT AND ENVIRONMENT.

The City should incorporate language into the proposed SP requiring residential, commercial and mixed-use developments within the SP area to be built using local workers who have graduated from a Joint Labor-Management Apprenticeship A10-4

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Program approved by the State of California, have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state-approved apprenticeship training program, or who are registered apprentices in a state-approved apprenticeship training program.

A10-4

Community benefits such as local hire can also be helpful to reduce environmental impacts and improve the positive economic impact of the SP. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of projects within the SP area can reduce the length of vendor trips, reduce greenhouse gas emissions, and provide localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

> [A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

A10-5

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the University of California, Berkeley Center for Labor Research and Education concluded:

> [L]abor should be considered an investment rather than a cost and investments in growing, diversifying, and upskilling California's workforce can positively affect returns on climate mitigation efforts. In other words, well-trained workers are key to delivering emissions reductions and moving California closer to its climate targets.[1]

A10-6

Furthermore, workforce policies have significant environmental benefits given that they improve an area's jobs-housing balance, decreasing the amount and length of job commutes and the associated greenhouse gas (**GHG**) emissions. In fact, on May 7, 2021, the South Coast Air Quality Management District found that that the "[u]se of a

A10-7

[1] California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf.

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local state-certified apprenticeship program" can result in air pollutant reductions.[2]

Locating jobs closer to residential areas can have significant environmental benefits. As the California Planning Roundtable noted in 2008:

> People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.[3]

A10-7

Moreover, local hire mandates and skill-training are critical facets of a strategy to reduce vehicle miles traveled (VMT). As planning experts Robert Cervero and Michael Duncan have noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions given that the skill requirements of available local jobs must match those held by local residents.[4] Some municipalities have even tied local hire and other workforce policies to local development permits to address transportation issues. Cervero and Duncan note that:

> In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing. The city's First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about

A10-8

[2] South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, *available at* http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10.

[3] California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, *available at* https://cproundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf

[4] Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? Journal of the American Planning Association 72 (4), 475-490, 482, *available at* http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf.

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negotiating corporate participation in First Source as a condition of approval for development permits. A10-8

Recently, the State of California verified its commitment towards workforce development through the Affordable Housing and High Road Jobs Act of 2022, otherwise known as Assembly Bill No. 2011 ("**AB2011**"). AB2011 amended the Planning and Zoning Law to allow ministerial, by-right approval for projects being built alongside commercial corridors that meet affordability and labor requirements. A10-9

The City should consider utilizing local workforce policies and requirements to benefit the local area economically and to mitigate greenhouse gas, improve air quality, and reduce transportation impacts.

II. THE CITY SHOULD INCORPORATE LANGUAGE IMPOSING TRAINING REQUIREMENTS FOR CONSTRUCTION ACTIVITIES TO PREVENT COMMUNITY SPREAD OF COVID-19 AND OTHER INFECTIOUS DISEASES INTO THE GP.

Construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupations Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.[5]

Western Carpenters recommend that the City adopt additional requirements to mitigate public health risks from various residential, commercial and mixed-use development construction activities. Western Carpenters requests that the City require safe on-site construction work practices as well as training and certification for any construction workers on residential, commercial and mixed-use developments within the SP area. A10-10

In particular, based upon Western Carpenters' experience with safe construction site work practices, Western Carpenters recommends that the City require that while construction activities are being conducted within the SP area ("**Project Site**"):

Construction Site Design:

[5] Santa Clara County Public Health (June 12, 2020) COVID-19 CASES AT CONSTRUCTION SITES HIGHLIGHT NEED FOR CONTINUED VIGILANCE IN SECTORS THAT HAVE REOPENED, *available at* https://www.sccgov.org/sites/covid19/Pages/press-release-06-12-2020-cases-at-construction-sites.aspx.

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- The Project Site will be limited to two controlled entry points.
- Entry points will have temperature screening technicians taking temperature readings when the entry point is open.
- The Temperature Screening Site Plan shows details regarding access to the Project Site and Project Site logistics for conducting temperature screening.
- A 48-hour advance notice will be provided to all trades prior to the first day of temperature screening.
- The perimeter fence directly adjacent to the entry points will be clearly marked indicating the appropriate 6-foot social distancing position for when you approach the screening area. Please reference the Apex temperature screening site map for additional details.
- There will be clear signage posted at the project site directing you through temperature screening.
- Provide hand washing stations throughout the construction site.

A10-10

<u>Testing Procedures:</u>

- The temperature screening being used are non-contact devices.
- Temperature readings will not be recorded.
- Personnel will be screened upon entering the testing center and should only take 1-2 seconds per individual.
- Hard hats, head coverings, sweat, dirt, sunscreen or any other cosmetics must be removed on the forehead before temperature screening.
- Anyone who refuses to submit to a temperature screening or does not answer the health screening questions will be refused access to the Project Site.
- Screening will be performed at both entrances from 5:30 am to 7:30 am.; main gate [ZONE 1] and personnel gate [ZONE 2]
- After 7:30 am only the main gate entrance [ZONE 1] will continue

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to be used for temperature testing for anybody gaining entry to the project site such as returning personnel, deliveries, and visitors.

- If the digital thermometer displays a temperature reading above 100.0 degrees Fahrenheit, a second reading will be taken to verify an accurate reading.
- If the second reading confirms an elevated temperature, DHS will instruct the individual that he/she will not be allowed to enter the Project Site. DHS will also instruct the individual to promptly notify his/her supervisor and his/her human resources (HR) representative and provide them with a copy of Annex A.

Planning

- Require the development of an Infectious Disease Preparedness and Response Plan that will include basic infection prevention measures (requiring the use of personal protection equipment), policies and procedures for prompt identification and isolation of sick individuals, social distancing (prohibiting gatherings of no more than 10 people including all-hands meetings and all-hands lunches) communication and training and workplace controls that meet standards that may be promulgated by the Center for Disease Control, Occupational Safety and Health Administration, Cal/OSHA, California Department of Public Health or applicable local public health agencies.[6]

A10-10

The United Brotherhood of Carpenters and Carpenters International Training Fund has developed COVID-19 Training and Certification to ensure that Carpenter union members and apprentices conduct safe work practices. The City should require that all construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at the Project Site.

Western Carpenters has also developed a rigorous Infection Control Risk Assessment

[6] *See also* The Center for Construction Research and Training, North America's Building Trades Unions (April 27 2020) NABTU and CPWR COVIC-19 Standards for U.S Constructions Sites, *available at* https://www.cpwr.com/sites/default/files/NABTU_CPWR_Standards_COVID-19.pdf; Los Angeles County Department of Public Works (2020) Guidelines for Construction Sites During COVID-19 Pandemic, *available at* https://dpw.lacounty.gov/building-and-safety/docs/pw_guidelines-construction-sites.pdf.

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("**ICRA**") training program to ensure it delivers a workforce that understands how to identify and control infection risks by implementing protocols to protect themselves and all others during renovation and construction projects in healthcare environments.[7]

ICRA protocols are intended to contain pathogens, control airflow, and protect patients during the construction, maintenance and renovation of healthcare facilities. ICRA protocols prevent cross contamination, minimizing the risk of secondary infections in patients at hospital facilities.

A10-10

The City should incorporate language requiring the residential developments related to the SP be built using a workforce trained in ICRA protocols.

III. THE PROJECT WOULD BE APPROVED IN VIOLATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

A. Background Concerning the California Environmental Quality Act

The California Environmental Quality Act is a California statute designed to inform decision-makers and the public about the potential significant environmental effects of a project. 14 California Code of Regulations ("**CEQA Guidelines**"), § 15002, subd. (a)(1).[8] At its core, its purpose is to "inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made." *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.

A10-11

1. Background Concerning Environmental Impact Reports

CEQA directs public agencies to avoid or reduce environmental damage, when possible, by requiring alternatives or mitigation measures. CEQA Guidelines, § 15002, subds. (a)(2)-(3); see also *Berkeley Keep Jets Over the Bay Committee v. Board of Port Comes* (2001) 91 Cal.App.4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553; *Laurel Heights Improvement Assn.*, 47 Cal.3d at p. 400. The EIR serves to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to "identify

[7] For details concerning Western Carpenters' ICRA training program, *see* https://icrahealthcare.com/.

[8] The CEQA Guidelines, codified in Title 14 of the California Code of Regulations, section 15000 et seq., are regulatory guidelines promulgated by the state Natural Resources Agency for the implementation of CEQA. Cal. Pub. Res. Code, § 21083. The CEQA Guidelines are given "great weight in interpreting CEQA except when . . . clearly unauthorized or erroneous." *Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 217.

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ways that environmental damage can be avoided or significantly reduced." CEQA Guidelines, § 15002, subd. (a)(2). If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns" specified in Public Resources Code section 21081. See CEQA Guidelines, § 15092, subds. (b)(2)(A)-(B).

While the courts review an EIR using an 'abuse of discretion' standard, the reviewing court is not to *uncritically* rely on every study or analysis presented by a project proponent in support of its position. *Berkeley Jets*, 91 Cal.App.4th at p. 1355 (quoting *Laurel Heights Improvement Assn.*, 47 Cal.3d at pp. 391, 409 fn. 12) (internal quotations omitted). A clearly inadequate or unsupported study is entitled to no judicial deference. *Id.* Drawing this line and determining whether the EIR complies with CEQA's information disclosure requirements presents a question of law subject to independent review by the courts. *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 515; *Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal.App.4th 48, 102, 131. As the court stated in *Berkeley Jets*, prejudicial abuse of discretion occurs if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process. 91 Cal.App.4th at p. 1355 (internal quotations omitted).

A10-11

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. *Communities for a Better Environment v. Richmond* (2010) 184 Cal.App.4th 70, 80 (quoting *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 449-450). The EIR's function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been considered. *Id.* For the EIR to serve these goals it must present information so that the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. *Id.*

A strong presumption in favor of requiring preparation of an EIR is built into CEQA. This presumption is reflected in what is known as the "fair argument" standard under which an EIR must be prepared whenever substantial evidence in the record supports

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a fair argument that a project may have a significant effect on the environment. *Quail Botanical Gardens Found., Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1602; *Friends of "B" St.* v. *City of Hayward* (1980) 106 Cal.3d 988, 1002.

The fair argument test stems from the statutory mandate that an EIR be prepared for any project that "may have a significant effect on the environment." PRC, § 21151; see *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.App.3d 68, 75; accord *Jensen v. City of Santa Rosa* (2018) 23 Cal.App.5th 877, 884. Under this test, if a proposed project is not exempt and may cause a significant effect on the environment, the lead agency must prepare an EIR. PRC, §§ 21100 (a), 21151; CEQA Guidelines, § 15064 (a)(1), (f)(1). An EIR may be dispensed with only if the lead agency finds no substantial evidence in the initial study or elsewhere in the record that the project may have a significant effect on the environment. *Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 785. In such a situation, the agency must adopt a negative declaration. PRC, § 21080, subd. (c)(1); CEQA Guidelines, §§ 15063 (b)(2), 15064(f)(3).

"Significant effect upon the environment" is defined as "a substantial or potentially substantial adverse change in the environment." PRC, § 21068; CEQA Guidelines, § 15382. A project may have a significant effect on the environment if there is a reasonable probability that it will result in a significant impact. *No Oil, Inc.*, 13 Cal.3d at p. 83 fn. 16; see *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 309. If any aspect of the project may result in a significant impact on the environment, an EIR must be prepared even if the overall effect of the project is beneficial. CEQA Guidelines, § 15063(b)(1); see *County Sanitation Dist. No. 2 v. County of Kern* (2005) 127 Cal.App.4th 1544, 1580.

A10-11

This standard sets a "low threshold" for preparation of an EIR. *Consolidated Irrigation Dist. v. City of Selma* (2012) 204 Cal.App.4th 187, 207; *Nelson v. County of Kern* (2010) 190 Cal.App.4th 252; *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928; *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572, 580; *Citizen Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 754; *Sundstrom*, 202 Cal.App.3d at p. 310. If substantial evidence in the record supports a fair argument that the project may have a significant environmental effect, the lead agency must prepare an EIR even if other substantial evidence before it indicates the project will have no significant effect. See *Jensen*, 23 Cal.App.5th at p. 886; *Clews Land & Livestock v. City of San Diego* (2017) 19 Cal.App.5th 161, 183; *Stanislaus Audubon Society, Inc. v. County of*

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Stanislaus (1995) 33 Cal.App.4th 144, 150; *Brentwood Assn. for No Drilling, Inc. v. City of Los Angeles* (1982) 134 Cal.App.3d 491; *Friends of "B" St.*, 106 Cal.App.3d 988; CEQA Guidelines, § 15064(f)(1). A10-11

B. The Project May Have a Significant Hazards Impact

The Project may have a significant hazards impact. The DEIR provides two Phase I Environmental Site Assessments ("**ESA**" or "**Phase I ESA**") prepared by Partner Engineering and Science, Inc., with a January 7, 2021 ESA included in Appendix 4.6-2 concerning the Project Site's *southern* portion (APN 6106-030-017) ("**South Phase I ESA**"), and a July 13, 2021 ESA included in Appendix 4.6-1 concerning the Project Site's *northern* portion (APNs 6106-030-011, 6106-030-015, and 6106-030-016) ("**North Phase I ESA**"). (DEIR, 4.6-1.) However, the Phase I ESAs are outdated and manifestly incomplete.

1. *Background on Phase I, II, and III Environmental Site Assessments*

The preparation of a Phase I ESA is "to research the current and historical uses of a property as part of a commercial real estate transaction" and "to assess if current or historical property uses have impacted the soil or groundwater beneath the property and could pose a threat to the environment and/or human health."[9] A10-12

As explained by experts in the field of ESA:

> The primary difference between Phase I and Phase II site assessment lies in the scopes of work of the assessment. A Phase I primarily assesses the likelihood that a site is contaminated through visual observations, historical use reviews and regulatory records, while a Phase II assesses whether contamination is in fact present. Here are the components of each.
>
> **Phase I Environmental Site Assessment**
>
> Review of records, to discover whether the site has been used for potentially hazardous purposes in the past.

[9] Jenny Redlin, REPA, Partner Engineering and Science, Inc., *What is a Phase I Environmental Site Assessment* (Apr. 9, 2018), *available at* https://www.partneresi.com/resources/articles/what-is-a-phase-i-environmental-site-assessment/#:~:text=A%20Phase%20I%20Environmental%20Site%20Assessment%2C%20commonly%20referred%20to%20as,a%20commercial%20real%20estate%20transaction. (accessed on Jan. 18, 2024).

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Visual inspection of the property's current condition, with comparison to site plans.

Visual inspection of adjoining properties.

Interviews with current property owners, operators, occupants, and local government officials.

Goal: Assess likelihood that property has been contaminated.

Phase II Environmental Site Assessment

Soil and water sampling for signs of contamination.

Comparison of lab results with local, state, and federal regulatory guidelines.

May include inspection of interior spaces for mold, radon, or lead paint.

May include identification of wetlands, ecological resources, or endangered species that may prevent certain land uses.

Goal: Assess actual presence of environmental contaminants.

Phase III Site Assessment

A Phase III Site Assessment is called for only when contamination has been identified. A Phase III Assessment determines the extent of the contamination, both horizontally and vertically, and forms the basis for preparing a remediation plan, and estimation of the cost for remediation. Buyers and lenders use the Phase III Assessment as a negotiating tool with the sellers to ensure the property they purchase yields the benefit they expect.[10]

Standards for performing a Phase I ESA have been established by the US Environmental Protection Agency ("**EPA**") and the American Society for Testing and Materials Standards ("**ASTM**").[11]

A10-12

2. The Phase I ESAs are Inadequate and Outdated

[10] Robert B. Greene, Phase I versus Phase II Environmental Site Assessment *available at* https://www.gleassociates.com/phase-i-versus-phase-ii-environmental-site-assessments/ (accessed on Jan. 18. 2024.)
[11] *See*, https://www.astm.org/e1527-21.html (last updated on Dec. 21, 2021.)

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As a preliminary matter, the Phase I ESAs were prepared in January and July of 2021, approximately three (3) years ago. In addition, given that the conditions of the Project Site and its surrounding area may have changed since 2021, the ESAs are now outdated.

Even further, and as detailed further below, the ESAs were conducted in 2021, which was prior to the EPA's subsequent adoption of the newer ASTM E1527-21 ("**ASTM E1527-21**"), thereby replacing the older and less stringent ASTM E1527-13 ("**ASTM E1527-13**"). Accordingly, the Phase I ESAs rely upon E1527-13 (DEIR Appendix 4.6-1, p. 4, Appendix 4.6-2, p. 3). However, it is critical that the Phase I ESAs implement the newer ASTM E1527-13 standard for identifying Recognized Environmental Conditions ("**REC**"), as discussed further below.

Therefore, the DEIR must be revised and recirculated to include new Phase I ESAs and, moreover, a new Phase II ESA, that adequately evaluate the Project's potential hazards impact and that apply the more recent and more stringent E1527-21 standard.

3. The Phase I ESA Improperly Relies on ASTM 1527-13 While the EPA Recently Adopted and Validated ASTM 1527-21

A10-13

As noted above, the Phase I ESAs are incomplete and inaccurate for purposes of CEQA because they only use the obsolete ASTM E1527-13, while the nonprofit organization ASTM International, founded as the American Society for Testing and Materials, has long adopted its more stringent ASTM Standard Practice E1527-21, which is in fact more rigorous than its predecessor E1527-13. Because Phase I ESAs rely upon the E1527-13 methodology recommended by ASTM International to identify Recognized Environmental Conditions in connection with the Project Site, they fail to adequately disclose the potential RECs on the Project Site and, as related, the Project-specific potential hazards and hazardous impacts and adverse impacts on human beings.

Specifically,

- "Under **ASTM E1527-13**, a REC is defined as the **presence or likely presence of any hazardous substances** or petroleum products in, on, or at a property: (1) due to **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.

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- Under **ASTM E1527-21**, a REC means (1) the **presence** of hazardous substances or petroleum due to a release to the environment; (2) the ***likely* presence** of hazardous substances or petroleum products due to a ***likely* release** to the environment; or (3) the presence of hazardous substances or petroleum products under conditions that pose a material threat of a future release to the environment. Further, the new standard provides clarifying discussion notes and examples to assist the environmental professional in applying the definition. Together, the new definition and interpretations direct a consultant to rely on the environmental professional's experience regarding the ***likelihood*** of certain conditions resulting in releases, such as the long term operation of a dry cleaner, instead of discounting that professional experience based on the lack of current "indications of a release."[12] (ital. original, bold emphasis added.)

Accordingly, as shown above in the E1527-21 definition of a REC, the use of phrases, "likely presence" or "likely release" are more stringent than the REC definition in E1527-13, which leaves out the potential impact for purposes of CEQA. The newer E1527-21, on the other hand, encompasses those concerns. Since the Phase I ESAs do not implement E1527-21, they could fail to account for other potential RECs at the Project Site. A10-13

Here, for example, the North Phase I ESA directly admits the Project Site is currently occupied by three (3) buildings, Buildings A-C, which were constructed in 1963, 1978, and 1957, respectively (DEIR Appendix 4.6-1, p. ii.) and that, based on the historical and regulatory sources, the property was occupied by "various light-industrial tenants," which included "two machine shops, an auto body repair operation, an engine repair business (FM Engine), a cabinet maker, and several manufacturing entities, all operations that would have used or stored hazardous substances." (*Id.* at p. iii.) The North Phase I ESA further notes that because some of the manufacturing tenant listings predated 1980, there is no documentation regarding "historical hazardous substance use, storage, or disposal practices." (*Id.*) The North Phase I ESA

[12] Quarles, *EPA Approves ASTM E1527-21 Phase I ESA Standard for All Appropriate Inquiry* (Mar. 29, 2022), *available at* https://www.quarles.com/publications/epa-approves-astm-e1527-21-phase-i-esa-standard-for-all-appropriate-inquiry/ (accessed on Jan. 18, 2024.)

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even further notes that there were some paint booths historically identified in connection with prior tenants and usage of solvents. (Id.)

Finally, the North Phase I ESA concludes that

> Partner understands the subject property is planned for residential redevelopment. Based on the plan to redevelop this site with a sensitive receptor (i.e. residential), the long-term duration of use/occupancy by businesses that used, stored and disposed of hazardous substances (60+ years), and lack of any subsurface data, the long-term light-industrial usage of the subject property is considered to be a REC.

A10-13

(Appendix 4.6-1, *supra.*)

Therefore, the North Phase I ESA identifies a REC at the Project Site and acknowledges that there will be residential use at the Project Site. Accordingly, it is imperative that the City adequately addresses this in the EIR and mitigates the significant hazards impacts. As such, the DEIR should be revised and recirculated to include updated Phase I ESAs using the more stringent ASTM E1527-21 standard to account for any other potential RECs at the Project Site that might not have been accounted for under the previous ASTM E1527-13 standard.

4. *The Project May Have Significant Hazards Impacts, as Well as Adverse Impacts on Human Beings Requiring Mandatory Findings of Significance*

Under CEQA Guidelines section 15065, subdivision (a)(1)(4), 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 […] (4) The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly."

A10-14

The North Phase I ESA expressly confirms that, due to the age of the buildings situated on the Project Site, there is potential for the presence of asbestos-containing materials ("**ACM**") and/or lead-based paint ("**LBP**") (DEIR Appendix 4.6-1, p. iv.)

It is undisputed that both *lead* and *asbestos* are dangerous to people's health. While intact asbestos by itself may not be hazardous, damaged or disturbed asbestos may

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release asbestos fibers and become a health hazard.[13] Per Occupational Health and Safety Administration's ("**OSHA**") description:

> **What are the hazards of asbestos?**
>
> Asbestos is well recognized as a health hazard and its use is now highly regulated by both OSHA and EPA. Asbestos fibers associated with these health risks are too small to be seen with the naked eye. Breathing asbestos fibers can cause a buildup of scar-like tissue in the lungs called asbestosis and result in loss of lung function that often progresses to disability and death. Asbestos also causes cancer of the lung and other diseases such as mesothelioma of the pleura which is a fatal malignant tumor of the membrane lining the cavity of the lung or stomach. Epidemiologic evidence has increasingly shown that all asbestos fiber types, including the most commonly used form of asbestos, chrysotile, causes mesothelioma in humans.

OSHA's Definition of "Asbestos" on its Official Website.[14]

A10-14

Similarly, *lead* is dangerous to people and their families. Per OSHA's report:

> Lead has been poisoning workers for thousands of years. Lead can damage the central nervous system, cardiovascular system, reproductive system, hematological system, and kidneys. When absorbed into the body in high enough doses, lead can be toxic.
>
> In addition, workers' lead exposure can harm their children's development. Short-term (acute) overexposure–as short as days--can cause acute encephalopathy, a condition affecting the brain that develops quickly into seizures, coma, and death from cardiorespiratory arrest.
>
> Short-term occupational exposures of this type are highly unusual but not impossible. Extended, long-term (chronic) overexposure can result in severe damage to the central nervous system, particularly the brain. It can also damage the blood-forming, urinary, and reproductive systems. There is no sharp dividing line between rapidly developing acute effects of lead

[13] *See*, https://www.cpsc.gov/safety-education/safety-guides/home/asbestos-home; *see also*, medical conditions associated with asbestos: https://www.atsdr.cdc.gov/asbestos/health_effects_asbestos.html

[14] *See*, United States Department of Labor, *Asbestos*, *available at* https://www.osha.gov/asbestos (accessed on Jan. 18, 2024.)

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and chronic effects that take longer to develop.[15]

OSHA also documents the adverse effects of lead on people's reproductive health:

> REPRODUCTIVE RISKS
>
> Lead is toxic to both male and female reproductive systems. Lead can alter the structure of sperm cells and there is evidence of miscarriage and stillbirth in women exposed to lead or whose partners have been exposed. Children born to parents who were exposed to excess lead levels are more likely to have birth defects, mental retardation, or behavioral disorders or to die during the first year of childhood.
>
> Workers who desire medical advice about reproductive issues related to lead should contact qualified medical personnel to arrange for a job evaluation and medical followup--particularly if they are pregnant or actively seeking to have a child. Employers whose employees may be exposed to lead and who have been contacted by employees with concerns about reproductive issues must make medical examinations and consultations available.[16]

A10-14

Therefore, the Project may also cause a significant hazard impact due to the demolition hazards, including impacts to human beings and sensitive receptors, air, and water quality. Thus, under CEQA Guidelines section 15065(a)(1)(4), the City shall make mandatory findings of significance and order that the EIR be revised and recirculated to thoroughly assess the potential hazards impact of the Project and its required demolition activities and potential handling of asbestos and lead-based paint and mitigate those impacts to a level of insignificance.

C. The Project May Have a Significant Noise Impact

There is substantial evidence the Project will have a significant noise impact. The DEIR directly admits that "[t]he Project's construction-related noise impacts would be significant and unavoidable, despite implementation of mitigation concerning equipment and a temporary noise barrier . . ." (DEIR, p. 6-19.) The DEIR further proposes various noise mitigation measures, including implementation of a temporary and impermeable sound barrier of ten feet (10) high with a minimum 12dBA noise

A10-15

[15] See, OSHA Report, *Lead in Construction* (2004) p. 3, *available at* https://www.osha.gov/sites/default/files/publications/osha3142.pdf (accessed on Jan. 18, 2024.)
[16] *Id.* at p. 4.

Letter A10 – Western States Regional Council of Carpenters
Page 18 of 18

reduction and minimum Sound Transmission Class rating of STC-25, along with use of large brass construction equipment a minimum of forty-five (45) feet away from the off-site residence adjacent to the Project Site (i.e. MM NOI-1 and MM NOI-2), however, the DEIR still concludes that even with implementation of the noise mitigation measures, there will be a significant and unavoidable impact. (*Id.* at ES-16.) However, given that the DEIR identifies numerous noise-sensitive receptors near the Project Site, including the residential uses to the north, south, and west, it is imperative that the City require further mitigation be implemented to reduce the impacts to a level of insignificance.

A10-15

Accordingly, the City should require that the DEIR be revised and recirculated to adequately mitigate the Project's significant noise impacts.

IV. CONCLUSION

Based on the foregoing, the City should require that the DEIR be revised and recirculated pursuant to CEQA to address the comments and issues identified in this letter. Similarly, the City should require additional environmental studies be performed to comply with CEQA and other state laws.

A10-16

Sincerely,

Mitchell M. Tsai
Attorneys for Western States Regional Council of Carpenters

Attached:

March 8, 2021, SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);

Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B); and

Air Quality and GHG Expert Matt Hagemann CV (Exhibit C).

A10-17

RESPONSE TO COMMENT LETTER NO. A10

Mitchell M. Tsai , Attorney
Western States Regional Council of Carpenters
March 18, 2024

A10-1
Thru
A10-17 This comment letter is a duplicate of Comment Letter No. A4 written on behalf of the Western States Regional Council of Carpenters. For responses to A10-1 through A10-17, please refer to Responses A4-1 through A4-17 above.

Letter A11 – Brenda Rodriguez
Page 1 of 2

Comment Letter 11

From: Brenda Rodriguez <brodriguez051687@gmail.com>
Sent: Tuesday, March 19, 2024 12:50 PM
To: publiccomment@cityofgardena.org
Subject: Planning Commission Comment

Caution! This message was sent from outside your organization.

To whom it may concern,

I am writing to express my strong objection to the construction of apartments in our neighborhood. As a resident of this area, I am deeply concerned about the potential negative impacts that such development could have on our community. A11-1

First and foremost, the construction of apartments in our area will inevitably lead to increased traffic congestion. Our neighborhood is already struggling with heavy traffic, and adding more residential buildings will only exacerbate the problem. This will not only make it more challenging for residents to navigate the area, but it will also impact air quality and overall environmental sustainability. A11-2

Additionally, I am dismayed by the fact that the city has primarily focused on building expensive apartments in our neighborhood. These apartments are unaffordable for many A11-3

Letter A11 – Brenda Rodriguez
Page 2 of 2

residents, and their construction could potentially displace long-time community members. It is clear that the city's priorities are out of touch with the needs and desires of the local population. A11-3

I urge you to reconsider the decision to allow the construction of apartments in our neighborhood. Instead, I encourage the city to prioritize sustainable and affordable housing options that benefit all residents. It is crucial that we protect our community from overdevelopment and ensure that our daily lives are not negatively impacted by ill-conceived construction projects. A11-4

Thank you for your attention to this matter.

Sincerely,

Brenda Rodriguez, MS

170th/Catalina

RESPONSE TO COMMENT LETTER NO. A11
Brenda Rodriguez, Resident
March 19, 2024

A11-1 This comment expresses opposition to the Project. This comment has been noted and no further response is necessary.

A11-2 This comment expresses concern about the Project leading to traffic in the surrounding neighborhoods, as well as such traffic leading to air quality impacts from mobile sources. As mentioned in Response A8-3, with the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by "level of service" (LOS) and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3).). Notwithstanding, please refer to Response A8-3 for a discussion regarding traffic.

Regarding air quality impacts, **DEIR Table 4.1-6: Operational Air Pollutant Emissions**, presents the Project's operational mobile source emissions and maximum daily total and indicates they would be below the SCAQMD's mass daily significance thresholds. As such, Project operations would result in a less than significant air quality impact. The comment does not provide any evidence regarding traffic and air impacts or address the DEIR's adequacy, thus, no further response is required.

A11-3 This comment discusses affordability of the housing provided by the Project and expresses concerns of resident displacement. Please refer to Response A8-5 for a discussion concerning affordable housing units. Regarding displacement of residents, as concluded in **DEIR Section 7.0: Effects Found Not to be Significant**, the Project would remove the existing onsite industrial uses and, in their place, construct residential uses. The Project would not displace existing housing or people or require construction of replacement housing elsewhere and no impact would occur in this regard. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.

A11-4 This comment urges decision makers to deny the proposed Project in order to protect the community from overdevelopment. This comment is noted, and no further response is necessary.

Letter A12 – Dalia Juarez
Page 1 of 1

From: Dalia Juarez <dalia1575@gmail.com>
Sent: Tuesday, March 19, 2024 4:02 PM
To: publiccomment@cityofgardena.org
Subject: Proposed 403 Unit Build

Caution! This message was sent from outside your organization.

This email serves as my formal objection to the proposed 403-unit build located at 16829-16907 Normandie.

There are several reasons for my objection to this build. First, quantity does not equal quality. The average cost of renting in the 90247 zip code ranges from $1900 for a studio space to $3400 for a 3-bedroom townhome. According to Zillow, there are currently 64 rentals available in the 90247 zip code. Take into consideration the fact that the minimum wage in California is $18.00 an hour. To afford $2900 in rent and individual would have to work 166 hours every month just to afford rent. A12-1

A12-2 The City of Gardena does not house industries necessary for individuals to be able to work and live in the city. This means that the filling of this proposed build relies on individuals commuting. Whether gas or electric, this means that more cars would be on the congested streets that are already deteriorating under the current traffic conditions with the city unable (or perhaps unwilling) to maintain streets at an adequate condition. And though developers may state that each unit will be provided with an attached garage/parking you must consider the possibility that a unit may house multiple individuals. People deserve fair and equitable housing. Does the city plan on making use of the Tenant Protection Act? A12-3 What about the potential impact on local schools? Gardena High School is overcrowded and ranks in the 50% percentile for quality of education. A12-4

Equally relevant to my opposition to this matter is the fact that the 403-unit build would place stress on the surrounding neighborhoods. Unless the unit includes sufficient guest parking options (a parking lot) the neighborhoods surrounding the 403 unit build would mean heavy traffic and unknown vehicles parking in neighborhoods with single-family homes. A12-5

A12-6 The 7-story build is antithetical to the architecture in the area. Much taller than any of the buildings in the area this build would also negatively impact the ecology of the area: more trash, an increase in water usage (a resource already strained), the construction will create about 50 million tons of carbon emissions, and overall will exhaust limited resources while placing construction workers in danger.

The city has done a disservice to the residents by only informing residents who live within 300 feet of the proposed building. All construction within the city limits is the right of the people to know. Do better! A12-7

Dalia R. Juarez
Resident & Homeowner on 166th St

RESPONSE TO COMMENT LETTER NO. A12
Dalia Juarez, Resident
March 19, 2024

A12-1 This comment notes its opposition to the Project and discusses housing affordability in the Project area. Please refer to Response A8-5 for a discussion concerning affordable housing units. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.

A12-2 This comment expresses concern with the Project's trip generation and resulting impacts to traffic and road maintenance services. As mentioned in Response A8-3, with the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by "level of service" (LOS) and other similar metrics, no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3).). Notwithstanding, please refer to Response A8-3 for a discussion regarding traffic. Regarding roadway maintenance, this is not an environmental issue pursuant to CEQA. Notwithstanding, the overall condition of the City's pavement network is rated as "Good," with a weighted average Pavement Condition Index (PCI) of 81.2 (range from 0 to 100). Additionally, the City's Public Works Department continues to allocate funds from its Capital Improvement Plan toward annual network pavement maintenance and rehabilitation, which is expected to gradually improve the City's weighted PCI over time. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.

A12-3 This comment notes that multiple tenants could live in a singular unit. This comments also notes that people deserve fair and equitable housing and questions if the City will make use of the Tenant Protection Act of 2019, a state law that protects tenants from excessive rent increases and evictions without cause. This comment does not address the DEIR's adequacy or raise a significant environmental issue. This comment has been provided to City staff. This comment is noted, and no further response is necessary.

A12-4 This comment questions the Project's impact to local schools. As concluded in **DEIR Section 4.11: Public Services**, sufficient capacity exists at the existing elementary and middle school facilities to accommodate the Project's forecast student population. 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…". Therefore, the Project would not result in adverse physical impacts associated with the construction of school facilities. A less than significant impact would occur in this regard, and no mitigation is required. This comment does not address the DEIR's adequacy and no further response is required.

A12-5 This comment suggests that the Project could increase traffic in the surrounding neighborhood and result in impacts to street parking in the local neighborhoods if there is no parking lot. As mentioned in Response A8-3, with the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by "level of service" (LOS) and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3).). Notwithstanding, please refer to Response A8-3 for a discussion regarding traffic. Additionally, parking is not an environmental issue pursuant to CEQA, and this comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary. Notwithstanding, please refer to Response A8-1 for a discussion regarding parking.

A12-6 This comment expresses concern about the Project's building heights and architecture and impacts to solid waste generation, water demand, and construction emissions. Please refer to Response A8-1 for a discussion concerning Project building height.

Regarding solid waste generation, as concluded in **DEIR Section 4.15: Utilities and Service Systems (Impact 4.15-7)**, the Project would not generate solid waste in excess of state or local standards, in excess of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Regarding water demand, as concluded in **DEIR Section 4.15 (Impact 4.15-5)**, Golden State Water Company would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Please refer to Response A11-2 for a discussion concerning air quality impacts. The commenter does not provide any evidence to substantiate their allegations and does not address the DEIR's adequacy. No further response is required.

A12-7 This comment expresses discontent with the noticing of the proposed Project and has been provided to City staff. This comment is noted, and no further response is necessary.

Letter A13 – Terri C.
Page 1 of 2

Comment Letter 13

From: pcchunk02-jobs@yahoo.com <pcchunk02-jobs@yahoo.com>
Sent: Tuesday, March 19, 2024 11:09 AM
To: Public Comment <publiccomment@cityofgardena.org>
Subject: PLANNING COMMISSION COMMENT - MARCH 19, 2024

Caution! This message was sent from outside your organization.

Dear City Officials,

Regretfully, I am unable to attend the public hearing tonight when considering the approval of Specific Plan #1-21 but would like to respectfully submit comments.

1. Proposing nearly 400 new housing units is an overambitious and overzealous commitment without being able to fully speak to how Gardena will look in 20-30 years based on today's decisions. A13-1

2. While the EIR already in full progress, and nationally, trendy urban planning studies tend to be proponents of the proposed high density housing, I have concerns for the current tax-paying residents in the area who care deeply about the community and would like to preserve a sense of community. How will this be addressed with building high density units where people stay cocooned indoors and have little incentive to get to know their neighbors? How will a sense of long-standing community involvement for all age groups be encouraged? A13-2

3. Re: construction noise, air quality, and road blockages/traffic for the residents in our quiet neighborhood directly adjacent to the construction site: Many senior citizen homeowners walk in their housing tracts for exercise. Health, safety and quality of life should be respected. How long will construction disturbances continue if this project moves forward? A13-3

4. Traffic: We have seen the congestion and traffic on Artesia Blvd over the past decade. I have had work colleagues from other counties tell me that they use Artesia Blvd as their freeway alternate to get home when the 405 is congested and it, too now resembles a busy highway. While there are sidewalks for pedestrians, I myself have almost been hit by a reckless driver while crossing the street on a green light and public safety is a growing concern that needs to be considered/addressed. A13-4

5. The goal on the Gardena city council website state that they are striving for "the highest qualtiy of life" . My question to the council is how this is actually being defined. Please genuinely listen and consider your current A13-5

Letter A13 – Terri C.
Page 2 of 2

constituents to make prudent decisions to preserve the things that make Gardena a great place. A13-5

Respectfully, Terri C.

RESPONSE TO COMMENT LETTER NO. A13
Terri C., Resident
March 19, 2024

A13-1 This comment questions the density of the Project and the long-term compatibility of the project within the City. Please refer to Response A8-1 for a discussion concerning Project density . The City's General Plan (Gardena General Plan 2006) is a state-required long-range planning document, which identifies the City's long-term objectives for the next 15-20 years; see **DEIR Section 4.8.: Land Use and Planning** for a discussion of Project consistency with the Gardena General Plan. As concluded in **Section 4.8**, the Project would not conflict with the relevant Gardena General Plan goals and policies and would not result in a significant environmental impact concerning a conflict with the Gardena General Plan. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.

A13-2 This comment expresses concern with the Project's density and how it will impact the sense of community in Gardena. Please refer to Response A8-1 for a discussion concerning Project density. Sense of community is not a CEQA matter, however, this comment has been noted and passed on to decision makers. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.

A13-3 This comment asks about Project construction duration, and noted concern about construction noise, construction air quality, and construction-related road blockages/traffic. As stated in **DEIR Section 2.0: Project Description**, construction is anticipated to occur over approximately 3.5 years. Please refer to Response A4-15 for a discussion concerning construction noise. Please refer to Response A11-2 for a discussion concerning air quality impacts. Finally, regarding construction-related road blockages and traffic, as stated in **DEIR Section 4.13: Transportation**, Project construction may require traffic lane, parking lane, and/or sidewalk closures, including along Normandie Avenue, but would not result in the complete closure of any public or private street. The Project would implement PDF TR-1, which requires a Construction Traffic Management Plan, approved by the City, to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction. With implementation of the Construction Traffic Management Plan, temporary construction activities would not impede use of the streets for emergencies or access for emergency response vehicles. As such, Project construction would not result in inadequate emergency access and a less than

significant impact would occur. Therefore, this comment does not address the DEIR's adequacy e and no further response is required.

A13-4 This comment expresses concern about safety related to pedestrian facilities. As discussed in **DEIR Section 4.13: Transportation**, the Project proposes to construct sidewalks along the Project site frontage: on the south side of West 169th Street (between Brighton Way and Normandie Avenue), on the north side of West 170th Street (between Brighton Way and Normandie Avenue), on the west side of Normandie Avenue (between West 169th Street and West 170th Street), and on the east side of Brighton Way (between West 169th Street and West 170th Street). Additionally, the Project proposes to construct approximately 266 linear feet of offsite sidewalk improvements along the south side of West 169th Street, just west of the Project site, between Brighton Way and the alley to the west of Brighton Avenue. The sidewalk improvements would be constructed pursuant to GMC §17.08.170: Improvements and designed to be consistent with the GGP Circulation Element requirements for a Local Street. With the incorporation of these proposed sidewalk improvements, the Project would create a continuous and complete pedestrian network in the area surrounding the Project site, thereby increasing pedestrian safety within the area. This comment does not address the DEIR's adequacy and no further response is required.

A13-5 This comment requests the lead agency to consider the opinions of current constituents when considering the Project. This comment is noted, and no further response is required.

Letter A14 – Yvonne and Arthur Acosta
Page 1 of 2

Comment Letter 14

From: Yvonne <itzyvonne7@gmail.com>
Sent: Tuesday, March 19, 2024 12:03 PM
To: PUBLICCOMMENT@cityofgardena.org
Subject: Impact of 403 unit housing project

Caution! This message was sent from outside your organization.

A14-1

Planning Commission,
As a tax paying homeowner in the city of Gardena, I am emailing your commission to make my voice heard and oppose this project (see attachment). The extra traffic, air quality pollution, and impact on the neighborhood directly behind the proposed site would be detrimental to our local community. Instead we should focus on improving, protecting, and funding our natural environment green spaces, namely the Gardena Wetlands Willows.

A14-2

Respectfully,
Yvonne and Arthur Acosta

Letter A14 – Yvonne and Arthur Acosta
Page 2 of 2

RECORDING REQUESTED BY
AND WHEN RECORDED MAIL TO:

City of Gardena
1700 West 162nd Street,
Gardena, CA 90247
Attention: City Manager

No fee for recording pursuant to
Government Code Sections 27383 and 27388.1

(Space above for Recorder's Use)

AFFORDABLE HOUSING AGREEMENT
AND DECLARATION OF RESTRICTIVE COVENANTS
(Normandie Crossing Specific Plan)

This Affordable Housing Agreement and Declaration of Restrictive Covenants (the "Agreement") is dated as of _____ __, 2024, and is by and between the City of Gardena, a municipal corporation (the "City"), and 16911 Normandie Associates, LLC, a Delaware limited liability company, authorized to do business in California, (the "Developer"), with reference to the following facts:

A. Developer is the owner of certain real property consisting of approximately 5.23 acres which is located at property commonly known as 16907, 16835, and 16829 Normandie Avenue, in the City of Gardena, County of Los Angeles, California, as more particularly described in the attached Exhibit A, which is incorporated herein by this reference (the "Property").

B. The City has approved a residential development of 403 units consisting of a single 7-story apartment building with 328 dwelling units ("Apartment Building") and 75 3-story townhome style units ("Townhomes") (collectively, the "Project") which required the following Project Approvals: General Plan Amendment to the Land Use Plan (the "General Plan Amendment"), Specific Plan, Zone Change, Zoning Code Amendment, Development Agreement, Affordable Housing Agreement, and Site Plan Review;

C. As part of the Development Agreement, Developer has agreed to provide 20 units which will be affordable for lower income households in the Apartment Building for a 55 year period from the date that a certificate of occupancy is issued for the Affordable Units (the "Affordability Term").

D. The Development Agreement requires the City to ensure, and Developer to agree to, continued affordability of the Affordable Units for the Affordablility Term. To ensure their continued affordability for the Affordablility Term, this Agreement shall be

1

RESPONSE TO COMMENT LETTER NO. A14
Yvonne and Arthur Acosta
March 19, 2024

A14-1 This comment expresses concern about the Project's traffic and air quality impacts to the neighborhood directly behind the Project site. With the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by "level of service" (LOS) and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3)). Notwithstanding, please refer to Response A8-3 for a discussion concerning traffic congestion. Please refer to Response A11-2 for a discussion concerning air quality impacts. This comment does not address the DEIR's adequacy and no further response is required.

A14-2 This comment suggests that decision makers should focus efforts on improving, protecting, and funding the natural environment and green spaces, namely the Gardena Wetlands Willows specifically. It is noted that this is a private Project, and no City funds are being spent. This comment has been noted and passed on to decision makers.

Letter A15 – Ace Rose
Page 1 of 1

Comment Letter 15

Good afternoon,

I am a homeowner and longtime resident of Gardena. I am writing regarding the development of Normandie Crossing. For reasons, I am opposed to the development of such a big building, bringing in more traffic, congestion, and parking issues to the neighborhood. I also understand the cities interest in property, taxes and more revenue for the city. However, please make a more livable and pleasant for its current residents who have been paying taxes for a very long time.

A15-1

A15-2

to reiterate, I am opposed to this development of Normandie Crossing, Please consider our comments and urges NOT to bring such an overwhelming building to our community.

Ace Rose

RESPONSE TO COMMENT LETTER NO. A15
Ace Rose
March 19, 2024

A15-1 This comment expresses concerns about the Project's impact to traffic and parking in local neighborhoods. With the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by "level of service" (LOS) and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3)). Notwithstanding, please refer to Response A8-3 for a discussion concerning traffic congestion. Additionally, parking is not an environmental issue pursuant to CEQA, and this comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary. Notwithstanding, please refer to Response A8-1 for a discussion regarding parking. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.

A15-2 This comment notes that decision makers may have an interest in the Project as it could lead to property taxes and revenue, but that they oppose the Project and urge decision makers to do the same. This comment has been noted and passed on to decision makers.

Letter A16 – Brandon Smith
Page 1 of 2

Comment Letter 16

From: Brandon Smith <thatbrandonsmith@gmail.com>
Sent: Wednesday, March 20, 2024 5:02 PM
To: publiccomment@cityofgardena.org
Subject: Normandie Crossing March 19 Planning Commission follow-up statement

Caution! This message was sent from outside your organization.

Dear Chairman Henderson and Planning Commission members,

Due to the reduced time for statements due to the outpouring of public comment on March 19, I wanted to more properly outline my thoughts regarding my full support of the original proposed Normandie Crossing design, for the following reasons:

- Of course, these 403 dwelling units, or any single housing project itself, will not solve our housing crisis, much like saving an extra $100 this month will not make or break a retirement fund in 30 years. However, every single unit built is a critical part of the whole. Each delay, size reduction or blocking of a project adds up and indeed has led to our present crisis. It is proven elsewhere in this country such as Minneapolis—building more housing units positively impacts rent prices for renters both in the newly built property and those surrounding it.

A16-1

- Regarding local concern around affordability—the "lower density" option with fewer

A16-2

Letter A16 – Brandon Smith
Page 2 of 2

apartments will only raise rent prices for the remaining units in order for the developer to recoup costs.

- Not only will the higher density reduce rent prices, but this construction is being discussed when a national court ruling in the last week regarding realtor fees is being widely reported to have a forthcoming reductive impact on purchase prices as well.
- As much as I would also love 100% affordable homes as some local voices are earnestly calling for, our system is set up to all but require private developers to build profitable properties. Social, at-cost housing is outside the scope of this project and not coming soon enough on a state level to impact the housing crisis as much as this project will.

A16-2

- Regarding local concern around traffic—although the EIR did not expect an appreciable impact on local streets, it is the responsibility of the city to add traffic calming measures to keep vehicles from driving unsafely. Speed bumps are one but not the only solution—slight chicanes and crosswalk bump-outs are also simple solutions to slow traffic and prevent 169th and other streets from becoming shortcuts for existing and future drivers.
    - It is fully up to the city to provide the safer streets that can handle this increase in population, taking heed of the landslide passing of measure HLA in Los Angeles that proves citizens across our region all want safer streets for all.

A16-3

- In addition to the above traffic focus, the city could take a page from other local municipalities (link) and require a concession from the builder to pay for Class IV bicycle paths which would further incentivize the ownership and use of alternative transportation in these units. This area is perfect for taking a casual ride to Gardena Boulevard for a sandwich at Giulianos, meeting up with a friend at Aunties Cafe, or riding a cargo bike to Sam's Club or Food4Less for groceries. This further reduces the potential traffic impact of the development. The project has 173 bike parking spaces—we should incentivize filling them out.

A16-4

- Concerned residents at the March 19 planning meeting raised the slow decline of Gardena in their eyes over the preceding decades. This project resets the tax base of these parcels, flowing critical additional funds that can go toward first responders & infrastructure improvements and reduce the visually blighted areas of our city.

A16-5

Simply put, there is no "somewhere else" for this project to go—all the other "somewhere elses" that, like this one, also allow for no displaced residents, must also be utilized for housing if the city is to properly attack our housing crisis and meet our minimum required housing allowance of over 5700 units within 7 years, lest we end up with even more loss of local control in the form of Builder's Remedy projects, etc.

I empathize and do not envy your position facing the public pressure you are receiving. These sorts of decisions are fraught and emotional on all sides. But the long view solution here to improve our city for our children's and grandchildren's future is to build this project at its full intended scale.

A16-6

Respectfully,
Brandon Smith

RESPONSE TO COMMENT LETTER NO. A16
Brandon Smith
March 20, 2024

A16-1 This comment notes that housing projects with high unit counts can positively impact rent prices for local renters and surrounding residences. This comment is noted, and no further response is necessary.

A16-2 This comment notes that the Reduced Density Alternative would raise rent prices for the remaining units in order for the Applicant to recuperate costs. It reiterates that the Project's proposed density would help reduce rent prices, and while it would be preferred to have 100 percent affordable homes, it would not be an economically feasible option for the Applicant. This comment has been noted, and no further response is necessary.

A16-3 This comments notes that the concerns surrounding local traffic and safety is the responsibility of the City to resolve; see also Responses A8.3 above, respectively. The comment suggested that the City consider options such as speed bumps, chicanes, and crosswalk bump-outs to slow traffic and prevent 169th street from becoming a shortcut for drivers. This comment is noted and has been passed on to the decision makers.

A16-4 This comment suggests that the City require a concession from the builder to pay for Class IV bicycle paths which would incentivize use of alternatives modes of transportation. The comment notes that the local area is ideal for bicycle travel and that the 173 bicycle spaces proposed by the Project helps incentivize bicycle travel. As noted in **DEIR Section 4.13: Transportation**, there are existing and proposed South Bay Bicycle Master Plan (SBBMP) bike routes near the Project site. As stated in **DEIR Section 4.13 (Impact 4.13-1)**, the Project does not propose any changes to the existing bicycle facilities surrounding the Project site and it would not impede or alter the installation of the SBBMP's -planned bicycle facilities, including the Bike Friendly Street segment planned along West 170th Street. This comment has been noted and will be passed on to decision makers.

A16-5 This comment notes that the Project would result in additional funding for first responders and City infrastructure and would reduce visually blighted areas in the City. This comment has been noted, and no further response is necessary.

A16-6 This comment notes that the City needs housing projects that do not displace current residents in order to resolve the housing crisis and meet the minimum required

housing allowance. This comments notes its support of the proposed Project. This comment is noted and, no further response is required.

Letter A17 – Gloria Mazzocco
Page 1 of 2

Comment Letter 17

As a homeowner and Gardena native, I voice the following concerns regarding the Normandie Crossing Project:

- Adding a minimum of 1,000 new residents will add more stress and congestion to our already overloaded infrastructure. Schools are crowded, Normandie already has immense traffic. A17-1
- The Gardena Willows Wetland Preserve, located less than half a mile from the proposed project site, is not even mentioned in the Initial Study. Yet the Dominguez Channel is mentioned "located 0.4 mile south of the Project Site" (https://files.ceqanet.opr.ca.gov/287728-1/attachment/KskNJFczUJeo_9pRtqTiGQzWJ5EcKM3xCMrIPBpgg9pkho2TCBr7dqYtFyM35EFORVdSpnNGtQH7GxuM0) A17-2
- Per the Draft Specific Plan (https://cityofgardena.org/wp-content/uploads/2023/12/DRAFT-Normandie-Specific-Plan.pdf) "The Plan Area is currently approximately 100 percent impervious. The Specific Plan will decrease the impervious area of the site by approximately fourteen percent to 86 percent." This greatly affects groundwater runoff to the above mentioned Willows, and therefore affecting water quality, soil, and air quality. A17-3
- Brighton Avenue, directly to the west of the Project, and 169th Street, directly north of the project are packed with cars on a regular basis, with overflow on 170th Street to the South and Brighton Avenue to the North On any given Street Sweeping Day the City Parking Enforcement issues many citations, which has become a way of life for these residents. The project proposes 10 Guest spaces for 75 townhomes, in addition to their 2 spaces allotted per home - which is a ridiculous ratio. Where will these guests and residents park? With townhomes the size of 2, 3 and 4 bedrooms, the residents will need more than two parking spaces per unit, more like 3 or 4. A17-4
- A 7-story building is excessive for this area, what other buildings can even compare? Gardena Memorial Hospital, which is essential to our community's healthcare is appropriate. But an overcrowded apartment building? No! A17-5
- The recent residential development to the north of the Project has over 60 single person units, and a great deal of its residents park on the street, not their automated parking garage, out of convenience. That property also took a significant amount of time to reach full occupancy - because so many people can't afford housing. With these larger units at the Project, there will be multiple families sharing one unit. And only 20 units of 403 deemed "affordable"? That's outrageous! A17-6

Letter A17 – Gloria Mazzocco
Page 2 of 2

- Construction timeline is over three years. The local residents cannot withstand that amount of noise and air pollution. There are children with asthma, elderly neighbors with weakened respiratory systems, residents with health conditions that can't enjoy a quality of life with such pollution.

A17-7

Respectfully,

Gloria Mazzocco, homeowner

(170th Street & Brighton Way)

RESPONSE TO COMMENT LETTER NO. A17
Gloria Mazzocco, Homeowner
March 20, 2024

A17-1 This comment expresses concerns about the Project's impacts to local infrastructure, schools, and traffic congestion. As concluded in **DEIR Section 4.19: Utilities and Service Systems**, with mitigation incorporated, the Project would result in less than significant environmental effects associated with construction of the proposed water facilities, wastewater facilities, stormwater drainage facilities, electric power and telecommunication facilities. Additionally, the proposed Project would result in a less than significant impact in regard to water supply, wastewater treatment, and solid waste generation. Please refer to response A12-4 for a discussion concerning impacts to local schools. With the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by "level of service" (LOS) and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3)). Notwithstanding, please refer to Response A8-3 for a discussion concerning traffic congestion. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.

A17-2 This comments states that the Initial Study failed to mention the Gardena Willows Wetland Preserve. The Gardena Wetland Willows Preserve is located 0.3-mile southeast of the Project, just north of the commercial development at the northwest corner of Vermont Avenue and Artesia Boulevard. While the Initial Study did not mention the Gardena Wetland Willows Preserve in the analysis, the Initial Study concluded that based on review of the existing and adjacent 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. The Project site is fully developed and contains no natural habitats, with only minimal landscaping. The Project site is also bounded by roadways and surrounded by urban uses (i.e., single- and multi- family residential on all sides). Finally, Project construction activities would also occur entirely within Project site boundaries. 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. This comment does not address the DEIR's adequacy or provide any evidence of an impact to the Willows Wetland. No further response is required.

A17-3 This comment expresses concern of the Project's impact to Gardena Wetland Willows due to the reduction of impermeable surface area and the resulting impacts on runoff,

water quality, soil, and air quality. As concluded in **DEIR Section 4.7: Hydrology and Water Quality**, the proposed Project would result in an increase in landscaped areas throughout the Project site, which would decrease impervious surfaces from 99.7 percent under existing conditions to 85.9 percent under proposed Project conditions. The Project would reduce impervious surfaces thereby reducing flows under 10-year, 25-year, and 50-year storm events between 11.7 percent and 13.8 percent, when compared to existing conditions. Because the Project would decrease surface runoff, it would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or result in flooding on- or off-site. The Project would also treat site runoff in accordance with the LID Standards Manual. Further, as concluded in DEIR Impact 4.8-1, the Project would be subject to compliance with NPDES and GMC requirements, which include implementation of BMPs. Overall, the Project would not substantially contribute to runoff.

Regarding water quality, following compliance with NPDES and GMC requirements, which include implementation of BMPs as a Condition of Approval, the Project's construction and operational activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Concerning soil, the Projects proposed LID systems are designed to safely convey stormwater runoff into the sub-surface soil without the threat of contaminant mobilization and will assist in improving the groundwater quality.

Finally, concerning air quality, as noted in **DEIR Section 4.2: Air Quality**, the Project's construction and operational emissions would be below SCAQMD thresholds and would result in a less than significant impact.

The comment does not provide any evidence of any impacts and does not address the DEIR's adequacy No further response is required.

A17-4 This comment expresses concern about the Project's proposed parking areas suggesting that the Project would result in parking on local streets. Parking is not an environmental issue pursuant to CEQA, and this comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary. Notwithstanding, please refer to Response A8-1 for a discussion regarding parking.

A17-5 This comment notes that a seven-story apartment building is excessive for the City. Please refer to Response A8-1 concerning Project building height. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.

A17-6 This comment notes that a residential project to the north uses the local streets for parking; see Response A17-5 above concerning parking on local streets. This comment also mentions that the residential project to the north took a long time to become fully occupied and notes discontent that only 20 units for the Project will be deemed affordable. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.

A17-7 This comment expresses concerns about Project construction-related air quality and noise impacts to nearby sensitive receptors. Please refer to Response A11-2 for a discussion concerning air quality impacts. Please refer to Response A4-15 for a discussion concerning construction noise. This comment does not address the DEIR's adequacy and no further response is required.

Letter A18– Liliana Arreguin
Page 1 of 1

Comment Letter 18

Hello,

I live on Brighton Way and have been living here for the past 15years.
It has been very peaceful and a very lovely neighborhood.
The fact that you want to build a 7 story tall building is very disturbing.
I work hard and pay property taxes to live in this nice quiet neighborhood. That 7 story building will make everything around me even more congested than what it is. And the NOISE level of building such monstrosity, I do not even want to image. Parking everywhere around my home will be a nightmare. Why should I suffer because you want to build something.

A18-1

A18-2

I know you guys can build somewhere else. Leave my neighborhood alone!
You keep on just building new apartments and condos in Gardena. How about let the neighbors who pay taxes enjoy their properties.

A18-3

Liliana Arreguin
Brighton Way, Gardena

RESPONSE TO COMMENT LETTER NO. A18
Liliana Arreguin, Resident
March 20, 2024

A18-1 This comment expresses concern about the Project's potential impacts to congestion. With the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by "level of service" (LOS) and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3)). Notwithstanding, please refer to Response A8-3 for a discussion concerning traffic congestion. This comment does not address the DEIR's adequacy or raise a significant environmental issue and no further response is required.

A18-2 This comment expresses concern about the Project's construction noise impacts and the potential impacts to parking on local streets. Please refer to **DEIR Section 4.9: Noise** and to Response A4-15 for a discussion concerning construction noise**.** The comment does not address the DEIR's adequacy on this issue and no further response is necessary.

Additionally, parking is not an environmental issue pursuant to CEQA, and this comment does not address the DEIR's adequacy or raise a significant environmental issue. As such, no further response is necessary. Notwithstanding, please refer to Response A8-1 for a discussion regarding parking.

A18-3 This comment expresses opposition to the Project. This comment is noted, and no further response is necessary.

Letter A19– Various
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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT 1

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

	NAME (Print)	SIGNATURE	ADDRESS	EMAIL
1.	DANA COTTER	[signature]	16808 HALLDALE	COTTER@D@TWC.COM
2	RICARDO MELGOSIX	[signature]	16904 HALLDALE AVE.	RK_ROC1@HOTMAIL
F 3.	FERNANDO LOPEZ	[signature]	16803 Halldale Ave	
F 4	CRAIG HAMA	[signature]	16715 Halldale Ave	craig.hama@gmail.com
F 5	LESLEY CHINEN	[signature]	16714 & 16716 HALLDALE AVE	lesley.chinen@gmail.com
Cut de sac 6	[illegible]	[signature]	1441 W. 168th St. Gardena	
7	Samantha Mendez	[signature]	1440 W. 168th st Gardena	
8	Jose Mendoza	[signature]	1440 W. 168th St. Gardena, CA	
9	Nancy Cervantes	[signature]	1449 W 168th st. Gardena, CA	nancycervantes@hotmail.
10	Elvira Cervantes	[signature]	1449 W 168th st Gardena	
11	Yolanda Alvarez		1449 W 168Th st Gardena	
12	Jose Luis C.P.	Jose Luis C.	1449 W 168th st. Gardena.	
13	Virginia DeLeon		16711 Halldale Ave. Gardena	
14	Tracy Edwards		16908 Halldale Ave #A. Gardena	
15	GARY JUE	[signature]	16929 halldale Ave GARDENA	
16	Leah Nakayama		17115 Halldale Ave, Gardena CA 90247	
17	MARIANO AVILA	[signature]	1510 W. 170TH ST. GARDENA	
18	Jeah Avila	[signature]	1510 W. 170th St. Gardena, CA 90247	

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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT 2

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

	NAME (Print)	SIGNATURE	ADDRESS	EMAIL
19	Hien Truong	[signature]	1520 W 170th St, #B Gardena, CA 90247	
20	Stephen Hunt	[signature]	~~1464 W. 170th STREET~~ GARDENA, CA. 90247	
21	ROBERTA Sturdevant Wood	[signature]	1460 W 170th St Gardena Ca 90247	
22	Michael J. Wood		1460 W. 170 ST. GARDENA, CA. 90247	
23	Shinji Takeshita	[signature]	1452 W. 170th Garden CA 90247	
24	SHERRI SALATIXIO	[signature]	1444 W. 170th Gardena Ca. 90247	
25	Susan Yamamoto	[signature]	1440 W. 170th St " " "	
26	Brent Aoki	[signature]	17107 Halldale, 90247	
27	Kenny Doi	[signature]	17111 Halldale Ave 90247	
28	Donna Doi	[signature]	17111 Halldale Ave 90247	
29	LYNN WITHROW		17119 HALLDALE AVE 90247	
30	RUBY ANCHETA		17203 Halldale Ave. 90247	
31	Lena Yang	[signature]	17210 Halldale Ave., 90247	
32	Julia Estrada		1519 W. 173rd St. Gardena Ca. 90247	
33	Byron Fonseca		1519 W. 173 St. Gardena. Ca. 90247	
34	IWAMOTO, I	[signature]	1520 W 173rd St Garden	

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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT 3

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

	NAME (Print)	SIGNATURE	ADDRESS	EMAIL
35	Lisa Price	Lisa Price	1516 W. 172nd St Gardena 90247	lisalynn.price@gmail.com
36	Antwon Martin	[illegible]	1468 West 173rd St.	drantwonmartin@gmail.
37	Erick Rubalcava	[illegible]	1464 W. 173rd St	erubalcava1974@gmail.
38	Armin Widjaja	[illegible]	1452 W. 173rd St.	hh-ming@yahoo.com
39	Les Harada	[illegible]	1436 W. 173rd St.	Harada L@hotmail.co
40	Anastasia Canlas	[illegible]	1431 W 173rd St	recrjunk@gmail.co
41	ERWIN CANLAS		1431 W. 173RD ST. 90247	INSOMNIACINLU@GMAIL.COM
42	[illegible]		1432 W 173 RD St	[illegible]
43	Denise Aumiller	[illegible]	1415 W. 172nd St.	deniseaumiller@gmail.com
44	ELINOR BARBICK		1411 W. 173RD St GARDENA, CA 90247	
45	STANLEY [illegible]		1420 W 173rd GARDENA	
46	TRACI Smith	[illegible]	17216 Brighton Wa	
47	SUNNY CHOI	[illegible]	17208 BRIGHTON WAY.	
48	JUNE SHIMIZU	June Shimizu	17204 Brighton Way	
49	ELAINE YANO	Elaine Yano	17200 Brighton Way Gardena	
50	CHIZUKO AMBROSE	[illegible]	17112 BRIGHTON WAY GARDENA, CA	

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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT 4

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

	NAME (Print)	SIGNATURE	ADDRESS	EMAIL
51	ALVIN BUTLER	Alvin Butler	16922	
52	RON NAGAOKA	[signature]	16916 S HARVARD BLVD	
53	SAYURI NAGAOKA	[signature]	" " "	
54	KUSSMES KYOG		16910 S HARVARD BLVD	
55	William Noul		1777 W 169th PL GARDENA CA	
56	Janice Soda		16902 S. Harvard Blvd Gardena CA	
57	Corby Carrera	Corby Carrera	16826 S. Harvard Blvd. CA.	
58	Alyn Carrera	[signature]	16906 S. Harvard Blvd. CA.	
59	Susan Bermudez		16824 S. Harvard Blvd. Ca.	
60	[signature]	[signature]	16820 S Harvard bl, Gardena	
61	Dinora Aquino	[signature]	16807 S. Harvard Blvd Gardena 9024	
62	Michael Bedernik	[signature]	16817 S Harvard Blvd Gardena CA 9024	
63	Stephanie Bedernik	[signature]	16817 S Harvard Blvd, Gardena, CA 9024	
64	LILLIE VERA	[signature]	16825 S HARVARD BLVD	
65	ROGER MARTINEZ	[signature]	16827 S. HARVARD BLVD 90247	
66	Minerva Martinez			
67	Maria	[signature]	16903 S. Harvard bl.	
68	Luis Gutierrez		424-221-4972	

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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT 5

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

	NAME (Print)	SIGNATURE	ADDRESS	EMAIL
69	NORA B. FREY	Nora B Frey	16911 S Harvard Blvd.	Rabinaf @aol.com
70	MICHAEL J. FREY	MJ Frey	16911 Harvard Blvd	LTCFREY @aol.com
71	Nieves Reyes		16919 S Harvard Blv	
72	Spenser Murabata		16973 Harvard Blvd	
73	KARL MURABATA		16923 HARVARD BL	
74	RAMONA RIVERA		16975 HARVARD BLVD	
75	EDWALDO VELASQUEZ		16931 S HARVARD BLVD	
76	Donnetta Salomo		16939 S Denker	
77	Joel Braun		16941 Denker Ave	
78	Elizabeth Braun		16941 Denker Ave	
79	Tim Braun		16941 Denker Ave	
80	KEITHER MCKENNIE		1714 W. 169th PLACE	
81	Jose Zavala		16930 S. Hobart Blvd.	
82	Brenda Zavala		16930 S. Hobart Blvd	
83	Ricardo DeBorbon		16930 S. Hobart Blvd	
84	CARMEN KOHATSU		16818 S. HOBART BLVD	
85	ALEX KOHATSU		16818 S. HOBART BLVD	

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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT 6

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

	NAME (Print)	SIGNATURE	ADDRESS	EMAIL
86	Kandace Adepoju		16811 Hobart Blvd Gardena 90247	khawkins.adepoju@gmail.com
87	Scott Shimoki		16915 S. Hobart Blvd.	
88	Steve Motoyasu		16915 S. Hobart Bl, #B GARDENA	
89	Tomie Tanda		16931 S. Hobart Bl Gardena	
90	Rosa Santiago		1738 W. 169th Place	JoseSantiago277@gmail.com
91	Jose Santiago		1738 W. 169th Place	JoseSantiago277@gmail.com
92	Rudolfo Navarro		1738 W. 169th Place	JoseSantiago277@gmail.com
93	Linda Yee		1722 W 169th Pl	
94	Joyce Wakatani		1652 W 169th Pl #A Gardena CA 90247	jmwakatani@gmail.com
95	Silvia Shishido		16208 W. 169th. Pl. Gardena, Ca. 90247	
96	Jessie N. Carrara	Jessie N. Carrara	16930 S Harvard Bl. 90249	
97	Silvia Carrara		" " " "	
98	Ha Nguyen		16816 W. 169th Pl Gardena	hanguyen1117@yahoo.com
99	Isabel Gomez		1624 W. 169th Pl. Gardena 90247	
100	Edwin A Garcia		17019 S. Denker Ave	
101	Cynthia Stevens		17107 S Denker Ave. Gardena 9024	
102	Mary Maeda		17129 Denker Ave. Gardena, 90247	

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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

	NAME (Print)	SIGNATURE	ADDRESS	EMAIL
103	Lucy Ramirez		16838 S Denker Ave	Gardena
104	ARMANDO [illegible]		[illegible] Ft 16938 Denker	
105	MARIA BRICK	Maria Brick	16922 La Salle Ave	Gardena

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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

	NAME (Print)	SIGNATURE	ADDRESS	EMAIL
106	Marie Takano	Marie Takano	17016 Steven St. Gardena 90247	
107	Betty Kiyohara	Betty Kiyohara	17024 Steven St. Gardena, 90247	
108	AURORA CACTOLA BIRCO	(illegible)	17116 Steven St Gardena 90247	
109	Linda Mays	Linda Mays	17120 Steven St, Gardena, CA 90247	
110	Diane Guzman	Diane Guzman	17111 Steven St Gardena 90247	
111	HOLLY CHANG		17027 Steven St Gardena 90247	
112	ALEXIS IVAN		1116 W 168TH St Gardena 90247	
113	STEVE YOSHIDA		17003 Steven St. Gardena 90247	

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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT 9

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

	NAME (Print)	SIGNATURE	ADDRESS	EMAIL
114	MICHAEL HALL	Michael Hall	1436 W. 171 ST 90247	mhall 90247
115	ROSE SATO	[signature]	1436 W. 171st St 90247	Rosiesato@yahoo.com
116	Todd Yorizane	[signature]	1446 W. 171st 90247	
117	Fujiko Yano		1444 W 171st 90247	
118	Harriet Shimohara	[signature]	1424 W 171st 90247	
119	ARTHUR SHIMOHARA	[signature]	1424 W. 171st 90247	
120	Tim Okamoto		1416 W 171st 90247	
121	Sachi Ishii		1408 W. 171st GARDENA.	
122	Matthew Patao	[signature]	1459 W. 171st ST Gardena 90247	
123	BOB TONAI	[signature]	1443 W. 171st St GARDENA.	
124	Darlene Azzam		1419 W. 171st Street Gardena 90247	
125	ED AZZAM		1419 W. 171 ST. GARDENA 90247	
126	Harris Samuels	[signature]	1415 W. 171st St Gardena CA 90247	
127	HARVEY KOWOSHIK		16954 Halldale Ave Gardena 90247	
128	DAVID IWAMASA		1435 W. 171st STREET, GARDENA, 90247	
129	Chong Koh		1447 W. 171st St. Gardena 90247	
130	Dawn Tankersley		1451 W. 171st St. Gardena, CA 90247	

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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT 10

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

	NAME (Print)	SIGNATURE	ADDRESS	EMAIL
131	GENE MAGILL			
132	Kathy Hashimoto		1463 W 171ST ST 90247	
133	CHRIS TANKERSLEY		1451 W. 171ST ST. 90247	
134	Gina Isaacson		1439 W 171st Gardena	Kdash515@gmail.com
135	ALAN MORIMIZU		1420 W. 171ST GARDENA	

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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

	NAME (Print)	SIGNATURE	ADDRESS	EMAIL
136	Kevin Collier		1332 W 169th Pl, Gardena	
137	Irene Collier		1332 W 169th Pl, Gardena, CA	Kitdcollier@aol.c
138	LESTER AVESTRUZ		1333 W 169TH PL. GARDENA CA 90247	
139	DELIA L TIO		1333 W169th Gardena	CA90247
140	MICHELLE NAKAMURA		1215 W. 169TH PLACE GARDENA	CA 90247
141	Nicole Ueda		1307 W 169TH Place Gardena	CA 90247
142	MICHAEL UEDA		1307 W 169TH PL GARDENA	CA 9024,
143	Aya Edamoto		16815 S Mariposa Ave	"
144	Karen Okamoto		16835 Mayflower Gardena	90247
145	Maria Hinojosa		16815 Mayflower Cir Garden	9024,
146	KIRSTEN TANAKA		16916 S. MARIPOSA Ave	GARDENA, CA 90247
	Nancy Langley		17007 Steven St, Gardena,	CA 90247
147	Joanne Nagano		17107 steven St. Gardena	
148	James Canter		17087 Vermont Ave	Gardena

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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT 11

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

	NAME (Print)	SIGNATURE	ADDRESS	EMAIL
147	Linda Wilson	[illegible]	17045 S. Dalton Ave.	
148	Patsy Nakano	Patsy Nakano	17112 S. Dalton Ave	
149	Teresa Patton	[illegible]	16818 S. Dalton Ave	
150	Jim Higa	[illegible]	1427 W. 172ND	thiga1122680@gm
151	Jackie Kordones	[illegible]	17104 Brighton Way	
152	Channie Chim	[illegible]	1435 W 172nd ST.	channie w chi gmail
153	Ruby Fujioki	[illegible]	1447 W. 172nd St	
154	MIKE HAMILTON	[illegible]	1455 W 172ND ST	
155	REGINA HAMILTON	[illegible]	1485 W 172ND ST	
156	Joseph Yi	[illegible]	1467 W 172ND ST	5yspamm@gmail.com
157	ELAINE MORITA	[illegible]	17202 Halldale Ave	emorita54@gmail.com Gardena CA 902
158	ROBERT JIMENEZ	[illegible]	1456 W 172ND ST.	GARDENA CA
159	DOMINGA JIMENEZ	Domingo Jimenez	1456 W 172ND ST	GARDENA CA
160	Paul + Monica VanGundy	[illegible]	1452 W. 172nd St	
161	BRIAN NGUYEN	[illegible]	1428 W. 172ND ST	
162	KIMBERLY NGUYEN	[illegible]	" " "	
163	Dawn [illegible]	[illegible]	16904 Halldale Ave	Gardena CA 90247

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Letter A19– Various
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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT 12

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

	NAME (Print)	SIGNATURE	ADDRESS	EMAIL
164	Hirfumi Kanada	[illegible]	169xx S Dalton Ave	[illegible].com
165	Virginia Almaraz	Virginia Almaraz	1516 W. 170th St	
166	Thomas Ige		1553 W. 170th St	
167	Barbara Ige	Barbara Ige	1533 W 170th St	
168	Miguel Castaneda	Miguel Castaneda	1644 W. 168th St. Gardena	
169	Jaclyn Marquez	Jaclyn Marquez	1637 W 168th St	
170	Chrissy Parson	Chrissy Par	1652 W 168 St. Gardena	
171	Harry Wilson	Harry Wilson	17057 S. Vermont unit 115 Garden	
172	Ana Munoz	[illegible]	17108 Brighton Way Gardena CA	
173	Liliana Arreguin	Liliana Arreguin	17108 Brighton Way Gardena CA	
174	AUDREY HOLLAND	Audrey Holland	17057 S. Vermont, Gardena, CA	
175	Norma Hydro		1324 W. 169th Pl., Gardena, CA	
	John Hydro		1324 W. 169th Pl., GARDENA, CA 90247	
	Mark Sather	Mark Sather	1428 W 171 ST	
	DANIEL SUYAMA		17001 BRIGHTON AVE	
	CARRIE ISHITANI		17001 BRIGHTON AVE	

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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT 13

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

	NAME (Print)	SIGNATURE	ADDRESS	EMAIL
171	Kathleen Kishi		1451 W. 172nd	Kathkishi@gmail
172	Glenn Kishi		" "	"
173	RUBY MURAI		1459 W 172nd St	RUBYKOKU@GMAIL.COM

Letter A19– Various
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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
Sal Silva	Sal Silva	16115 Halldale Ave Gardena 90247	SSilvafatboy@yahoo.c
Ruby Hunt	Ruby Hunt	1464 W. 170th St Gardena, CA 90247	
BRANDON TANORI	B T	1443 W. 172nd St Gardena CA 90247	
Andrea Tanori	A. Tanori	1443 W. 172nd St. Gardena, CA 90247	
LORY SHIOZAKI	Lory Shiozaki	1424 W. 170th St. Gardena, CA 90	
Andres Hernandez		15817 HALLDALE Ave 902	
Justin Jalomo		15824 Halldale Ave 90247	
Gladys Alatamirano		15824 Halldale Ave 90247	
ROBIN SERPAS		15824 HALLDALE AVE 90247	APT C
Christopher Gordon		15824 Halldale Ave 90247	Apt C

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Letter A19– Various
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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
Julie Nystrom	Julie Nystrom	1212 W 166th St	juliebnystrom@yahoo.
ADRIAN YOSHIYAMA		15801 HALLDALE AVE	adrian0140@aol.com
NIKKI YASUDA	Nikki Yasuda	15801 Halldale Ave	

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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
Annie Roddy	[signature]	15817 1/2 Halldale Ave Gardena	Tourist 2001 @ gmail
TIMOTHY HALL	[signature]	212 AMETHYST CIR	
Virginia Burgos	[signature]	1056 W 168 St	grandeemoe@hot
RICHARD LUNA	[signature]	1209 W. GARDENA BLVD 90247	
Shirley Trecker	[signature]	29 MERIT PKDR, GARDENA 902	
J. Honami Uchiyama	[signature]	15824 Halldale Ave, Fmt, Gardena, CA 902	
EDNA M KURIYAMA	[signature]	15828 La Salle AVE GARDENA CA	
MINORU KURIYAMA	[signature]	15828 La Salle Ave	
FRED TANAKA	[signature]	16105 BRIGHTON GARDENA	
Ariel Nakano	[signature]	15820 la Salle Ave Garde	
AUDREY YOSHIYAMA	[signature]	15801 HALLDALE CA 902	
MICHAEL YOSHIYAMA	[signature]	15801 HALLDALE AVE GARDENA 90247	
CARI SEMENZA	[signature]	15913 S. Halldale Ave gard	
Tina Semenza	[signature]	49 merit Pk Dr 90247	
ROSALVA R. GOMEZ	[signature]	16105 S. DALTON AVE. 90247	Rosie70@yn
Lovie A. Gomez	[signature]	16105 S. Dalton Ave 90247	gomez lovie 17@yn
Amy Silva	[signature]	16115 Halldale Ave Gardena 90247	uquela@ick cc

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Letter A19– Various
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PETITION TO DENY HIGH DENSITY RESIDENTIAL PROJECT

We, the undersigned residents of Gardena, ask that the Gardena City Council deny the project located at 16829-16835-16907 Normandie Ave. With 403 units and 7 stories high, it is extremely dense and will greatly impact traffic and quality of life. Normandie Ave is a high traffic arterial street and will increase traffic not only in the surrounding area but other neighborhoods as well. This is not the kind of project Gardena needs. Residents and Businesses will be negatively impacted.

NAME (Print)	SIGNATURE	ADDRESS	EMAIL
Patricia McCauley	[signature]	17012 Steven St	tishmccauley@gmail.com
Victor J. Rocha	V Rocha	16111 HALLDALE AVE	juttarocha@hotmail
Donald L. Dear	Donald L Dear	15433 CATALINA	dldear@hotmail.com
Sylvia Hernandez	[signature]	1907 W 147th St.	49erfans@SBC global.net
Scott Arroyo	[signature]	1908 W 154 ST	INKAMAN@AOL.COM
REYNE ROCHA	[signature]	17012 STEVEN ST.	RRL4067@AOL.COM
NAOMI SEKIGUCHI	[signature]	16924 So. Mariposa A. Gardena, CA 90247	
DEBORAH REMILLARD	[signature]	16924 So. Mariposa Av Gardena CA 90247	
Jeanne Wong	[signature]	233 Citrine Ct. Grd 90248	
Alyssa Santos	[signature]	17018 S. Catalina Ave 90247	idreamofhighair@aol.com
Shirley Treuden	[signature]	29 MERIT PK DR, GARDENA CA	
Ebony McDuffie	[signature]	13016 Daleside Ave Gardena, CA 90249	
Rebekah Blonshine	[signature]	13016 Daleside Ave Gardena CA 90249	
Aileen Araki	[signature]	1124 W. 182nd St. gardena CA 90248	
Barbara Reyes-Rodriguez	[signature]	16107 S Dalton Ave Garden	bxkona@pacbell.net

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RESPONSE TO COMMENT LETTER NO. A19

Various, Residents

April 2, 2024

A19-1 This petition is has been provided to City staff. The petition expresses concern with the height and density of the proposed apartment building, and potential impacts related to traffic and quality of life. Please refer to Response A8-1 for a discussion concerning Project building height and density. As mentioned in Response A8-3, with the adoption of the changes to the State CEQA Guidelines in 2018, automobile delay, as measured by "level of service" (LOS) and other similar metrics, no longer constitutes a significant environmental effect under CEQA. (Pub. Resources Code, § 21099, subd. (b)(3).). Notwithstanding, please refer to Response A8-3 for a discussion regarding traffic. As traffic and quality of life are not CEQA issues, this comment has been noted, and no further response is necessary.

Comment Letter A20 – Layne Fajeau

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Via Email

March 19, 2024

Amanda Acuna, Planner
Community Development, Planning
City of Gardena
1700 W. 162nd Street, Room 101
Gardena, CA 90247
AAcuna@cityofgardena.org
publiccomment@cityofgardena.org

Re: Comment on Normandie Crossing Specific Plan Project (SCH No. 2023050241, SPR #11-21, Environmental Assessment #20-21) at the March 19, 2024, City of Gardena Planning Commission Meeting, Agenda Item #6A

Dear Ms. Acuna,

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the Normandie Crossing Specific Plan Project (SCH No. 2023050241, SPR #11-21, Environmental Assessment #20-21), including all actions related or referring to the proposed demolition of 115,424 square feet of industrial uses and construction of 403 multi-family dwelling units, including 328 apartment units in one building and 75 townhome units in nine buildings, located at 16829, 16835, and 16907 South Normandie Avenue in the City of Gardena ("Project") that will be heard by the Gardena Planning Commission on March 19, 2024, as Agenda Item #6A. A20-1

SAFER is concerned that the Final Environmental Impact Report ("FEIR") fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. Specifically, SAFER is concerned that the FEIR fails to mitigate harmful impacts regarding noise pollution. SAFER requests that the Community Development Department address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project. A20-2

SAFER reserves the right to supplement these comments during the administrative process. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997). A20-3

RESPONSE TO COMMENT LETTER NO. A20
Layne Fajeau, Attorney
March 19, 2024

A20-1 This comment is introductory in nature and states that the Law Office of Lozeau Drury has submitted comments on behalf of the Supporters Alliance for Environmental Responsibility (SAFER). No further response is necessary.

A20-2 The comment suggests the City should revise and recirculate the DEIR to address "all feasible mitigation measures to reduce noise pollution." Further, the comment suggests the City recirculate the Draft EIR.

As discussed in Section 4.9, due to the distance to sensitive receptors, there are no feasible mitigation measures to mitigate construction noise to less than significant. As discussed in Section 6.5, the analysis considered, but ultimately rejected, an alternative which would avoid the Project's significant unavoidable construction noise, given the only way to avoid the significant impact would be no construction. Section 6.5 includes discussion of other mitigation measures incorporated to attempt to mitigate the impact, but nevertheless the impact would remain significant and unavoidable. The commenter has not provided substantial evidence of any other feasible mitigation measures that should be adopted.

A20-3 The comment states that the commenter reserves the right to supplement the comments and incorporates by reference all comments regarding the EIR. The comment is noted. No further response is necessary.

Comment Letter A21 – Brian Flynn
Page 1 of 4

Via Email

March 27, 2024

Deryl Henderson, Chair
Stephen P. Langley, Vice-Chair
Jules Kanhan
Steve Sherman
Ronald Wright-Scherr
Planning and Envtl. Quality Commission
City of Gardena
1700 W. 162nd Street
Gardena, CA 90247
publiccomment@cityofgardena.org

Amanda Acuna, Planner
Community Development Department
City of Gardena
1700 W. 162nd Street, Room 101
Gardena, CA 90247
AAcuna@cityofgardena.org

Re: Comment on Normandie Crossing Specific Plan Project EIR
EA 20-21; GPA 3-21; ZC 4-21; ZTA 6-21; SP 1-21; SPR 11-21; VTM 4-21; DA 2-21
Hearing Date: April 2, 2024

To Chair Henderson, Vice-Chair Langley, Honorable Commissioners, and Ms. Acuna,

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") and its members living in/near the City of Gardena regarding the Normandie Crossing Specific Plan Project (EA 20-21; GPA 3-21; ZC 4-21; ZTA 6-21; SP 1-21; SPR 11-21; VTM 4-21; DA 2-21) ("Project") to be heard at the Commission's April 2, 2024 meeting.

The Project proposes the demolition of 115,424 square feet of industrial uses and construction of 403 multi-family dwelling units, including 328 apartment units in one building and 75 townhome units in nine buildings, located at 16829, 16835, and 16907 South Normandie Avenue.

A21-1

SAFER is concerned that the Draft Environmental Impact Report ("DEIR") and Final Environmental Impact Report ("FEIR") (collectively, "EIR") fail to comply with the requirements of the California Environmental Quality Act ("CEQA"). SAFER respectfully requests that the Commission refrain from recommending approval of the Project until the EIR's deficiencies are remedied and a revised EIR is circulated for public review and comment.

A21-2

Comment Letter A21 – Brian Flynn
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SAFER Comment
Normandie Crossing Specific Plan Project
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DISCUSSION

I. The EIR Relies on Improperly Deferred Mitigation.

An agency's adoption of a mitigation measure for a significant environmental effect that merely states a "generalized goal" to mitigate a significant effect without committing to any specific criteria or standard of performance violates CEQA by improperly deferring the formulation and adoption of enforceable mitigation measures. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 670.) Here, the City is improperly relying on deferred mitigation for the Project's impacts from asbestos and soil contamination and, as a result, the EIR does not comply with CEQA.

According to the DEIR, the potential impacts from asbestos exposure during demolition will be mitigated by COA HAZ-1:

> **Asbestos Survey**. Prior to demolition activities, an Asbestos Hazard Emergency Response Act (AHERA) and California Division of Occupational Safety and Health (Cal/OSHA) certified inspector shall conduct an Asbestos Survey to determine the presence or absence of asbestos containing-materials (ACMs) pursuant to South Coast Air Quality Management District (SCAQMD) regulations.

(DEIR, p. 4.6-22.) COA HAZ-1 only requires a future survey to determine the presence or absence of asbestos. There are no specific criteria or standards of performance in COA HAZ-1 to address how the impacts of asbestos will be mitigated in the event that asbestos is detected prior to demolition. Without any such criteria or standards of performance, the City cannot rely on COA HAZ-1 to mitigate the Project's asbestos impacts. A21-3

MM HAZ-1 similarly requires a future "Construction Management Plan" with *no* specific criteria or performance standards:

> **MM HAZ-1.** Prior to issuance of any demolition permit for the onsite structures, a construction management plan addressing procedures and requirements for responding to disturbance of undocumented contaminated soil shall be prepared and submitted to the City for review and approval.

(DEIR, p. 4.6-23.) MM HAZ-1 is improperly vague and only requires that a plan be submitted prior to demolition. MM HAZ-1 does not provide any criteria or performance standards for the plan. Instead, MM HAZ-1 only requires a future plan that will discuss the "procedures and requirements for responding to a disturbance of undocumented contaminated soil."

Comment Letter A21 – Brian Flynn
Page 3 of 4

March 27, 2024
SAFER Comment
Normandie Crossing Specific Plan Project
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CEQA is clear that the City may only defer the formulation of mitigation measures when it "recognizes the significance of the potential environmental effect, commits itself to mitigating its impact, and articulates specific performance criteria for the future mitigation." (*Gentry v. City of Murietta* (1995) 36 Cal.App.4th 1359, 1411.) Because COA HAZ-1 and MM HAZ-1 do not contain any specific performance criteria, those measures amount to improperly deferred mitigation. As a result, the EIR must be revised to include specific performance criteria for hazards.

A21-3

II. The EIR Fails to Sufficiently Justify a Statement of Overriding Considerations.

As the City concedes, the Project would result in *significant and unavoidable impacts* due to construction noise. Under CEQA, when an agency approves a project with significant environmental impacts that will not be fully mitigated, it must adopt a "statement of overriding considerations" finding that, because of the project's overriding benefits, it is approving the project despite its environmental harm. (14 CCR § 15043; PRC § 21081(B); *Sierra Club v. Contra Costa Cnty.* (1992) 10 Cal.App.4th 1212, 1222). A statement of overriding considerations expresses the "larger, more general reasons for approving the project, such as the need to create new jobs, provide housing, generate taxes and the like." (*Concerned Citizens of South Central LA v. Los Angeles Unif. Sch. Dist.* (1994) 24 Cal.App.4th 826, 847).

A statement of overriding considerations must be supported by substantial evidence in the record. (14 CCR § 15093(b); *Sierra Club v. Contra Costa Co.* (1992) 10 Cal.App.4th 1212, 1223.) The agency must make "a fully informed and publicly disclosed" decision that "specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project." (14 CCR § 15043(b)). As with all findings, the agency must present an explanation to supply the logical steps between the ultimate finding and the facts in the record. (*Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515). Key among the findings that the lead agency must make is that:

A21-4

> "Specific economic, legal, social, technological, or other considerations, including the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report…[and that those] benefits of the project outweigh the significant effects on the environment."

(PRC § 21081(a)(3), (b).) The City must make specific findings, supported by substantial evidence, concerning both the environmental impacts of the Project, and the economic benefits including "the provision of employment opportunities for highly trained workers" created. However, the City fails to include any mention of the Project's use of highly trained workers in the EIR or Staff Report.

Comment Letter A21 – Brian Flynn
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March 27, 2024
SAFER Comment
Normandie Crossing Specific Plan Project
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In short, the City cannot support its conclusion that the economic benefits of the Project outweigh the environmental costs if it does not know what the economic benefits will be. A revised EIR, Fiscal Analysis and Statement of Overriding Considerations is required to provide this information. The analysis must analyze whether the Project will provide employment opportunities for highly trained workers during construction and operation, or whether employment opportunities will be only for low-paid, unskilled workers. A21-4

CONCLUSION

Due to improperly deferred mitigation for the impacts of hazards and hazardous materials and the failure to justify a statement of overriding considerations for the significant and unavoidable noise impacts, SAFER respectfully requests that the Commission refrain from recommending certification of the EIR. Instead, a revised EIR should be prepared and circulated for public review and comment prior to further consideration of the Project. SAFER reserves the right to further supplement this comment during the administrative process. (*Galante Vineyards v. Monterey Peninsula Water Management Dist*., 60 Cal. App. 4th 1109, 1121 (1997).) A21-5

Sincerely,

Brian B. Flynn
Lozeau Drury LLP

RESPONSE TO COMMENT LETTER NO. A21
Bryan Flynn, Attorney
March 27, 2024

A21-1 This comment is introductory in nature and states that the Law Office of Lozeau Drury has submitted comments on behalf of the Supporters Alliance for Environmental Responsibility (SAFER). The comment also summarizes the Project. No further response is necessary.

A21-2 This comment states that SAFER has concerns regarding the Draft EIR and believes the Draft EIR should be recirculated. See responses A21-3 through A21-4. This is simply a generalized comment that does not require a response.

A21-3 This comment states that COA HAZ-1 and MM HAZ-1 are deferred mitigation measures, as neither include performance standards or criteria. Given the potential for unknown hazardous materials/contamination is unknown (place, medium, amount, type of contaminant, etc.), it is not possible to set performance standards for unknown contamination that could be included in MM HAZ-1. In regard to COA HAZ- 1, Section 18.42.200 of the GMC requires the Project to comply with SCAQMD Rule 1403 for asbestos-containing materials. SCAQMD Rule 1403 provides requirements for demolition and renovation activities to include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials. Therefore, if the Asbestos Survey required per COA HAZ- 1 determines that there are ACMs present, the criteria and standards of performance for removal would be completed in accordance with standard procedures set forth in SCAQMD Rule 1403. Therefore, COA HAZ-1 would not be deferred mitigation as the removal process pursuant to SCAQMD rule 1403 is required per the GMC. Phase I Environmental Site Assessments, Phase II Environmental Site Assessments, and a Vapor Intrusion Risk Assessment (VIRE) were prepared for the Project to assess potential for hazardous materials and contamination; see **DEIR Section 4.6**. This comment is noted, and additional discussion to the regulatory setting and impact analysis in **DEIR Section 4.6: Hazards and Hazardous Materials** is included as shown below.

DEIR Section 4.6: Hazards and Hazardous Materials

DEIR Page 4.6-19

Pursuant to GMC Section 18.42.200 (B), the Project is required to comply with the objective standards of the South Coast Air Quality Management District (SCAQMD) Rule 1403 for asbestos-containing materials. SCAQMD Rule 1403

provides requirements for demolition and renovation activities to include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials.

DEIR Section 4.6: Hazards and Hazardous Materials

DEIR Page 4.6-20

The existing buildings were noted as a REC due to potential ACM and LBP. Demolition of the onsite buildings 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. Condition of Approval (COA) HAZ-1 requires an ACM and LBP survey of the existing onsite buildings. COA HAZ-1 includes measures for the safe dismantling and removal of building components and debris and prevents the accidental release of asbestos, and COA HAZ-2 includes measures to safely demolish structures containing potential LBP, thereby protecting workers and the public from potential exposure to hazardous materials and wastes during demolition. Further, GMC §18.42.200(B) requires the Project to comply with the objective standards of the SCAQMD Rule 1403, which provides requirements asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste material. Therefore, following compliance with COA HAZ-1, COA HAZ-2, and GMC §18.42.200(B), the potential presences of these materials would not result in a significant hazard to the public through reasonably foreseeable upset and accident conditions.

A21-4 This comment states that the Project must include a statement of overriding considerations, and that the statement of overriding considerations must include a determination of the economic benefits of the Project, supported by substantial evidence, including whether the provision of employment opportunities for highly trained workers.

A statement of overriding considerations will be prepared alongside the Staff Report following completion of the Final EIR. The statement of overriding considerations will include relevant considerations, supported by substantial evidence, for why the benefits of the project outweigh any significant impacts. certain mitigation measures are infeasible. A statement of overriding considerations is not prepared or released as part of a Draft or Final EIR, nor would it be appropriate to do so. Furthermore, the

provision of highly trained workers is only one consideration that may be taken into account; it is not mandatory that employment is provided for such workers or that the EIR address this issue to make a statement of overriding considerations finding. Thus, the comment is noted, and no further response is necessary.

A21-5 This comment summarizes and reiterates that SAFER has concerns regarding the Draft EIR and believes the Draft EIR should be recirculated. See responses A21-3 through A21-4. Again, this is a generalized statement that does not require a response.

NOTE TO FILE NO. A22
October 23, 2024

A22-2 During a review of **DEIR Section 4.1: Air Quality** (Impact 4.1-3) a typo was found. Therefore, a revision has been made to **DEIR Section 4.1**; please see below.

DEIR Section 4.1: Air Quality

DEIR Page 4.1-19

~~Error! Reference source not found.~~ Table 4.1-8: Maximum Residential Receptor and Carcinogenic Resk presents the carcinogenic risk estimate for the maximum exposed residential receptor.

A22-1 During a review of **DEIR Section 4.2: Cultural Resources** (Impact 4.3-2) a typo was found. Therefore, a revision has been made to **DEIR Section 4.2**; please see below.

DEIR Section 4.2: Cultural Resources

DEIR Page 4.2-17

The depth of excavation for the Project is approximately 6~~0~~ feet below the surface, which would likely require excavation of underlying alluvial sediments and removal of the overlying artificial fill.

DEIR Section 4.2: Cultural Resources

DEIR Page 4.2-19

The maximum anticipated depth of excavation below the existing surface grade is estimated at 6~~0~~ feet.

3.0 ERRATA TO THE DRAFT EIR

The responses included in **FEIR Section 2.0: Comment Letters and Responses**, may include text revisions to clarify or amplify information in the DEIR and/or appendices, 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

It is noted none of the corrections/clarifications identified in this section constitute "significant new information" pursuant to State CEQA Guidelines § 15088.5. The corrections/clarifications identified in this section merely clarify/amplify and make insignificant modifications to the DEIR. The corrections/clarifications involve only minor changes in the Project, but do not involve changes to the environmental setting or significant new information.

3.1 PUBLIC REVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

DEIR Table of Contents

DEIR Page xiii

Appendix 4.7-2: Water Resources Analysis

Appendix 4.9-1: Noise Impact Study

Appendix 4.9-2: Operational Noise Analysis

DEIR Section ES: Executive Summary

DEIR Page ES-3

- Redesignate the residential parcel at 16964 ~~179th Street~~ Brighton Avenue from Industrial to Single Family Residential and rezone from General Industrial Zone (M-2) to Single Family Residential Zone (R-1) consistent with the existing residential land use.

DEIR Section 2.0: Project Description

DEIR Page 2-10

The parcel immediately adjacent to the Project site's southwest corner, at 16964 ~~West 179th Street~~ Brighton Avenue, is occupied by a single-family residential (SFR) DU.

DEIR Page 2-10, **Table 2-3: Surrounding Land Uses and Zoning**

Table 2-1: Surrounding Land Uses and Zoning

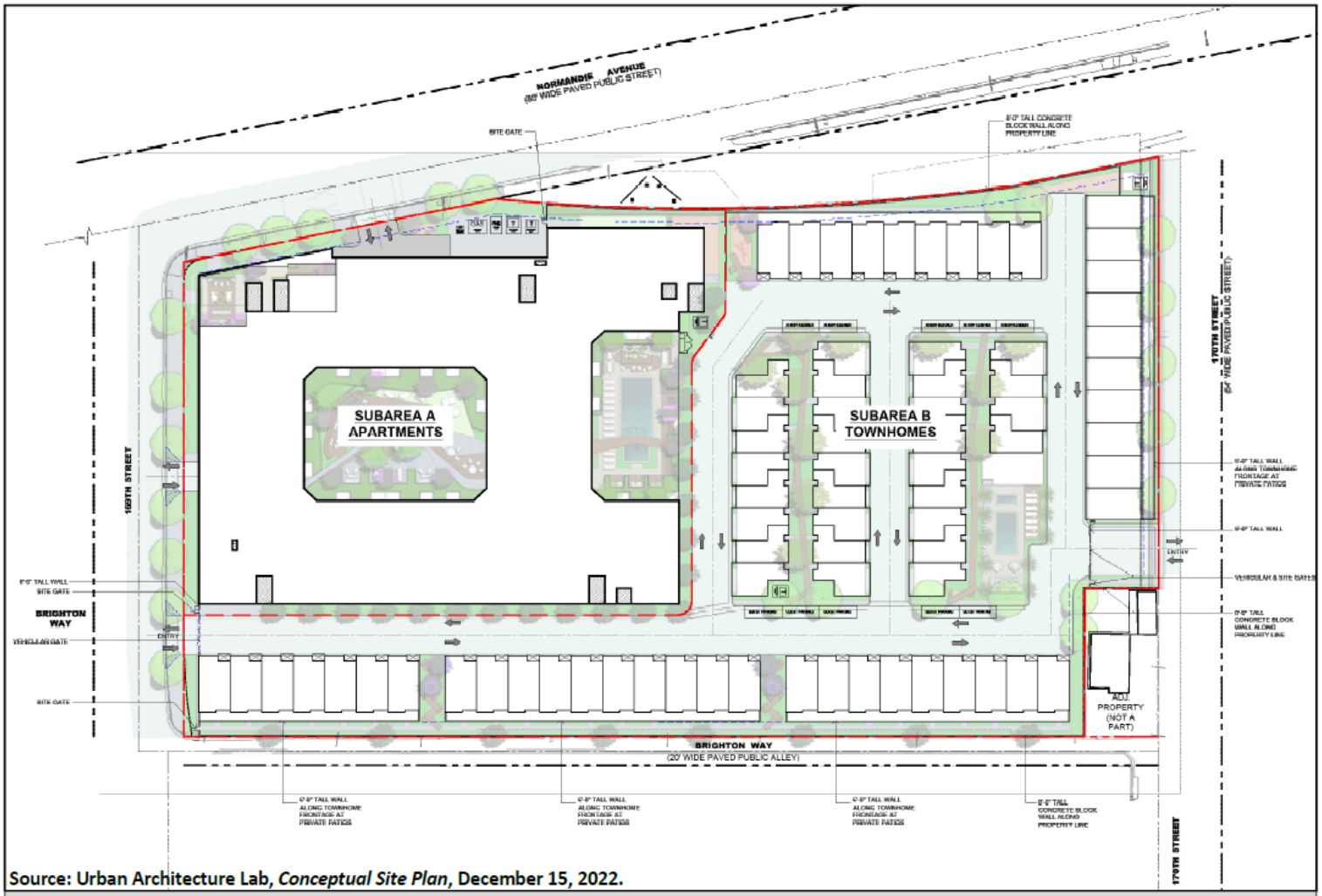
Direction	Existing On-the-Ground Land Uses	Zoning[1]
North	North: West 169th Street, with a 63-unit single-room occupancy multi-family development across the street, at 16819 South Normandie Avenue. Northwest: Single-family residential uses are west of South Normandie Avenue.	North: Industrial Zone (M-1)[2] Northwest: Low-Density Multi-Family Residential Zone (R-2)[3]
South	South: West 170th Street, with single-family residential uses across the street. Southwest: One single-family residential dwelling unit is immediately adjacent, at 16964 ~~West 179th Street~~ Brighton Avenue.	South: Single-Family Residential Zone (R-1)[4] Southwest: General Industrial Zone (M-2)[5]
East	East: South Normandie Avenue and an existing UPRR track (north/south orientation) are immediately adjacent and to the east. Northeast/Southeast: Multi- and single-family residential uses are across South Normandie Avenue, respectively.	East: General Industrial Zone (M-2)[5] Northeast: Normandie Estates Specific Plan[6] / Southeast: Single-Family Residential Zone (R-1)[4]
West	Brighton Way (an alleyway) is to the west, with single-family and duplex residential uses across the alley.	Low-Density Multiple Family Residential Zone (R-2)[3]

Notes:
1. City of Gardena. (2020). Zoning. Available at https://cityofgardena.org/wp-content/uploads/2020/11/Gardena_Zonning_2020.pdf.
2. GMC Chapter 18.36: Industrial Zone (M-1). See GMC §18.36.040: Performance Standards, for property development standards.
3. GMC Chapter 18.14: Low-Density Multi-Family Residential Zone (R-2). See GMC §18.14.050: Property Development Standards, for property development standards.
4. GMC Chapter 18.12: Single-Family Residential Zone (R-1). See GMC §18.12.050: Property Development Standards, for property development standards.
5. GMC Chapter 18.38: General Industrial Zone (M-2). M-1 Zone performance standards apply; see GMC §18.36.040.
6. Normandie Estates Specific Plan single-family detached residential.
7. GMC §18.14.050: Property Development Standards.

DEIR Page 2-11

Additionally, the Project proposes to redesignate and rezone two parcels that are adjacent to the site and outside the proposed Specific Plan area to be consistent with existing uses, as depicted on Exhibit 2-2. These areas include the residential parcel at 16964 ~~West 179th Street~~ Brighton Avenue and the UPRR parcel immediately adjacent and east of the Project site.

DEIR Page 2-13, **Exhibit 2-4: Conceptual Site Plan**
(Previous Conceptual Site Plan dated December 15, 2022)

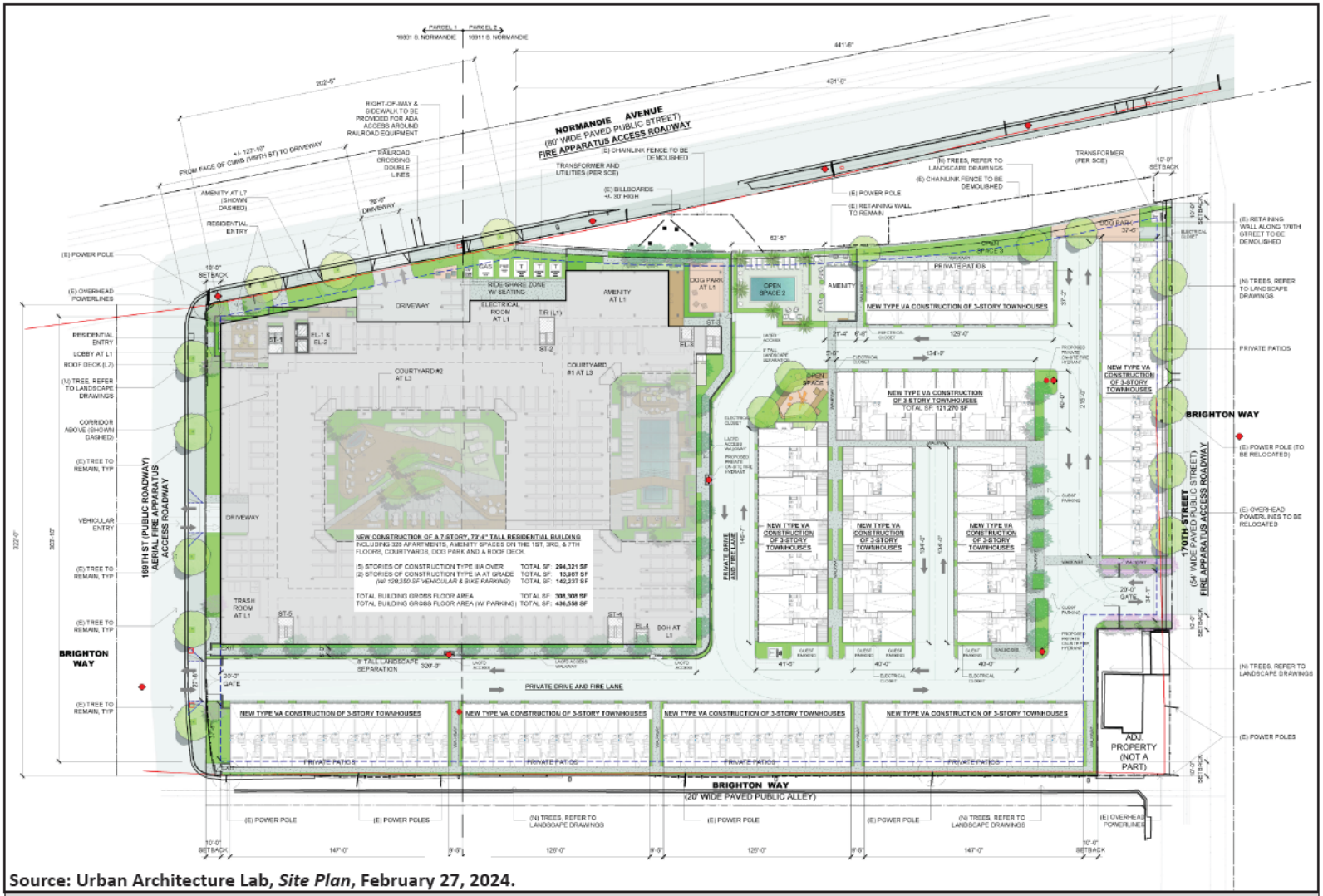


Source: Urban Architecture Lab, *Conceptual Site Plan*, December 15, 2022.

EXHIBIT 2-4: CONCEPTUAL SITE PLAN
Normandie Crossing Specific Plan Project

NOT TO SCALE

(Revised Conceptual Site Plan dated February 27, 2024)



Source: Urban Architecture Lab, *Site Plan*, February 27, 2024.

EXHIBIT 2-4: CONCEPTUAL SITE PLAN
Normandie Crossing Specific Plan Project

NOT TO SCALE

DEIR Page 2-15

Additionally, the Project proposes approximately ~~50,493~~ 44,420 total SF of open space, comprised of approximately ~~20,150~~ 13,600 SF of private open space and approximately ~~30,343~~ 32,820 SF of common open space. The Project proposes approximately 20,432 SF of planting areas, including approximately 10,553 SF within Subarea A and approximately 9,879 SF within Subarea B.

DEIR Page 2-15, **Table 2-4: Land Use Summary – Proposed Project**

Table 2-2: Land Use Summary - Proposed Project

Description	Industrial (Square Feet)[1]	Residential[1]	
		(Gross Square Feet)	(Dwelling Units)
Industrial (to be removed)	-115,424	-	-
Industrial (to be removed, but excluded from Project impact offsets)	9,324		
Apartment Building	-	308,308	328
Townhome-Style Residential	-	~~120,673~~ 121,270	75
Project Total	***-106,100***	***~~+428,981~~ +429,578***	***+403***

Notes:
1. See **Table 2-1.**
2. Urban Architecture Lab (~~2022~~ 2024). *16911 Normandie Apartments and Townhomes Entitlement Set, Sheet No. G0.01: Project Information.*

DEIR Page 2-15

The Project proposes an approximately 308,308-SF apartment building with 328 DU at a density of approximately ~~155~~ 154 DU/AC.

DEIR Page 2-15

~~Each~~ Subarea A ~~unit~~ would ~~be~~ provide~~d a minimum of 50~~ 9,850 SF of private open space. The common open space amenities proposed in Subarea A total approximately ~~22,698~~ 22,140 SF and include: roof deck with BBQs and seating areas; swimming pool with BBQ and seating areas; a dog park fitness room; club houses; and a courtyard with seating area.

DEIR Page 2-16, **Table 2-5: Land Use Summary – Proposed Apartment Building[1]**

Table 2-3: Land Use Summary – Proposed Apartment Building [1]

Level	Description	Floor Area[2] (Square Feet)	Dwelling Units
L1	Lobby	~~2,800~~ 2,080	
	Amenity I: Fitness Room	~~2,682~~ 2,526	
L2 - L7	Apartment Units	~~241,109~~ 241,065	328 (68 Studio, 194 1-Bedroom, 66 2- Bedroom)
	Balconies (Covered)[4]	6,991	
L3	Amenity II: Courtyard	~~1,446~~ 1,332	
	Amenity III: Pool Court	~~1,500~~ 1,382	
L4	Amenity IV: BBQ Covered Dining Area	~~795~~ 725	
Other	Other[3]	~~50,985~~ 52,207	
Total		***308,308***	

Notes:
1. Urban Architecture. (~~2022~~ 2024). *16911 Normandie Apartments & Townhomes Entitlement Set*.
2. "Floor Area," as defined in GMC Chapter 18:04: Definitions.
3. Other = Circulation, stairs, elevator shafts, trash vestibules, and trash rooms.
4. Only covered portions of balconies are included in the floor area calculation.

DEIR Page 2-16

- Vehicle Parking, 195 Spaces: ~~135~~ 155 Standard, ~~20 electric vehicle charging (one of which is a van electric vehicle charging), and~~ 8 accessible, and 32 tandem.

DEIR Page 2-16

- Vehicle Parking, 204 Spaces: ~~150~~ 170 Standard ~~and 20 electric vehicle charging~~ and 34 tandem.

The apartment building would provide 20 spaces with EV chargers installed, 40 spaces that are EV capable with electrical panel space and load capacity, and 100 spaces that are EV ready with branch circuit, raceway, and receptacles. The EV parking spaces would be distributed between the building's first two levels.

DEIR Page 2-16

Up to ~~90~~ 66 spaces could be tandem; tandem spaces could only be rented as a pair to a single unit.

DEIR Page 2-16

The Project proposes 75 townhome-style units in ~~nine~~ ten buildings (totaling approximately ~~120,673~~ 121,270 gross SF), at a density of approximately 24 DU/AC.

DEIR Page 2-17

The ~~various~~ proposed townhome product types ~~are 30 two-bedroom, 35~~ 65 three-bedroom, and 10 four-bedroom units.

DEIR Page 2-17, **Table 2-6: Land Use Summary – Proposed Townhomes**

Table 2-4: Land Use Summary – Proposed Townhomes

Level	Description	Floor Area[1] (Square Feet)	Dwelling Units
L1-L3	Townhouses	~~115,982~~ 119,480	~~30 two-bedroom~~ ~~35~~ 65 three-bedroom 10 four-bedroom
	Balconies (Covered)[2]	~~3,916~~ 1,190	
L1	Amenity V	~~775~~ 600	
	Subtotal	**~~120,673~~ 121,270**	

Source: Urban Architecture. (~~2022~~ 2024). *16911 Normandie Apartments & Townhomes Entitlement Set.*

Notes:
1. "Floor Area," as defined in GMC Chapter 18:04: Definitions.
2. Only covered portions of balconies are included in the floor area calculation.

DEIR Page 2-17

The common open space amenities proposed in Subarea B total approximately ~~7,645~~ 8,680 SF and include the following: swimming pool with BBQ and seating areas; dog park; club house; and ~~paseos with seating areas~~ playground.

DEIR Page 2-19

- Removing approximately 170 linear feet of railroad spur track~~, which enters the Project site~~ on UPRR property ~~and~~ that formerly served the southernmost industrial building (i.e., 16911 South Normandie Avenue).

DEIR Page 2-19

Residential Parcel at 16964 ~~179th Street~~ Brighton Avenue
Concerning the SFR parcel immediately adjacent to the Project site's southwest corner (not a part of the Specific Plan area) at 16964 ~~West 179th Street~~ Brighton Avenue, the Project proposes to redesignate the parcel from Industrial to Single Family Residential, and rezone from General

Industrial Zone (M 2) to Single Family Residential Zone (R-1) consistent with the existing residential land use.

DEIR Page 2-22

- Concerning the residential parcel at 16964 ~~West 179th Street~~ Brighton Avenue, a General Plan amendment to change the land use designation on the General Plan Land Use Map from Industrial to Single-Family Residential; and rezone from General Industrial Zone (M2) to Single Family Residential Zone (R-1) consistent with existing residential land use.

DEIR Page 2-22

- Concerning the residential parcel at 16964 ~~West 179th Street~~ Brighton Avenue, a zoning map amendment to change the zone on the Zoning Map from General Industrial (M-2) Zone to Single-Family Residential (R-1) Zone; and

DEIR Section 4.1: Air Quality

DEIR Page 4.1-1

It is noted, the Air Quality Report and Health Risk Assessment identified above were based on an earlier Conceptual Site Plan, which has since been slightly modified ("February 2024 Conceptual Site Plan"). **Section 2.3: Project Characteristics** describes the proposed Project based on the February 2024 Conceptual Site Plan. Given the February 2024 Conceptual Site Plan involved only minor modifications to the Project, the Air Quality Report and Health Risk Assessment significance conclusions remain valid and applicable to the February 2024 Conceptual Site Plan.

It is further noted that Kimley-Horn conducted a third-party review on behalf of the City of Gardena ("City") of the Project's Air Quality Report and Health Risk Assessment; see **Appendix 4.1-1 and Appendix 4.1-2**.

DEIR Page 4.1-19

~~Error! Reference source not found.~~ Table 4.1-8: Maximum Residential Receptor and Carcinogenic Resk presents the carcinogenic risk estimate for the maximum exposed residential receptor.

DEIR Section 4.2: Cultural Resources

DEIR Page 4.2-17

The depth of excavation for the Project is approximately 6~~0~~ feet below the surface, which would likely require excavation of underlying alluvial sediments and removal of the overlying artificial fill.

DEIR Page 4.2-19

The maximum anticipated depth of excavation below the existing surface grade is estimated at 6~~0~~ feet.

DEIR Section 4.3: Energy

DEIR Page 4.3-1

It is noted, the Energy Assessment and Air Quality Report identified above were based on an earlier Conceptual Site Plan, which has since been slightly modified ("February 2024 Conceptual Site Plan"). **Section 2.3: Project Characteristics** describes the proposed Project based on the February 2024 Conceptual Site Plan. Given the February 2024 Conceptual Site Plan involved only minor modifications to the Project, the Energy Assessment and Air Quality Report significance conclusions remain valid and applicable to the February 2024 Conceptual Site Plan.

It is further noted that Kimley-Horn conducted a third-party review on behalf of the City of Gardena ("City") of the Project's Air Quality Technical Report; see **Appendix 4.1-1**.

DEIR Page 4.3-13

Additionally, the Project's proposed apartment building would provide 1.2 parking spaces per unit, including approximately ~~40 electric vehicle (EV) spaces~~ 20 spaces with EV chargers installed, 40 spaces that are EV capable with electrical panel space and load capacity, and 100 spaces that are EV ready with branch circuit, raceway, and receptacles which would ~~to~~ encourage carpooling or other alternate modes of transportation.

DEIR Section 4.5: Greenhouse Gas Emissions

DEIR Page 4.5-1

It is noted, the GHG Technical Report identified above was based on an earlier Conceptual Site Plan, which has since been slightly modified ("February 2024 Conceptual Site Plan"). **Section 2.3: Project Characteristics** describes the proposed Project based on the February 2024 Conceptual Site Plan. Given the February 2024 Conceptual Site Plan involved only minor modifications to the Project, the GHG Technical Report significance conclusions remain valid and applicable to the February 2024 Conceptual Site Plan.

DEIR Page 4.5-27, **Table 4.5-2: Summary of Construction GHG Emissions**

Table 4.5-5: 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~~2024	234.36	39.86	23.61	~~52.25~~53.52	~~350.09~~351.35
~~2022~~2025	365.09	301.17	38.28	–	704.53
~~2023~~2026	364.32	375.53	56.40	–	796.25
~~***Total***~~2027	238.75	244.91	37.10	–	520.76
Total	***1,202.52***	***961.47***	***155.38***	***53.52***	***2,372.89***
				30-year Amortized	**79**

1. Construction emissions include on-site and off-site (worker/vendor/hauling) emissions, estimated using CalEEMod. CO2e includes CO2, CH4, and N2O emissions, weighted by their respective global warming potentials.
2. CalEEMod - California Emissions Estimator Model

CH4 = methane; CO2 = carbon dioxide; CO2e = carbon dioxide equivalents; GHG = greenhouse gases; MT = metric tons; N2O = nitrous oxide; yr = year

Source: Ramboll US Corporation. (2023). Greenhouse Gas Technical Report Table 7; see **Appendix 4.5-1.**

DEIR Page 4.5-30, **Table 4.5-4: City of Gardena Climate Action Plan Analysis**

Table 4.5-6: City of Gardena Climate Action Plan Analysis

Strategy	Goal		Project Analysis
Land Use and Transportation (LUT)	**A**	Accelerate the market for EV vehicles	**No Conflict**. The Project would designate approximately 40 percent of the 399 parking stalls in the apartment building to be capable, ready, or equipped for EV Chargers. More specifically, the Project would provide 10 percent of parking stalls to be EV capable, 25 percent of parking stalls to be EV ready with Level 2 EV charging receptacles, and 5 percent of parking stall to be equipped with Level 2 EV Chargers.
	B	Encourage ride-sharing	**No Conflict**. A designated loading area at the apartment building along Normandie Avenue would be signed and distinguished (e.g., with paving and/or paint) such that it may be utilized as a pick-up and drop-off zone for ride-sharing services.
	C	Encourage transit usage	**No Conflict**. Existing GTrans bus stops are located less than 600 feet to the north of the Project site along 166th Street. The Project includes ROW improvements along 169th Street which would create a continuous pedestrian path and allow

Strategy	Goal		Project Analysis
			greater access to public transit opportunities. Additional Torrance Transit and Metro services are located approximately 0.25 mile south of the Project site, at the Artesia Boulevard and South Normandie Avenue intersection. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9 mile to the south, providing more access to public transit opportunities. Per the NCSP, new apartment residents who sign a 12-month lease would be offered a one-time free monthly Metro pass.
	D	Adopt active transportation initiatives	**No Conflict**. The Project would provide 173 bicycle parking spaces on the first level of the apartment building (located in secured facilities accessible only by apartment building residents). All bicycle parking would be located in a safe, convenient location, encouraging the use of bicycle transportation by residents and guests.
	E	Parking strategies	**No Conflict**. The vehicle parking spaces would be unbundled from the rental of the apartment units to encourage alternate modes of transportation.
	F	Organizational strategies	**No Conflict**. The proposed apartment amenities include a multi-purpose office space to provide workspace for residents that work from home. Additionally, this amenity would encourage future residents to telecommute work and therefore reduce VMT.
	G	Land use strategies	**No Conflict**. The Project proposes 403 DU at a density of 77 (DU/AC). The apartment building would provide ~~155~~ 154 DU/AC and the townhomes would provide 24 DU/AC.
	H	Digital technology strategies	**No Conflict**. The Project buildings would be capable of connection to a future fiber network in order to implement the South Bay Fiber-Optic Master Plan.[1]
Energy Efficiency (EE)	**A**	Increase energy efficiency in existing residential units	**Not Applicable**. The Project does not involve existing residential units.
	B	Increase energy efficiency in new	**No Conflict**. The Project would be built to meet the California Green Building Code. Additionally, the proposed pools would use electricity for

[1] Magellan Advisors. (2017). *Fiber-Optic Master Plan – Prepared for the South Bay Workforce Investment Board and the South Bay Cities Council of Governments.*

Strategy	Goal		Project Analysis
		residential developments	filters, pumps, and water heating rather than natural gas.
	C	Increase energy efficiency in existing commercial units	**Not Applicable**. The Project site is currently occupied by industrial uses.
	D	Increase energy efficiency in new commercial developments	**Not Applicable**. The Project includes only residential uses.
	E	Increase energy efficiency through water efficiency	**No Conflict**. The Project would be subject to compliance 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	**No Conflict**. The Project would reduce the impervious surface area by ~~13.8~~ approximately 8.6 percent, thereby reducing the temperature of the site and surrounding area. The Project would also provide shade from providing ~~89~~ 75 new trees.
	G	Participate in education, outreach, and planning for energy efficiency	**Not Applicable**. The Project is a new residential development, and as such, 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, and as such, would not directly be involved in planning for the City's infrastructure efficiency.
	J	Reduce energy consumption in the long- term	**No Conflict**. New residential and non-residential buildings would be subject to the 2022 Title 24 Part 6 Building Code.
Solid Waste (SW)	**A**	Increase Diversion and Reduction of Residential Waste	**No Conflict**. The Project would be subject to compliance with the state's waste diversion goal of 75 percent 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.

Strategy	Goal		Project Analysis
Urban Greening (UG)	**A**	Increase and maintain urban greening in the community	**No Conflict**. The Project includes an increase of approximately ~~50,493~~ 44,420 SF of open space and proposed to plant 75 new trees.
	B	Increase and maintain urban greening in municipal facilities	**Not Applicable**. The Project does not involve municipal facilities.
Energy Generation & Storage (EGS)	**A**	Support energy generation and storage in the community	**Not Applicable.** The Project is a new residential development, which would be serviced by SCE.
Sources: Refer to **Exhibit 2-4: Conceptual Site Plan** and **Appendix 4.5-1** for assumptions used in this analysis.			

DEIR Page 4.5-30, **Table 4.5-5: RTP/SCS Goals and Analysis**

Table 4.5-7: RTP/SCS Goals Analysis

Goal		Project Analysis
Goal 1	Encourage regional economic prosperity and global competitiveness.	**Not Applicable.** The Project proposes residential uses only.
Goal 2	Improve mobility, accessibility, reliability, and travel safety for people and goods.	**No Conflict.** The Project includes ROW improvements along West 169th Street which would create a continuous pedestrian path and allow greater access to public transit opportunities. The Project proposes to construct sidewalks along the Project site frontage: on the south side of West 169th Street (between Brighton Way and South Normandie Avenue), on the north side of West 170th Street (between Brighton Way and South Normandie Avenue), on the west side of South Normandie Avenue (between West 169th Street and West 170th Street), and on the east side of Brighton Way (between West 169th Street and West 170th Street). Additionally, the Project proposes to construct approximately 266 linear feet of offsite sidewalk improvements along the south side of West 169th Street, just west of the Project site, between Brighton Way and the alley just west of Brighton Avenue. Additionally, the Project includes railroad improvements on Normandie Avenue. Both ROW and Railroad improvements would upgrade existing infrastructure and increase mobility, reliability, and travel safety for people and goods.

Goal		Project Analysis
Goal 3	Enhance the preservation, security, and resilience of the regional transportation system.	**No Conflict**. The Project includes railroad improvements on Normandie Avenue. These improvements would enhance the preservation, security, and resilience of the regional transportation system.
Goal 4	Increase person and goods movement and travel choices within the transportation system.	**No Conflict.** The Project includes sidewalk improvements, as described in Goal 2 above. The Project also proposes railroad track improvements along South Normandie Avenue, which include the following: • Removing ~~the~~ approximately 170 linear feet of railroad spur track, ~~which enters the project site~~ on UPRR property. • Removing approximately 830 linear feet of railroad spur currently located along the Project site's eastern boundary. • A new median both north and south of the track alignment, and • New warning devices and tactile warning strips on the South Normandie Avenue east and west sidewalks. • Refreshing railroad crossing pavement markings immediately north and south of the track alignment.
Goal 5	Reduce greenhouse gas emissions and improve air quality.	**No Conflict.** The Project site is in an urban area near existing transit routes and freeways. The Project's location within an urbanized, walkable area would reduce trip lengths, which would reduce GHG and air quality emissions.
Goal 6	Support healthy and equitable communities	**No Conflict.** The Project does not exceed South Coast AQMD's regional or localized thresholds. Based on the Friant Ranch decision, projects that do not exceed the South Coast AQMD's localized significance thresholds (LSTs) would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and result in no criteria pollutant health impacts.
Goal 7	Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Not Applicable.** This is not a project-specific goal.
Goal 8	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**No Conflict.** As mentioned previously, the Project would designate approximately 40 percent of the ~~559~~ 399 apartment parking stalls to be capable, ready, or equipped for EV Chargers. Each

Goal		Project Analysis
		townhome unit would have one EV ready space within each garage. Additionally, a designated loading area at the apartment building along Normandie Avenue would 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.
Goal 9	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**No Conflict.** The Project proposes various housing types that would provide diverse housing options and be served by public transit located within approximately 0.25 mile of the Project site. Existing GTrans bus stops are located less than 600 feet north of the Project site along 166th Street. Additional Torrance Transit and Metro services are located approximately 0.25 mile south of the Project site, at the Artesia Boulevard and South Normandie Avenue intersection. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9 mile south of the Project site, providing more access to public transit opportunities. The Project includes ROW improvements along 169th Street, which would create a continuous pedestrian path and allow greater access to public transit opportunities. Further, the Project would provide new apartment residents who sign a 12-month lease one free monthly Metro pass.
Goal 10	Promote conservation of natural and agricultural lands and restoration of habitats.	**Not Applicable.** The Project site is not located on agricultural lands and does not contain native habitat.
Source: Southern California Association of Governments. (2020). *Connect SoCal (2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy*.		

DEIR Section 4.6: Hazards and Hazardous Materials

DEIR Page 4.6-9

According to California Division of Oil, Gas and Geothermal Resources (CalGEM), ~~no oil or gas wells are located on~~ one abandoned "dry hole" "wildcat" well, identified as "Gardena E.H", exists 121 feet north and 55 feet east from the intersection of 170th Street and Brighton Way thereby placing the well within the parking area east of the southernmost building. There are no oil or gas wells located ~~or~~ immediately adjacent to the site. ~~The closest well was identified to be located approximately 480 feet south of the site and is reported as "abandoned".~~

DEIR Page 4.6-19

Pursuant to GMC Section 18.42.200 (B), the Project is required to comply with the objective standards of the South Coast Air Quality Management District (SCAQMD) Rule 1403 for asbestos-containing materials. SCAQMD Rule 1403 provides requirements for demolition and renovation activities to include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials.

DEIR Page 4.6-20

The existing buildings were noted as a REC due to potential ACM and LBP. Demolition of the onsite buildings 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. Condition of Approval (COA) HAZ-1 requires an ACM and LBP survey of the existing onsite buildings. COA HAZ-1 includes measures for the safe dismantling and removal of building components and debris and prevents the accidental release of asbestos, and COA HAZ-2 includes measures to safely demolish structures containing potential LBP, thereby protecting workers and the public from potential exposure to hazardous materials and wastes during demolition. Further, GMC §18.42.200(B) requires the Project to comply with the objective standards of the SCAQMD Rule 1403, which provides requirements asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste material. Therefore, following compliance with COA HAZ-1, COA HAZ-2, and GMC §18.42.200(B), the potential presences of these materials would not result in a significant hazard to the public through reasonably foreseeable upset and accident conditions.

DEIR Page 4.6-21

As previously addressed, the Phase I ESAs identified various onsite RECs associated with past uses of the Project site. As discussed in **Section 4.6.1: Existing Setting**, there is an existing abandoned well within the Project site where townhomes are proposed. This well is already abandoned and would be capped during Project construction in coordination with CALGEM.

DEIR Section 4.7: Hydrology and Water Quality

DEIR Page 4.7-1

Information in this section is based primarily on hydrology and water quality data provided in **Appendix 4.7-1: Water Resources Technical Report** ("Water Resources Technical Report").

DEIR Page 4.7-1

It is noted, the Water Resources Technical Report was based on an earlier Conceptual Site Plan, which has since been slightly modified ("February 2024 Conceptual Site Plan"). **Section 2.3: Project Characteristics** describes the proposed Project based on the February 2024 Conceptual Site Plan. A follow-up 16911 S Normandie Water Resources Technical Report and Updated Entitlements Package Dated February 27, 2024 ("Water Resources Analysis") (Fuscoe Engineering, March 7, 2024) (see **Appendix 4.7-2**) was conducted to analyze the February 2024 Conceptual Site Plan. The Water Resources Analysis found the Water Resources Technical Report's significance conclusions remain valid and applicable to the February 2024 Conceptual Site Plan.

It is further noted that Kimley-Horn conducted a third-party review on behalf of the City of Gardena ("City") of the Project's Water Resources Technical Report; see **Appendix 4.7-1**.

DEIR Page 4.7-17

The Project proposes various exterior open spaces, thus, would increase the Project site's pervious surfaces from almost nothing (0.3 percent) to ~~14.1~~ approximately 8.6 percent.

DEIR Page 4.7-18

The proposed Project would result in an increase in landscaped areas throughout the Project site, which would decrease impervious surfaces from 99.7 percent under existing conditions to ~~85.9~~ 91.1 percent under proposed Project conditions.

DEIR Page 4.7-19, **Table 4.7-4: Existing Versus Proposed Drainage Conditions**

Table 4.7-8: Existing Versus Proposed Drainage Conditions

Drainage Area	Area (acres)	% Impervious	Q10 (cfs)	Q25 (cfs)	Q50 (cfs)
Existing	5.25	99.70	10.61	13.80	16.76
Proposed	5.25	~~85.9~~ 91.1	9.18	12.10	14.80
Difference	0	~~13.8~~ 8.6	1.43	1.70	1.96
% Change from Existing to Proposed Conditions	-	~~-13.8%~~ -8.6%	-13.5%	-12.3%	-11.7%
Source: **Appendix 4.7-1**, Table 6					

DEIR Page 4.7-24

Fuscoe Engineering, Inc. (2024). *16911 S Normandie Water Resources Technical Report and Updated Entitlements Package Dated February 27, 2024*; see **Appendix 4.7-2**.

DEIR Section 4.8: Land Use and Planning

DEIR Page 4.8-5

- **Southwest:** As noted above, there is one single-family residential dwelling unit immediately adjacent to the Project site and to the southwest, at 16964 ~~West 179th Street~~ Brighton Avenue.

DEIR Page 4.8-7

The parcel immediately adjacent to the Project site's southwest corner, at 16964 ~~West 179th Street~~ Brighton Avenue, and the parcel immediately adjacent and east of the Project site are both designated Industrial.

DEIR Page 4.8-11

The multi-family residential development proposes two types of residential uses: an apartment building with 328 DU at the Project site's northern portion; and 75 townhome-style units within ~~nine~~ ten buildings; see **Exhibit 2-4: Conceptual Site Plan**.

DEIR Page 4.8-11, **Table 4.8-4: Gardena General Plan 2006 Analysis**

Table 4.8-9: Gardena General Plan 2006 Analysis

General Plan Policy	Project Analysis
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.	**No Conflict**. The NCSP would implement new zoning and development standards to promote development of high-quality housing in the City. The Project facilitates the surrounding neighborhood's transition into a more complete community, in that it would bring new residents to the neighborhood, bring new housing to this area, improve the streetscape, and activate the pedestrian realm.
Policy LU 1.2: Protect existing sound residential neighborhoods from incompatible uses and development.	**No Conflict**. Factors influencing land use compatibility include aesthetics, air quality, noise, and traffic. As concluded in **Section 4.2: Air Quality**, **Section 4.9: Noise**, **Section 4.13: Transportation**, and **Section 4.16 Aesthetics,** respectively, the Project would result in less than significant operational impacts concerning these resource areas, which in turn would influence land use compatibility. The surrounding properties include single- and multi-family land uses. Therefore, the Project would

General Plan Policy	Project Analysis
	be a compatible land use and would involve removal of potentially incompatible industrial uses with NCSP approval.
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.	**No Conflict**. Commercial uses and services are located approximately 0.16 mile south of the Project site at the Artesia Boulevard at Normandie Avenue intersection. These shopping centers are characterized by commercial and retail uses that would provide community services and facilities to the Project's future residents. Additionally, the Project would cluster urban-density housing at an appropriate location in the vicinity of the Harbor Gateway Transit Center, which would offer easy access to public transportation 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.	**No Conflict**. The Project would incorporate quality residential amenities, including private and community open spaces. The Project's apartment amenities include a fitness room, dog park, and bike room on the ground level; pools, BBQ's and courtyards with fire pits on level three; and a roof deck and club room on level seven. The Project's townhome amenities include a dog park, ~~paseos~~ playground, courtyard with BBQ's and fire pits, and a pool. The Project provides adequate residential amenities which would create more attractive and livable spaces for residents. The Project would also provide approximately 399 off-street vehicle and 173 bicycle parking spaces.
Policy LU 1.6: Ensure residential densities are compatible with available public service and infrastructure systems.	**No Conflict**. The Project 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 Project 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.	**No Conflict.** The Project proposes three vehicle access points at 169th Street (north), 170th Street (south), and Normandie Avenue (east). 169th Street and 170th Street are classified as Local Streets in the GGP. Traffic on these two roadways proceed to Normandie Avenue, which is classified as a Major Collector. The Project minimizes through-traffic on residential streets by orienting vehicular access towards Normandie Avenue.

General Plan Policy	Project Analysis
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.	**No Conflict.** The Project facilitates the development of quality housing near 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 quality housing options; social, cultural, and environmental amenities; access to shops and restaurants; and low-stress commutes. Project implementation would help alleviate the negative impacts of a lack of housing for local technology and creative sector employees. 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.	**No Conflict**. The Project has been subject to City review and approval to ensure that future development is held to quality design practices and standards.
Policy DS 1.4: Provide a sense of arrival to Gardena through entry monument signs, landscaping features, architectural and motifs at key gateway locations.	**No Conflict**. The Project would enhance the visual environment by replacing obsolete, industrial warehouse buildings with a new multi-family development. The Project would incorporate high-quality design and landscaping consistent with the Specific Plan standards. Developing new residential uses in proximity to growing local technology and creative sector industries would help create a positive image of the City. The Project would provide onsite landscaping features and a high-quality sign identifying the Project, consistent with GMC Chapter 18.58 sign standards, 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.	**No Conflict**. The Project is intended to achieve quality and attractively designed development that can serve as a model for future multi-family development in the City. The Project would replace aged and dilapidated industrial warehouse buildings with a residential development that is intended to serve as a catalyst to transform southeast Gardena into a multi-family neighborhood.
Policy DS 2.2: Ensure that new and remodeled dwelling units are designed with	

General Plan Policy	Project Analysis
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.	**No Conflict.** The NCSP development standards would ensure the development includes a variety of massing, floorplans, color schemes, façade treatments, elevations, 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.	**No Conflict**. The apartment building portion of the Project design and access is oriented towards Normandie Avenue and away from the nearest single-family housing located to the south and west of the Project site. Further, the Project appropriately transitions building massing from a single- to multi-family scale by locating the townhome style buildings along the Project boundary that borders single-family housing (south and west) and the apartment building near the multi-family apartments (north) and Normandie Avenue (east).
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.	**No Conflict**. The Project would provide landscape treatments that would create a "greener" environment. The Project would replace existing industrial warehouses 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.	**No Conflict**. The Project would incorporate quality residential amenities, including ~~16,120~~ 13,600 SF of private and ~~32,900~~ 32,820 SF of community open spaces. The Project's apartment amenities include a fitness room, dog park, pool, and bike room on the ground level; pools, BBQs and courtyards on level 3; and a roof deck and club room on level 7. The Project's townhome amenities include a dog park, ~~paseos~~ playground, courtyard with BBQs, and a pool. These amenities would create more attractive and livable spaces for residents to enjoy.
Policy DS 2.12: Provide well-designed and safe parking areas that maximize security, surveillance, and efficient access to building entrances.	**No Conflict**. The apartment building portion of the Project would provide parking in an enclosed garage consisting of two 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

General Plan Policy	Project Analysis
	system. Residents would be able to enter the building directly from the parking garage. The townhome units would have enclosed parking garages.
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.	**No Conflict**. The Project includes design guidelines to ensure that the Project is designed with a varied but cohesive architectural style. These design standards would ensure that the Project would be designed with 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.	**No Conflict**. The Project would provide a new high-quality residential development through Specific Plan implementation, which would conform to the latest CALGreen sustainability standards and encourage 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.	**No Conflict.** The Project's apartment building portion would provide 173 bicycle parking spaces and 399 auto parking spaces, consistent with the NCSP but less than the City's parking requirements, providing 1.2 parking spaces per apartment unit. As such, the Project would discourage multi-vehicle households. Providing less parking spaces per unit encourages residents to carpool or seek alternative modes of transportation. The Project further promotes use of multi-modal transportation networks through its close proximity to such networks. Existing GTrans bus stops are located less than 600 feet to the north of the Project site along 166th Street. Additional Torrance Transit and Metro services are located approximately 0.25 mile to the south of the Project site, at the intersection of Artesia Boulevard and South Normandie Avenue. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9 mile to the south, providing more access to public transit opportunities. Further, per the NCSP, new residents who sign a 12-month lease would be offered one free monthly Metro pass. The Project would provide two parking spaces per townhouse unit, plus 10 guest parking spaces.
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.	

General Plan Policy	Project Analysis
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.	**No Conflict.** Transit and pedestrian facilities exist near the Project site. Existing GTrans bus stops are located less than 600 feet to the north of the Project site along 166th Street. Additional Torrance Transit and Metro services are located approximately 0.25 mile to the south of the Project site, at the intersection of Artesia Boulevard and South Normandie Avenue. The Los Angeles County Metropolitan Transportation Authority (Metro) Harbor Gateway Transit Center is also located approximately 0.9 mile to the south, providing more access to public transit opportunities. To improve access to public transportation, the Project includes the construction of onsite and offsite sidewalks in this area. The Project includes the construction of sidewalks per Local Street requirements along the south side of 169th Street, Brighton Way (west), and 170th Street (south). Additionally, the Project proposes to construct offsite sidewalk improvements offsite along the south side of 169th Street. The Project, with the incorporation of these sidewalk improvements, would improve connectivity to regional services and promote alternative modes of transportation for residents. Further, the NCSP proposes that new residents who sign a 12-month lease would be offered one free monthly Metro pass. This provision would increase the use of established public transit in the area.
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.	**No Conflict.** The Project would include reconstruction of sidewalks, curbs, and gutters adjoining the Project site. Furthermore, as mentioned above, the Project proposes to construct offsite sidewalk improvements offsite along the south side of 169th Street and onsite along Brighton Way (west) and 170th Street (south) pursuant to the GGP Circulation Element requirements for a Local Street (2 lanes, undivided with parking).
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.	**No Conflict.** The Project promotes bicycle usage through provision of bicycle access along street frontages and bicycle parking.
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.	**No Conflict.** The Project reduces the impact of governmental constraints on housing construction and cost by implementing special zoning and development standards to permit more flexibility in housing developments in southeast Gardena. The Project offers

General Plan Policy	Project Analysis
	an opportunity to create a vibrant, multi-family 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.
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.	**No Conflict.** Upon adoption of the General Plan Amendment and zone change to Specific Plan, the Project would be consistent with land use designations and zoning to provide for the development of multi-family residential development. The provision of up to 403 residential units near regional serving public transit infrastructure assists the City in meeting its share of the regional housing needs allocation. Currently, residential development in southeast Gardena primarily consists of single-family housing with minimal multi-family housing along arterials. The Project permits a greater range of residential densities than is currently permitted in this area of the City. Additionally, three parcels of the existing Project site are designated with a Housing Overlay which identifies that the site has potential to be redeveloped with residential uses to help the City meet its Regional Housing Needs Allocation.
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.	**No Conflict**. The Project conserves and protects 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 site is approximately 99.7% impervious under existing conditions.[2] The Project would reduce the impermeable area to approximately ~~85.90~~ 91.1% , an approximately ~~13.80~~ 8.6% reduction by incorporating approximately ~~31,000~~ 20,432 SF of new planting areas. The Project would be required to comply with all applicable
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.	

[2] Urban Architecture Lab. (2022). 16911 Normandie Apartments and Townhomes Entitlement Set, Sheet No. G0.01: Project Information.

General Plan Policy	Project Analysis
	regulations regarding the disposal of hazardous waste and waste oil during construction.
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.	**No Conflict**. The Project would comply with all applicable local and state requirements for waste diversion during both construction and operations, including the City's Source Reduction and Recycling Element.
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.	**No Conflict**. The Project would be a multi-family development subject to 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. The Project would comply with the 2022 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.	**No Conflict.** 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. See **Section 4.14: Tribal Cultural Resources**.
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.	**No Conflict**. The City has considered law enforcement, crime prevention, and fire safety concerns in its Project review. The building and parking structure would be accessible only to residents. <u>The five spaces directly off Normandie Avenue will be made available for public parking.</u> The Project proposes 10 guest parking spaces, which would be located near the townhome units. 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.	**No Conflict.** The Project would be 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.	**No Conflict.** The Project site is near parcels within a liquefaction zone; therefore, a geotechnical study was prepared for the Project area; see **Appendix 4.4-1: Preliminary Geotechnical Investigation**.

General Plan Policy	Project Analysis
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.	**No Conflict.** The Project's proposed multi-family residential building would be professionally managed and the property managers would develop standard emergency preparedness plans and procedures.
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.	**No Conflict**. The Project's potential for generating noise impacts on the surrounding environment both during construction and operation is addressed in **Section 4.9: Noise.** As concluded in **Section 4.9: Noise**, impacts associated with Project onsite construction activities would be significant and unavoidable despite the specified mitigation measures. In accordance with **Policy 2.4**, mitigation is required to minimize construction noise impacts. As to **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. As to **Policy 2.9,** the Project would incorporate design features necessary to control residential interior noise levels and minimize exposure of residents to nearby mobile noise sources 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.	**No Conflict.** The Project would be subject to compliance 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.	**No Conflict.** The Project would be subject to compliance with the City's regulations regarding permitted construction hours.
Source: City of Gardena. 2006. *Gardena General Plan 2006, Updated 2022*. https://www.cityofgardena.org/general-plan/. Accessed May 2023.	

DEIR Page 4.8-21

These approvals are needed for Project development, which proposes one seven-story apartment building with 328 apartments and ~~nine~~ ten three-story structures which include 75 townhome style units to replace the warehouse buildings currently on the property.

DEIR Section 4.9: Noise

DEIR Page 4.9-1

It is noted, the Noise Impact Study was based on an earlier Conceptual Site Plan, which has since been slightly modified ("February 2024 Conceptual Site Plan"). **Section 2.3: Project Characteristics** describes the proposed Project based on the February 2024 Conceptual Site Plan. A follow-up Project Modified Site Plan – Operational Noise Analysis ("Operational Noise Analysis") (Acoustical Engineering Services, March 7, 2024) was conducted (see **Appendix 4.9-2**) to analyze the February 2024 Conceptual Site Plan. The Operational Noise Analysis found the Noise Impact Study's significance conclusions remain valid and applicable to the February 2024 Conceptual Site Plan.

It is further noted, Kimley-Horn conducted a third-party review on behalf of the City of Gardena ("City") of the Project's Noise Impact Study; see **Appendix 4.9-1**.

DEIR Page 4.9-19

-Townhomes: ~~swimming~~ outdoor pool with BBQ and seating areas; dog park; club house; and ~~paseos with seating areas~~ playground.

DEIR Page 4.9-20

Concerning the February 2024 Conceptual Site Plan, the location of the townhomes pool (L1) changed to the eastern portion of the Project site to approximately 430 feet northeast of sensitive receptor R1 and approximately 140 feet west of sensitive receptor R3. Although the outdoor activity noise levels presented in **Table 4.9-8** were modelled using the pool's original location, the noise levels associated with the pool's modified location would be less or similar to those presented in the table. In its modified location, the pool would move further away from sensitive receptor R1, thus noise levels would be less than 46.6 dBA, resulting in a less than significant impact. In its modified location, the pool would move closer to sensitive receptor R3, however, as shown above in **Table 4.9-8**, the estimated noise from outdoor activities at receptor R2, which is the receptor nearest the modified pool location, is only 37.7 dBA, which would be far below the significance threshold of 67.3 dBA. The pool's relocation would not increase outdoor operational noise levels such that the significance threshold would be exceeded. Further, any increase in outdoor activity noise levels at sensitive receptor R3 would be masked by offsite mobile roadway noise along South Normandie Avenue. Thus, the Project's outdoor stationary noise source noise levels associated with the February 2024 Conceptual Site Plan would remain less than significant.

DEIR Page 4.9-29

Acoustical Engineering Services, Inc. (2024). *Project Modified Site Plan – Operational Noise Analysis*; see **Appendix 4.9-2**.

DEIR Section 4.10: Population and Housing

DEIR Page 4.10-10

The Project proposes to remove all existing onsite structures and, in their place, construct a 403-DU multi-family residential development with two types of residential uses: an apartment building with 328 DU at the Project site's northeastern portion; and 75 townhome-style units within ~~nine~~ ten buildings at the Project site's southern portion and along the western site boundary; see **Exhibit 2-4: Conceptual Site Plan**. **Table 2-4~~5~~5: Land Use Summary – Proposed Apartment Building** summarizes the apartment building's proposed floor areas and various proposed apartment product types (i.e., 68 studio, 194 one-bedroom, and 66 two-bedroom). **Table 2-~~5~~56: Land Use Summary – Proposed Townhomes** summarizes the townhome proposed floor areas and the various proposed townhome product types (i.e., ~~30 two-bedroom, 35~~ 65 three-bedroom, and 10 four-bedroom).

DEIR Section 4.12: Recreation

DEIR Page 4.12-6

The Normandie Crossing Specific Plan (Section VI. Landscape and Open Space Plan) specifies that the Project must provide a minimum of ~~16,400~~ 9,850 SF (50 SF ~~per unit~~ for 60 percent of the units) of private open space and ~~22,698~~ 22,140 SF of outdoor common open space for the proposed apartments and 3,750 SF (50 SF per unit) of private space and ~~7,645~~ 8,680 SF of indoor and outdoor common open space for the proposed townhomes.

DEIR Page 4.12-6

Overall, the Project proposes approximately ~~50,493~~ 44,420 SF of open spaces, including approximately ~~20,150~~ 13,600 SF of private open space and approximately ~~30,343~~ 32,820 SF of common open space.

DEIR Page 4.12-6

~~Each~~ Subarea A ~~unit~~ would ~~be provided~~ provide a minimum of 50 SF of private open space for 60 percent of the units (197 units).

DEIR Page 4.12-6

Each Subarea B unit would be provided 50 SF of private open space (i.e., balconies and ~~roof decks~~ yards). The amenities proposed in Subarea B's public open spaces are as follow: swimming pool with BBQ and seating areas; dog park; club house; and ~~paseos with seating areas~~ a playground.

DEIR Section 4.13: Transportation

DEIR Page 4.13-1

It is noted, the CEQA Transportation Assessment and Local Transportation Assessment identified above were based on an earlier Conceptual Site Plan, which has since been slightly modified ("February 2024 Conceptual Site Plan"). **Section 2.3: Project Characteristics** describes the proposed Project based on the February 2024 Conceptual Site Plan. Given the February 2024 Conceptual Site Plan involved only minor modifications to the Project, the CEQA Transportation Assessment and Local Transportation Assessment significance conclusions remain valid and applicable to the February 2024 Conceptual Site Plan.

It is further noted, Kimley-Horn conducted a third-party review on behalf of the City of Gardena ("City") of the Project's CEQA Transportation Impact Assessment and Local Transportation Assessment; see **Appendix 4.13-1** and **Appendix 4.13-2**.

DEIR Page 4.13-16

- Removing approximately 170 linear feet of the spur track~~, which enters the project site and~~ on UPRR property that formerly ~~serves~~ served the southernmost industrial building (16911 Normandie Avenue);

DEIR Section 4.15: Utilities and Service Systems

DEIR Page 4.15-1

It is noted, the Water Resources Technical Report and Energy Assessment identified above were based on an earlier Conceptual Site Plan, which has since been slightly modified. However, from the time the reports were completed, the Conceptual Site Plan has not changed concerning Project elements which are foundational to these studies and which would inform Project-relevant data. **Section 2.3: Project Characteristics** describes the proposed Project elements based on the current February 2024 Conceptual Site Plan. Because the Conceptual Site Plan has not changed concerning Project elements foundational to the Water Resources Technical Report and Energy Assessment, their conclusions remain valid and applicable to the February 2024 Conceptual Site Plan. As such, updates to these studies to reflect the February 2024 Conceptual Site Plan are not warranted. Fuscoe Engineering provided a memorandum on March 7th, 2024 confirming that the conclusions from the Water and Wastewater Technical Report dated April 2023 remain valid and applicable to the February 2024 Conceptual Site Plan.

DEIR Page 4.15-25

The Project's estimated wastewater generation would be approximately ~~86,500~~ 88,000 gpd, or approximately ~~75,890~~ 77,390 gpd (0.08 mgd) over existing conditions; see **Table 4.15-7: Estimated Project Wastewater Generation**.

DEIR Page 4.15-25, **Table 4.156-7: Estimated Project Wastewater Generation**

Table 4.15-10: Estimated Project Wastewater Generation

Land Use	Dwelling Units	Average Generation Factor (gpd/DU)[1]	Total Wastewater Generation (gpd)
Apartments	68 Units – (Studio)	150	10,200
	194 Units – (1-BR)	200	38,800
	66 Units – (2-BR)	250	16,500
Townhomes	10 Units – (4-BR)	300	3,000
	~~35~~ 65 Units – (3-BR)	300	~~10,500~~ 19,500
	~~30 Units – (2- BR)~~	~~250~~	~~7,500~~
		Total Project	***~~86,500~~ 88,000***
		Total Existing[2]	***-10,610***
		Net Project	***~~+ 75,890~~ +77,390 (0.08 mgd)***

Note:
[1] Based on the sewer generation factors from the "Estimated Average Daily Sewage Flows for Various Occupancies" document from LA County Public Works.
[2] See **Table 4.15-4**.

Source: **Appendix 4.7-1**, Table 4.

DEIR Page 4.15-29

The Project's estimated water demand would total approximately ~~158,211~~ 159,266 gpd, or approximately ~~145,479~~ 146,534 gpd over existing conditions; see **Table 4.15-9: Estimated Project Water Demand**.

DEIR Page 4.15-30, **Table 4.15-9: Estimated Project Water Demand**

Table 4.15-11: Estimated Project Water Demand

Land Use	Units	Average Demand Factor (gpd/DU)[1]	Total Water Demand (gpd)
Apartments	68 Units – (Studio)	180	12,240
	194 Units – (1-BR)	240	46,560
	66 Units – (2-BR)	300	19,800
Townhomes	10 Units – (4-BR)	360	3,600
	~~35~~ 65 Units – (3-BR)	360	~~12,600~~ 23,400
	~~30 Units – (2- BR)~~	~~300~~	~~9,000~~
Pool(s)[2]	1 Unit @ - L1 Courtyard	13,614	13,614
	1 Units @ - L1 Courtyard	2,693	2,693
	1 Unit @ - L3 Courtyard	35,904	35,904
Landscaping	~~30,891~~ 20,432 SF	ETWU Method[3, 4]	~~2,200~~ 1,455
		Total Project	***~~158,211~~ 159,266 (~~177.2~~ 178.4 AFY)***
		Total Existing[5]	***-12,732***
		Net Project	***~~+ 145,479~~ +146,534 (~~+163~~ +164.1 AFY)***

Note:
[1] Based on 120% of the sewer generation factors from the "Estimated Average Daily Sewage Flows for Various Occupancies" document from LA County Public Works. See Golden State Water Company 2020 Urban Water Management Plan Southwest Service Area, page 1-2.
[2] Pools vary in size: therefore, pools have different water consumption values per unit.
[3] Demand based on Estimated Total Water Use equation: (Eto*plant factor*landscaped area* 0.62)/irrigation efficiency. Utilizing CIMIS Reference Evapotranspiration Zones Map ET of 46.6 in/yr, and a conservative plant factor of 0.7 and irrigation efficiency of 0.81 proposed condition.
[4] The Project's proposed landscaping was updated to total 30,205 SF (See **Section 3.0: Project Description**) after completion of this analysis. Because the Project's updated landscaping would generate less water demand, this analysis conservatively assumes 30,891 SF of proposed landscaping for purposes of determining water demand.
[5] See **Table 4.15-1**.

Source: **Appendix 4.15**, Table 3.

DEIR Page 4.15-31

The Project's increase in water demand of ~~145,479~~ 146,534 gpd (~~163~~ 164.1 AFY) represents approximately 6.5% of the UWMP's forecast increase in demand between 2025 and 2045.

DEIR Page 4.15-31

As discussed above, the Project's estimated wastewater generation would be approximately ~~86,500~~ 88,000 gpd, or approximately ~~75,890~~ 77,390 gpd (0.08 mgd) over existing conditions; see **Table 4.15-7**.

DEIR Page 4.15-31

The Project's estimated wastewater generation of ~~75,890~~ 77,390 gpd (~~0.076~~ 0.08 mgd) comprises less than 0.06 percent of JWPCP's remaining available capacity of 156.9 mgd.

DEIR Section 4.16: Aesthetics

DEIR Page 4.16-10

- At 16964 ~~West 179th Street~~ Brighton Avenue, rezone from General Industrial (M-2) Zone to Single-Family Residential (R-1) Zone;

DEIR Section 5.0: Other CEQA Considerations

DEIR Page 5-3

The Project would remove all onsite uses to develop a 403-DU multi-family residential development with two types of residential uses: an apartment building with 328 DU at the Project site's northern portion; and 75 townhome-style units within ~~nine~~ ten buildings at the Project site's southern portion and along the western site boundary.

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The Project proposes a 403-dwelling unit (DU) multi-family residential development with two types of residential uses: an apartment building with 328 DU at the Project site's northern portion; and 75 townhome-style units within ~~nine~~ ten buildings at the Project site's southern portion and along the western site boundary.

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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;
- "Reduced Density" Alternative; and
- "Community Input" Alternative.

Throughout the following analysis, the alternatives' impacts are analyzed for each environmental issue area, as examined in **Sections 4.1: Air Quality** through **4.16: Aesthetics**. In this manner, each Alternative can be compared to the Project on an issue-by-issue basis. ~~**Table 6-3: Comparison of Alternatives**~~ **Table 6-12: Comparison of Alternatives**, 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.

DEIR Page 6-16, **Table 6-1: Comparison Between Proposed Project and No Project/Existing Land Use Designation Alternative**

Table 6-1: Comparison Between Proposed Project and No Project/Existing Land Use Designation Alternative

Description	Apartment Building (DU)[1]	Townhomes (DU)[1]	Density (DU/AC)[1]	Floor Area (SF)[1]
Proposed Project	328	75	77	~~429,000~~ 429,578 (Residential)
No Project/Existing Land Use Designation Alternative				~~200,310~~ 228,690 (Industrial)
Difference	*-328*	*-75*		*-200,888*
% Difference	*-100%*	*-100%*		~~*-47%*~~ *-53%*
Note: 1. DU = dwelling units; AC = acre; SF = square feet.				

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The Project proposes an apartment building approximately 90 feet tall and ~~nine~~ ten townhome buildings approximately 40 feet tall, as measured from the finished floor (i.e., the level of the finished floor on the ground level) of the roof's highest point.

DEIR Page 6-25, **Table 6-2: Comparison Between Proposed Project and Reduced Density Alternative**

Table 6-2: Comparison Between Proposed Project and Reduced Density Alternative

Description	Apartment Building (DU)[1]	Townhomes (DU)[1]	Density (DU/AC)	Height of Building (Stories)	Floor Area (SF)
Proposed Project	328	75	77	7	~~429,000~~ 429,578
Reduced Density Alternative	192	75	51	5	253,110
Subtotal Difference	*-136*	*-0*			
Total Difference	*-136*			*-2*	*~~-175,890~~ -176,468*
% Difference	*-34%*				*-41%*
Note: DU = dwelling units; and AC = acre.					

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The Reduced Density Alternative proposes approximately 34 percent fewer DU than the Project and less floor area (approximately 253,110 SF compared to approximately ~~429,000~~ 429,578 SF), thus, proportionately fewer construction emissions as presented in **Table 4.1-5** would occur.

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6.4.5 COMMUNITY INPUT" ALTERNATIVE

The Community Input Alternative was added as a result of input received from the community through the public hearing and public review processes, as well as from a follow-up meeting the Applicant had with neighborhood residents following the March 19, 2024 Planning Commission meeting. This new Alternative addresses the following primary concerns that were raised by the community and neighborhood residents: density; and apartment building height and mass, parking, and the alignment of the driveway on 170th Street.

DESCRIPTION OF ALTERNATIVE

The Community Input Alternative assumes development of the Project site similar to the proposed Project. The townhomes would remain unchanged; however, under this Alternative, the apartment building would be reduced to 258 DUs (from 328 DU) and the building height would be reduced to five above grade stories at a maximum height of 70 feet from existing grade (from seven above grade stories at a maximum height of 90 feet from existing grade) and would include one level of subterranean parking (with none under the proposed Project). This Alternative proposes a total of 333 DU, or approximately 17 percent fewer DU than the Project's

proposed 403 DU and would reduce the density to 63 DU/AC (from 77 DU/AC). With fewer units, this Alternative would include fewer affordable units (7 affordable DU rather than 20 affordable DU). **Table 6-3: Comparison Between Proposed Project and Community Input Alternative** compares development under the Project and the Community Input Alternative.

Table 6-3: Comparison Between Proposed Project and Community Input Alternative

Description	Apartment Building (DU)[1]			Townhomes (DU)[1]	Total DU	Density (DU/AC)	Height of Apartment Building		Floor Area (SF)
	Market Rate	Affordable	Subtotal				Above Grade Stories	Below Grade Stories	
Proposed Project	308	20	328	75	403	77	7	0	429,000
Community Input Alternative	251	7	258	75	333	63	5	1	367,000
Subtotal Difference	*-57*	*-13*	*-70*	*0*		--	*-2*	*+1*	--
Total DU Difference	*-70*					--	*-1*		*-62,000*
% Difference	*-17%*					--	--		*-14%*

Note:
1. DU = dwelling units, SF=square feet, and AC = acre.

Table 6-4: Community Input Alternative Parking compares parking under the Project and parking under the Community Input Alternative. Under this Alternative, onsite vehicle parking would be reduced to 556 spaces (from 559 spaces) and bicycle parking would be reduced to 69 spaces (from 173 spaces). However, given this Alternative would include 70 fewer DU, the parking spaces per DU ratio would increase to 1.67 spaces per DU (from 1.39 spaces per DU).

Table 6-4: Community Input Alternative Parking

Description	Total DU[1]	Total Parking Spaces[2]			Parking Spaces per DU Ratio		
		Apartment Building	Townhomes	Total	Apartment Building	Townhomes	Total
Proposed Project	403	399	150 + 10 guest parking	559	1.22	2.13	1.39
Community Input Alternative	333	387	150 + 19 guest parking	556	1.5	2.25	1.67
Total Difference	*-70*	*-12*	*+9*	*-3*	*0.28*	*0.12*	*+0.28*
% Difference	*-17%*	*-3%*	*+6%*	*-1%*	*23%*	*6%*	*+20%*

Note:
1. DU = dwelling units
2. Total parking spaces includes electric vehicle charging, accessible, guest, and standard parking spaces.

Except the townhome's 170th Street access driveway, it is assumed all access driveways under this Alternative would be the same as the Project, thus, this Alternative would similarly require offsite railroad improvements pursuant to CPUC standards and UPRR guidelines. Under this Alternative, the townhome's 170th Street access driveway would be relocated west to align with the Brighton Avenue at West 170th Street intersection. Under the Community Input Alternative,

more grading would be required for the proposed subterranean parking (approximately 40,730 cubic yards of cut and export with a maximum depth of excavation to 15.0 feet below ground surface [bgs]) rather than approximately 10,000 cubic yards of cut and export with a maximum depth of excavation to 6.0 feet bgs). Additionally, because construction hauling trips are determined based on project-specific grading material movement, under the Community Input Alternative, more construction hauling trips would occur (approximately 2,546 construction hauling trips rather than 625 construction hauling trips).[3] Similar to the Project, construction under this Alternative would occur over approximately 3.5 years.

As discussed more fully below, all impacts of the Community Input Alternative except for construction noise, including those associated with the subterranean parking structure, dirt export, and hauling, are found to be less than significant similar to the original project.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Air Quality

Table 4.1-5: Construction Air Pollutant Emissions provides the Project's construction-related maximum daily criteria air pollutant (CAP) emissions using the CARB-approved CalEEMod Version 2020.4 computer program, which was the most recent version when the Project's Notice of Preparation (NOP) was released in 2021. **Table 4.1-5** shows the Project's construction-related maximum daily CAP emissions would be below the SCAQMD's mass daily significance thresholds, resulting in a less than significant impact.

The Community Input Alternative's construction-related emissions were calculated using CalEEMod Version 2022.1, which is the most current version of the computer program. To compare the Community Input Alternative's construction-related criteria air pollutant emissions and the proposed Project's emissions using the same computer model, the Project's construction-related emissions were also calculated using CalEEMod Version 2022.1 for informational purposes only; see **Appendix 6.0-1: Air Quality, Greenhouse Gas, and Noise Modeling Data** for proposed Project and Community Input Alternative construction assumptions and CalEEMod Version 2022.1 outputs.[4]

Table 6-5: Community Input Alternative Construction Air Pollutant Emissions provides the construction-related maximum daily criteria air pollutants emissions for the proposed Project and the Community Input Alternative using CalEEMod Version 2022.1. **Table 6-5** shows the Community Input Alternative's construction-related maximum daily criteria air pollutant emissions and shows they would be greater than the proposed Project for VOC, less than the proposed Project for NO_X and CO, and the same as the proposed Project for SO_X, PM_{10}, and $PM_{2.5}$. While the Community Input Alternative would result in greater regional emissions for one pollutant, like the proposed Project, this Alternative's construction-related maximum daily

[3] California Air Pollution Control Officers Association (CAPCOA). *CalEEMod User Guide, Appendix C Emission Calculation Details for CalEEMod, Section 4.6.1 Default Values for Vehicle Trip Rate Pg. C-19.* Retrieved from: https://www.caleemod.com/documents/user-guide/04_Appendix%20C.pdf. Accessed October 23, 2024.

emissions would be below the SCAQMD significance thresholds and impacts would be less than significant.

Table 6-5: Community Input Alternative Construction Air Pollutant Emissions

Year	Maximum Daily Criteria Air Pollutant Emissions [1,2,3] (lb/day)					
	VOC[4]	NO_x	CO	SO_x	PM_{10}[5]	$PM_{2.5}$[5]
2025	0.51	5.57	25.34	0.05	8.05	4.07
2026	1.32	5.46	28.49	0.05	3.34	1.62
2027	1.16	3.83	21.86	0.02	3.01	0.75
2028	30.10	0.98	5.70	0.00	1.05	0.25
Community Input Alternative Maximum [6]	***30***	***6***	***28***	***<1***	***8***	***4***
Proposed Project Maximum	*12*	*9*	*48*	*<1*	*8*	*4*
SCAQMD Significance Threshold[8]	**75**	**100**	**550**	**150**	**150**	**55**
Exceed 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. Emissions shown here are based on the specific construction schedule and hauling material for the Alternative and the Project. Emissions were estimated using CalEEMod Version 2022.1. CalEEMod defaults were used for on-site construction equipment mix and on-road vehicle trips. See **Appendix 6.0-1** for detailed CalEEMod outputs for the Alternative and the Project. Analysis assumes on-site fugitive dust control [watering three times daily during construction].
3. Alternative and Project construction assume the use of USEPA Tier 4 for construction equipment greater than 50 hp.
4. For purposes of this analysis, VOC emissions are assumed to be equal to ROG emissions.
5. PM emissions are estimated as a sum of exhaust, tire wear, brake wear, and fugitive dust emissions. PM fugitive dust emissions during construction include a 55% reduction (for watering at least two times daily to comply with SCAQMD Rule 403).
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.

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: Kimey-Horn and Associates, Inc. (2024). See **Appendix 6.0-1.**

Table 4.1-7: Localized Significance of Construction Emissions provides the Project's maximum daily on-site construction-related criteria air pollutant emissions using the CalEEMod Version 2020.4, which was the most recent version when the Projects NOP was released in June 2021. Table 4.1-7 shows that the Project's maximum daily on-site construction related criteria air pollutant emissions would be less than the SCAQMD mass-rate LSTs for NOx, CO, PM10, and PM2.5. The Project's contribution to the localized air concentrations of these pollutants would be less than significant.

The Community Input Alternative's maximum daily on-site construction-related criteria air pollutant emissions were calculated using CalEEMod Version 2022.1. To compare the Community

Input Alternative's maximum daily on-site construction related criteria air pollutant emissions and the proposed Project's emissions using the same computer model, the Project's maximum daily on-site construction related criteria air pollutant emissions were also calculated using CalEEMod Version 2022.1 for informational purposes only; see Appendix 6.0-1 for proposed Project and Community Input Alternative construction assumptions and CalEEMod Version 2022.1 outputs.

Table 6-6: Community Input Alternative Localized Significance of Construction Emissions (Maximum Pounds Per Day) provides the maximum daily on-site construction-related criteria air pollutant emissions for the proposed Project and the Community Input Alternative using CalEEMod Version 2022.1. **Table 6-6** shows that would be greater than the proposed Project for PM_{10} and $PM_{2.5}$ and less than the proposed Project for CO, NO_X and 1-hour NO_X. While the Community Input Alternative would result in greater maximum daily on-site construction-related emissions for two pollutants, like the proposed Project, this Alternative's maximum daily on-site construction-related emissions would not exceed the SCAQMD mass-rate LSTs and impacts would be less than significant. Like the Project, the Alternative's contribution to the localized air concentrations of these pollutants would also be less than significant.

Table 6-6: Community Input Alternative Localized Significance of Construction Emissions (Maximum Pounds Per Day)

Emission Type	Maximum Daily On-Site Construction Emissions (lb/day) [1]				
	CO	NO_X	1-Hour NO_X [2]	PM_{10} [3]	$PM_{2.5}$ [3]
Community Input Alternative Maximum	***24.3***	***2.6***	***2.6***	***8.0***	***4.1***
Proposed Project Maximum	*28.31*	*4.5*	*4.5*	*7.7*	*3.9*
SCAQMD Localized Significance Thresholds [4]	***1,796***	***197***	***109***	***15***	***8***
Exceed Threshold?	***No***	***No***	***No***	***No***	***No***

1. Emissions represent the change in on-site emissions due to the proposed land uses relative to emissions from the existing conditions. Emissions were estimated using CalEEMod Version 2022.1.
2. An approximated LST was estimated to evaluate the federal 1-hour NO_2 standard for the Project and Alternative, 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-hr NO_2 standard with the ratio of the federal to state 1-hr NO_2 standard (0.10 ppm/0.18 ppm).
3. PM fugitive dust emissions for the Project and Alternatives during unmitigated construction include a 55% reduction (for watering at least two times daily to comply with South Coast AQMD Rule 403).
4. LSTs based on a 5-acre Project site SRA 3 (Southwest Coastal LA County) for a 25-m receptor distance. LSTs were obtained from the 2008 SCAQMD Final Localized Significance Threshold Methodology, Appendix C, Mass Rate LST Look-up Tables. Available at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysishandbook/localized-significance-thresholds.

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; South Coast AQMD - South Coast Air Quality Management District

Source: Kimley-Horn and Associates Inc. (2024). See **Appendix 6.0-1.**

As shown in **Table 4.1-6**, the Project's operational criteria pollutant emissions would be below the SCAQMD's mass daily significance thresholds and would result in a less than significant air

quality impact. The Community Input Alternative would result in less operational emissions than the Project given it proposes 17 percent fewer DUs and 14 percent less floor area. Therefore, the Community Input Alternative's contribution to the localized air concentrations of these pollutants would be less than significant during operations.

The Community Input Alternative would result in less impacts than the proposed Project regarding air quality. The Community Input Alternative, like the proposed Project, would result in less than significant construction-related emissions. Because the Community Input Alternative would include fewer DU, long-term operational emissions associated with vehicle trips, energy usage, and areas sources would be less 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. The Community Input Alternative would involve demolition and ground disturbing construction activities similar to the Project, but increased depth of excavation for the proposed subterranean parking. Although the increased depth of excavation could increase the likelihood of encountering as yet undiscovered archaeological resources, incorporation of similar mitigation would sufficiently avoid or mitigate potential impacts to as yet undiscovered archaeological resources. Therefore, like the Project, this Alternative would not cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines § 15064.5, and a less than significant impact would occur.

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. The Community Input Alternative would involve demolition and ground disturbing construction activities similar to the Project, but increased depth of excavation due to the proposed subterranean parking. Although the increased depth of excavation could increase the likelihood of encountering undiscovered human remains, compliance with the established regulatory framework would reduce impacts to less than significant in the event human remains are encountered. 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 Community Input Alternative would result in similar impacts as the proposed Project regarding cultural resources with mitigation incorporated.

Energy

As shown in **Table 4.3-5: Project and Countywide Energy Consumption**, the Project would result in construction-related energy consumption from diesel fuel, and gasoline usage. However, the Project would result in less than significant impacts concerning construction-related energy consumption since wasteful, inefficient, or unnecessary consumption of energy resources would not occur following compliance with Title 24 requirements.

The Community Input Alternative's construction-related energy consumption is identified in **Table 6-7: Community Input Alternative Construction Energy Consumption**. As shown in **Table 6-7**, under the Community Input Alternative there would be less construction-related diesel and gas consumption. Additionally, this Alternative would also be subject to compliance with Title 24 requirements. Like the Project, the Community Input Alternative's construction activities would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in a less than significant impact.

Table 6-7: Community Input Alternative Construction Energy Consumption

Energy Type	Community Input Alternative Annual Energy Consumption (gallons)	Los Angeles County Annual Energy Consumption[1,2] (gallons)	Alternative Percentage of Countywide Consumption	*Proposed Project Annual Energy Consumption (gallons)*[4]	*Proposed Project Percentage of Countywide Consumption*
Diesel[3]	155,127	507,214,212	0.0306%	*160,224*	*0.0316%*
Gasoline[3]	81,486	3,816,162,983	0.0021%	*121,444*	*0.0032%*

Notes:
1. The Alternative's and Project increases in electricity and natural gas consumption are compared with the total consumption in Los Angeles County in 2021.
2. The Alternative's and Project increases in automotive fuel consumption are compared with the countywide fuel consumption in 2021.
3. Countywide fuel consumption is from the California Air Resources Board EMFAC2021 model.
4. The proposed Project's annual energy consumption in Table 4.3-5 was calculated using input from CalEEMod Version 2020.4, which was the most recent version when the Project's NOP was released in 2021. The Community Input Alternatives construction related energy consumption were calculated using inputs from CalEEMod Version 2022.1, which is the most current Version. To compare the Community Input Alternative's construction energy and the Project's construction energy, the Project's construction energy was also calculated using inputs from CalEEMod Version 2022.1 for informational purposes only.

Source: Kimley-Horn and Associates Inc. (2024). See **Appendix 6.0-1.**

The Project's operational energy consumption would occur from building energy use, water use, and transportation-related fuel use; see **Table 4.3-5**. The Project would be subject to compliance with applicable energy standards. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in a less than significant impact concerning energy. Further, the Project would not conflict with/obstruct a State or local plan for renewable energy or energy efficiency. Under the Community Input Alternative, operational energy consumption would be proportionately less than the Project, as approximately 17 percent fewer DU would operate under this Alternative. Like the Project, this Alternative would not result in wasteful, inefficient, or unnecessary consumption of energy resources during operations, resulting in a less than significant impact concerning energy.

The Community Input Alternative would result in less impacts than the proposed Project regarding energy. The Community Input Alternative would result in similar construction-related energy consumption but less operational-related energy consumption. Like the Project, this Alternative would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in less than significant impacts concerning energy.

Geology, Soils, and Paleontological Resources

Grading and earthwork activities during Project construction would expose soils to potential short-term erosion by wind and water. During construction, the Project would be subject to compliance with the GMC erosion and siltation control measures and the Construction General Permit. 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. Under the Community Input Alternative, more grading and increased depth of excavation as compared to the proposed Project would be required for the proposed subterranean parking. However, like the proposed Project, following compliance with the established regulatory framework, this Alternative's potential impacts concerning soil erosion and loss of topsoil would be less than significant.

Under the Community Input Alternative, more grading and increased depth of excavation as compared to the proposed Project would be required for the proposed subterranean parking. Therefore, a Preliminary Geotechnical Report was prepared to evaluate potential impacts under this Alternative; see **Appendix 6.0-2: Preliminary Geotechnical Report**. The Geotechnical Report concluded that within incorporation of standard recommendations, this Alternative would not be subject to strong seismic ground shaking, seismic-related ground failure, including liquefaction, landslides, or unstable geologic units or soils. Like the Project, this Alternative would be subject to compliance with standard engineering practices, CBSC regulations, and the Geotechnical Investigation's recommendations for design and construction, which would be verified by the Gardena Building Services Division in accordance with Gardena Municipal Code section 18.42.200.A. Therefore, like the proposed Project, this Alternative would result in less than significant impacts concerning geology and soils.

Project construction-related impacts (i.e., ground disturbing activities) on paleontological resources are concluded to be less than significant, with mitigation incorporated. The Community Input Alternative would involve demolition and ground disturbing construction activities similar to the Project, but with an increased depth of excavation due to the proposed subterranean parking. Although the increased depth of excavation could increase the likelihood of encountering as yet undiscovered paleontological resources, compliance with the COA and incorporation of MM would reduce impacts to less than significant in the event paleontological resources are encountered.

The Community Input Alternative would result in similar impacts as the proposed Project regarding geology, soils, and paleontological resources.

Greenhouse Gas Emissions

Table 4.5-3: Summary of Operational GHG Emissions provides the Project's amortized construction emissions and operational maximum opening year GHG emissions using the CalEEMod Version 2020.4 computer program, which was the most recent version when the Project's NOP was released in 2021. **Table 4.5-3** shows Project emissions would not exceed SCAQMD's bright line, unadopted screening-level threshold.

The Community Input Alternative's construction GHG emissions were calculated for each year of construction activity using CalEEMod computer program Version 2022.1, which is the most current version of the computer program. To compare the Community Input Alternative construction GHG emissions and the proposed Projects emissions using the same computer model, the Project's construction related GHG emissions were also calculated using CalEEMod Version 2022.1 for informational purposes only;; see **Appendix 6.0-1** for proposed Project and Community Input Alternative construction assumptions and CalEEMod Version 2022.1 outputs.

Table 6-8: Community Input Alternative's Summary of Construction GHG Emissions provides the construction-related GHG emissions for the proposed Project and the Community Input Alternative using CalEEMod Version 2022.1. As shown in **Table 6-8**, the Community Input Alternative's construction related GHG emissions would be greater than the proposed Project for on-road hauling trips, and less than the proposed Project for on-road worker and vendor trips, off-road emissions, and total construction-related GHG emissions. While the Community Input Alternative would result in greater GHG emissions for hauler trips, overall construction GHG emissions and the Alternative's amortized GHG emissions are lower than the proposed Project.

Table 6-8: Community Input Alternative's Summary of Construction GHG Emissions

Calendar Year	Total Off-Road Emissions	Total On-Road Emissions			Total Construction Emissions[1]
		Worker	Vendor	Hauling	
	(MT CO2e)				
2025	525.60	16.31	-	187.80	730.32
2026	322.60	352.81	186.20	23.70	885.30
2027	171.98	297.62	157.0	-	626.01
2028	8.97	48.71	-	-	57.65
Community Input Alternative Total	***1,029.15***	***715.45***	***343.20***	***211.50***	***2,299.29***
Proposed Project Total	*1,076.3*	*1,066.3*	*474.1*	*86.6*	*2,703.19*
Community Input Alternative 30-year Amortized					***77***
Proposed Project 30-year Amortized					*90*

1. Construction emissions for the Community Input Alternative and the Project include on-site and off-site (worker/vendor/hauling) emissions, estimated using CalEEMod Version 2022.1. CO2e includes CO2, CH4, and N2O emissions, weighted by their respective global warming potentials.

CH4 = methane; CO2 = carbon dioxide; CO2e = carbon dioxide equivalents; GHG = greenhouse gases; MT = metric tons; N2O = nitrous oxide; yr = year

Source: Kimley-Horn and Associates Inc. (2024). See **Appendix 6.0-1.**

The Community Input Alternative would result in proportionately less operational GHG emissions than the proposed Project, as approximately 17 percent fewer DU would operate under this Alternative.

The Community Input Alternative would result in less impacts than the proposed Project regarding greenhouse gasses. The Community Input Alternative would result in similar

construction GHG emissions and less operational GHG emissions than the proposed Project. Like the Project, GHG emissions would not exceed significance thresholds, thus would be less than significant under this Alternative.

Hazards and Hazardous Materials

The proposed Project would require demolition of onsite buildings which could expose construction workers to concentrations exceeding federal and state thresholds. Additionally, Project construction activities could 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. Implementation of COA HAZ-1 and COA HAZ-2, and MM HAZ-1, would reduce impacts to less than significant.

Like the Project, the Community Input Alternative construction would require demolition of onsite buildings, which could expose construction workers to concentrations exceeding federal and state thresholds. Also like the Project, construction activities under this Alternative could 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. Additionally, the Community Input Alternative would involve more grading and increased depth of excavation (15.0 feet bgs). Because the historical high groundwater level in the area is 15.0 feet bgs and groundwater was encountered during exploration with samples taken up to 22.0 ft bgs, groundwater could be encountered and exposed to construction-related hazardous materials release. However, like the Project, construction activities under this Alternative would be subject to applicable rules and regulations under NPDES General Construction Permit regulations and GMC standards. Further, like the Project, compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste, would reduce the potential for this Alternative's construction activities to 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 release contaminants into environment (i.e., groundwater). Like the Project, impacts would be less than significant with COA and mitigation (i.e., COA HAZ-1 and COA HAZ-2, and MM HAZ-1) incorporated.

The Phase II Investigation identified PCE and VOC 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 determined the cancer risk estimated to result from unmitigated vapor intrusion was below the DTSC thresholds at the apartment building, but above the thresholds at the townhomes. Therefore, the VIRE recommended that an engineered vapor mitigation measure (such as an impermeable membrane) be included in the design of any townhome and that the apartment building parking structure include sufficient ventilation to minimize accumulation of VOCs. With incorporation of COA HAZ-1, COA HAZ-2, MM HAZ-1 and MM HAZ-2, 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.

Under the Community Input Alternative, more grading and increased depth of excavation as compared to the proposed Project would be required for the proposed subterranean parking. Therefore, a VIRE was prepared to evaluate potential impacts under this Alternative; see **Appendix 6.0-3: VIRE**. The VIRE concluded estimated cancer risks under this Alternative would be below the DTSC thresholds with mitigation(i.e., MM HAZ-2). Therefore, like the Project, with mitigation incorporated, impacts would be less than significant.

Like the Project, this Alternative would require offsite railroad improvements pursuant to CPUC to minimize potential impacts from derailments. Therefore, compliance with CPUC standards and UPRR guidelines would bring the crossing up to current CPUC standards and UPRR guidelines, thus, a less than significant impact would occur.

The Community Input Alternative would result in similar impacts as the proposed Project regarding hazards and hazardous materials.

Hydrology and Water Quality

Like the Project, this Alternative's construction activities would require compliance with NPDES and GMC requirements, which include implementation of construction water quality BMPs. This Alternative would involve more grading and increased depth of excavation than the Project, but water quality BMPs and compliance with NPDES and GMC requirements would prevent this Alternative's construction activities from violating any water quality standards or waste discharge requirements or otherwise substantially degrading surface or ground water quality, and a less than significant impact would occur.

Following compliance with NPDES and GMC requirements, which include implementation of operational water quality BMPs, the Project's operations would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, thereby resulting in less than significant impact. Under this Alternative, approximately 17 percent fewer DU would be built. As such, this Alternative is assumed to result in similar operational impacts as the Project, although to a lesser degree than the Project. Therefore, like the Project, impacts under this Alternative would be less than significant.

The Project would result in an overall decrease in impervious surface coverage from existing conditions and increase in infiltration of stormwater runoff, which would decrease the existing peak flow rates due to a decrease in impervious surface coverage. The Project would not impede or redirect flood flows, and would not result in substantial erosion, increase the rate or amount of surface runoff, or create runoff that would exceed the capacity of existing stormwater drainage systems, since no net increase of flows would be expected. Like the Project, this Alternative would also decrease the site's impervious surface coverage and increase in infiltration of stormwater runoff, as this Alternative proposes a similar development footprint and impervious surfaces. Therefore, like the Project, this Alternative would decrease peak flow rates and would not impede or redirect flood flows, result in substantial erosion, increase the rate or amount of surface runoff, or create runoff that would exceed the capacity of existing stormwater

drainage systems, since no net increase of flows would be expected. Like the Project, a less than significant impact would occur under this Alternative.

The historical high groundwater level in the area is 15.0 feet bgs and groundwater was encountered during exploration with samples taken up to 22.0 ft bgs; see **Appendix 4.4-1: Preliminary Geotechnical Investigation**. Although the Project would require excavation of existing soils, excavation depth would be at a higher elevation (6.0 feet bgs) than the historical high groundwater level elevation in the area, therefore, Project construction activities are not expected to encounter groundwater. If perched groundwater were encountered during excavation, it would be directed to a dewatering system and discharged in accordance with all applicable rules and regulations under NPDES General Construction Permit regulations and City grading permit conditions. As a result, potential Project construction-related groundwater impacts would be less than significant.

Under the Community Input Alternative, construction would involve more grading and increased depth of excavation (15.0 feet bgs). As concluded in **Appendix 6.0-2: Preliminary Geotechnical Investigation**, the historical high groundwater level in the area is 15.0 feet bgs and groundwater was encountered during exploration with samples taken up to 22.0 ft bgs. Therefore, groundwater could be encountered, and temporary dewatering operations could be required under this Alternative. Dewatering operations would discharge water in accordance with all applicable rules and regulations under NPDES General Construction Permit regulations and GMC Standards. Compliance with NPDES General Construction Permit and GMC standards would reduce impacts to less than significant. Therefore, like the Project, construction under this Alternative would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge.

The Project's proposed structures would be constructed above the historical high groundwater level elevation in the area, and permanent dewatering operations are not anticipated to be required. Under the Community Input Alternative, the apartment's proposed subterranean parking would be constructed at 12 feet bgs near the historical high groundwater level elevation in the area. Therefore, **Appendix 6.0-2** recommends basement waterproofing to be incorporated into this Alternative's final design. Basement waterproofing could involve application of sealants on foundation walls to prevent infiltration, interior drainage systems to remove infiltration, or other methods to minimize groundwater infiltration in the subterranean parking area. Like the Project, the Gardena Building Services Division would review this Alternative's plans to verify compliance with standard engineering practices, the GMC/CBSC, and the Preliminary Geotechnical Investigation's (**Appendix 6.0-2**) recommendations for design including which basement waterproofing method should be incorporated into the Alternative's final design. The basement waterproofing method determined for the Alternative would have a nominal impact on groundwater levels in the area. Further, the Project site is not located within a groundwater recharge basin. Therefore, through compliance with standard engineering practices, the GMC/CBSC, and the Preliminary Geotechnical Investigation's (**Appendix 6.0-2**) recommendations for design, which are required to be imposed in accordance with Gardena Municipal Code Section

18.42.200.A, this Alternative would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge, and a less than significant impact would occur.

The Project would rely on GSWC for water service. GSWC's water sources include imported water, groundwater wells from the Southwest System, and recycled water. GSWC would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. The water demand, including groundwater, under this Alternative would be proportionately less than the Project, as approximately 17 percent fewer DU would be developed under this Alternative. Therefore, like the Project, GSWC would have sufficient water supplies available to serve this Alternative and reasonably foreseeable future development during normal, dry, and multiple dry years.

The Project proposes to increase the Project site's pervious surfaces, which would improve the Project site's stormwater percolation/groundwater recharge capacity over existing conditions. Further, the Project would include low impact development (LID) best management practices (BMPs) to increase infiltration of stormwater runoff. Therefore, the Project would not interfere with groundwater recharge and impacts would be less than significant. Like the Project, the Community Input Alternative would result in an overall increase in pervious surface which would improve the site's stormwater percolation/groundwater recharge capacity over existing conditions. This Alternative would also include LID BMPs, which would further increase infiltration of stormwater runoff on the site. As discussed above, under the Community Input Alternative, the apartment's proposed subterranean parking would be constructed at 12 feet bgs near the historical high groundwater level elevation in the area, where groundwater could infiltrate subterranean parking during operations. Therefore, this Alternative would include basement waterproofing which could involve application of sealants on foundation walls to prevent infiltration, interior drainage systems to remove infiltration, or other methods to minimize groundwater infiltration in the subterranean parking area. Basement waterproofing methods could involve the removal of minimal groundwater. However, given the Project site is not located within a groundwater recharge basin, operations under this Alternative would not interfere with groundwater recharge and impacts would be less than significant.

The Community Input Alternative would result in similar impacts as the proposed Project regarding hydrology and water quality.

Land Use and Planning

To accommodate the proposed apartment building and townhomes, the Project would remove the approximately 115,424 SF of industrial buildings. The Project would replace the Project site's existing General Plan Industrial and Industrial, High Density 30 Overlay land use designations with Specific Plan, and Industrial (M-1), General Industrial (M-2), and Housing Overlay 4 (HO-4) zoning with Normandie Crossing Specific Plan (NCSP). To implement the Project, the Applicant would require several discretionary permits/approvals, including General Plan/General Plan Map Amendments, Zone Change and Zone Map Amendment, and Zoning Text Amendment, and Normandie Crossing Specific Plan (NCSP), among others; see **Section 2.6**. As discussed in **Section**

4.8: Land Use, the Project would not conflict with the GGP policies and plans, GMC standards or with the RTP/RCP's long-term goals and policies concerning air quality, water quality, transportation, and infrastructure. Therefore, the Project would result in a less than significant impact concerning a potential conflict with a GGP, GMC, or RTP/SCS land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

The Community Input Alternative assumes similar entitlements and development as the Project; however, this Alternative proposes 17 percent fewer DU, as indicated in **Table 6-3**. Therefore, like the Project, this Alternative would not conflict with GGP policies and plans and GMC standards. Additionally, as discussed in the Community Input Alternative discussion regarding air quality, water quality, and transportation, this Alternative would not conflict with the RTP/RCP's long-term goals and policies concerning air quality, water quality, transportation, and infrastructure. Therefore, like the Project, this Alternative would result in less than significant impacts concerning a potential conflict with a GGP, GMC, or RTP/SCS land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

The Community Input Alternative would result in similar impacts as the proposed Project regarding land use and planning.

Noise

The Project's construction-related noise impacts would be significant and unavoidable, despite implementation of mitigation measures (MM NOI-1 and MM NOI-2) concerning construction equipment and a temporary noise barrier, based on exceedance of noise standards, the proposed building height (seven stories), and extended construction period; see **Table 4.9-6**.

Construction activities under the Community Input Alternative would occur within the same footprint and distance from sensitive receptors as the Project. As compared to the Project, this Alternative would construct approximately 17 percent fewer DUs and approximately 62,000 fewer square feet, however, more grading and depth of excavation would be required for the parking garage. **Table 6-9: Community Input Alternative's Estimated Construction Noise Levels** provides the Alternative's estimated construction noise levels for various construction phases at the nearest offsite noise-sensitive receptors. The construction noise levels for the Community Input Alternative were estimated using the same methodology as the proposed Project. **Table 6-9** provides the Alternative's estimated construction noise levels at the nearest offsite noise-sensitive receptors with MM NOI-1 and MM NOI-2 incorporated; see **Section 4.9** for a description of the mitigation used in the construction noise analysis. As indicated in **Table 6-9**, construction noise for the Community Input Alternative would be the same as the proposed Project for all construction phases except the grading phase due to this Alternative's increased depth of excavation. Despite implementation of MM NOI-1 and MM NOI-2 achieving an approximately 12-dBA attenuation (i.e., noise reduction), the Community Input Alternative's construction noise levels at all six of the significantly impacted noise-sensitive receptors (i.e., receptor locations R1, R2, R4, R5, R6, and R7) would also exceed the City's specified thresholds. The Community Input Alternative would result in higher construction noise levels than the proposed Project only at Receptor R3, as it would be located nearest the apartment building's construction activities.

However, as identified in **Table 6-9**, although this Alternative's construction noise levels at Receptor R3 would be modestly greater than the Project's, this Alternative's construction noise levels would still be below the City's specified thresholds. Therefore, like the Project, this Alternative would still result in a significant unavoidable impact concerning construction noise, but to a slightly higher degree than the Project.

Table 6-9: Community Input Alternative's Estimated Construction Noise Levels

Receptor Location	Estimated Noise Levels by Construction Phase[1] dBA (L_{eq})[2]						Measured Ambient Noise Levels[2]	*Significance Threshold*[3]	*Alternative Mitigated Noise Level*[4]	*Proposed Project Mitigated Noise Level*[4]
	Demolition	Site Preparation	Grading	Foundation Construction	Building Construction	Paving/ Landscaping				
R1	86.8	86.7	85.4	83.5	85.3	85.1	49.0	*59.0*	***74.8***	*74.8*
R2	83.8	83.7	82.1	80.4	81.4	81.1	55.1	*65.1*	***71.8***	*71.8*
R3	72.1	71.9	74.9	68.4	68.0	67.4	69.9	*79.9*	***62.9***	*60.1*
R4	81.2	81.0	79.4	77.7	78.0	77.6	56.9	*66.9*	***69.2***	*69.2*
R5	84.6	84.5	83.1	81.3	82.5	82.2	54.8	*64.8*	***72.6***	*72.6*
R6	84.6	84.5	83.1	81.3	82.5	82.2	54.6	*64.6*	***72.6***	*72.6*
R7	81.2	81.0	80.1	77.7	78.0	77.6	56.9	*66.9*	***69.7***	*69.7*

Notes:
1. Detailed calculation worksheets are included in **Appendix 6.0-1**.
2. See **Table 4.9-5: Construction Equipment Noise Emission Reference Levels and Usage Factors**.
3. 10 dBA over ambient threshold.
4. With Mitigation Measure MM NOI-1: Construction Equipment Noise and MM NOI-2: Construction Noise implemented.

Source: Kimley-Horn and Associates Inc. (2024). See **Appendix 6.0-1.**

As shown in **Table 4.9-11**, the Project's composite stationary source noise level would be below the significance thresholds, resulting in a less than significant impact. The Community Input Alternative would generate similar operational noise as the Project, but to a slightly lesser degree than the Project since this Alternative proposes 17 percent fewer DU. The Project 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 than the Project as this Alternative would generate fewer trips.

The Project's construction-related vibration impacts associated with human annoyance would be less than significant with mitigation incorporated (MM NOI-3). As indicated in Table **4.9-12**, the Project's estimated vibration velocity levels from all construction equipment would be below the City's significance criteria at all offsite vibration-sensitive receptors, except receptor location R1.

Table 6-10: Community Input Alternative Construction Vibration Impacts – Human Annoyance, provides the Alternative's estimated construction-related vibration levels pursuant to the City's significance criteria of 80 VdB for human annoyance. The estimated construction vibration levels for the Community Input Alternative were estimated using the same methodology as the proposed Project. As indicated in **Table 6-10**, the estimated vibration velocity levels for the Community Input Alternative would be the same as the proposed Project for all pieces of construction equipment except this Alternative adds vibration from caisson drilling (required due to depth of excavation under this Alternative), which is not required for the proposed Project. The Community Input Alternative would result in higher construction vibration levels than the proposed Project only at receptor R4 as it would be closer to where the proposed apartment building drilling would occur under this Alternative. However, as also indicated in **Table 6-10**, although the construction vibration at this receptor location would be modestly higher under this Alternative than under the proposed Project, the construction vibration at this receptor would still be below the City's significance criteria of 80 VdB for human annoyance.

Under this Alternative, the estimated vibration velocity levels from all pieces of construction equipment would be below the City's significance criteria at all remaining offsite vibration-sensitive receptors, except receptor R1, where the estimated construction vibration level would be up to 87 VdB. To prevent the Community Input Alternative's construction-related vibration impacts, implementation of MM NOI-3: Construction Vibration Impacts, which prohibits the use of large construction equipment greater than 400 horsepower or loaded trucks within 45 feet from receptor location R1 would still be required for this Alternative. Additionally, the Community Input Alternative would result in the same construction vibration levels as the proposed Project at all remaining receptors identified in **Table 6-10**. Like the Project, this Alternative would still result in a less than significant impact with mitigation incorporated concerning construction vibration for human annoyance.

Table 6-10: Community Input Alternative's Construction Vibration Impacts – Human Annoyance

Receptor Location	Estimated Vibration Velocity Levels at the Offsite Vibration-Sensitive Receptors, VdB[1]					Significance Threshold[2] VdB	Community Input Alternative Maximum Vibration Velocity	Alternative Significant Impact?	*Proposed Project Maximum Vibration Velocity*	*Proposed Project Significant Impact?*
	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer					
FTA Reference Vibration Levels at 25 feet	87	87	86	79	58	--	--	--	--	--
R1	87	57	86	79	58	80	87	Yes	*87*	*Yes*
R2	78	53	77	70	49	80	78	No	*78*	*No*
R3	68	63	67	60	39	80	68	No	*68*	*No*
R4	74	75	73	66	45	80	75	No	*74*	*No*
R5	79	68	78	71	50	80	79	No	*79*	*No*
R6	75	69	74	67	46	80	75	No	*75*	*No*
R7	74	74	73	66	45	80	74	No	*74*	*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 **Appendix 4.9-1** Table 13.

The Project's construction-related vibration impacts associated with building damage would be less than significant. As indicated in **Table 4.9-13**, the estimated vibration velocity levels from construction equipment would be below the FTA's significance criteria for building damage of 0.2 PPV at the nearest offsite buildings.

Table 6-11: Community Input Alternative Construction Vibration Impacts – Building Damage Criteria provides the estimated vibration levels at the nearest offsite buildings for this Alternative. The construction vibration levels for the Community Input Alternative were estimated using the same methodology as the proposed Project. As indicated in **Table 6-11**, the estimated vibration velocity levels for the Community Input Alternative would be the same as the proposed Project for all pieces of construction equipment except this Alternative adds vibration from caisson drilling (required due to depth of excavation under this Alternative), which is not required for the proposed Project. The Community Input Alternative would result in higher construction vibration levels than the proposed Project only at the residential buildings to the north and east as they would be closer to where the apartment building drilling would occur under this Alternative. However, as also indicated in **Table 6-11**, although the construction vibration at these two buildings would be modestly higher under this Alternative than under the proposed Project, the construction vibration at these two buildings would still be below the FTA's significance criteria for building damage at all offsite vibration-sensitive receptors. Therefore, like the proposed Project, the Alternative's construction-related vibration levels, pursuant to the significance criteria for building damage, would be less than significant without mitigation.

Table 6-11: Community Input Alternative's Construction Vibration Impacts – Building Damage

Receptor Location	Estimated Vibration Velocity Levels at the Offsite Vibration-Sensitive Receptors, PPV[1]					Significance Threshold[2] PPV	Community Input Alternative Maximum Vibration	Alternative Significant Impact?	*Proposed Project Maximum Vibration*	*Proposed Project Significant Impact?*
	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer					
FTA Reference Vibration Levels at 25 feet	0.089	0.089	0.076	0.035	0.003	--	--	--	--	--
Residential building to the North	0.019	0.024	0.016	0.008	0.001	**0.2**	**0.024**	**No**	*0.019*	*No*
Residential buildings to the South	0.024	0.018	0.020	0.009	0.001	**0.2**	**0.024**	**No**	*0.024*	*No*
Residential buildings to the East	0.010	0.011	0.008	0.004	0.000	**0.2**	**0.011**	**No**	*0.010*	*No*
Commercial buildings to West	0.089	0.010	0.076	0.035	0.003	**0.2**	**0.089**	**No**	*0.089*	*No*
Residential building adjacent to the Project site	0.192	0.003	0.164	0.075	0.007	**0.2**	**0.192**	**No**	*0.192*	*No*

1. Vibration level calculated based on FTA reference vibration level at 25-foot distance.
2. Significance threshold is based on FTA vibration limit of 0.20 in/sec PPV

Source **Appendix 4.9-1** Table 13.

The Community Input Alternative would result in less impacts than the proposed Project regarding noise and vibration. The Community Input Alternative would result in similar construction noise impacts, similar construction-related vibration impacts, and less operational noise impacts. Notwithstanding, the Alternative would still have significant and unavoidable impacts regarding construction noise despite implementation of MM NOI-1 and MM NOI-2 and would still require implementation of MM NOI-3 to mitigate the vibration impacts to nearby sensitive receptors to less than significant levels.

Population and Housing

The Project proposes 403 DUs. As indicated in **Table 4.10-7**, the Project is forecast to generate a population growth of approximately 1,088 persons. The Project would induce unplanned population growth in the City directly through new housing, but the Project's forecast population growth is not considered substantial. This Alternative is forecast to generate proportionately less population growth than the Project given 17 percent fewer DUs would be constructed. Assuming 2.70 persons per household, this Alternative is forecast to generate a population growth of 899 persons. As with the proposed Project, this Alternative would induce unplanned population growth, but it would not be significant. Like the Project, this Alternative would not displace existing housing.

The 2021-2029 Housing Element Update identified a total of 122 opportunity housing sites, which includes a portion of the Project site (Sites A and B). As shown in **Table 4.10-6**, the City's RHNA allocation is 5,735 units. The Project would meet approximately 7 percent of the City's 6th Cycle RHNA allocation, including providing 20 units of affordable housing. Thus, the Project would be in furtherance of meeting the City's 6th Cycle RHNA allocation.

Under this Alternative, 70 fewer DUs (including 57 fewer market rate DUs and 13 fewer affordable housing DUs) would be provided. This Alternative would also be in furtherance of meeting the City's RHNA allocation, however, to a lesser degree than the Project. However, Housing Elements include a housing buffer in the site inventory to avoid violating the No Net Loss requirement. The HEU sites inventory provides for a total (including ADUs) of 6,586 housing units, a 13 percent buffer above the City's RHNA allocation. Therefore, given the 13 percent buffer in housing units included in the HEU, this Alternative's provision of fewer market rate and affordable housing units would not preclude the City from meeting their RHNA obligation and the findings under Government Code § 65863 can be made.

The Community Input Alternative would result in similar impacts as the proposed Project regarding population and housing.

Public Services

The Project would generate an incremental increase in demand for fire and police protection, and library services. However, because the Project site is in a developed area where these services and equipment/infrastructure are already in place, the Project would not require construction of new or physically altered fire and police protection, or library facilities, resulting

in a less than significant impact. Like the proposed Project, this Alternative would incrementally increase demands on fire and police protection services, and library facilities, but to a lesser degree than the Project given fewer DUs would be developed. Notwithstanding, neither this Alternative nor the Project would result in a significant impact concerning fire and police protection services, or library facilities as neither would result in an adverse physical impact associated with the provision of new or physically altered facilities.

The Project is forecast to generate a student population growth of approximately 151 students at the LAUSD, which would incrementally increase the demand for school facilities and services. Although, insufficient capacity exists at the high school, with payment of school impact fees in accordance with SB 50, Project impacts would be fully mitigated and no physical impacts concerning school facilities would occur. The Community Input Alternative would involve approximately 17 percent fewer DU, with proportionately less student population increase and demand for school facilities as the Project. Like the Project, payment of school impact fees would fully mitigate potential impacts and no physical impacts concerning school facilities would occur.

The Community Input Alternative would result in less demand for public services, as the Project since fewer DUs would be constructed. Like the Project, this Alternative would not result in an adverse physical impact 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 fire and police protection, or library services.

The Community Input Alternative would result in less impacts than the proposed Project regarding public services.

Recreation

Neither the Project nor this Alternative would result in adverse physical impacts associated with governmental park facilities, since neither proposes to provide or physically alter a government park facility. Further, like the Project, the Community Input Alternative Applicant would be required to comply with GMC Chapter 17.20, which requires payment of fees for future recreational purposes in the City for the townhome units. Therefore, like the Project, impacts would be less than significant.

The Project's forecast population growth would incrementally increase the use of existing neighborhood and regional parks and/or other recreational facilities, but not to the degree that substantial physical deterioration of existing facilities would occur or be accelerated given the Project would provide onsite open space and recreational facilities. Under the Community Input Alternative, fewer DUs would be developed, and proportionately less forecast population growth would occur. Therefore, this Alternative would also incrementally increase the use of existing neighborhood and regional parks and/or other recreational facilities, but to a lesser degree than the Project. Like the Project, this Alternative would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and a less than significant impact would occur.

Like the Project, this Alternative proposes onsite open space and recreational amenities. The Project's proposed open spaces and recreational facilities are discussed as part of the overall environmental analyses of this EIR. As concluded in these sections, the Project's environmental effects would be reduced to less than significant through compliance with the established regulatory framework and implementation of the specified mitigation measures, except concerning construction noise, which would be a significant and unavoidable impact. However, given construction of the proposed open spaces and recreational facilities alone would not result in a significant and unavoidable impact concerning noise, construction or expansion of recreational facilities would not be considered to have an adverse physical effect on the environment and a less than significant impact with incorporation of mitigation would occur. Given this Alternative's proposed open spaces and recreational facilities would be similar in nature and scale to the Project's, their construction-related impacts would also not be considered significant with mitigation incorporated. Therefore, like the Project, this Alternative would result in less than significant environmental effects associated with construction of the proposed open spaces and recreational facilities, with mitigation incorporated.

The Community Input Alternative would incrementally increase the use of existing neighborhood and regional parks/other recreational facilities to a lesser degree than the Project, and therefore would result in less impacts as the Project regarding recreational facilities.

Transportation

The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and a less than significant impact would occur. The Community Input Alternative proposes a similar residential development layout, except the townhome's 170th Street access driveway would be relocated west to align with the Brighton Avenue at West 170th Street intersection. The modified access would not conflict with Community Development Element, Circulation Plan policies, nor other programs, plans, ordinances, or policies addressing the circulation system, transit, roadway, bicycle, or pedestrian facilities and would result in less than significant impacts.

The Project is located within a low VMT generating area, one of the three screening criteria for VMT. Therefore, the Project would result in a less than significant impact concerning VMT. This Alternative is on the same site, thus, would also be screened from further VMT, resulting in a less than significant impact concerning VMT.

Project construction would require traffic lane, parking lane and/or sidewalk closures, but would not result in the complete closure of any public or private streets and would implement a Construction Traffic Management Plan (PDF TR-1), approved by the City, to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction, as well as ensure adequate emergency access. Temporary construction activities would not impede the use of road for emergencies or emergency response vehicles. Therefore, the Project would result in less than significant impacts concerning emergency access. The Community Input Alternative would involve similar construction activities, and it would be

required to minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians during construction, as well as ensure adequate emergency access, similar to the Project. Following implementation of similar traffic management measures (i.e., PDF TR-1) as a part of this Alternative's construction, less than significant impacts would also occur.

The Community Input Alternative would result in similar impacts as the proposed Project regarding transportation.

Tribal Resources

The Project would result in less than significant impacts to as yet undiscovered tribal cultural resources, with incorporation of MM TCR-1, MM TCR-2, and MM TCR-3, as requested by the Gabrieleno Band of Mission Indians-Kizh Nation. The Community Input Alternative would also involve demolition and ground disturbing construction activities similar to the Project, but increased depth of excavation due to the proposed subterranean parking. Although the increased depth of excavation could increase the likelihood of encountering undiscovered tribal cultural resources, incorporation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts to less than significant in the event tribal cultural resources are encountered.

The Community Input Alternative would be result in similar impacts as the proposed Project regarding tribal cultural resources.

Utilities and Service Systems

As shown in **Table 4.15-7**, **Table 4.15-8**, and **Table 4.15-9**, Project operations would increase wastewater generation, electricity demand, and water demand, but would decrease solid waste generation. The Project would require construction of new connections to nearby existing water, wastewater conveyance, stormwater, electric power, and telecommunication facilities. With mitigation incorporated, the Project's environmental effects from construction of new facilities would be reduced to less than significant through compliance with the established regulatory framework and implementation of the specified mitigation measures, except concerning construction noise, which would be a significant and unavoidable impact. However, given construction of the proposed utilities and service systems alone would not result in a significant and unavoidable impact concerning noise, construction of the proposed utilities and service systems would not be considered to have an adverse physical effect on the environment and a less than significant impact with incorporation of mitigation would occur. The Community Input Alternative would also result in an overall increase from existing conditions in wastewater generation, electricity demand, and water demand, but proportionately less than the Project since this Alternative proposes 17 percent fewer DUs. Therefore, like the Project, this Alternative's environmental effects from construction of new facilities would be reduced to less than significant through compliance with the established regulatory framework and implementation of the specified mitigation measures, except concerning construction noise, which would be a significant and unavoidable impact. However, given construction of the proposed utilities and service systems alone would not result in a significant and unavoidable impact concerning noise, construction of the proposed utilities and service systems would not be

considered to have an adverse physical effect on the environment and a less than significant impact with incorporation of mitigation would occur under this Alternative.

The Community Input Alternative would result in less demands concerning utilities and service systems than the Project, but similar impacts concerning environmental effects associated with construction of the proposed utilities and service systems.

Aesthetics

The Project proposes a 403-unit apartment building and 75 townhomes. The maximum height of the apartment building would be seven stories above ground at approximately 90 feet from existing grade and the townhomes would be three stories above ground at approximately 40 feet from existing grade . Under this Alternative, the site's visual character/quality would be altered similar to the Project since the existing industrial use would be removed and replaced with residential uses (a 258 DU apartment building and 75 townhomes). However, under this Alternative, the site's visual character/quality would be altered to a lesser degree than the Project, given the apartment building under this Alternative would be only five stories above ground at a maximum of 70 feet from existing grade, whereas the Project proposes seven stores at a maximum of 90 feet from existing grade.

The Project would not result in a significant source of light or glare. This Alternative proposes 70 fewer DU, thus aesthetic impacts from light and glare would be proportionately less under this Alternative compared to the Project. As with the Project, this Alternative would result in less than significant light and glare impacts.

The Community Input Alternative would result in less impacts than the proposed Project regarding aesthetics/light and glare.

ABILITY TO MEET PROJECT OBJECTIVES

The Community Input Alternative would fulfill most of the Project objectives but would provide fewer market rate and affordable housing units. This Alternative would still support the expanding technology and creative sector with newly constructed high-quality housing opportunities, cluster urban residential development near technology firms and large employment centers, establish housing development that meets high standards of design and pursues environmental sustainability, and redevelop a blighted site while increasing tax revenues to the City and supporting the City's RHNA goals. However, because this Alternative proposes 70 fewer DU (13 fewer affordable housing and 57 fewer market rate DU) than the Project, this Alternative would not accomplish these objectives to the same degree as the Project. In addition, the tax revenues to the City would be proportionately reduced and the City's RHNA goals would be supported to a lesser degree. This Alternative would not avoid the Project's unavoidable significant construction-related noise impacts and would result in similar construction-related vibration impacts as the proposed Project. Notwithstanding, construction-related noise and vibration impacts are temporary and intermittent. The Community Input Alternative would result in similar construction noise, similar construction-related vibration impacts, and less operational

noise impacts. Notwithstanding, the Alternative would still have significant and unavoidable impacts regarding construction noise despite implementation mitigation, similar to the Project.

DEIR Section 6.0: Alternatives To The Proposed Project

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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**~~ **Table 6-12** summarizes the comparative analyses presented above (i.e., the Alternatives compared to the proposed Project). As indicated in ~~**Table 6-3**~~ **Table 6-12**, 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**~~ **Table 6-12** and ~~**Table 6-4**~~ **Table 6-13**, it would result in similar or less impacts for all resources areas except population and housing, for which it would result in greater impacts than 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 degree as the proposed Project.

~~Table 6-4~~ Table 6-12: Comparison of Alternatives

Sections	Alternative 6.4.2: No Project/No Construction	Alternative 6.4.3: No Project/Existing Land Use Designation	Alternative 6.4.4: Reduced Density	Alternative 6.4.5: Community Input
Air Quality	↓	↓	↓	↓
Cultural Resources	↓	=	=	=
Energy	↑	↓	↓	↓
Geology, Soils, and 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	↓	=	=	=
Aesthetics	↑	↓	↓	↓

↑ 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).
** Impact would still be significant and unavoidable.

Table 6-13: Alternatives Ability to Meet Project Objectives

Would the Alternative:	Alternative 6.4.2: No Project/No Construction	Alternative 6.4.3: No Project/Existing Land Use Designation	Alternative 6.4.4: Reduced Density	Alternative 6.4.5 Community Input
Diversify the City of Gardena's existing housing options, by providing a range of housing types and sizes, to serve the region's growing and evolving technology and creative sectors and aid in recruiting and retaining talent for local companies?	No	No	Yes – but to a lesser degree	Yes – but to a lesser degree
Support the expanding technology and creative sector with newly constructed, high-quality housing opportunities, enabling local employees to live close to where they work?	No	No	Yes – but to a lesser degree	Yes – but to a lesser degree
Cluster urban residential development near technology firms, other large employment centers, and commercial corridors providing City residents with the opportunity to live, work, and shop with less reliance on automobiles?	No	No	Yes – but to a lesser degree	Yes – but to a lesser degree
Establish housing development that meets high standards of design and pursues environmental sustainability?	No	No	Yes	Yes
Redevelop a blighted site, increase tax revenues to the City, provide affordable housing to support the City's Regional Housing Needs Assessment goals, and create a catalyst for future development in this part of Gardena.	No	No	Partially, it would not provide affordable housing.	Yes – but to a lesser degree

DEIR Appendix 4.13-2: Local Transportation Assessment

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3.3.1 Freeway Ramp & Intersection Queueing at State Facilities

As detailed below in section 3.7, based on the Project's estimates, trip generation and distribution, few trips are expected at the I-405 off-ramps to Normandie/190th or the I-110 off-ramps to Redondo Beach Boulevard (<25 peak hour trips at each location). Therefore, the Project is not expected to add two or more car lengths to these off-ramp queues during peak hours, exacerbate potentially unsafe ramp conditions at these locations (if such conditions exist or are projected to occur in the opening year of the Project), and analysis is not needed. At the intersection of SR-91 and Vermont Avenue, Project traffic is expected to primarily be eastbound and westbound through movements since primary Project access is from Normandie Avenue, where most turning movements would occur. As such, the Project is not expected to add substantial traffic to any left or right-turning movements at the intersection of SR-91 and Vermont Avenue, and the Project is not expected to materially affect the utilization of turn pocket storage that would lead to an impedance of through traffic. Therefore, no further analysis is needed related to queueing at these locations.

3.3.2 Pedestrian & Bicycle Volumes at State Facilities

As detailed below in section 3.7, 5% of the Project's net new trips are expected to be walking or biking in nature, which may also include a subsequent trip on transit. This amounts to less than 10 trips during either peak hour in total. Most of these non-transit biking and walking trips are expected to be local in nature, accessing nearby schools and businesses within 0.5 miles of the Project Site. Substantial bicycle and pedestrian trips generated by the Project are not expected to occur at the SR-91 and Vermont Avenue, I-405 off-ramps at Normandie/190th, or I-110 off-ramps at Redondo Beach Boulevard intersections given how far away they are from the Project Site. SR-91 and Vermont Avenue is located 0.8 miles from the Project Site, while the other two intersections are located over one mile from the Project Site. Because these locations are outside of the Project Study Area, Multi-Modal Conflict Analyses and/or Complete Street Access considerations should not be necessary.

4.0 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 Normandie Crossing 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 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 Draft EIR 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 will complete ongoing documentation and mitigation compliance monitoring. The completed MMRP and supplemental documents will be kept on file at the City Community Development Department.

NORMANDIE CROSSING 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, a qualified archaeologist shall be retained to conduct a Pre-construction Worker Training on the types of unanticipated resources that could be encountered during construction, based on the site's history. This archaeologist may also be retained to ensure prompt assessment in the event that unanticipated cultural resources are encountered during construction.	Prior to any Ground Disturbance	Notification to Construction Personnel	General Contractor		
If archaeological resources are exposed during construction, work within 50 feet of the find must stop until a qualified archaeologist can evaluate the significance of the find. Construction activities may continue in other areas. If the discovery proves significant under CEQA (14 CCR 15064.5[f]; PRC 21082), additional work such as testing, or data recovery may be warranted.	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: 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		
HAZARDOUS MATERIALS & WASTES					
MM HAZ-1: Construction Management Plan. Prior to issuance of any demolition permit for the onsite structures, a construction management plan addressing procedures and requirements for responding to disturbance of undocumented contaminated soil shall be prepared and submitted to the City for review and approval.	Prior to Demolition Permit Issuance	Prepare a Construction Management Plan	Community Development Director		
MM HAZ-2: Engineered Vapor Mitigation and Ventilation. Prior to commencement of construction activities, the City of Gardena Building Department shall review the building plans to verify that an engineered vapor measure (such as an impermeable membrane or equivalent) is included in the design of all townhomes and that the apartment parking structures include sufficient ventilation to minimize accumulation of VOCs on the	Prior to Construction Activities	Verification of an engineered vapor measure within the design of all townhomes and apartment parking structures.	Building and Safety Department Chief Building Official		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
Project site. 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 City of Gardena Building Department shall have oversight/sign-off responsibility for the vapor barrier.					
NOISE					
MM NOI-1: Construction Equipment Noise. Prior to issuance of any Demolition or Grading Permit, the Public Works Department shall verify that the Project plans and specifications include provisions that require all power construction equipment (including combustion engines), fixed or mobile to be: 1) equipped with state-of-the-art noise shielding and muffling devices (consistent with manufactures' standards); and 2) properly maintained to ensure that no additional noise, due to worn or improperly maintained parts, would be generated.	Prior to issuance of any demolition or grading permit	Verification of provisions that require all power construction equipment to be equipped with noise shielding and muffling devices and properly maintained	Public Works Director		
MM NOI-2: Construction Noise. A temporary and impermeable sound barrier shall be provided along the Project northern, southern, and western property line. The temporary sound barrier shall be minimum 10-foot high and provide minimum 12 dBA noise reduction, and shall have a minimum Sound Transmission Class rating of STC-25, such as, acoustical barrier blanket (with STC-25 rating) or 3/4" thick exterior grade plywood.	Prior to and During Construction	Provide a Temporary and Impermeable Sound Barrier	Community Development Director		
MM NOI-3: Construction Vibration Impacts. The use of large construction equipment (e.g., large bulldozer greater than 400 horsepower and/or loaded trucks) shall be a minimum of 45 feet away from the off-site residence adjacent to the Project site (receptor R1) (16964 Brighton Ave).	During Construction	Provide a minimum 45-foot buffer away from residences adjacent to the Project site	Community Development 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 Prior to Commencement of Ground-Disturbing Activities. A. The Applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject Project at all Project locations (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground- disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native	Prior to any Ground Disturbance During Construction Phases Involving Ground-Disturbing Activities	Contract a Tribal Monitor/Consultant Copy of executed monitoring agreement 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
American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Applicant/lead agency upon written request to the Tribe. D. On-site tribal monitoring shall conclude upon the latter of the following: (1) written confirmation to the monitor from a designated point of contact for the Applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project site or in connection with the Project are complete; or (2) a determination and written notification by the monitor to the Applicant/lead agency that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact TCRs.					
MM TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects. A. 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 Public Resources Code § 5097.98, are also to be treated according to this statute. B. If human remains and/or grave goods are discovered or recognized on the Project site, then all construction activities shall immediately cease within 200 feet of the discovery. Health and Safety Code § 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the	During Construction, Upon Discovery of any human remains or grave goods	Telephone communication with the Native American Heritage Commission within 24 hours	County Coroner Native American Heritage Commission Qualified Tribal Monitor/Consultant		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
Native American Heritage Commission, and Public Resources Code § 5097.98 shall be followed. C. Human remains and grave/burial goods found with such remains shall be treated alike per California Public Resources Code § 5097.98(d)(1) and (2). D. Construction activities may resume in other parts of the Project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the monitor determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the Project manager express consent of that determination (along with any other mitigation measures the monitor and/or archaeologist deems necessary). (CEQA Guidelines § 15064.5(f).) E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.					
MM TCR-3: Procedures for Burials and Funerary Remains. This mitigation measure shall only apply if the Gabrielino Band of Mission Indians-Kizh Nation is designated the Most Likely Descendant ("MLD") by the NAHC: A. 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. B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created. C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact.	During Construction, if an Unanticipated Discovery, and the Gabrieleno Band of Mission Indians – Kizh Nation is Designated Most Likely Descendant If there are four or more burials	Implement Koo-nas-gna Burial Policy Creation of a cemetery treatment plan	Tribal Monitor/Consultant		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
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. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials. D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will 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 should be posted outside of working hours. The Tribe will 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 will be removed. E. In the event preservation in place is not possible despite good faith efforts by the Applicant/developer and/or landowner, before ground-disturbing activities may resume on the Project site, the landowner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects. F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should 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	If discovered remains cannot be fully documented and recovered on the same day If preservation in place is not possible	Covering of remains with muslin cloth and a steel plate to protect remains -or- 24-hour guard outside working hours Designation of site location within the footprint of the Project for reburial	Gabrielino Band of Mission Indians-Kizh Nation Native American Heritage Council		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered. G. The Tribe will work closely with the Project's qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall 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.					

NORMANDIE CROSSING 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, a qualified archaeologist shall be retained to conduct a Pre-construction Worker Training on the types of unanticipated resources that could be encountered during construction, based on the site's history. This archaeologist may also be retained to ensure prompt assessment in the event that unanticipated cultural resources are encountered during construction.	Prior to any Ground Disturbance	Notification to Construction Personnel	General Contractor		
If archaeological resources are exposed during construction, work within 50 feet of the find must stop until a qualified archaeologist can evaluate the significance of the find. Construction activities may continue in other areas. If the discovery proves significant under CEQA (14 CCR 15064.5[f]; PRC 21082), additional work such as testing, or data recovery may be warranted.	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: 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		
HAZARDOUS MATERIALS & WASTES					
MM HAZ-1: Construction Management Plan. Prior to issuance of any demolition permit for the onsite structures, a construction management plan addressing procedures and requirements for responding to disturbance of undocumented contaminated soil shall be prepared and submitted to the City for review and approval.	Prior to Demolition Permit Issuance	Prepare a Construction Management Plan	Community Development Director		
MM HAZ-2: Engineered Vapor Mitigation and Ventilation. Prior to commencement of construction activities, the City of Gardena Building Department shall review the building plans to verify that an engineered vapor measure (such as an impermeable membrane or equivalent) is included in the design of all townhomes and that the apartment parking structures include sufficient ventilation to minimize accumulation of VOCs on the	Prior to Construction Activities	Verification of an engineered vapor measure within the design of all townhomes and apartment parking structures.	Building and Safety Department Chief Building Official		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
Project site. 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 City of Gardena Building Department shall have oversight/sign-off responsibility for the vapor barrier.					
NOISE					
MM NOI-1: Construction Equipment Noise. Prior to issuance of any Demolition or Grading Permit, the Public Works Department shall verify that the Project plans and specifications include provisions that require all power construction equipment (including combustion engines), fixed or mobile to be: 1) equipped with state-of-the-art noise shielding and muffling devices (consistent with manufactures' standards); and 2) properly maintained to ensure that no additional noise, due to worn or improperly maintained parts, would be generated.	Prior to issuance of any demolition or grading permit	Verification of provisions that require all power construction equipment to be equipped with noise shielding and muffling devices and properly maintained	Public Works Director		
MM NOI-2: Construction Noise. A temporary and impermeable sound barrier shall be provided along the Project northern, southern, and western property line. The temporary sound barrier shall be minimum 10-foot high and provide minimum 12 dBA noise reduction, and shall have a minimum Sound Transmission Class rating of STC-25, such as, acoustical barrier blanket (with STC-25 rating) or 3/4" thick exterior grade plywood.	Prior to and During Construction	Provide a Temporary and Impermeable Sound Barrier	Community Development Director		
MM NOI-3: Construction Vibration Impacts. The use of large construction equipment (e.g., large bulldozer greater than 400 horsepower and/or loaded trucks) shall be a minimum of 45 feet away from the off-site residence adjacent to the Project site (receptor R1) (16964 Brighton Ave).	During Construction	Provide a minimum 45-foot buffer away from residences adjacent to the Project site	Community Development 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 Prior to Commencement of Ground-Disturbing Activities. A. The Applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject Project at all Project locations (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground- disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native	Prior to any Ground Disturbance During Construction Phases Involving Ground-Disturbing Activities	Contract a Tribal Monitor/Consultant Copy of executed monitoring agreement 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
American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Applicant/lead agency upon written request to the Tribe. D. On-site tribal monitoring shall conclude upon the latter of the following: (1) written confirmation to the monitor from a designated point of contact for the Applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project site or in connection with the Project are complete; or (2) a determination and written notification by the monitor to the Applicant/lead agency that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact TCRs.					
MM TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects. A. 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 Public Resources Code § 5097.98, are also to be treated according to this statute. B. If human remains and/or grave goods are discovered or recognized on the Project site, then all construction activities shall immediately cease within 200 feet of the discovery. Health and Safety Code § 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the	During Construction, Upon Discovery of any human remains or grave goods	Telephone communication with the Native American Heritage Commission within 24 hours	County Coroner Native American Heritage Commission Qualified Tribal Monitor/Consultant		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
Native American Heritage Commission, and Public Resources Code § 5097.98 shall be followed. C. Human remains and grave/burial goods found with such remains shall be treated alike per California Public Resources Code § 5097.98(d)(1) and (2). D. Construction activities may resume in other parts of the Project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the monitor determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the Project manager express consent of that determination (along with any other mitigation measures the monitor and/or archaeologist deems necessary). (CEQA Guidelines § 15064.5(f).) E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.					
MM TCR-3: Procedures for Burials and Funerary Remains. This mitigation measure shall only apply if the Gabrielino Band of Mission Indians-Kizh Nation is designated the Most Likely Descendant ("MLD") by the NAHC: A. 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. B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created. C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact.	During Construction, if an Unanticipated Discovery, and the Gabrieleno Band of Mission Indians – Kizh Nation is Designated Most Likely Descendant If there are four or more burials	Implement Koo-nas-gna Burial Policy Creation of a cemetery treatment plan	Tribal Monitor/Consultant		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
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. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials. D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will 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 should be posted outside of working hours. The Tribe will 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 will be removed. E. In the event preservation in place is not possible despite good faith efforts by the Applicant/developer and/or landowner, before ground-disturbing activities may resume on the Project site, the landowner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects. F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should 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	If discovered remains cannot be fully documented and recovered on the same day If preservation in place is not possible	Covering of remains with muslin cloth and a steel plate to protect remains -or- 24-hour guard outside working hours Designation of site location within the footprint of the Project for reburial	Gabrielino Band of Mission Indians-Kizh Nation Native American Heritage Council		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered. G. The Tribe will work closely with the Project's qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall 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.					

Docusign Envelope ID: 1FF6AD21-C9DD-4499-B80B-C9BE39743C14

RESOLUTION NO. 6684

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 5.25 ACRE PROPERTY LOCATED AT 16829, 16835, AND 16907 SOUTH NORMANDIE AVENUE TO SPECIFIC PLAN, CHANGING THE LAND USE DESIGNATION OF THE 0.11 ACRE PROPERTY LOCATED AT 16964 BRIGHTON AVENUE TO SINGLE FAMILY RESIDENTIAL, CHANGING THE LAND USE DESIGNATION OF THE 0.43 ACRE PROPERTY LOCATED AT THE EASTERN EDGE OF THE SPECIFIC PLAN AREA TO PUBLIC/INSTITUTIONAL AND MAKING MINOR TEXT CHANGES TO THE LAND USE PLAN

WHEREAS, on December 22, 2021, 16911 Normandie Associates, LLC ("Developer"), filed an application for a General Plan Amendment to the Land Use Plan (the "General Plan Amendment"), Specific Plan, Zone Change, Zoning Code Amendment, Vesting Tentative Tract Map, and Site Plan Review to develop a 273 unit apartment building and 76 townhome style units on a total of 5.25 acres located at 16829, 16835, and 16907 South Normandie Avenue (APN ## 6106-030-011, 6106-030-015, 6106-030-016 - 6106-030-017) (the "Property); and

WHEREAS, on December 22, 2022, Developer amended its project to develop a 328 unit apartment building and 75 townhomes on the Property; and

WHEREAS, the City determined that in addition to the residential development and needed entitlements proposed by Developer, the project should also include revisions to the General Plan land use designations and zoning for two adjacent properties on the same block as the Project to match the actual uses of the properties. Specifically, for the property located at 16964 Brighton Avenue (APN # 6106-030-008), change the General Plan Amendment from Industrial to Single Family Residential and change the zoning from General Industrial (M-2) to Single Family Residential (R-1); and for the property just to the east of the Project site owned by the Southern Pacific Railroad (APN # 6106-030-800), change the General Plan land use designation from Industrial to Public/Institutional and change the zoning from General Industrial (M-2) to Official (O); and

WHEREAS, the General Plan Amendments, Specific Plan, Zone Changes, Zoning Code Amendments, Development Agreement, Site Plan Review, and Vesting Tentative Tract Map are collectively referred to as the Project; and

WHEREAS, on March 19, 2024, 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, but did not recommend approval of the Project; and

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WHEREAS, on September 30, 2024, Developer submitted revised plans to the City for a new alternative to be considered which consists of 70 fewer units in the apartment building and a reduction in height level from ground floor from seven stories to five stories, with one underground level of parking (hereafter the "Community Input Alternative;" and

WHEREAS, on December 3, 2024, the Planning Commission held a duly noticed public hearing on the Project, including revisions to the Final EIR to address the new Community Input Alternative submitted by the Developer; and

WHEREAS, at the close of the public hearing the Planning Commission recommended that the City Council certify the Revised and Updated Final EIR, make CEQA findings regarding mitigation measures and alternatives, adopt a statement of overriding considerations, and approve all of the requested entitlements for the Community Input Alternative; and

WHEREAS, on January 14, 2025, 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. 6683 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 Amendments changing the land use designation of the 3.9 acre parcel (APN # 6106-030-017) shown on Exhibit A from Industrial to Specific Plan, and changing the land use designation of the 1.36 acre parcels (APN ## 6106-030-015, 6106-030-016, and 6106-030-011) from Industrial with a High Density 30 Overlay to Specific Plan as shown on Exhibit A and amending the text of the Land Use Plan as shown on Exhibit B is in the public interest for the following reasons:

A. The General Plan Amendment will allow the development of a high-density, 333-unit, residential development made up of 75-townhome style units and 258 first-class apartment units which will provide new and needed housing opportunities in the City. These residential units will provide numerous amenities for the occupants.

B. The General Plan Amendment will allow development of housing which will satisfy approximately 10 percent of the City's Regional Housing Needs Assessment (RHNA) allocation for above-moderate housing and provide seven units for moderate income units for the Sixth Cycle Housing Element.

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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 neighboring cities.

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 and improve safety conditions relating to the railway crossing and sidewalk on Normandie Avenue.

E. The General Plan Amendment which will allow residential uses is more compatible with the surrounding neighborhood than the current designation which allows industrial uses adjacent to residential uses. The High Density 30 overlay already allowed residential development of a portion of the project site.

F. The General Plan Amendment will allow development which will provide the following benefits to the City:

1. 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 and 2,246 units allocated to lower income units. This Project will satisfy approximately 10 percent of the City's above-moderate allocation and provide seven moderate income units.

2. The Project will help revitalize a site that does not meet current development standards and whose buildings are in a deteriorated condition.

3. The Project will provide the following one-time economic benefits from the construction:

a. The Project will provide numerous construction jobs amounting to the equivalent of 1,580 total job years. As the Project includes a commitment from the developer to implement a local hiring policy, this will benefit lower income individuals and individuals who live in the City. Additionally, there will be an indirect benefit of additional jobs created because of the construction jobs, amounting to approximately another 414 job years; and.

b. Construction is expected to create approximately $109 million in total labor income, due to direct, indirect, and induced workers associate with the construction. Of that, $80.9 million is projected to be paid to onsite construction employees, providing individuals with additional income to spend on services and goods in Gardena; and

c. The principles of Developer also own Tasoro, a company which provides quality building materials for apartments and is located in Gardena. Use of these products will provide sales tax revenue to the City. Additionally, the

Docusign Envelope ID: 1FF6AD21-C9DD-4499-B80B-C9BE39743C14

Development Agreement provides for a local buying program for construction goods as well as a local hire program; and

d. Developer will pay in-lieu park fees under the Subdivision Map Act of $10,000 per unit on the 75 condominium units; and

e. Developer will provide one-time construction-related revenues totaling over $3 million, including construction fees, development impact fees, and sales tax from construction materials; and

f. Each contractor that does business in the City will be required to obtain and pay for a City business license.

4. The Project will provide the following recurring annual revenues to the City:

a. The creation of approximately 73 jobs per year which includes 47 direct onsite jobs, plus indirect and induced jobs created in the local economy by residential spending; and

b. Economic output associated with operations of approximately $12.6 million per year in the local economy, of which $7.1 million is attributable to the value of direct project operations and household spending; and

c. Over $455,538 in revenues per year, $444,938 larger than the estimated revenues generated by the current use at the Property. This includes sales tax, property tax, utility tax, and other revenues generated from the new residential units.

5. 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 and will therefore help existing businesses and encourage new businesses.

6. The Project will help encourage people to use alternate means of transportation by providing one-month free transit passes to persons who sign a one-year lease.

7. The Project will provide off-site safety improvements by providing sidewalks along 169th street where there currently are none.

8. The Project will provide safety improvements by upgrading the railway crossing and sidewalks in front of the Project site along Normandie Avenue.

G. Approval of the text changes to the Land Use Plan, as shown in Exhibit B, reflect the updates to Table LU-1 to include the Project.

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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. Housing Element Goal 5.0: Promote equal opportunity for all residents to reside in the housing of their choice;

10. Conservation Plan Goal 2: Conserve and protect groundwater supply and water resources;

11. Conservation Plan Goal 3: Reduce the amount of solid waste produced in Gardena;

12. Conservation Plan Goal 4: Conserve energy resources through the use of technology and conservation methods;

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13. Conservation Plan Goal 5: Protect the City's cultural resources;

14. Public Safety Plan Goal 1: Maintain a high level of fire and police protection for residents, businesses and visitors;

15. Public Safety Plan Goal 2: Protect the community from dangers associated with geologic instability, seismic hazards and other natural hazards;

16. Public Safety Plan Goal 4: Increase public awareness of crime and fire prevention, and emergency preparedness and procedures;

17. Noise Plan Goal 2: Incorporate noise considerations into land use planning decisions; and

18. Noise Plan Goal 3: Develop measures to control non-transportation noise impacts.

I. The General Plan Amendment allows the adoption of the Normandie Crossing Specific Plan. Without this change, the development cannot be built.

J. As demonstrated by the EIR which was certified pursuant to Resolution No. 6683, 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 decades-old buildings that are in a state of disrepair.

SECTION 2. The City Council of the City of Gardena does hereby find that the General Plan Amendment changing the land use designation of the 0.11 acre parcel (APN # 6106-030-008) shown on Exhibit A from Industrial to Single Family Residential is in the public interest as it will provide a land use designation that is consistent with the existing use of the property and consistent with the surrounding neighborhood uses which are residential.

SECTION 3. The City Council of the City of Gardena does hereby find that the General Plan Amendment changing the land use designation of the 0.43 acre parcel (APN # 6106-030-800) shown on Exhibit A from Industrial to Single Family Residential is in the public interest as it will provide a land use designation that is consistent with the existing use of the property.

Docusign Envelope ID: 1FF6AD21-C9DD-4499-B80B-C9BE39743C14

SECTION 4. The City Council hereby approves the General Plan Amendments changing the General Plan Land Use Designations of the 3.9 acre parcel (APN # 6106-030-017) shown on Exhibit A from Industrial to Specific Plan, changing the land use designation of the 1.36 acre parcels (APN ## 6106-030-015, 6106-030-016, and 6106-030-011) from Industrial with a High Density 30 Overlay to Specific Plan as shown on Exhibit A, changing the land use designation of the 0.11 acre parcel (APN # 6106-030-008) shown on Exhibit A from Industrial to Single Family Residential, and changing the 0.43 acre parcel (APN 6106-030-800) shown on Exhibit A from Industrial to Public/Institutional. Additionally, the City Council approves the text changes to the City's Land Use Plan as shown on Exhibit B.

SECTION 5. 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 6. 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 Greg Tsujiuchi, Community Development Director who can be reached at 310/217-9546 or gtsujiuchi@cityofgardena.org.

SECTION 7. Certification. The City Clerk shall certify the passage of this resolution.

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SECTION 8. 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 ____day of January, 2025.

TASHA CERDA, Mayor

ATTEST:

MINA SEMENZA, City Clerk

APPROVED AS TO FORM:

CARMEN VASQUEZ, City Attorney

Exhibit A – General Plan Land Use Changes for GPA #3-21

Exhibit B – General Plan Land Use Text Change

Docusign Envelope ID: 1FF6AD21-C9DD-4499-B80B-C9BE39743C14

Exhibit A

Adopted General Plan Amendment #3-21

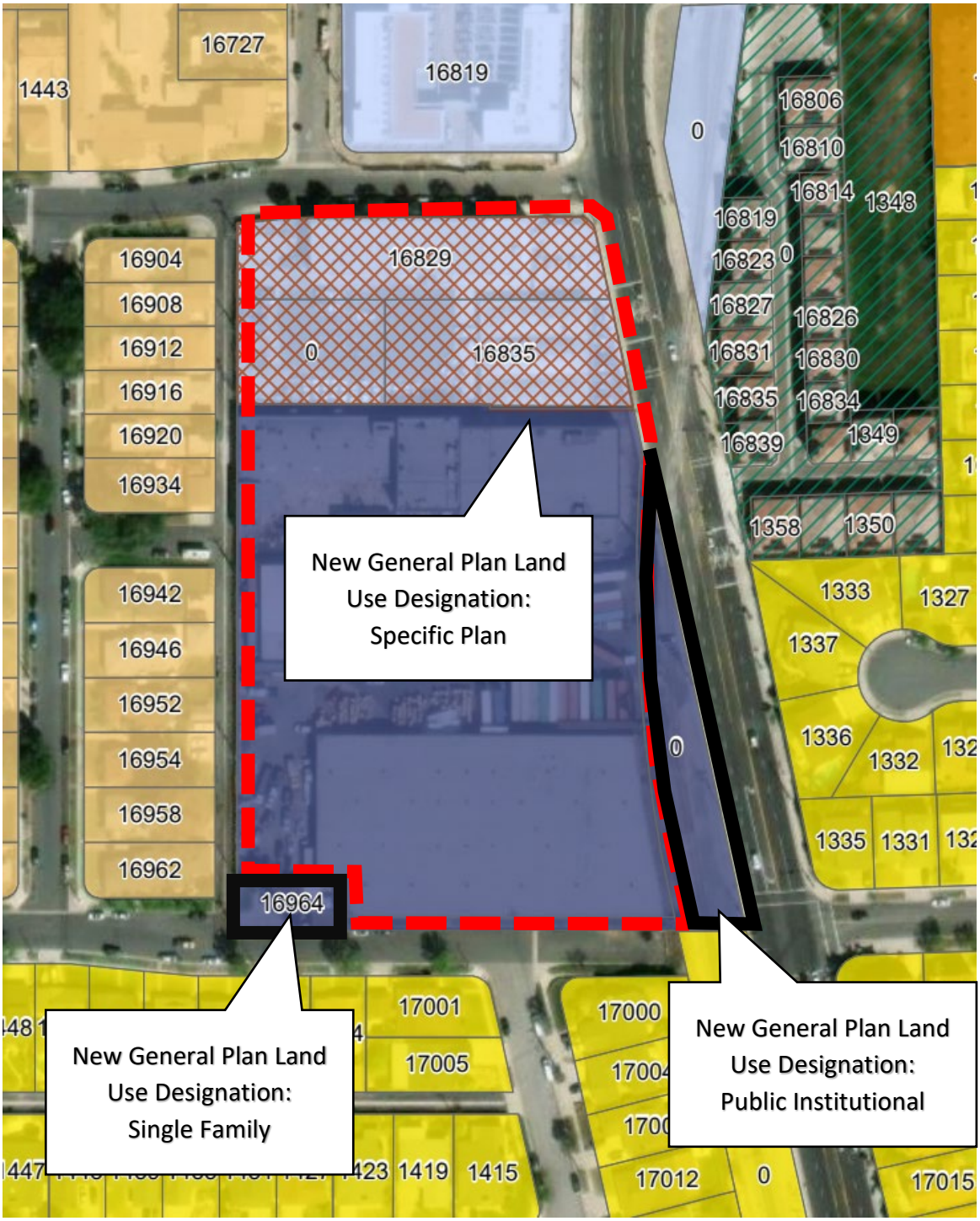

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Exhibit B

Table LU-1 – Updated January 2025

Gardena Specific Plans

Specific Plans	Adoption Year	Location	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.
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
1450 Artesia	2023	South east corner of Artesia Blvd. and Normandie Ave.	To be developed with industrial/commercial uses
Normandie Crossing	2025	Southwest corner of Normandie Ave and 169th Street	333 residential unit development

Docusign Envelope ID: C64713DE-C465-4F87-A9BF-E5865ED0A8A7

ORDINANCE NO. 1878

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 THE GARDENA ZONING MAP BY REZONING THE 5.25 ACRE PROPERTY LOCATED AT 16829, 16835, and 16907 SOUTH NORMANDIE AVENUE TO NORMANDIE CROSSING SPECIFIC PLAN, REZONING THE 0.11 ACRE PROPERTY LOCATED AT 16964 BRIGHTON AVENUE TO SINGLE FAMILY RESIDENTIAL, REZONING THE 0.43 ACRE PROPERTY LOCATED AT THE EASTERN EDGE OF THE SPECIFIC PLAN AREA TO OFFICIAL, APPROVING THE NORMANDIE CROSSING SPECIFIC PLAN, INCLUDING THE SITE PLAN CONTAINED THEREIN, APPROVING A DEVELOPMENT AGREEMENT, AND APPROVING AN AFFORDABLE HOUSING AGREEMENT RELATING TO THE NORMANDIE CROSSING SPECIFIC PLAN

WHEREAS, on December 22, 2021 16911 Normandie Associates, LLC ("Developer"), filed an application for a General Plan Amendment to the Land Use Plan (the "General Plan Amendment"), Specific Plan, Zone Change, Zoning Code Amendment, Vesting Tentative Tract Map, and Site Plan Review to develop a 273 unit apartment building and 76 townhome style units on a total of 5.25 acres located at 16829, 16835, and 16907 South Normandie Avenue (APN ## 6106-030-011, 6106-030-015, 6106-030-016 - 6106-030-017) (the "Property); and

WHEREAS, on December 22, 2022, Developer amended its project to develop a 328 unit apartment building and 75 townhomes on the Property; and

WHEREAS, the City determined that in addition to the residential development and needed entitlements proposed by Developer, the project should also include revisions to the General Plan land use designations and zoning for two adjacent properties on the same block as the Project to match the actual uses of the properties. Specifically, for the property located at 16964 Brighton Avenue (APN# 6106-030-008), change the General Plan Amendment from Industrial to Single Family Residential and change the zoning from General Industrial (M-2) to Single Family Residential (R-1); and for the property just to the east of the Project site owned by the Southern Pacific Railroad (APN# 6106-030-800), change the General Plan land use designation from Industrial to Public/Institutional and change the zoning from General Industrial (M-2) to Official (O); and

WHEREAS, the General Plan Amendments, Specific Plan, Zone Changes, Zoning Code Amendment, Development Agreement, Site Plan Review, and Vesting Tentative Tract Map are collectively referred to as the Project; and

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WHEREAS, on March 19, 2024, 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; and

WHEREAS, on April 2, 2024, the Planning Commission adopted PC Resolution No. 4-24, recommending that the City Council certify the Environmental Impact Report, but did not recommend approval of the Project; and

WHEREAS, after the Planning Commission's actions, Developer attended a community meeting where the project was discussed; and

WHEREAS, on September 30, 2024, Developer submitted revised plans to the City for a new alternative to be considered which consists of 70 fewer units in the apartment building and a reduction in height level from ground floor from seven stories to five stories, with one underground level of parking (hereafter the "Community Input Alternative;" and

WHEREAS, on December 3, 2024, the Planning Commission held a duly noticed public hearing on the Project, including revisions to the Final EIR to address the new Community Input Alternative submitted by the Developer; and

WHEREAS, at the close of the public hearing the Planning Commission recommended that the City Council certify the Revised Final EIR, make CEQA findings regarding mitigation measures and alternatives, adopt a statement of overriding considerations, and approve all of the requested entitlements for the Community Input Alternative; and

WHEREAS, on January 14, 2025, the City Council of the City of Gardena held a duly noticed hearing on the Project;

WHEREAS, after the close of the public hearing and prior to adopting this Resolution, the City Council adopted Resolution No. 6683 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;

WHEREAS, after the close of the public hearing and prior to adopting this Ordinance the City Council also adopted Resolution No. 6684 approving the General Plan Amendment; and

WHEREAS, the Site Plan is incorporated into the Specific Plan and therefore requires approval by the City Council;

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

SECTION 1. Specific Plan Findings.

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A. The Normandie Crossing Specific Plan will act as the zoning for the Property and establishes the permitted uses and development standards that apply to the Project.

B. The Specific Plan contains all of the requirements required by Government Code section 65451.

SECTION 2. Findings – Zoning Entitlements. The City Council of the City of Gardena does hereby find as follows with regard to the Normandie Crossing Specific Plan, associated zone changes for the Specific Plan area, and zoning code amendment (collectively, "Specific Plan Zoning Entitlements"):

A. The Zoning Code Amendment establishes a new zone, the Normandie Crossing Specific Plan zone. Creation of this zone is desirable and necessary to implement the proposed Project as the land use designation of the Specific Plan Property was changed to Specific Plan. Without amending the Gardena Zoning Code, the current zoning would not permit this residential development.

B. The Specific Plan Zoning Entitlements will allow the development of a high-density, 333-unit residential development consisting of a 258 first-class apartment project and 75 townhome style condominium units in the southern portion of Gardena. The apartment building will provide seven affordable units for moderate income households, providing a variety of new and needed housing opportunities in the City. The 258 market rate units satisfies approximately 10 percent of the City's Regional Housing Needs Assessment (RHNA) allocation for above-moderate housing for the Sixth Cycle Housing Element. A majority of the Specific Plan area, 3.9 acres, was not included on the Site Inventory for the City's 6th Cycle Housing Element because the residential development was already being discussed with the City and the project is listed in the Housing Element as a pending project and the 403 units were accounted for in determining the City's remaining RHNA obligation.

C. The Specific Plan Zoning Entitlements will allow a residential development which will provide needed housing to nearby employers in the City of Gardena as well as the neighboring cities.

D. The Specific Plan Zoning Entitlements will allow a development which will help revitalize a site that is rundown and does not meet current development standards and improve safety conditions relating to the railway crossing and sidewalk on Normandie Avenue.

E. A residential development is more compatible with the surrounding properties which are residential on all sides. The existing zoning allows industrial uses.

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F. The Specific Plan Zoning Entitlements will allow development which will provide the following benefits to the City:

1. 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 and 2,246 units allocated to lower income units. This Project will satisfy approximately 10 percent of the City's above-moderate allocation and provide seven moderate income units.

2. The Project will help revitalize a site that does not meet current development standards and whose buildings are in a deteriorated condition.

3. The Project will provide the following one-time economic benefits from the construction:

a. The Project will provide numerous construction jobs amounting to the equivalent of 1,580 total job years. As the Project includes a commitment from the developer to implement a local hiring policy, this will benefit lower income individuals and individuals who live in the City. Additionally, there will be an indirect benefit of additional jobs created because of the construction jobs, amounting to approximately another 414 job years.

b. Construction is expected to create approximately $109 million in total labor income, due to direct, indirect, and induced workers associate with the construction. Of that, $80.9 million is projected to be paid to onsite construction employees, providing individuals with additional income to spend on services and goods in Gardena.

c. The principles of Developer also own Tasoro, a company which provides quality building materials for apartments and is located in Gardena. Use of these products will provide sales tax revenue to the City. Additionally, the Development Agreement provides for a local buying program for construction goods as well as a local hire program.

d. Developer will pay in-lieu park fees under the Subdivision Map Act of $10,000 per unit on the 75 condominium units.

e. Developer will provide one-time construction-related revenues totaling over $3 million, including construction fees, development impact fees, and sales tax from construction materials.

f. Each contractor that does business in the City will be required to obtain and pay for a City business license.

4. The Project will provide the following recurring annual revenues to the City:

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a. The creation of approximately 73 jobs per year which includes 47 direct onsite jobs, plus indirect and induced jobs created in the local economy by residential spending.

b. Economic output associated with operations of approximately $12.6 million per year in the local economy, of which $7.1 million is attributable to the value of direct project operations and household spending.

c. Over $455,538 in revenues per year, $444,938 larger than the estimated revenues generated by the current use at the Property. This includes sales tax, property tax, utility tax, and other revenues generated from the new residential units.

5. 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 and will therefore help existing businesses and encourage new businesses.

6. The Project will help encourage people to use alternate means of transportation by providing one-month free transit passes to persons who sign a one-year lease.

7. The Project will provide off-site safety improvements by providing sidewalks along 169th street where there currently are none.

8. The Project will provide safety improvements by upgrading the railway crossing and sidewalks in front of the Project site along Normandie Avenue

G. Approval of the Specific Plan Zoning Entitlements 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 are consistent with the Land Use Plan.

2. The Zoning Changes implement a number of Goals 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;

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b. Land Use Policy 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;

c. Land Use Policy 1.5: Provide adequate residential amenities such as open space, recreation, off-street parking and pedestrian features in multifamily residential developments;

d. Economic Development Plan Goal 3: Attract desirable businesses to locate in the City;

e. Community Design Plan Goal 1: Enhance the visual environmental and create a positive image of the City;

f. Community Design Plan Goal 2: Enhance the aesthetic quality of the residential neighborhoods in the City;

g. 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;

h. 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;

i. Housing Element Goal 3.0: Minimize the impact of governmental constraints on housing construction and cost;

j. 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;

k. Housing Element Goal 5.0: Promote equal opportunity for all residents to reside in the housing of their choice;

l. Conservation Plan Goal 2: Conserve and protect groundwater supply and water resources;

m. Conservation Plan Goal 3: Reduce the amount of solid waste produced in Gardena;

n. Conservation Plan Goal 4: Conserve energy resources through the use of technology and conservation methods;

o. Conservation Plan Goal 5: Protect the City's cultural resources;

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p. Public Safety Plan Goal 1: Maintain a high level of fire and police protection for residents, businesses and visitors;

q. Public Safety Plan Goal 2: Protect the community from dangers associated with geologic instability, seismic hazards and other natural hazards;

r. Public Safety Plan Goal 4: Increase public awareness of crime and fire prevention, and emergency preparedness and procedures;

s. Noise Plan Goal 2: Incorporate noise considerations into land use planning decisions; and

t. Noise Plan Goal 3: Develop measures to control non-transportation noise impacts.

H. The Zoning Entitlements implement the public convenience, general welfare and good land use practice for the reasons set forth above.

SECTION 3. Additional Zoning Changes.

A. Approval of the zone change for the 0.11 acre parcel located at 16964 Brighton Avenue will bring the zoning into compliance with the use of the property at that location and the zone change will be consistent with the General Plan amendment.

B. Approval of the zone change for the 0.43 acre parcel located on the east side of the Specific Plan area will bring the zoning into compliance with the use of the property at that location and the zone change will be consistent with the General Plan amendment.

SECTION 4. Development Agreement Findings.

In addition to the benefits described above relating to the Specific Plan Zoning Entitlements, the Development Agreement provides the following additional benefits:

A. 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 in exchange for providing valuable development rights of a high-density mixed-use housing project along with a 5 year entitlement with two 5 year extension options.

B. 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 increased sales tax revenues.

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C. The Development Agreement will provide for seven moderate income rental units in the City with a guaranteed affordability of 55 years.

SECTION 5. No Net Loss Findings.

A. The three parcels of land comprising the 1.36 acres on the northern portion of the development (APN 6106-030-015, 6106-030-016, and 6106-030-011) have a high density 30 general plan overlay and a zoning overlay of high density 30 (HO-4). These parcels were identified as inventory sites in the City's 6th Cycle 2021 – 2029 Housing Element and there was to be a total of 31 moderate income units on these sites.

B. Pursuant to Government Code section 65863, the City must make sure development opportunities remain available throughout the planning period to accommodate the City's regional housing needs allocation (RHNA), especially for lower and moderate income households. When the City approves a development on an inventory site with fewer units than shown in the Housing Element, it must make findings that the remaining sites have sufficient capacity to accommodate the remaining unmet RHNA by each income level and the approval is consistent with the adopted General Plan.

1. The City's RHNA allocation for moderate income is 894 units; the 6th Cycle Housing Element identified sites for 1797 moderate income units, leaving a surplus of 913 units. Therefore, there are more than sufficient sites to provide for the fact that no moderate units will be built on the identified sites.

2. Prior to adopting this Ordinance, the City Council adopted Resolution No. 6684 changing the land use designation to Specific Plan. This project is consistent with the General Plan as amended and the Housing Element which included adequate surplus inventory to account for the situation that not all properties would develop with housing at the assumed income levels.

SECTION 6. 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

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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 Crossing Specific Plan
Normandie Estates Specific Plan
Normandie Place Specific Plan
Redondo Village Specific Plan
Platinum Row Specific Plan

SECTION 7. Legislative Approvals.

Based on the findings set forth above:

A. The City Council hereby approves the zone change of the 3.9 acre parcel of the Specific Plan Area (APN # 6106-030-017) from General Industrial (M-2) to Normandie Crossing Specific Plan as shown in Exhibit A, attached hereto and incorporated herein by reference;

B. The City Council hereby approves the zone change of the 1.36 acre parcels of the Specific Plan Area (APN ## 6106-030-015, 6106-030-016, and 6106-030-011) from Industrial (M-1) with a High Density 30 Overlay (HO-4) to Normandie Crossing Specific Plan as shown in Exhibit A, attached hereto and incorporated herein by reference;

C. The City Council hereby approves the zone change to the 0.11 acre parcel (APN # 6106-030-008) from General Industrial (M-2) to Single-Family Residential (R-1) as shown on Exhibit A, attached hereto and incorporated herein by reference;

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C. The City Council hereby approves the zone change to the 0.43 acre parcel located to the east of the Specific Plan area (APN # 6105-030-800) from General Industrial (M-2) to Official (O), as shown in Exhibit A, attached hereto and incorporated herein by reference;

D. The City Council hereby approves the Normandie Crossing Specific Plan, a copy of which is attached hereto as Exhibit B, subject to the conditions of approval attached hereto as Exhibit D, which exhibits are attached hereto and incorporated herein by reference.

E. The City Council hereby approves the Development Agreement attached hereto as Exhibit E, attached hereto and incorporated herein by reference.

SECTION 8. Site Plan Approval.

The Site Plan for the Project is included as Exhibit A to the Specific Plan and is approved as part of the Specific Plan. The plans being approved are dated November 1, 2024, and attached hereto as Exhibit C. The City Council makes the following findings with regard to the Site Plan:

A. The physical location, size, massing, setbacks, pedestrian orientation, and placement of proposed structures on the site and the location of proposed uses within the project are consistent with the applicable standards:

Analysis: The project is consistent with the applicable standards as the standards are set forth in the Normandie Crossing Specific Plan and the Project implements this Plan.

B. The development is consistent with the intent and general purpose of the general plan and provisions of the Zoning Code:

Analysis: The Land Use Designation for the Property is Specific Plan and the zoning is Normandie Crossing Specific Plan. As the development implements the Specific Plan, it is consistent with both the General Plan land use designation and the zoning. Additionally, the development implements numerous other goals and policies of the Specific Plan as outlined above.

C. The health and safety services (police and fire) and public infrastructure are sufficient to accommodate the new development:

Analysis: The development has been reviewed by the Gardena Police Department and the Los Angeles County Fire Department. Neither Department has raised any issues regarding the ability to provide services. Additionally, the project has received will serve letters from the various utilities.

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D. The project is compatible with the surrounding sites and neighborhoods:

Analysis: The project is a high-density residential project located on a major collector street. Property immediately to the north is developed with an SRO project that has density of 90 units/acre. The density of the apartment building, which is along Normandie Avenue, is 120 units/acre. The apartment buildings are buffered from the existing residential zones to the west and south by the 3-story townhome units which have a density of 24 units/acre.

E. The project has been determined to be exempt from CEQA or the appropriate environmental document has been completed and required findings have bene made:

Analysis: An EIR has been prepared for the Project in accordance with CEQA and the CEQA Guidelines.

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. Custodian of Record. Each and every one of the findings and determinations in this Ordinance 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 Greg Tsujiuchi, Community Development Director who can be reached at 310/217-9546 or gtsujiuchi@cityofgardena.org.

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.

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Passed, approved, and adopted this ____ day of January, 2025.

TASHA CERDA, Mayor

ATTEST:

MINA SEMENZA, City Clerk

APPROVED AS TO FORM:

CARMEN VASQUEZ, City Attorney

on the findings set forth above:

- Exhibit A – Normandie Crossing Specific Plan Zone Change for ZC #4-21
- Exhibit B – Normandie Crossing Specific Plan
- Exhibit C – Project Plans
- Exhibit D – Conditions of Approval
- Exhibit E – Development Agreement
- Exhibit F – Draft Affordable Housing Agreement

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Exhibit A

Adopted Zone Change #4-21

CITY OF GARDENA

NORMANDIE CROSSING SPECIFIC PLAN

XXXX 2025

DRAFT

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CHAPTER 1. SUMMARY STATEMENT

The Normandie Crossing Specific Plan (Specific Plan, or Plan) facilitates the transition of a large underutilized industrial lot into a multi-family residential development offering both apartment and townhome units where residents live near, and walk or bicycle to, schools, shopping, and recreation. The Specific Plan allows the development of up to 333 residential units with related residential amenities and ancillary uses within the 5.25-acre Specific Plan Area (Plan Area) in the City of Gardena (City). The Specific Plan is designed to be compatible with adjacent and anticipated land uses and the surrounding built environment, including the surrounding residential neighborhoods. The Specific Plan regulates buildout of the Plan Area in a manner that is consistent with applicable State law.

CHAPTER 2. INTRODUCTION

I. AUTHORITY

The Specific Plan 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 Specific Plan 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

The Specific Plan integrates a wide range of high-quality housing options into the City, including apartments ranging from studio to two-bedroom units and townhomes ranging from three- to four-bedroom units. This newly constructed multi-family housing development will replace a large underutilized industrial lot creating a more compatible development with the surrounding residential neighborhoods and resident-serving commercial uses.

III. SITE LOCATION

The Plan Area is made up of four tax parcels that total approximately 228,559 square feet, or 5.25 acres, and is located at 16829, 16835, and 16907 South Normandie Avenue (commonly referred to as 16911 Normandie Avenue) in the City. The Plan Area is situated between Normandie Avenue and Brighton Way, and between 169th Street and 170th Street, excluding the existing single-family home located at 16964 Brighton Avenue. The location of the Plan Area within the City boundaries is illustrated in Figure 1. An aerial photograph of the Plan Area vicinity is provided in Figure 2. The Specific Plan divides the Plan Area in two subareas: Subarea A will include up to 258 apartment units and Subarea B will include up to 75 townhome style units. Subarea A and Subarea B are shown in Figure 2.

Figure 1. *Regional and Project Vicinity Map*

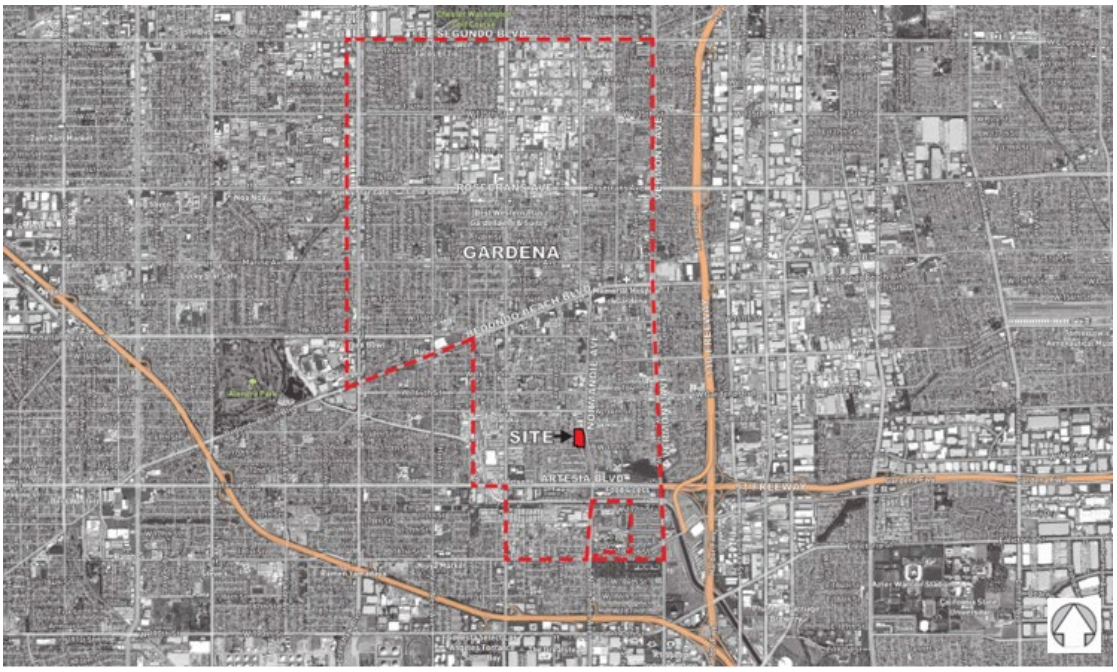


Figure 2. *Project Aerial*

Regional Setting

The City of Gardena is located in the South Bay area of Los Angeles County, approximately nine miles south of downtown Los Angeles, approximately seven 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 Plan Area 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 three-square-mile community known for its farm products to an approximate six-square-mile, highly developed City with a population of over 60,000.

Local Setting

The 5.25-acre Plan Area is located in the southern portion of the City of Gardena south of Redondo Boulevard and north of Artesia Boulevard. The Union Pacific Railroad Torrance Branch (Railroad) abuts approximately half of the eastern edge of the Plan Area and enters the Plan Area just south of the current vehicle driveway. Normandie Avenue runs to the east of the Railroad and eventually abuts the north portion of the eastern edge of the Plan Area. Brighton Way, an alley, abuts the Plan Area immediately to the west, 169th Street abuts the Plan Area immediately to the north, and 170th Street abuts the Plan Area immediately to the south. The Plan Area does not include the single-family home located at 16964 Brighton Ave.

The Plan Area is part of a diverse urban environment with a diverse set of land uses including single-family homes and low-density multi-family residential developments on Brighton Way and 170th Street, and commercial and retail uses on Artesia Boulevard to the south and on Normandie Avenue to the north. Except for auto-related uses north of the Plan Area on Normandie, the Plan Area is one of the only industrial developments in the vicinity.

Regional access to the Plan Area is provided by Normandie Avenue and a network of arterial and collector streets. The arterial street that serves the Plan Area is Artesia Boulevard. The collector streets include Normandie Avenue, Gardena Boulevard, and 166th Street. The local streets include 169th Street and 170th Street.

The Plan Area is within walking distance of several bus stops, including the GTrans Route 1X, which connects to both the LA Metro C Line Redondo Beach Station and Harbor Freeway Station. The Plan Area is also within walking distance (approximately 1/2 mile) of a variety of resident-serving commercial uses on Artesia Boulevard, including grocery stores and restaurants. The Specific Plan'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. Direct access to major freeways also allows convenient automobile access.

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 is 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 Specific Plan 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 Specific Plan is consistent with recent legislative efforts (such as Senate Bills 375 and 743) 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).

The Plan Area is 5.25 acres and is currently designated as Industrial under the General Plan Land Use Plan and is located in the M-1 (Industrial) and M-2 (General Industrial) zoning districts. The M-1 portion, which is the northern 1.32-acre portion, also has a High Density 30 Overlay under the General Plan and an HO-4 (High Density 30) Overlay under the zoning regulations. The manufacturing zoning districts do not permit residential uses and permit a maximum FAR of 1.0:1 and a maximum building height of 65 feet; and the Residential Overlay allows 30 dwelling units per acre and a 55-foot height limit. By comparison, the Specific Plan zoning permits residential density of up to 64 dwelling units

per acre, maximum FAR of up to 1.6:1, and building heights of up to (70 feet), with no more than five stories above grade, as further described below.

V. PROJECT DESCRIPTION

Redevelopment of the Plan Area under the Specific Plan requires the demolition of six existing one- and two-story industrial buildings for the construction of a residential development with up to 333 residential units. The Specific Plan would provide no more than 366,191 square feet of residential floor area, resulting in a floor area ratio (FAR) of up to 1.6:1. The Specific Plan would result in a density of 64 dwelling units per acre.

The Specific Plan divides the Plan Area into two subareas. Subarea A provides a five-story above-grade apartment building with up to 258 apartment units (Apartment Building). The Apartment Building will also have one subterranean level, which will be used for parking along with the first above ground story. Subarea B provides 75 three-story townhome-style units (Townhomes). Development of each of the subareas is described in further detail below.

The Project architectural style will draw upon new local technology buildings or other nearby features that contribute to the aesthetic ambience of the immediate area. The Specific Plan will provide consistency in architectural style throughout the Plan Area and will promote a high-quality design achieved through the creative use of massing, roof forms, materials, and facades.

Subarea A

Subarea A will be developed with the Apartment Building, which includes up to 258 apartment units (244,971 square feet of residential floor area) in five stories above ground with a maximum height of 70 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, and one subterranean level. The Apartment Building will include four levels of residential units over two levels of parking, starting at the subterranean level. The Apartment Building will provide 387 unbundled vehicle parking spaces, including 29 spaces for guest parking. Up to 50 percent of the required parking spaces within Subarea A may be compact spaces. Additionally, up to 110 of the spaces would be available as tandem spaces that can be leased as a pair to a single unit. The Apartment Building will also provide 69 on-site bicycle parking spaces for residents (65 secured long-term and four short-term spaces). Subarea

A will provide the following amenities: a roof deck with seating area; a swimming pool with BBQ and seating areas; a dog park; a fitness room; club house; and a large courtyard with seating area.

The specific land use regulations and development standards applicable within Subarea A are described in further detail in Chapter 5 of the Specific Plan.

Subarea B

Subarea B will be developed with up to 75 Townhomes (121,220 square feet of residential floor area), each of which with a maximum height of 40 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. Each unit will include a two-car garage, three levels of living space and a yard or balcony. In addition to the 150 vehicle parking spaces provided within the Townhomes, 19 guest spaces will be provided within Subarea B. Subarea B will provide the following amenities: a swimming pool with BBQ and seating areas; a club house; and a dog park.

The specific land use regulations and development standards applicable within Subarea B are described in further detail in Chapter 5 of the Specific Plan.

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 Specific Plan. As required by the Mitigation Monitoring and Reporting Program that was adopted in conjunction with the EIR, the Specific Plan will implement mitigation measures to reduce potential impacts resulting from development pursuant to the Specific Plan to a less-than-significant level [(SCH#2023050241)]. All mitigation measures identified in the EIR are incorporated in this Specific Plan by reference, and included as Exhibit D.

VII. RELATED APPLICATIONS AND DOCUMENTS

In addition to approval of this Specific Plan (SP #1-21), the following entitlements were also approved by the City and are required to develop the Specific Plan:

General Plan Amendment (GPA #3-21)

A general plan amendment to (i) change the land use designation on the General Plan Land Use Map from "Industrial" and "Industrial, High Density 30 Overlay" to "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 Amendement (ZC #4-21/ZTA #6-21)

A corresponding zoning map amendment to replace the existing Industrial (M-1) with a High Density 30 Overlay (HO-4) and General Industrial (M-2) zoning with the Normandie Crossing Specific Plan zone and to amend the text of the Gardena Municipal Code to add this new zone.

Development Agreement (DA #2-21)

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 5 years, with the right to a 5 year extension, and provides community benefits to the City in the form of affordable housing, sidewalk improvements to 169th and 170th Street and improvements to the railroad crossing and sidewalk along Normandie Avenue.

Vesting Tentative Tract Map (VTM #2-21)

A vesting tentative tract map to merge four lots into one with condominiums for the Townhomes and one parcel for the Apartment Building.

Site Plan Review (SPR #11-21)

A Site Plan Review to review of the physical design of the development.

Affordable Housing Agreement

An agreement between the City and the developer that guarantees that seven units in Subarea A will remain affordable to moderate income households for a 55-year period.

CHAPTER 3. CONTEXT AND EXISTING CONDITIONS

I. PLAN AREA AND LAND USES

The Plan Area consists of four tax parcels totaling approximately 5.25 acres in size, situated between Normandie Avenue and Brighton Way, and between 169th Street and 170th Street, except for the single-family home located at 16964 Brighton Ave. Existing land uses in the Specific Plan Area include six, one- and two-story buildings within an industrial lot developed with warehouse logistics uses and associated offices and surface parking lots at the time the Specific Plan was initiated, with paved parking located throughout the Plan Area. The Plan Area is surrounded by single-family homes to the west and south, apartment complex to the north and townhomes to the east across Normandie Avenue.

A photo of the existing development within the Plan Area is provided in Figure 3.

Figure 3. *Existing Development*

II. TOPOGRAPHY

The topography of the Plan Area slopes from the northeast corner to the southwest corner, with an elevation difference of approximately seven feet across the Plan Area.

A topographical survey of the Specific Plan Area is provided in Figures 4a and 4b.

Figure 4a. *Topographical Survey*

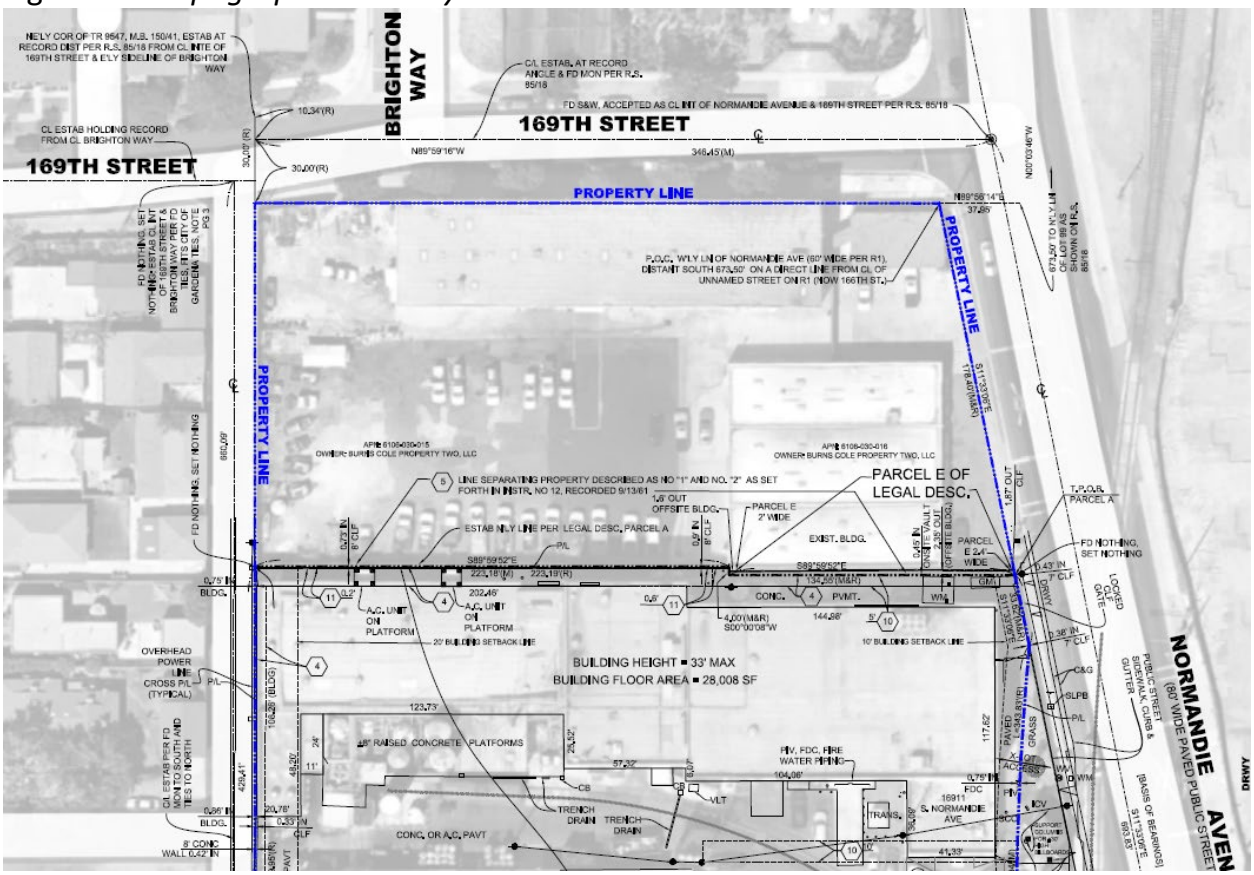
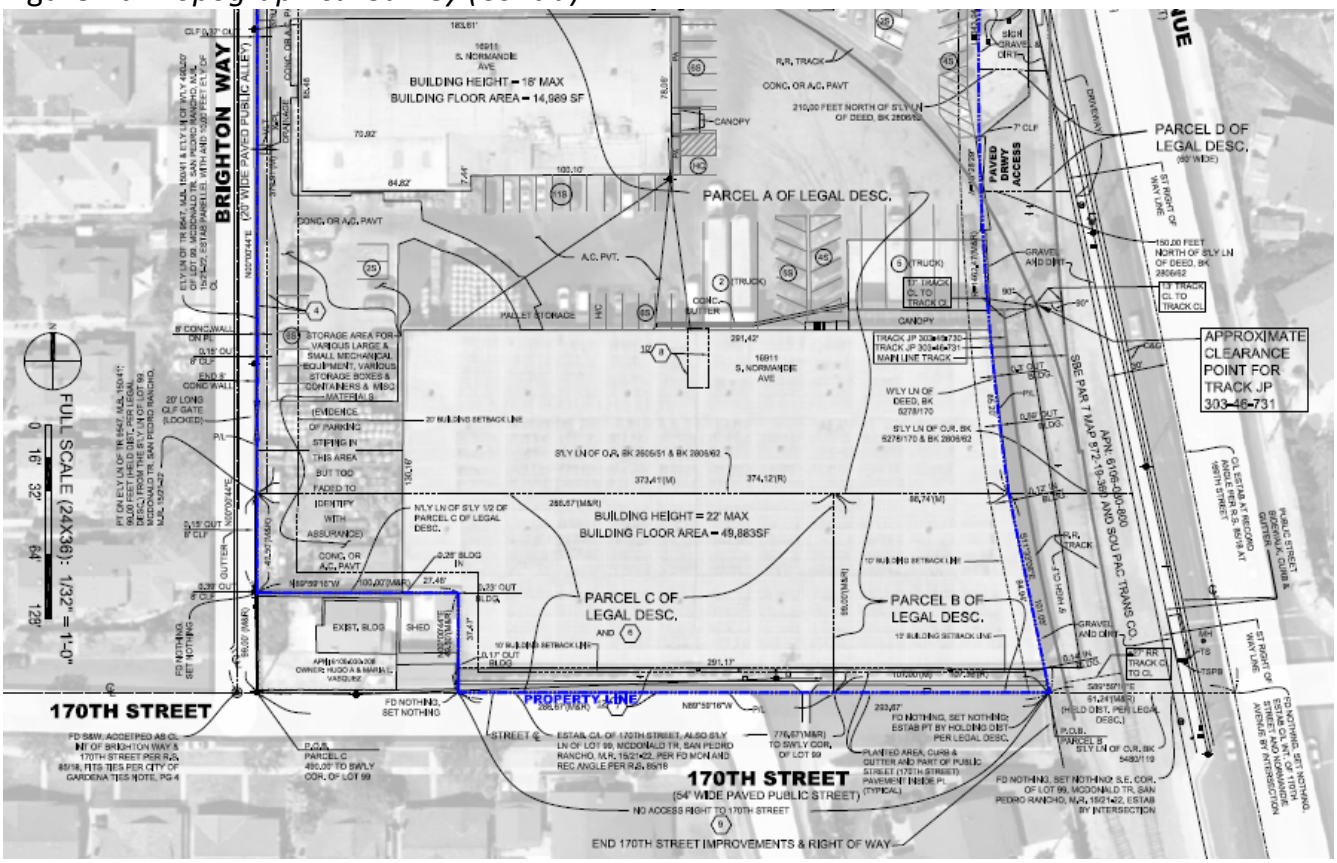


Figure 4b. *Topographical Survey (Cont'd)*



III. GEOLOGY AND SOILS

A geotechnical study of the Specific Plan Area was prepared by Hamilton & Associates on October 25, 2021. Existing geology and soils conditions are taken from the geotechnical study.

Based on review of available geologic maps, the Plan Area is not located within an Alquist-Priolo Earthquake Fault Zone. The Inglewood Fault is located approximately 0.6 miles west of the Plan Area. In addition, the Plan Area is not located in a liquefaction zone.

The Plan Area is underlain by artificial fill and alluvium. The fill encountered on the Plan Area at a depth of five feet from existing grade. The fill is in turn underlain by native alluvial soils.

Groundwater was encountered at an approximate depth of 22 feet below the existing grade. Based on available groundwater data, the historically highest groundwater level for the Plan Area was approximately 15 feet below the existing grade.

The primary geologic hazard at the Plan Area 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 landslides.

IV. HYDROLOGY

A hydrology study of the Specific Plan Area was prepared by Fuscoe Engineering on August 10, 2022.

The Plan Area runoff sheet flows to a catch basin near the intersection between 169th Street and Normandie Ave as well as a catch basin on Normandie Ave. The catch basin on 169th Street and Normandie Ave discharge into LA County storm drain system which flows southerly through Dominguez Channel. All roof flows from the southerly existing buildings and paved parking areas are captured by a series of drains and discharge directly to ground level, where they join surface-level sheet flows and discharge to a catch basin location on Brighton Way.

The grading pattern for the proposed development will largely be consistent with that of the existing condition and surface flow northwest towards southeast. The Plan Area is currently approximately 100 percent impervious. The Specific Plan will decrease the impervious area of the site by approximately nine percent to 91 percent.

V. GENERAL PLAN AND ZONING DESIGNATIONS

The City's General Plan Land Use Plan currently designates the Plan Area for Industrial land uses. The Industrial land use designation is intended for industrial park development, with permitted uses such as offices, laboratories, research and development, manufacturing, maintenance services, machine shops, commercial printing, parking lots and restaurants. Its corresponding zoning includes Industrial (M-1) and General Industrial (M-2), the current zoning of the Plan Area. The M-1 portion of the Plan Area, which is the northern 1.32-acre portion, also has a High Density 30 Overlay under the General Plan and an HO-4 (High Density 30) Overlay under the zoning regulations.

Properties to the north, across West 169th Street, are also designated Industrial and zoned M-1 and are developed with a 63-unit studio apartment project as allowed in the

M-1 zone. The Normandie Estates Specific Plan is located across Normandie Avenue east and northeast of the Plan Area. Property designated as Single-family Residential and zoned Single-family Residential (R-1) is also located to the east of the Plan Area, across Normandie Avenue and to the south across West 170th Street; and properties designated Medium Residential and zoned Low Density Multiple-Family Residential Zone (R-2) to the west and northwest; and adjoining property to the southwest is designated Industrial and zoned M-2, but will be concurrently changed to a single family residential general plan designation and zoning.

As described in Chapter 7, 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

Four major freeways provide regional access to the Plan Area: I-105 to the north, I-405 to the west, and the I-110 and SR-91 to the east.

The I-110 and SR-91 freeways connect to the Plan Area via Artesia Boulevard, which runs east-west and connects to Normandie Avenue, which runs north-south along the eastern boundary of the Plan Area. Normandie Avenue provides local access to the site and is a major collector roadway with two lanes in each direction that runs through the City.

The Union Pacific Torrance Branch Railroad (Railroad), carrying port-related and refinery-related fright, runs along Normandie Avenue corridor south of 166th Street and passes the Plan Area.

Existing sidewalks are provided along the site frontage and within a continuous and complete pedestrian network in the surrounding area. A sidewalk along the south side of 169th Street and along the west side of Normandie Avenue north of the railroad crossing provides pedestrian access to the site. Sidewalks along the south side of 169th Street are discontinuous for a short segment from just west of the project to Halldale Avenue. Sidewalks are also not present on Brighton Way, which is a public alleyway, or on 170th Street adjacent to the Plan Area. Marked crosswalks, curb ramps, and pedestrian signals are provided at the nearest signalized intersections along Normandie Avenue at 166th Street and 170th Street, which provides direct access to bus transit stops and surrounding land uses. Normandie Avenue is designated as a bike route (Class III). Additionally, 166th

Street, 170th Street and Gardena Boulevard are designated as bike routes (Class III), but not on segments directly adjacent to the Plan Area.

See Chapter 4, Section III of this Specific Plan for details on the TDM strategies implemented by the Specific Plan.

VII. UTILITIES AND SERVICES

Ensuring the Specific Plan 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 Plan Area is generally conveyed to the Dominguez Channel through catch basins on 169th Street and Normandie Avenue. The Plan Area is currently built out and covered with a combination of structures, surface parking, and other impervious surfaces.

Sewer

Wastewater at the Plan Area is conveyed via an existing 15-inch public sewer line underneath Normandie Avenue owned and maintained by Los Angeles County Sanitation District, which connects to a network of sewer lines that ultimately convey wastewater flows to the Joint Water Pollution Control Plant (JWPCP).

Water

Water and fire services are provided to the property by an 8-inch line owned and maintained by the Golden State Water Company. There are currently existing domestic and fire water laterals serving the site. There are two existing fire hydrants adjacent to the Plan Area, including one located near the intersection of 169th Street and Normandie Avenue and another located more south along Normandie Avenue.

Electrical Power

The Plan Area is currently served by overhead power lines along Normandie Avenue, 170th Street and Brighton Way owned and maintained by SoCal Edison.

Natural Gas

The Southern California Gas Company provides natural gas to the Plan Area with mains along and near the Plan Area.

Solid Waste

Waste Resources of Gardena provides solid waste pickup services for the City.

Public Services

The Los Angeles County Fire Department (LACFD) provides fire protection services and emergency medical service to the City. The closest facility to the Plan Area, located 0.9 miles to the Plan Area and a three-minute driving distance, is Fire Station 158 at 1650 W 162nd Street, Gardena, CA 90247. The provision of water for fire suppression is available from existing water lines via adjacent hydrants.

The Gardena Police Department (Gardena PD) provides police protection services to the City. The Plan Area is approximately 0.5 miles from the police station located at 1718 W 162nd Street, Gardena, CA 90247. The Gardena PD divides the City into three districts, each with its own District Policing Team. The Plan Area is located within District 3.

The Los Angeles County Library provides library services to the City. There are two libraries within City limits. The closest library facility to the Plan Area, located 0.5 miles to the northwest and a three-minute driving distance, is the Gardena Mayme Dear Library at 1731 W Gardena Boulevard.

The Los Angeles Unified School District provides educational services and facilities for students from kindergarten through twelfth grade. The Plan Area is within the service district of LAUSD and is served by the following schools: Denker Avenue Elementary, Peary Middle School, and Gardena High School. There are private schools in the area as well.

CHAPTER 4. SPECIFIC PLAN CONCEPTS

I. PROJECT GOALS AND OBJECTIVES

The overall goal of the Specific Plan is to transform a large underutilized industrial lot and introduce a wide range of high-quality housing options into the City, including apartment and townhome units. This newly constructed multi-family housing development will replace a large underutilized industrial lot creating a more compatible development with the surrounding residential neighborhoods and resident-serving commercial uses.

Implementation of the Specific Plan 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, and activating the pedestrian realm. The Specific Plan 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 housing options, by providing a range of housing types and sizes, including apartment and townhome style options, to serve the region's growing and evolving technology and creative sectors and aid in recruiting and retaining talent for local companies.

2. Support the expanding technology and creative sector with newly constructed, high-quality housing opportunities, enabling local employees to live close to where they work.

3. Cluster urban residential development near technology firms, other large employment centers, and commercial corridors providing City residents with the opportunity to live, work, and shop with less reliance on automobiles.

4. Establish housing development that meets high standards of design and pursues environmental sustainability.

5. Redevelop a blighted site, increase tax revenues to the City, provide affordable housing to support the City's Regional Housing Needs Assessment goals, and create a catalyst for future development in this part of Gardena.

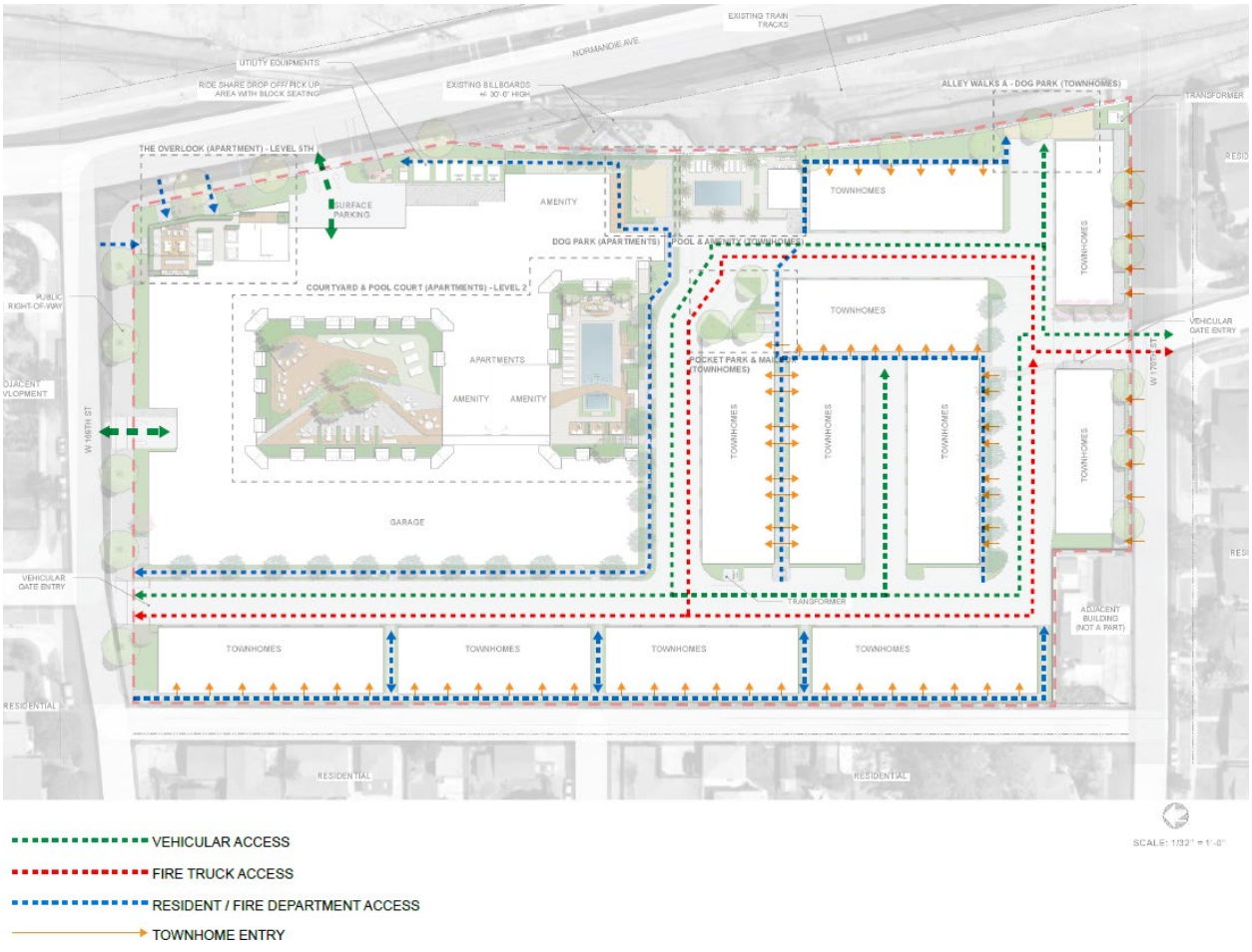
II. SITE PLAN AND RENDERINGS

The Specific Plan generally provides for development of up to 333 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 Plan Area must be substantially consistent with this Exhibit.

III. TRANSPORTATION AND CIRCULATION PLAN

The circulation plan for the Specific Plan is provided in Figure 5.

Figure 5. *Circulation Plan*



On-Site Circulation and Access

The project replaces a large underutilized industrial lot containing warehouse logistics uses with associated offices and surface parking lots that contain one curb cut that interrupts the sidewalk along Normandie Avenue with a new residential development with amenities.

Vehicular access to the Plan Area will be provided by the following four driveways (see Figure 5):

- Driveway 1 serves Subarea A and provides access to the Apartment Building's parking garage from 169th Street west of Normandie Avenue.
- Driveway 2 also serves Subarea A and provides a right-in/right-out only to the Apartment Building's parking garage from southbound Normandie Avenue.
- Driveway 3 serves Subarea B and provides access to the Townhomes from 170th Street. This driveway also serves as fire truck access for both Subarea A and Subarea B.
- Driveway 4 also serves Subarea B and provides access to the Townhomes from 169th Street. This driveway also serves as fire truck access for both Subarea A and Subarea B.

Development under the Specific Plan will include 556 on-site vehicle parking spaces: 387 spaces for the Apartment Building in Subarea A; and 169 spaces for the Townhomes in Subarea B. For Subarea A, on-site vehicle parking will be provided in an enclosed garage within the Apartment Building consisting of two vertical floors, starting at the subterranean level. The Apartment Building parking garage is designed to permit two-way travel between the two levels with adequate circulation. For Subarea B, on-site vehicle parking will be provided in ground level, two-car garages in each of the Townhomes. Internal roadways within Subarea B link Driveways 3 and 4 to all the Townhomes, but do not connect to the Apartment Building garage in Subarea A. These internal roadways are a minimum of 24 feet wide with a 26-foot wide marked fire access lane in compliance with LACFD requirements and offer a continuous fire access lane through the Plan Area.

Off-Site Improvements

The Specific Plan will provide offsite sidewalk and railroad improvements, as described below.

169th Street Sidewalk Improvements

Approximately 266 linear feet of offsite sidewalk improvements will be provided along the south side of 169th Street, just west of the Plan Area, between Brighton Way and the alley just west of Brighton Avenue, as shown in Exhibit B. The sidewalk improvements will be constructed pursuant to Municipal Code Section 17.08.170 and designed to be consistent with the City General Plan Circulation Element requirements for a Local Street.

Normandie Avenue Railroad Improvements

Various railroad track and roadway/sidewalk improvements will be provided along South Normandie Avenue pursuant to current California Public Utilities Commission (CPUC) standards and UPRR guidelines, as follows and shown in Exhibit C:

- Removing approximately 170 linear feet of railroad spur track which enters the Plan Area and formerly served the southernmost industrial building (i.e., 16911 Normandie Avenue).
- Removing approximately 830 linear feet of railroad spur track, which enters the Plan Area and formerly served the central industrial building (i.e., 16907 South Normandie Avenue).
- Constructing a new median both north and south of the track alignment.
- Installing new warning devices and tactile warning strips on the South Normandie Avenue east and west sidewalks.
- Refreshing (i.e., adding a slurry seal) the railroad crossing pavement markings immediately north and south of the track alignment.
- Installing approximately 210 linear feet of realigned sidewalk improvements over the railroad tracks with channelized railing along the west side of Normandie Avenue.

Pedestrian Access

Pedestrian access to Subarea A will be provided on the ground floor with primary pedestrian access located at the building lobby located on the northeastern portion of the site at Normandie Avenue and 169th Street. Additional restricted pedestrian access will also be provided around the perimeter of the Apartment Building connecting 169th Street and Normandie Avenue, and via the parking garage. Pedestrian access to Subarea B will be provided on 169th Street and 170th Street. On-site pedestrian circulation within Subarea B will consist of a network of pathway connections between residential units and common areas.

Marked crosswalks, curb ramps, and pedestrian signals are provided at the nearest signalized intersections along Normandie Avenue at 166th Street and 170th Street, which provide direct access to bus transit stops and surrounding land uses.

Transit Access

The Plan Area is located less than a mile walking distance from five different bus routes:

- **Line 1X (GTrans)**: Connects the LA Metro C Line Redondo Beach Station and Gardena to Downtown Los Angeles. Route 1X runs express service between Redondo Beach Boulevard and Harbor Freeway C (Green)/J (Silver) Line Station where connections can be made Downtown Los Angeles. There are two bus stops within 0.25-mile of the Plan Area: both are located on 166th Street and Brighton Avenue (eastbound and westbound).
- **Line 2 (GTrans):** Circles Western, Imperial Highway, Vermont, Normandie and PCH up to just past the 105 freeway and south to Harbor UCLA Medical Center. The northbound stop is approximately 0.8 miles from the Plan Area at Vermont Avenue and Gardena Boulevard and the southbound stop is approximately 0.6 miles at Vermont Avenue and 170th Street.
- **Line 1 (Torrance Transit):** This line goes from Del Amo Fashion Center at Carson and Hawthorne Boulevards to Figueroa Street located at the 105 Freeway. Both the northbound and southbound stops are at Vermont Avenue and Gardena Boulevard approximately 0.8 miles from the Plan Area.
- **Line 13 (Torrance Transit):** This line goes from Veteran's Park in Redondo Beach, north to Artesia Boulevard through Hermosa Beach to Vermont Avenue, past California State University Dominguez Hills, and ending in the City of Commerce across from the Crystal Casino. Both the eastbound and westbound stops are

approximately 0.4 miles from the Plan Area at Artesia Boulevard and Normandie Avenue.

- **Line 344 (Metro):** This line goes from Palos Verdes Drive and Hawthorne Boulevard to Artesia Boulevard, and then along Vermont Avenue to the Harbor Gateway Transit Center. The bus stops are both approximately 0.4 miles from the Plan Area, also at Artesia Boulevard and Normandie Ave.
- **Harbor Gateway Transit Center:** The Transit Center, located at 731 West 182nd Street, is a large bus station that serves as a transport hub for the South Bay region of Los Angeles County, including the City of Gardena. The J line can be accessed from this station which provides transit to both downtown Los Angeles and San Pedro. Numerous other lines can be accessed from here as well. The Transit Center also includes a 980 space park and ride. The Transit Center is approximately 0.9 miles from the Plan Area.

Bicycle Access

Secured long-term bicycle storage (65 spaces) will be provided in Subarea A within the enclosed Apartment Building garage, and short-term bicycle parking (four spaces) will be provided off Normandie Avenue near the driveway to the Apartment Building garage. Separated or protected bicycle facilities are not currently provided along Normandie Avenue along the Plan Area. Designated bike routes (Class III) in the vicinity are Normandie Avenue, 170th Street, 166th Street, and Gardena Boulevard.

Transportation Demand Management

This section describes transportation demand management (TDM) strategies that will be implemented in Subarea A to advance the Specific Plan's vision for multi-modal transportation. The Specific Plan will integrate TDM measures to reduce single-occupant automobile travel and take advantage of the Specific Plan's proximity to large employment centers, transit services, and bicycle and pedestrian facilities. The following applicable TDM strategies shall be provided by the developer or the property owner of the Specific Plan.

Unbundled Parking. There shall be a charge for parking spaces within Subarea A. The developer or property owner shall unbundle automobile parking charges from the rents or other fees charged for leasing residential units in Subarea A. None of

the parking spaces will be allowed to be leased to non-residents of the apartment building.

Pre-Leasing for Area Employees. Residential units within Subarea A shall be marketed exclusively for a 30-day period to residents who are employees working within a one-mile radius of the development, before the units are offered for rent to the general public. The developer or property owner shall submit a pre-leasing marketing plan for Subarea A to the Community Development Director for review and approval prior to issuance of a certificate of occupancy. The developer or property owner must then demonstrate compliance with the approved 30-day exclusive marketing plan prior to issuance of a final certificate of occupancy.

Transit Information. To ensure that residential tenants within Subarea A 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 Apartment Building. Transit information will also be available online, and the website will be advertised on the information board or kiosk.

On-site Residential Bicycle Parking. Bicycle parking spaces (69 spaces, including 65 long-term and four short-term spaces) shall be provided within Subarea A. 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.

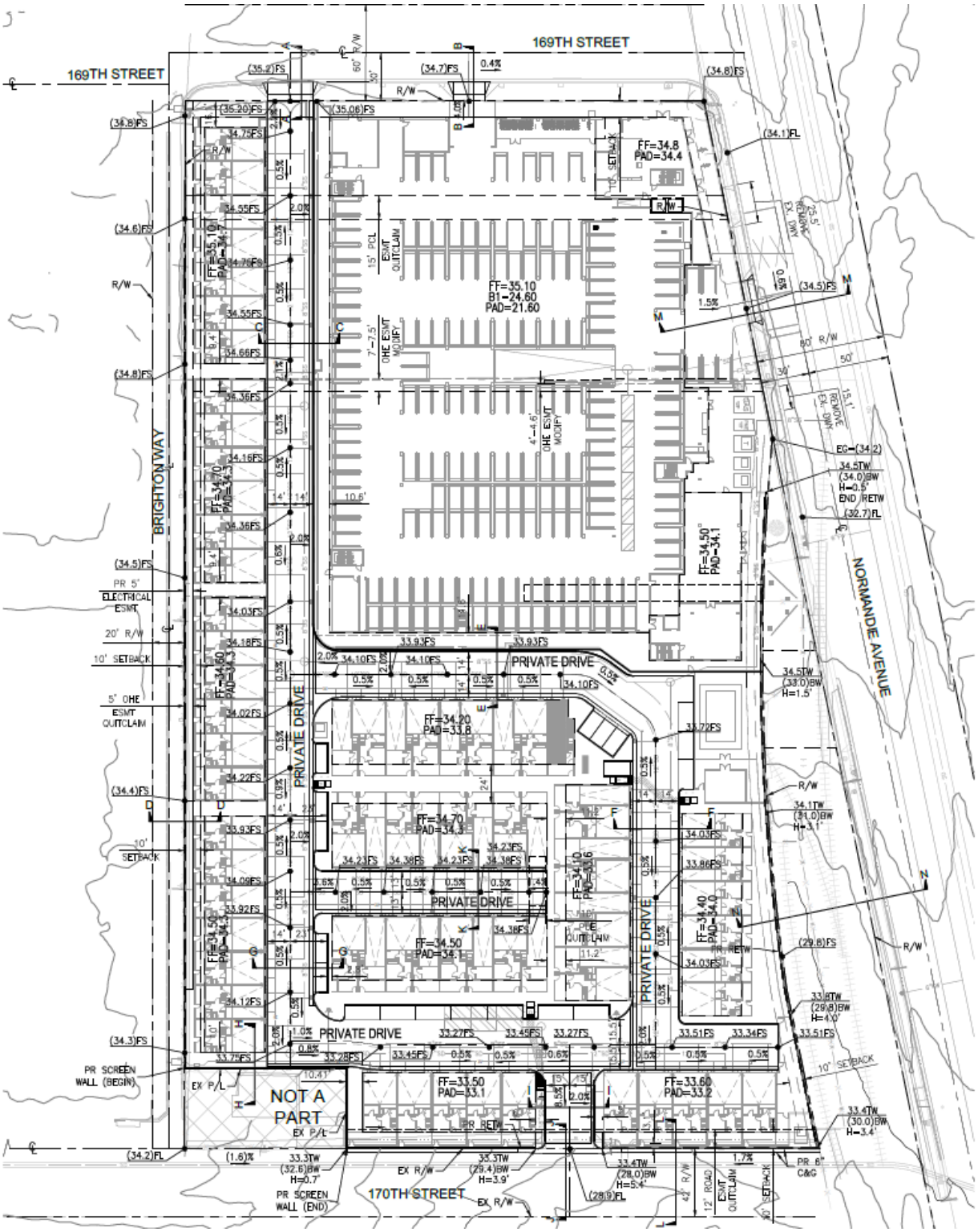
Ride-Sharing Pick-Up/Drop-Off. A designated loading area within the Subarea A shall be signed and distinguished (e.g., with paving and/or paint) so that it may be utilized as a pick-up and drop-off zone for ride-sharing services.

One-time Free Monthly Pass. Within Subarea A, when units become available for rent, new residents who commence a 12-month lease shall be offered a one-time free monthly Zone 1 EZTransit pass.

IV. GRADING PLAN

The grading plan for the Plan Area is provided in Figure 6.

Figure 6. *Grading Plan*



The Plan Area will be graded to mimic the existing grading and drainage patterns. The overall grading and drainage pattern will be northwest towards southeast. Onsite area drains and catch basin will collect all onsite runoff prior to discharging through the curb into the existing gutter.

V. PUBLIC FACILITIES AND 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 Plan Area is currently approximately 100 percent impervious. Construction under Specific Plan will decrease the Plan Area's impermeability by approximately nine percent. The Specific Plan will not substantially change either the amount or rate of stormwater runoff flows currently generated in the Plan Area. In compliance with existing regulations, the Specific Plan developers or property owner 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 in compliance with Municipal Code Section 8.70.110. The drainage improvements are subject to the City's standard development review and permit process, including plan checks and inspections.

The Plan Area shall be graded to collect stormwater onsite and route the water by means of various BMP solutions and into the street flow line of Normandie Avenue. The Specific Plan shall utilize overflow drainage features if an influx of stormwater overtaxes the system.

Stormwater within the Plan Area will be treated as determined by the Los Angeles County 85th Percentile 24-hour event precipitation isohyetal map.

Sewer

As noted above, wastewater at the Plan Area is conveyed via an existing 15-inch public sewer line underneath Normandie Avenue owned and maintained by Los Angeles County Sanitation District, which connects to a network of sewer lines that ultimately convey wastewater flows to the Joint Water Pollution Control Plant (JWPCP).

It is not anticipated that any City or County sewer lines will need to be upsized. Development within the Plan Area will connect to the existing 15-inch sewer main through a series of laterals varying in size.

Water

As noted above, there are two existing fire hydrants adjacent to the Plan Area, including one located near the intersection of 169th Street and Normandie Avenue and another located more south along Normandie Avenue.

Development within the Plan Area under the Specific Plan will connect a domestic water line, a fire line, and irrigation line to the 8-inch existing main. Development of the Specific Plan will include all state mandated water-saving features, including water-efficient faucets, shower heads, and toilets.

Electrical Power

As noted above, the Plan Area is currently served by overhead power lines along Normandie Avenue, 170th Street and Brighton Way maintained by SoCal Edison. Development within the Plan Area will connect to the existing lines.

Natural Gas

As noted above, the Southern California Gas Company provides natural gas to the Plan Area with mains along and near the Plan Area. Development within the Plan Area will connect to the existing mains.

Solid Waste

As noted above, solid waste pickup for the Plan Area will be handled by Waste Resources of Gardena. Trash pickup locations will be coordinated with Waste Resources.

Public Services

As described above, the Plan Area and surrounding area is developed and afforded all municipal services, and the Specific Plan can be adequately served by existing public services without the need for expansion.

VI. LANDSCAPE AND OPEN SPACE PLAN

Landscaping

The total landscaped area within the Plan Area is approximately 20,083 square feet (or approximately nine percent of the Plan Area). The landscaping within the Plan Area 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. The Specific Plan includes a layered landscape program with the proposed plants throughout the project regionally adapted with a focus on minimizing water use.

The Specific Plan will be consistent with the State and City of Gardena water efficient landscape ordinances. 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.

The Specific Plan will provide street trees along the frontages of 169th Street, 170th Street and Normandie Avenue. The street trees will provide a valuable vertical element, shade the street and sidewalk, and create a pedestrian scale screen at the ground level.

Open Space

The Specific Plan will provide private open space for each unit throughout the Plan Area, in addition to public open spaces consisting of a series of interior amenity rooms, courtyards and outdoor areas, both active and passive for use by residents and their guests, as described below for each Subarea.

Subarea A

A minimum of 50 square feet of private open space (i.e., balconies) shall be provided for 155 of the 258 units (60 percent) in Subarea A (7,750 square feet). Additionally, approximately 21,739 square feet of indoor and outdoor common open space shall be provided within Subarea A, including at a minimum:

- Roof deck with seating area;
- Swimming pool with BBQ, and seating areas;
- Dog park;
- Fitness room;
- Club house; and
- Large courtyard with seating area.

A total of approximately 29,489 square feet of open space shall be provided in Subarea A.

Subarea B

A minimum of 50 square feet of private open space (i.e., yards or balconies) per unit shall be provided in Subarea B (3,750 square feet). Additionally, approximately 7,130 square feet of indoor and outdoor common open space shall be provided within Subarea B, including at a minimum:

- Swimming pool with BBQ and seating areas;
- Club house;
- Dog park; and
- Pocket park.

A total of approximately 10,880 square feet of open space will be provided in Subarea B.

The recreation and open space plan for the Plan Area is provided in Figure 7a with more detailed plans provided in Figures 7b-h.

Figure 7a. *Recreation and Open Space Plan*

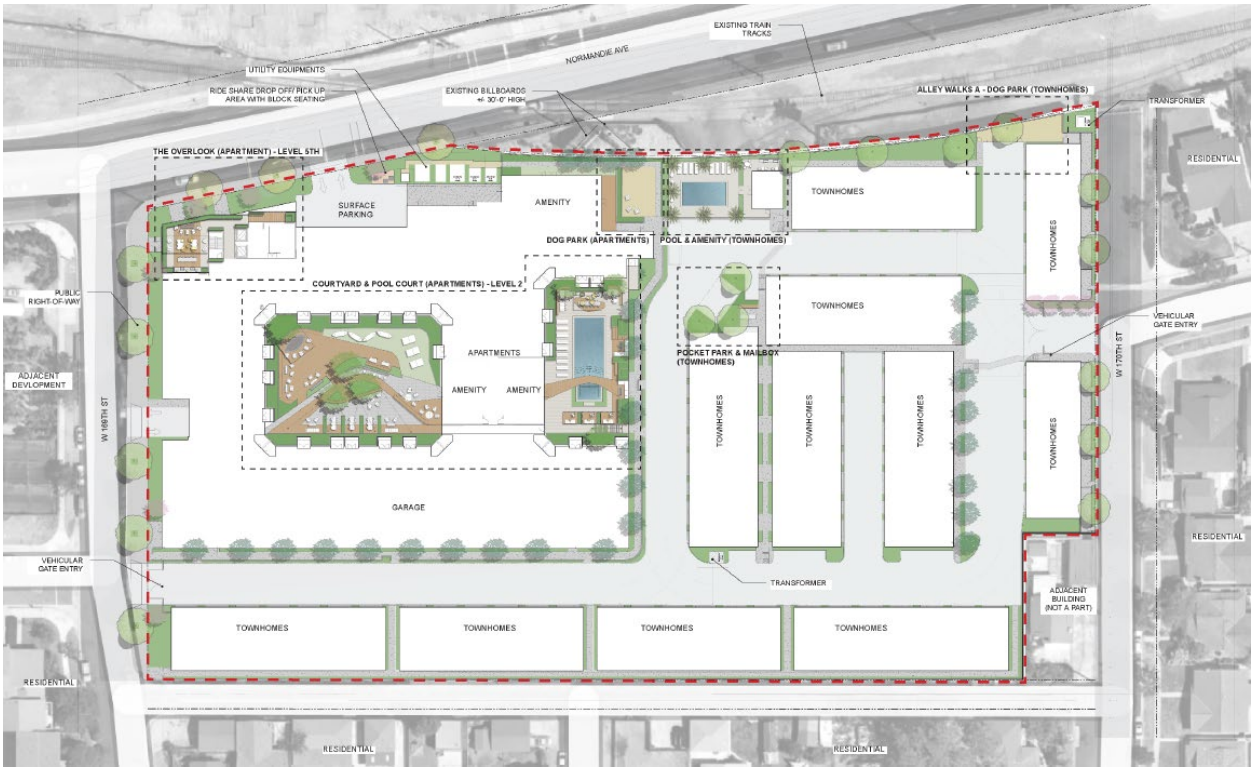


Figure 7b. Rooftop (Subarea A)

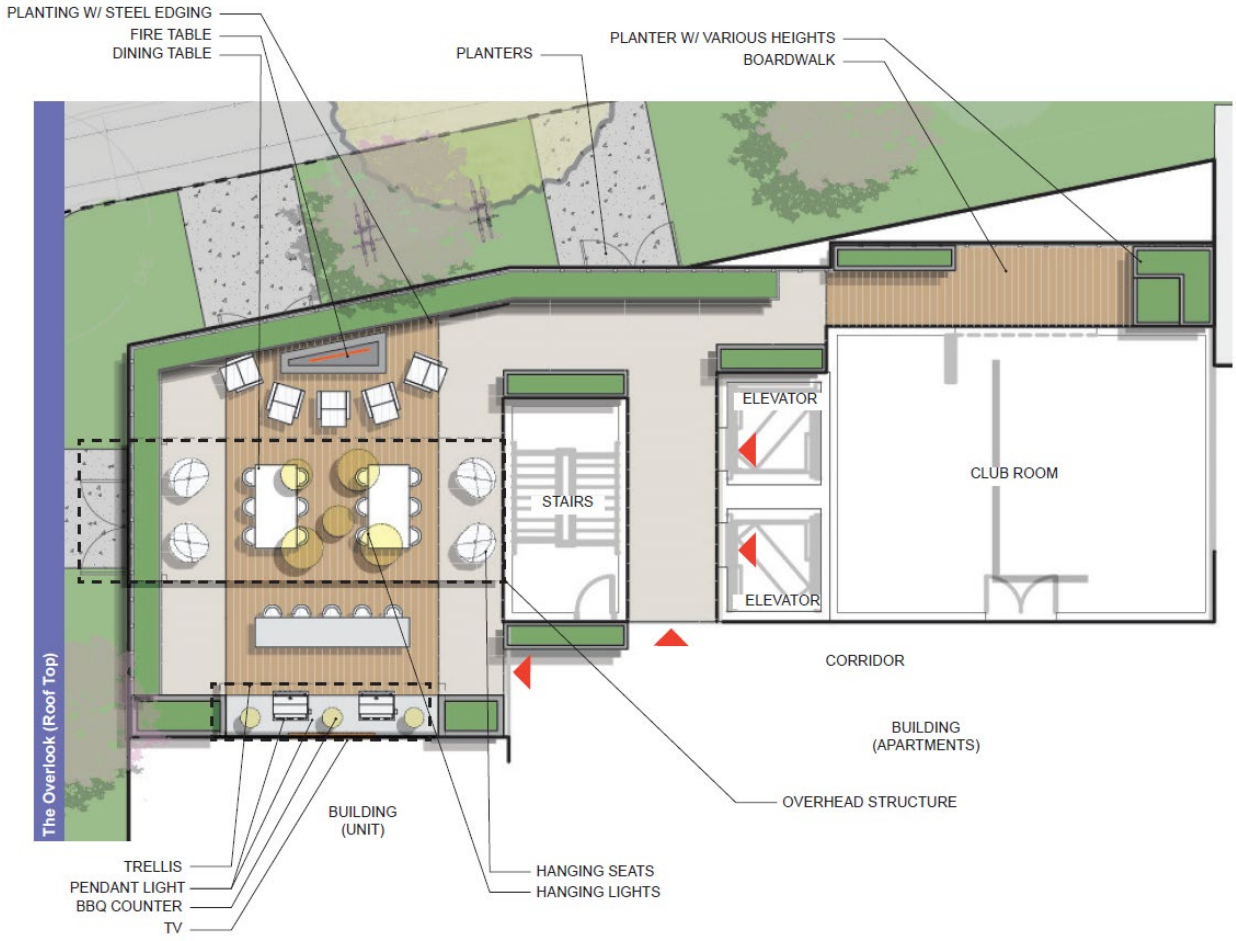


Figure 7c. Dog Park (Subarea A)

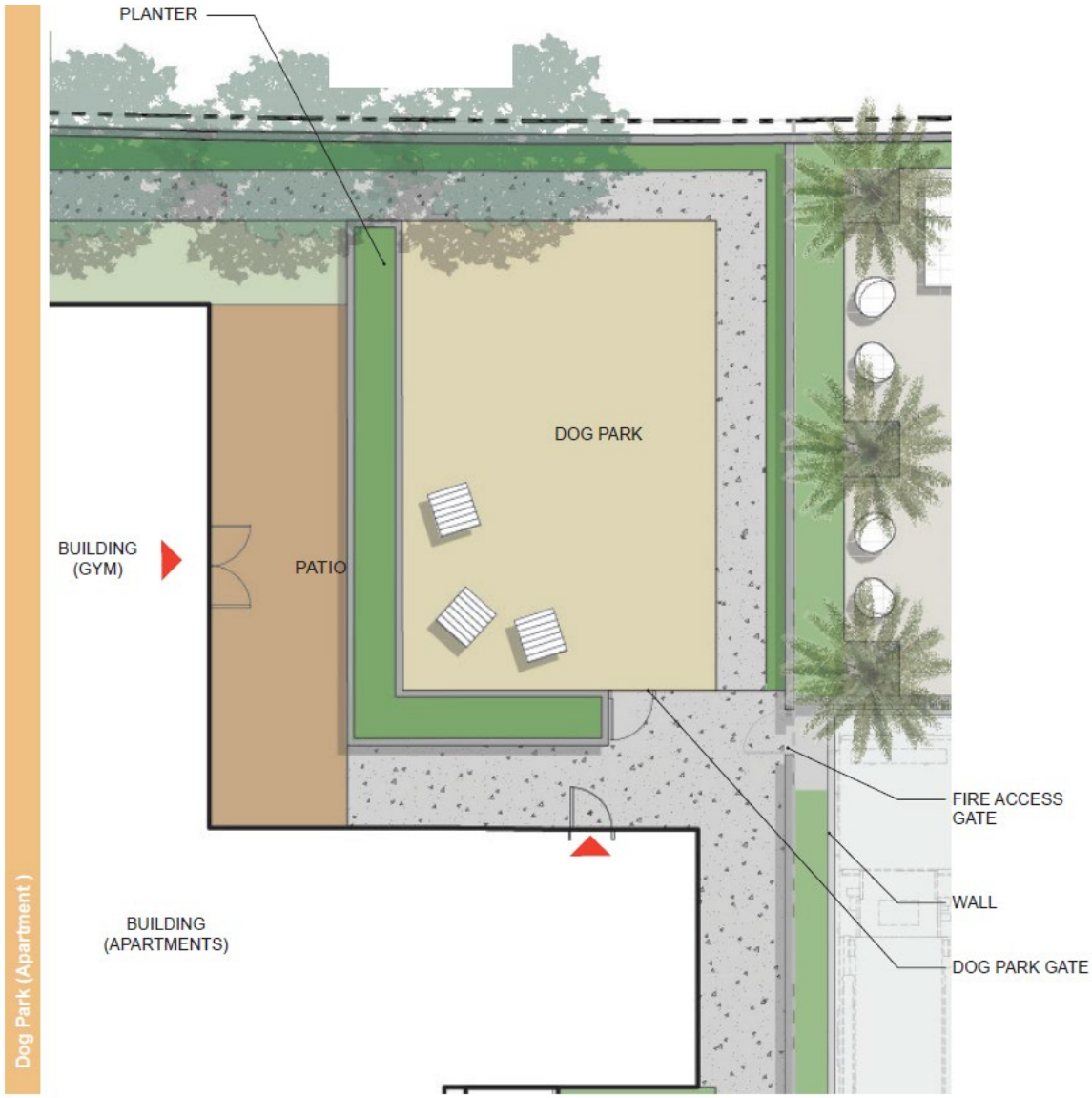


Figure 7d. Pool Court and Amenities (Subarea A)

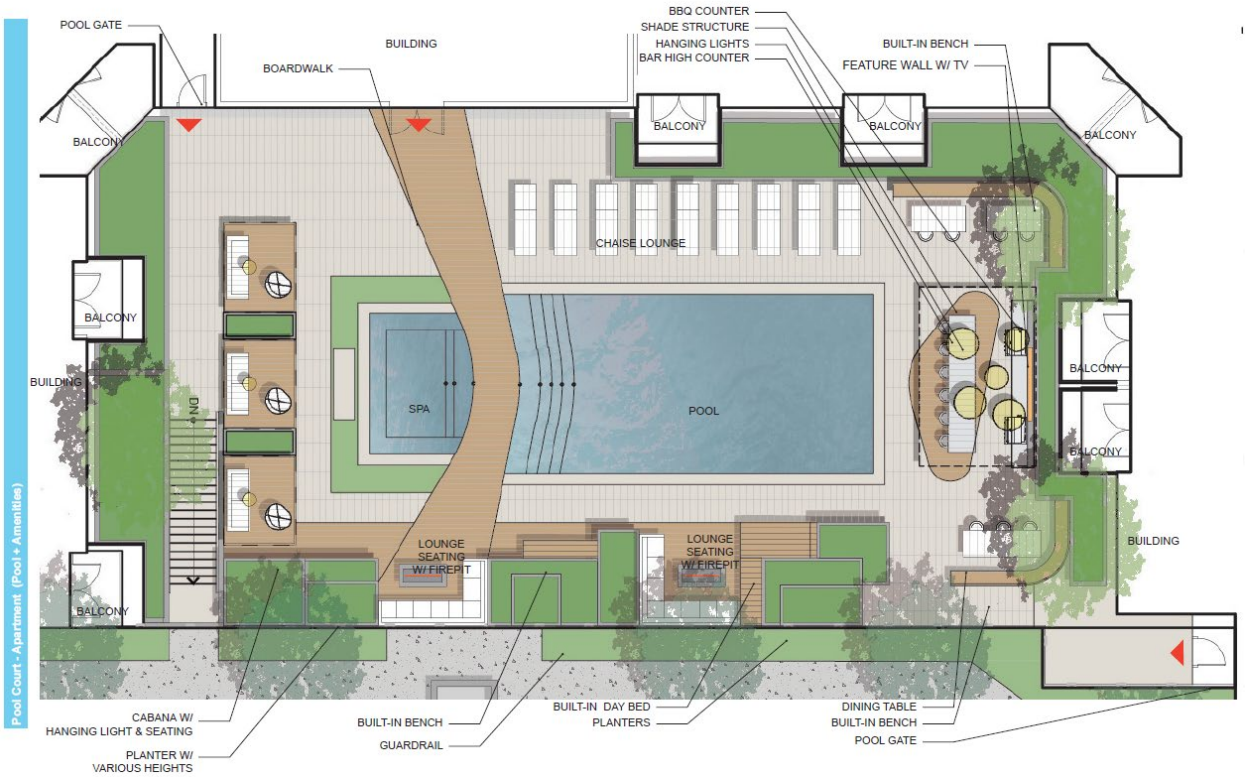


Figure 7e. Central Courtyard (Subarea A)

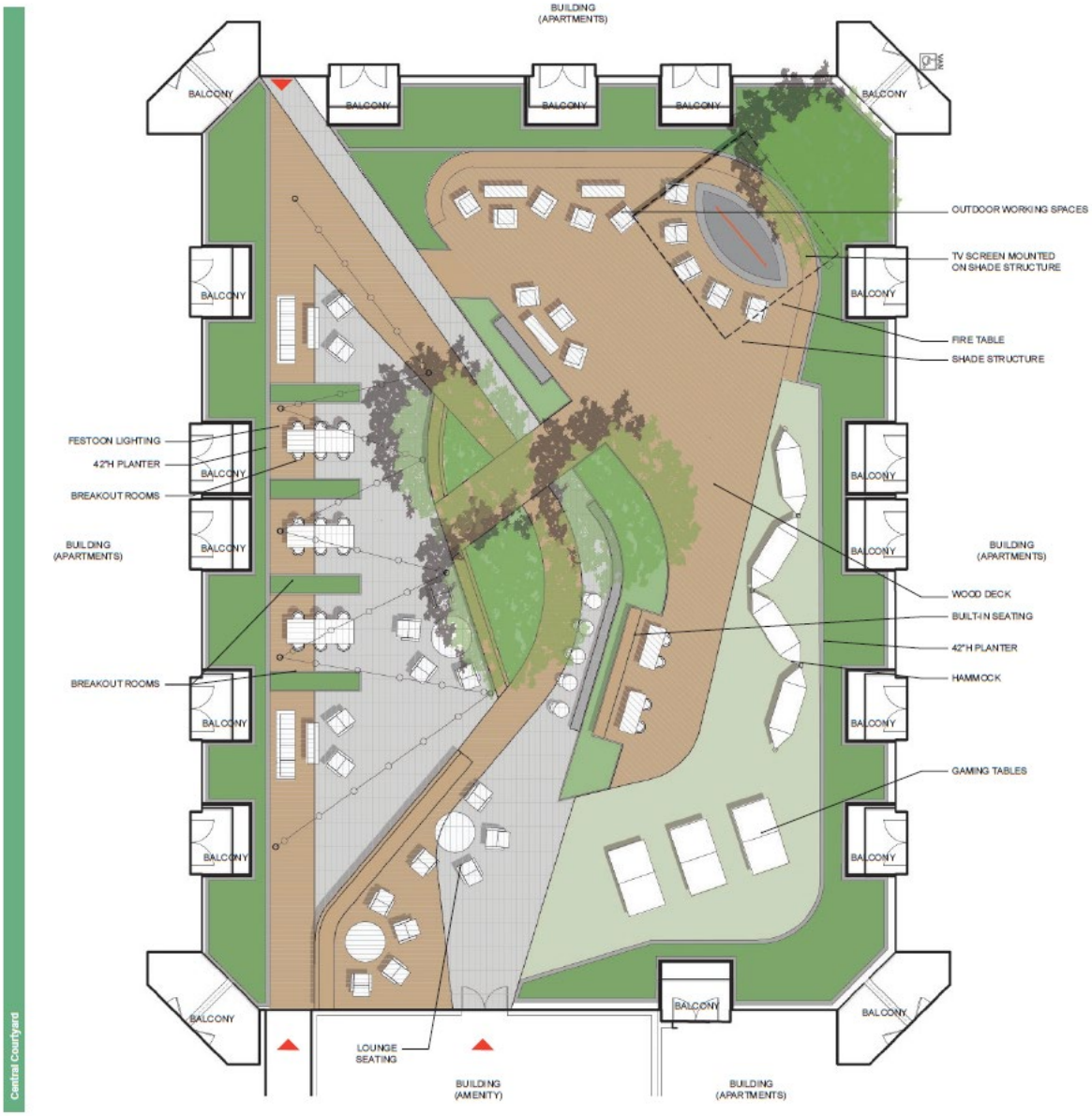


Figure 7f. Pool Court and Amenities (Subarea B)

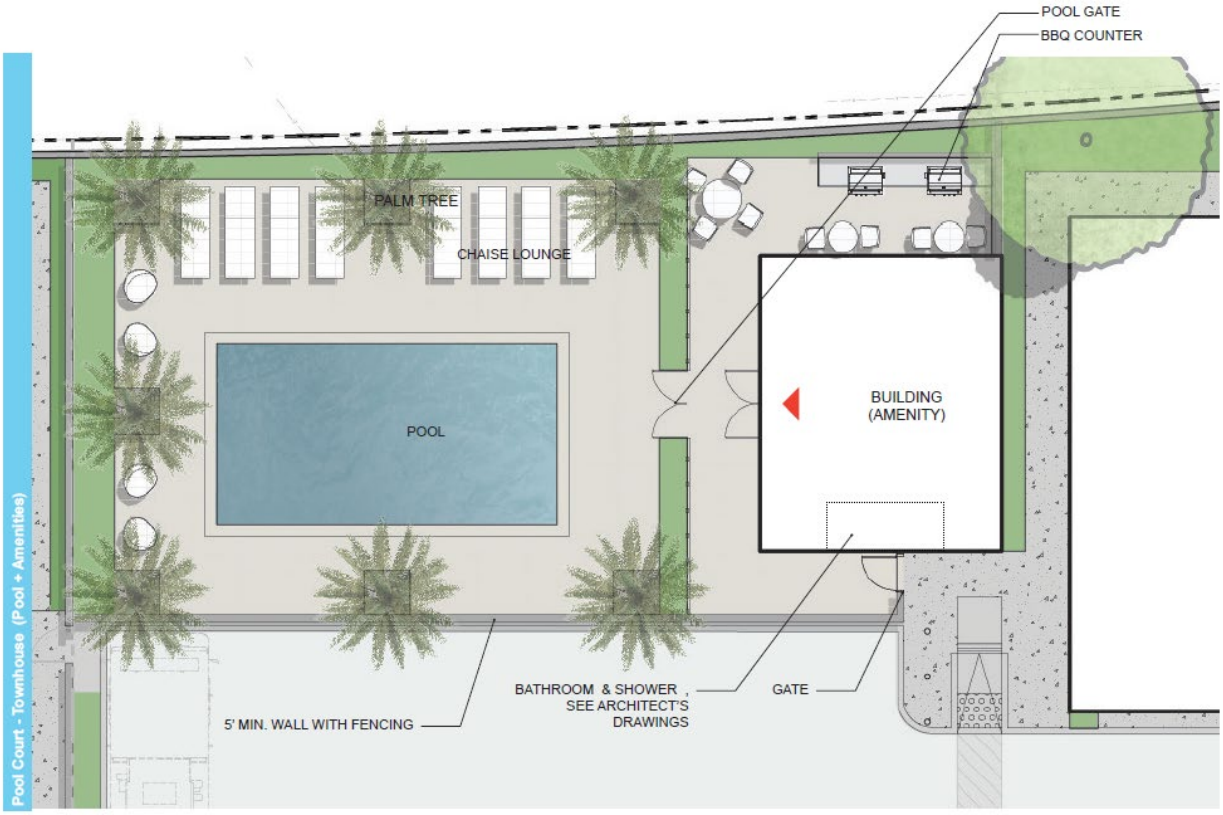


Figure 7g. Dog Park (Subarea B)

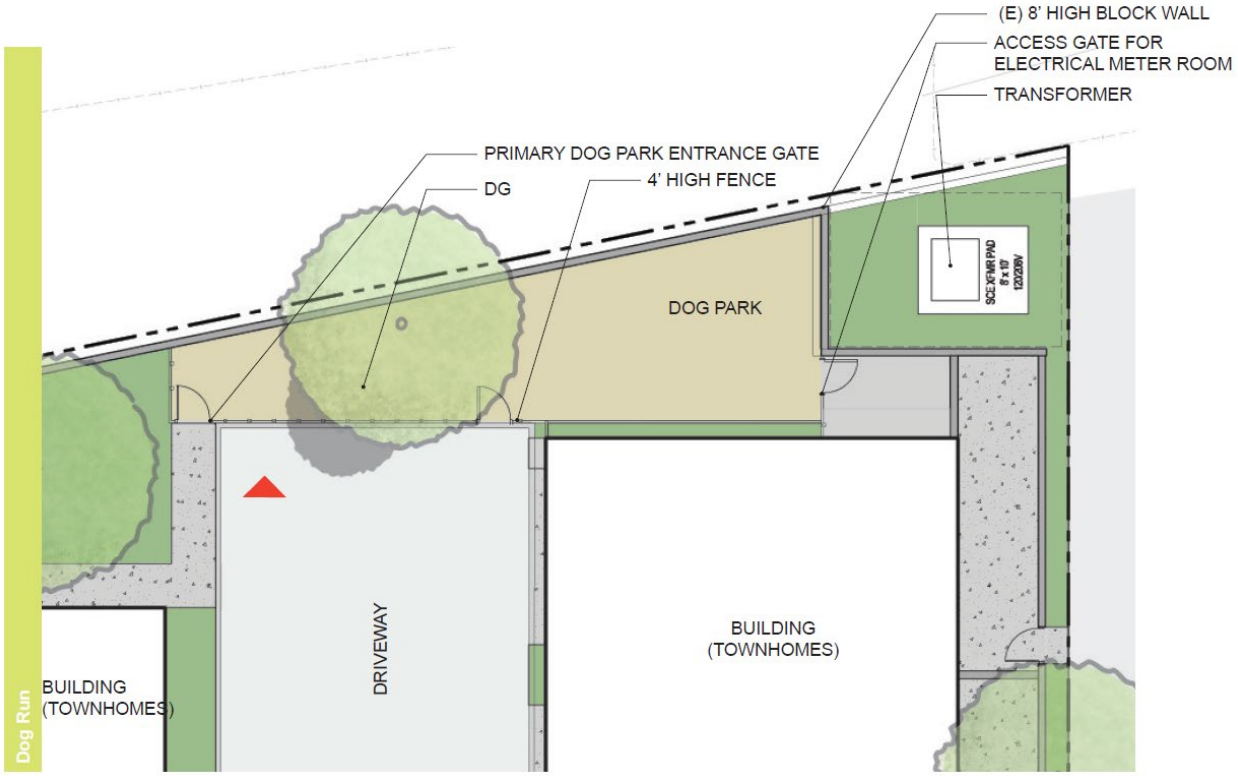
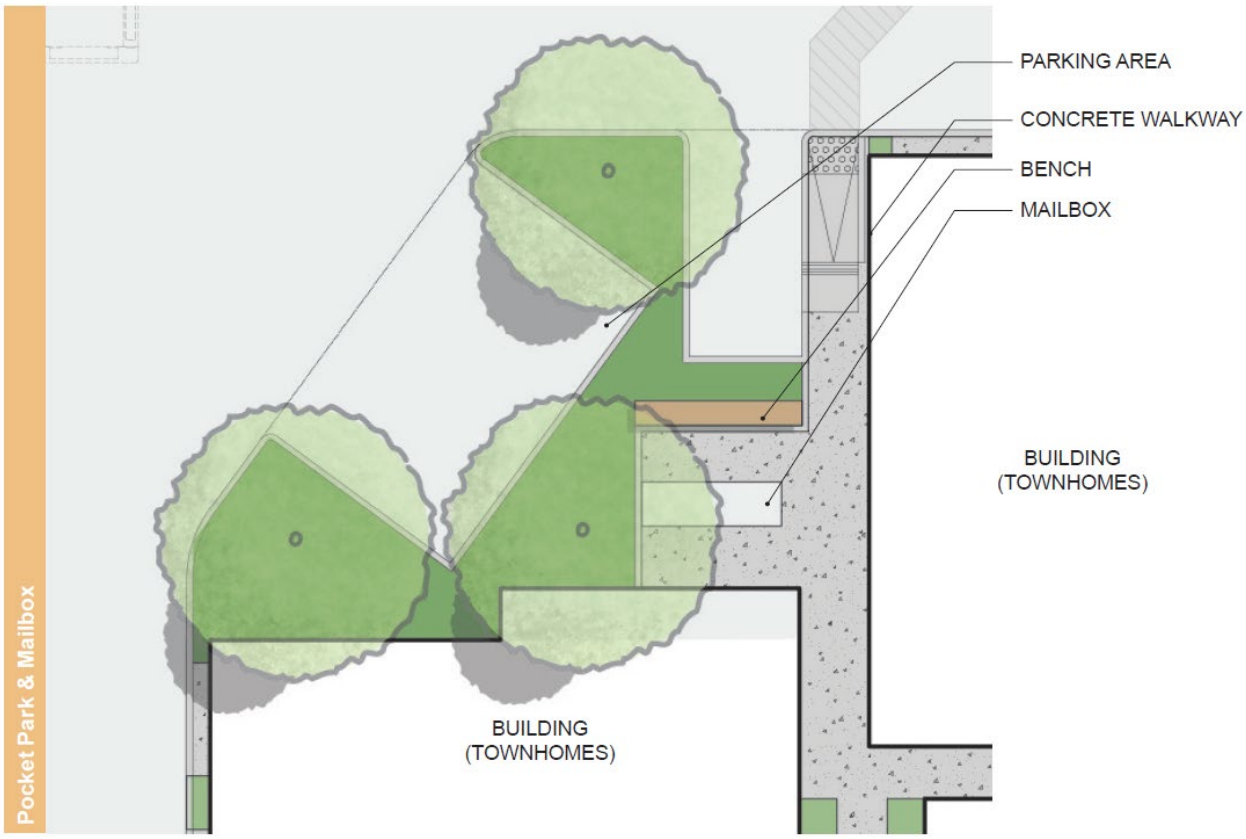


Figure 7h. Pocket Park (Subarea B)



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).

Subarea A

The following uses are permitted by right in Subarea A

- Multi-family housing, including apartment units;
- Residential amenities and ancillary uses, including home occupations that do not involve any physical client/customer contact at the residence, and any use customarily incidental to a permitted use;
- Any other use not specifically listed here determined by the Community Development Director to be similar to a permitted use.

Subarea B

- Multi-family housing, including attached and detached townhome style units;
- Residential amenities and ancillary uses, including home occupations, and any use customarily incidental to a permitted use;
- Any other use not specifically listed here determined by the Community Development Director to be similar to a permitted use.

Prohibited Uses

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 in both Subarea A and B. Additionally, the following uses are expressly prohibited in Subarea A and B:

- Short-term rentals, except short-term rental as permitted above in Subarea A;
- Home-sharing rentals;
- Short-term corporate housing.

Density and Development Capacity

The density for the Specific Plan is determined by the entire Plan Area, and shall not exceed 64 units per acre. The maximum development allowed under the Specific Plan is 333 residential units with related amenities and ancillary uses, including 258 units within an Apartment Building in Subarea A and 75 Townhomes in Subarea B.

Maximum Building Height

Subarea A

The Apartment Building shall not exceed five above ground stories and 70 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).

Subarea B

The Townhomes shall not exceed three stories and 40 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).

Floor Area Ratio

The FAR for the Specific Plan shall not exceed a maximum of 1.6:1 as calculated over the entire Plan Area, excluding parking areas.

Dwelling Unit Size

Subarea A

The minimum dwelling unit size for the units within the Apartment Building in Subarea A shall be:

- 450 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.

Subarea B

There are no minimum dwelling unit sizes for the Townhomes in Subarea B.

Setbacks

Setbacks within the entire Plan Area shall comply with the following (as measured from the property line):

- Front (Normandie Avenue): 10 feet
- Rear (Brighton Way): 10 feet
- Side (169th Street and 170th Street): 10 feet

Permitted Encroachments: Balconies and 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 feet. Fire lanes and other drive aisles may be located in the required side yard setbacks.

Affordable Housing

Seven moderate affordable housing units shall be provided and distributed throughout Subarea A for a period of 55 years.

II. DESIGN STANDARDS

The following standards are specifically tailored to ensure the quality development envisioned for the Specific Plan area. The purpose of the design standards is to 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. The following design standards cover building form and massing, façade articulations along street frontages; siding materials; colors; landscaping; and lighting.

Design Standard 1: Form and Massing

Subarea A

- The structure should be broken up by creating horizontal emphasis using trim, protruding balconies, eaves, canopies, accent materials, or other ornamentation.
- Modulation – The Apartment Building shall be designed with articulation in the horizontal and vertical plane that breaks down the massing into discrete, smaller sections.
- Balconies – All units that face a public right-of-way, shall have balconies oriented in that direction. All units that face a courtyard area, shall have the balconies oriented towards those areas. All railings for balconies shall consist of either metal or glass guard railing.
- Street Corner – The building shall have a major along Normandie Ave south of the corner at 169th street and Normandie. Additionally, the massing is further reduced by a seventh-floor roof deck at the corner of Normandie Ave and 169th Street.

Subarea B

- Horizontal Plane – Each Townhome Building shall have a change in horizontal plane at a minimum of every 30 feet.
- All primary entries into each townhome shall be recessed or under an eave or other projection.
- Balconies – All railings for balconies shall consist of either metal or glass guard railing.
- Windows – All windows must be recessed a minimum of 1.5 inches. This requirement shall apply to all structures within the Specific Plan area.

Design Standard 2: Siding Materials

- 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.
- The materials used on each building shall be limited to concrete, cement plaster, cement board siding, glass, and metal screening.

Design Standard 3: Colors

- Colors shall include a base color and at least one accent color.
- Only colors on the approved exterior color palette list, as approved by resolution of the City Council, are permitted by-right. Accent or trim colors that are not included on the approved color palette list are allowed provided that do not exceed 15 percent of the total surface area on each elevation of the building.
- Stone veneer, approved metals and wood are not subject to the exterior palette list.

- All building shall be always maintained in good condition. The Director of Community Development or designee may require more frequent exterior maintenance if the improvements are not maintained in good condition.

Design Standard 4: Landscaping

- Landscaping for any development within the Specific Plan area must be 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.

- The property owner shall maintain all landscaped areas.

- Landscaping shall not encroach within pedestrian walkways or impede the visibility of signage. All landscaping at driveway entrances and exits shall not exceed three-feet in height for the first ten-feet.

Design Standard 5: Lighting

- Open spaces and pedestrian areas shall be illuminated.

- All exterior fixtures on the same building shall be of the same design, material, and color.

- All light fixtures shall be designed and located in a manner that does not allow spillover onto adjacent properties.

Design Standard 6: Sustainability

Development within the Specific Plan area shall conform to the most recent CALGreen mandatory 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.

III. RECREATION AND OPEN SPACE STANDARDS

Required Open Space

The Specific Plan shall provide a minimum of 50 square feet of private open space (i.e., balconies) for 155 of the 258 units (7,750 square feet) and approximately 21,739 square feet of common open space within Subarea A.

The Specific Plan shall provide a minimum of 50 square feet of private open spaces (i.e., yard or balcony deck) per unit (3,750 square feet) and approximately 7,130 square feet of common open space within Subarea B.

Consistent with Chapter 4, Section IV, the Specific Plan's common open space includes courtyards and open areas, both active and passive, and indoor amenity areas for use by residents and their guests.

Open Space Standards

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.

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.

IV. PARKING AND LOADING

Vehicle Parking

<u>Subarea A</u>

The Apartment Building will provide 387 vehicle parking spaces that will be unbundled, including 29 spaces for guest parking. Up to 50 percent of the required parking spaces within Subarea A may be compact spaces. Subarea A may also provide a maximum of 110 tandem spaces that can be leased as a pair to a single unit.

The minimum parking stall dimensions for required parking spaces within Subarea A 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 within Subarea A would 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.

Subarea B

Each of the Townhomes will provide two spaces (150 spaces), some of which will be tandem, in addition to 19 guest spaces. The minimum width of the drive aisles within Subarea B shall be 24 feet.

A two-car tandem garage shall have a minimum interior dimension of 10 feet in width and 33 feet in depth. A two-car non-tandem garage shall have a minimum interior dimension of 20 feet in width and 19 feet in depth.

Parallel guest parking spaces shall have a minimum dimension of 18 feet in width and nine feet in depth.

Bicycle Parking

Secured long-term bicycle storage will be provided in Subarea A (65 stalls) within the enclosed Apartment Building garage, and short-term bicycle parking (four stalls) will be provided off Normandie Avenue near the driveway to the Apartment Building garage.

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.

Loading Spaces

Loading spaces are not required for the Specific Plan. 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.

Transportation Demand Management Strategies

See Chapter 4, Section III of this Specific Plan for details on the TDM strategies implemented by the Specific Plan.

V. NONCONFORMITIES

The Plan Area is currently comprised of 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 Plan Area ceases to operate or exist for a period of one year, it will be considered abandoned or discontinued without the need for any public hearing.

VI. MAINTENANCE STANDARDS

The developer or property owner shall be required to maintain the Plan Area in an orderly manner during and following construction. The developer or property owner shall perform all regular maintenance and necessary repairs to the exterior and interior of the Specific Plan. Should Subarea A and Subarea B be operated by two separate entities, then the developer or property owner associated with each Subarea will independently be responsible for maintenance under the Specific Plan.

VII. STANDARDS FOR ACCESSORY STRUCTURES, ADDITIONS, WALLS, FENCES, OTHER CHANGES

Walls, fences, and gates will be used to identify separate areas and provide needed privacy and security, as shown in Exhibit A, Site Plan. Where constructed, walls, fences,

and gates will be required to 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, except that the driveway on 169th Street associated with Subarea B shall be set back 10 feet. All walls or fences in the side and rear yard setbacks shall not exceed 10 feet in height and shall be constructed of solid decorative concrete masonry, open wrought iron or wood alternative composite material.

VIII. SIGN PROGRAM

A master sign program shall be submitted to the Community Development Director for administrative approval. The master sign program shall include identification and wayfinding signage throughout the Specific Plan Area.

CHAPTER 6. 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 Specific Plan provides for the orderly and efficient development and revitalization of the Plan Area consistent with the City of Gardena General Plan. The Specific Plan 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 Specific Plan 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 "Industrial" 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 Normandie Crossing Specific Plan zone replaces the site's existing zoning, Industrial (M-1) and General Industrial (M-2). 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 Specific Plan shall be subject to the standards and regulations of the Zoning Ordinance.

II. GENERAL PLAN CONSISTENCY ANALYSIS

The Specific Plan 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 Specific Plan reduces the impact of governmental constraints on housing construction and cost. Consistent with Policy 3.3, the Specific Plan implements special zoning and development standards to permit more flexibility in housing developments in the Plan Area. The Specific Plan facilitates more diverse 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 Specific Plan provides the appropriate land use and zoning for development of multi-family residential uses, including affordable housing. Construction of up to 333 residential units assists the City in meeting its share of the regional housing needs allocation. Currently, residential development in the vicinity of the

Plan Area primarily consists of single-family housing with multi-family housing along major arterials. The Specific Plan permits a greater range of residential densities than is currently permitted in this area of the City, consistent with Policy 4.1.

Policy 4.3: Encourage residential development within the new Housing Overlay.

The northern portion of the Specific Plan area has a housing overlay of HO-30. The Specific Plan exceeds this housing overlay density and encourages residential development in this area.

Policy 4.4: Encourage development at maximum attainable densities and encourage use of density bonuses for inclusion of affordable units.

The density proposed in the Specific Plan area exceeds that which was set forth in the HO-30 designation in order to provide seven affordable housing units.

GOAL 5.0: Promote equal opportunity for all residents to reside in the housing of their choice.

Policy 5.2: Provide a range of housing options, locational choices, and price points to accommodate the diverse needs in Gardena and to allow for housing mobility.

Consistent with this goal and policy, the Specific Plan development will provide housing units that range from studio apartments to 3-story townhome style units, including seven apartment units for moderate-income households. The range in sizes and affordability helps accommodate Gardena's diverse need.

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 multi-family 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 Specific Plan implements new zoning and development standards to promote the development of additional high-quality housing types in the City. The Specific Plan includes development standards and design guidelines to promote high quality housing and attractive and safe residential neighborhoods, consistent with Policy 1.1. The Specific Plan facilitates a transition from the single-family homes surrounding the Plan Area along Brighton Way and 170th Street to the Townhomes within Subarea B at the edge of the Plan Area to the denser Apartment Building within Subarea A off Normandie Avenue in the northeastern portion of the Plan Area near the multi-family and commercial uses immediately north of the Plan Area. The Specific Plan 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 more transit-friendly development.

Consistent with Policy 1.2, the Specific Plan protects the existing single-family residential homes surrounding the Plan Area along Brighton Way and 170th Street by replacing industrial uses with a high-quality multi-family development. As a residential project, the Specific Plan will be compatible with the adjacent residential neighborhood. Access to the Apartment Building is oriented to Normandie Avenue and away from the nearest residential neighborhood.

Consistent with Policy 1.4, the Specific Plan clusters urban-density within walking distance of a variety of resident-serving commercial uses on Artesia Boulevard, including grocery stores and restaurants. These features of the Specific Plan will increase convenience for residents and reduce future residents' automobile dependence.

Consistent with Policy 1.5, the Specific Plan provides residential amenities including open space, recreation areas, and structured off-street parking. Consistent with Chapter 4, Section IV, the Specific Plan's common open space includes courtyards and open areas, both active and passive, and indoor amenity areas, for use by residents and their guests. On-site parking for the Apartment Building will be provided in an enclosed garage on the subterranean level and the first floor above grade, and in individual two-car garages in each unit for the Townhomes.

Consistent with Policy 1.6, the Specific Plan 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 Specific Plan 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 for the Apartment Building in the northeastern portion of the Plan Area away from the single-family neighborhood primarily off Normandie Avenue, a major collector street. Vehicular access for the Townhomes component of the project would be provided in the northwestern portion of the Plan Area off 169th Street and in the southern portion of the Plan Area off 170th Street. While these access points are adjacent to the single-family neighborhoods, the Townhomes are less dense (75 units) than the Apartment Building (258 units) and therefore most of the vehicles entering the Plan Area will not enter the single-family neighborhoods surrounding the Plan Area. The Specific Plan 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 3, the Specific Plan facilitates the development of high-quality housing which attracts desirable businesses to locate in the City. Implementation of the Specific Plan will help alleviate the negative impacts of a lack of housing for potential future employees. Consistent with Policy 3.3, the Specific Plan adopts a multidisciplinary,

proactive approach, supporting the expanding business 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 Specific Plan will enhance the visual environment by replacing a large underutilized industrial lot containing warehouse uses with associated offices and surface parking lot with a new multi-family development project. The Specific Plan will incorporate high-quality design and landscaping consistent with the standards of the Specific Plan to further enhance the visual environment. Developing new residential uses in proximity to resident-serving retail thus reduces dependencies on vehicle transportation and helps create a positive image of the City. Consistent with DS 1.3, development within the Plan Area will be subject to the City's design review process. Consistent with DS 1.4, the Specific Plan would provide on-site landscaping features consistent with the standards identified in this Specific Plan.

DS Goal 2: Enhance the aesthetic quality of the residential neighborhoods in the City.

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 guidelines to 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 Specific Plan would enhance the aesthetic quality of the Specific Plan Area. The Specific Plan is intended to achieve quality and attractively designed development that can serve as a model for future multi-family in the City. Implementation of the Specific Plan will replace an underutilized industrial lot containing warehouse uses with associated office and surface parking lots with a high-quality residential development that is intended to serve as a catalyst to transform the Plan Area into a vibrant neighborhood. Consistent with Policies 2.2 and 2.3, Chapter 5 of the Specific Plan provides development regulations for residential development to ensure that development within the Specific Plan is designed with a varied, yet compatible architectural style. Consistent with Policy 2.14, these design standards will ensure that development within the Specific Plan would be designed with attractive building design

features, safe ingress and egress, sufficient parking, adequate pedestrian amenities, and landscaping.

Consistent with Policies 2.7 and 2.9, the Specific Plan was designed to respect the existing single-family neighborhoods surrounding the Plan Area. The Specific Plan replaces industrial uses with a high-quality multi-family development. As a residential project, the Specific Plan would be compatible with the adjacent residential neighborhood. Moreover, the Specific Plan facilitates a transition from the single-family homes surrounding the Plan Area along Brighton Way and 170th Street to the Townhomes within Subarea B at the edge of the Plan Area to the denser Apartment Building within Subarea A off Normandie Avenue in the northeastern portion of the Plan Area near the multi-family and commercial uses immediately north of the Plan Area. Access to the Apartment Building is oriented to Normandie Avenue and away from the nearest residential neighborhood.

Consistent with Policy 2.10, the Specific Plan, including the open space amenities, will provide landscape treatments that will create a "greener" environment. The Specific Plan will replace a large underutilized industrial lot containing warehouse uses with associated offices and surface parking lots with multi-family residential buildings that incorporate street trees to shade the street and sidewalk and create a pedestrian-scale screen on the ground level.

Consistent with Policy 2.11, implementation of the Specific Plan would incorporate quality residential amenities, including private and communal open spaces, into the proposed multi-family development project. Consistent with Chapter 4, Section IV, the Specific Plan's common open space includes courtyards and open areas, both active and passive, and indoor amenity areas, for use by residents and their guests. These amenities would improve the quality of the project and create more attractive and livable spaces for residents.

Consistent with Policy 2.12, on-site vehicle parking for the Apartment Building will be provided in an enclosed garage consisting of two floors, starting at the subterranean level. The Apartment Building parking garage is designed to permit two-way travel between the various levels with adequate circulation. 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. For the Townhomes, on-site vehicle parking will be provided in ground level, two-car garages in each unit. Internal roadways link

Driveways 3 and 4 to all townhomes, but do not connect to the Apartment Building garage.

Consistent with Policy 2.12, the Specific Plan includes design guidelines to ensure the development 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 Specific Plan 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 Specific Plan promotes reduced reliance on single-occupancy vehicle trips and convenient access to multi-modal transportation through its location within a transit priority area and required TDM measures.

Cl 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.

> Cl 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.
>
> Cl 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 with Goal 3, the Specific Plan promotes alternative modes of transportation by placing residents near resident-serving retail to which residents may easily walk or bike. The Specific Plan is also within close proximity to a number of bus stops and a defined transit priority area. The project also facilitates development of a Complete Street along the Plan Area frontages by redeveloping a large underutilized industrial lot with associated offices and surface parking lots; reducing 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 Plan Area is located within a quarter mile of several bus stops. The TDM measures will also encourage use of public transportation.

Consistent with Policy 3.3, the sidewalks, curbs, and gutters adjoining the Plan Area will be reconstructed as part of the Specific Plan.

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.

Consistent with Goal 2 and its supporting policies, the Specific Plans 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 decrease the impermeable area of the Plan Area by approximately nine percent.

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 Goal 3 and Policy 3.1, the Specific Plan 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 Specific Plan facilitates a multi-family and townhome development that meets high standards of environmental sustainability. Development proposals within the 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, development within the Specific Plan 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 Specific Plan 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 Specific Plan. The Apartment Building and parking structure will be accessible only to residents and secured by a key fob entry system.

Specific Plan development 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 Goal 2 and Policy 2.3, development within the Specific Plan is 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 Plan Area which confirmed that it is not located within an Alquist-Priolo Earthquake Fault Zone.

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, development within the 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 Specific Plan's potential for generating noise impacts on the surrounding environment both during construction and operation, and imposed mitigation measures as appropriate was analyzed. Consistent with Policies 2.5 and 2.6, the Specific Plan 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 Specific Plan 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 Specific Plan complies with the City's noise ordinance. Consistent with Policy 3.3, the Specific Plan complies with the City's regulations regarding permitted construction hours.

CHAPTER 7. IMPLEMENTATION

I. PHASING PROGRAM

The Specific Plan is envisioned to be built in one phase, however, Subarea A and Subarea B could be built separately, each in a single phase. Phased occupancy of the Specific Plan is also permitted, so that Subarea A could be occupied while Subarea B is under construction or Subarea B could be occupied while Subarea A is under construction.

II. PLAN REVIEW PROCESS

Development in the Specific Plan area will be implemented through City review of maps, plans, plot plans, building permits, and other permits that may be required by the City to ensure compliance with the approved Site Plan #11-21. Any modification to the Site Plan attached as Exhibit A, including new construction or minor modifications to approved buildings, whether approved or not, shall be reviewed by the Community Development Director for conformance with the General Plan, this Specific Plan, the Zoning Ordinance (if not superseded by this Specific Plan), and all other applicable documents pursuant to Section VI of this Chapter of the Specific Plan.

III. CEQA REVIEW

For any subsequent discretionary approvals within the Specific Plans requiring further CEQA review, the City as lead agency will rely on the certified EIR for the Specific Plan, together with any necessary errata, addenda or subsequent or supplemental EIR to the fullest extent permitted by CEQA.

IV. INFRASTRUCTURE IMPROVEMENTS/COORDINATION

The developer or property owner shall be responsible for making transportation and infrastructure utility improvements identified as part of the Specific Plan and/or the EIR. All improvements shall be to the specifications of the City of Gardena Community Development Department, Public Works Department, or another applicable City department.

V. FINANCING MEASURES

Implementation and financing of improvements of the Specific Plan depend exclusively on private investment and development. The developer or property owner shall be responsible for financing the Specific Plan, including all improvements and mitigation measures.

VI. ADMINISTRATION OF PLAN

Framework

Approval of the Specific Plan 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 Plan Area.

Review Authority

This Specific Plan shall be administered by the Community Development Department 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.

Substantial Conformance

Substantial Conformance allows for administrative approval and interpretation of minor modifications to the Specific Plan graphics, and/or approved project design that do not change the meaning or intent of the Specific Plan or create a substantial modification of the approved Site 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. “Significant modifications” are 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 258 for the Apartment Building and 75 for the Townhomes.

3. An increase in building height above 70 feet for the Apartment Building and above 40 feet for the Townhomes.

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 five percent.

6. Any decrease in any building setback.

7. Any decrease in the amount of vehicular parking for the Specific Plan Area

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 architectural, landscape, security or lighting plans as shown in Exhibit A.

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.

Any modifications to the Site Plan, including a change to materials or colors used, shall be subject to the review and approval of the Community Development Director who will determine whether the change is "significant" or "minor." If the Director determines that the change is significant, but still within the scope of the Specific Plan, the modification shall be approved by the Planning Commission, but no Specific Plan amendment shall be required.

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 Specific Plan, the words "shall" and "must" are always mandatory.

The Specific Plan 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 Specific Plan 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 Specific Plan.

EXHIBIT A

SITE PLAN

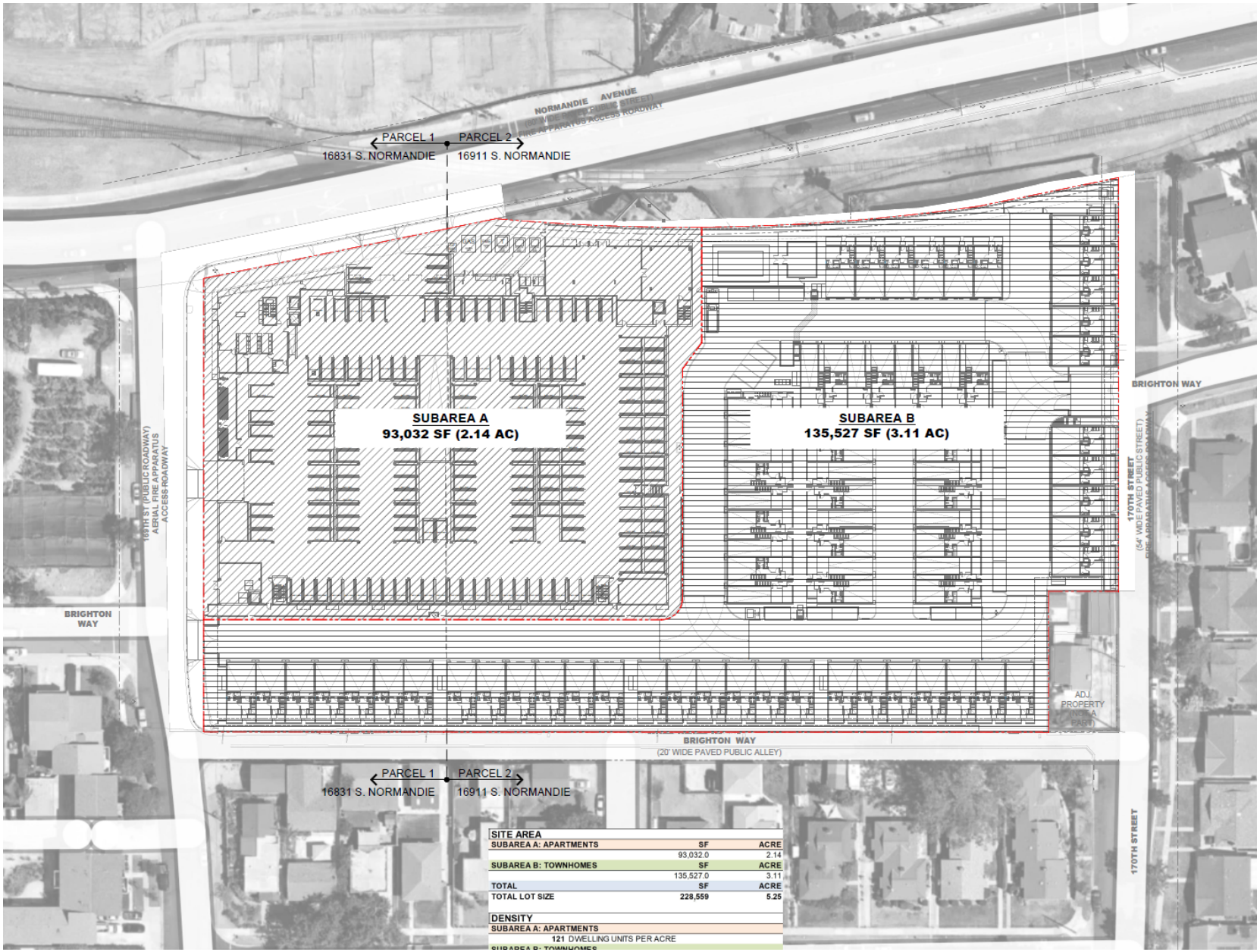

NORMANDIE AVENUE
PARCEL 1
16831 S. NORMANDIE
PARCEL 2
16911 S. NORMANDIE
SUBAREA A
93,032 SF (2.14 AC)
SUBAREA B
135,527 SF (3.11 AC)
BRIGHTON WAY
169TH ST (PUBLIC ROADWAY)
AERIAL FIRE APPARATUS ACCESS ROADWAY
170TH STREET
(54' WIDE PAVED PUBLIC STREET)
ADJ. PROPERTY (NOT A PART)
BRIGHTON WAY
(20' WIDE PAVED PUBLIC ALLEY)
PARCEL 1
16831 S. NORMANDIE
PARCEL 2
16911 S. NORMANDIE
170TH STREET
SITE AREA
SUBAREA A: APARTMENTS SF ACRE
93,032.0 2.14
SUBAREA B: TOWNHOMES SF ACRE
135,527.0 3.11
TOTAL SF ACRE
TOTAL LOT SIZE 228,559 5.25
DENSITY
SUBAREA A: APARTMENTS
121 DWELLING UNITS PER ACRE

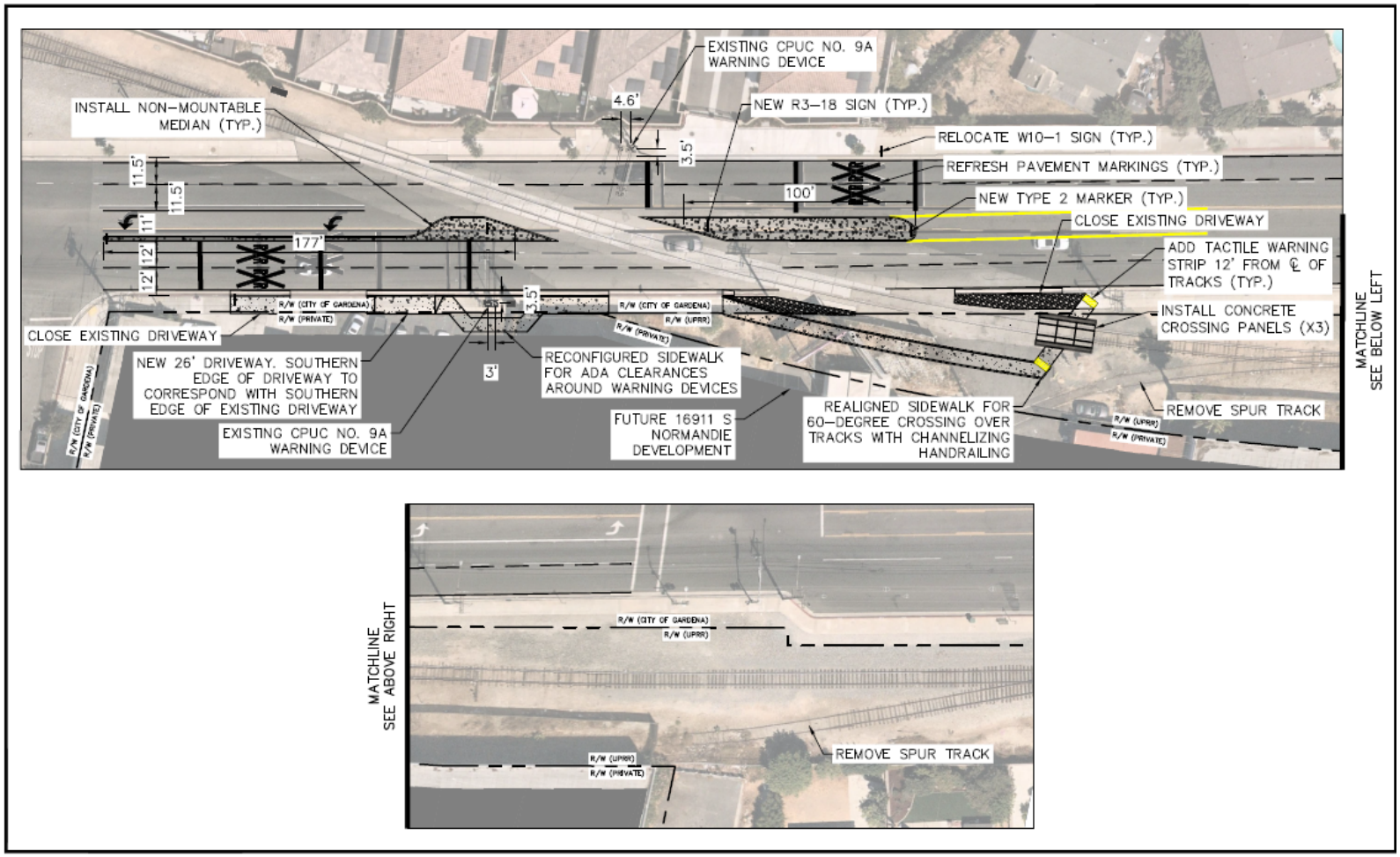
EXHIBIT B

OFFSITE SIDEWALK IMPROVEMENTS ON 169TH STREET

169th Street
Brighton Ave
Brighton Way
W 169th St
Project Area
N
Google

EXHIBIT C

OFFSITE RAILROAD IMPROVEMENTS



Kimley»Horn

April 2023

GRAPHIC SCALE IN FEET
0 20 40 80

NORMANDIE AVE GRADE CROSSING IMPROVEMENTS

EXHIBIT D

NORMANDIE CROSSING SPECIFIC PLAN
ENVIRONMENTAL IMPACT REPORT (SCH#2023050241)
MITIGATION MEASURES

NORMANDIE CROSSING 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, a qualified archaeologist shall be retained to conduct a Pre-construction Worker Training on the types of unanticipated resources that could be encountered during construction, based on the site's history. This archaeologist may also be retained to ensure prompt assessment in the event that unanticipated cultural resources are encountered during construction. If archaeological resources are exposed during construction, work within 50 feet of the find must stop until a qualified archaeologist can evaluate the significance of the find. Construction activities may continue in other areas. If the discovery proves significant under CEQA (14 CCR 15064.5[f]; PRC 21082), additional work such as testing, or data recovery may be warranted.	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: 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		
HAZARDOUS MATERIALS & WASTES					
MM HAZ-1: Construction Management Plan. Prior to issuance of any demolition permit for the onsite structures, a construction management plan addressing procedures and requirements for responding to disturbance of undocumented contaminated soil shall be prepared and submitted to the City for review and approval.	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
MM HAZ-2: Engineered Vapor Mitigation and Ventilation. Prior to commencement of construction activities, the City of Gardena Building Department shall review the building plans to verify that an engineered vapor measure (such as an impermeable membrane or equivalent) is included in the design of all townhomes and that the apartment parking structures include sufficient ventilation to minimize accumulation of VOCs on the Project site. 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 City of Gardena Building Department shall have oversight/sign-off responsibility for the vapor barrier.	Prior to Construction Activities	Verification of an engineered vapor measure within the design of all townhomes and apartment parking structures.	Building and Safety Department Chief Building Official		
NOISE					
MM NOI-1: Construction Equipment Noise. Prior to issuance of any Demolition or Grading Permit, the Public Works Department shall verify that the Project plans and specifications include provisions that require all power construction equipment (including combustion engines), fixed or mobile to be: 1) equipped with state-of-the-art noise shielding and muffling devices (consistent with manufactures' standards); and 2) properly maintained to ensure that no additional noise, due to worn or improperly maintained parts, would be generated.	Prior to issuance of any demolition or grading permit	Verification of provisions that require all power construction equipment to be equipped with noise shielding and muffling devices and properly maintained	Public Works Director		
MM NOI-2: Construction Noise. A temporary and impermeable sound barrier shall be provided along the Project northern, southern, and western property line. The temporary sound barrier shall be minimum 10-foot high and provide minimum 12	Prior to and During Construction	Provide a Temporary and Impermeable Sound Barrier	Community Development Director		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
dBA noise reduction, and shall have a minimum Sound Transmission Class rating of STC-25, such as, acoustical barrier blanket (with STC-25 rating) or 3/4" thick exterior grade plywood.					
MM NOI-3: Construction Vibration Impacts. The use of large construction equipment (e.g., large bulldozer greater than 400 horsepower and/or loaded trucks) shall be a minimum of 45 feet away from the off-site residence adjacent to the Project site (receptor R1) (16964 169th Street).	During Construction	Provide a minimum 45-foot buffer away from residences adjacent to the Plan Area	Community Development Director		
TRIBAL CULTURAL RESOURCES					
MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities. A. The Applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject Project at all Project locations (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the	Prior to any Ground Disturbance	Contract a Tribal Monitor/Consultant Copy of executed monitoring agreement Tribal Cultural	Community Development Director Tribal Monitor/Consultant		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
issuance of any permit necessary to commence a ground-disturbing activity. C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground- disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Applicant/lead agency upon written request to the Tribe. D. On-site tribal monitoring shall conclude upon the latter of the following: (1) written confirmation to the monitor from a designated point of contact for the Applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project site or in connection with the Project are complete; or (2) a determination and written notification by the monitor to the Applicant/lead agency that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact TCRs.	During Construction Phases Involving Ground-Disturbing Activities	Resources Monitoring & Complete Daily Monitoring Logs			

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
MM TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects. A. 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 Public Resources Code § 5097.98, are also to be treated according to this statute. B. If human remains and/or grave goods are discovered or recognized on the Project site, then all construction activities shall immediately cease within 200 feet of the discovery. Health and Safety Code § 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code § 5097.98 shall be followed. C. Human remains and grave/burial goods found with such remains shall be treated alike per California Public Resources Code § 5097.98(d)(1) and (2). D. Construction activities may resume in other parts of the Project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the monitor determines in its sole discretion that resuming construction activities at that	During Construction, Upon Discovery of any human remains or grave goods	Telephone communication with the Native American Heritage Commission within 24 hours	County Coroner Native American Heritage Commission Qualified Tribal Monitor/Consultant		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
distance is acceptable and provides the Project manager express consent of that determination (along with any other mitigation measures the monitor and/or archaeologist deems necessary). (CEQA Guidelines § 15064.5(f).) E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.					
MM TCR-3: Procedures for Burials and Funerary Remains. This mitigation measure shall only apply if the Gabrielino Band of Mission Indians-Kizh Nation is designated the Most Likely Descendant ("MLD") by the NAHC: A. 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. B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created. C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact.	During Construction, if an Unanticipated Discovery, and the Gabrieleno Band of Mission Indians – Kizh Nation is Designated Most Likely Descendant If there are four or more burials	Implement Koo-nas-gna Burial Policy Creation of a cemetery treatment plan	Tribal Monitor/Consultant		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
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. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials. D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will 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 should be posted outside of working hours. The Tribe will 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 will be removed. E. In the event preservation in place is not possible despite good faith efforts by the Applicant/developer and/or landowner, before ground-disturbing activities may resume on the Project site, the landowner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects. F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural	If discovered remains cannot be fully documented and recovered on the same day If preservation in place is not possible	Covering of remains with muslin cloth and a steel plate to protect remains -or- 24-hour guard outside working hours Designation of site location within the footprint of the Project for reburial	Gabrielino Band of Mission Indians-Kizh Nation Native American Heritage Council		

MITIGATION MEASURES (MM)	IMPLEMENTATION TIMING	MONITORING/ REPORTING METHODS	RESPONSIBLE FOR APPROVAL/ MONITORING	VERIFICATION	
				DATE	INITIALS
patrimony will be removed to a secure container on site if possible. These items should 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. G. The Tribe will work closely with the Project's qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall 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.					

SAIKO
INVESTMENT CORPORATION

NEXTGEN
APARTMENTS

urban-architecture LAB

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

GARDENA, CA 90247 | ENTITLEMENT SUBMITTAL | 11/01/2024

SHEET INDEX

GENERAL

	COVER
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G0.01	PROJECT DATA
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G2.20	OPEN SPACE DIAGRAM
G2.30	HYDRANTS AND FIRE ACCESS PLAN
G2.40	RAILROAD TRACK OVERLAY PLAN
G2.50	SITE AREA - PARCEL SEPARATION

CIVIL

C1	VESTING TENTATIVE TRACT MAP
C2	VTTM NOTES
C3	CONCEPTUAL GRADING PLAN
C4	PRELIMINARY UTILITY PLAN
C5	PRELIMINARY FIRE ACCESS

ARCHITECTURAL

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A1.00	SITE PLAN
A1.10	BASEMENT FLOOR PLAN
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A1.15	FIFTH FLOOR PLAN
A1.16	ROOF PLAN
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A2.02	VIEW 02
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A2.24	BUILDING ELEVATIONS
A3.01	BUILDING SECTION
A3.02	BUILDING SECTION
A5.01	ENLARGED UNIT PLANS
A5.02	ENLARGED UNIT PLANS
A5.03	ENLARGED UNIT PLANS
A5.04	ENLARGED UNIT PLANS
A5.05	ENLARGED UNIT PLANS
A5.06	ENLARGED UNIT PLANS
A5.07	ENLARGED UNIT PLANS
A5.08	ENLARGED UNIT PLANS
A5.09	ENLARGED UNIT PLANS
A5.10	ENLARGED UNIT PLANS
A5.11	ENLARGED UNIT PLANS
A5.12	ENLARGED UNIT PLANS

LANDSCAPE

L1.01	BUBBLE DIAGRAM & PRECEDENT IMAGERY
L1.02	OVERALL ILLUSTRATIVE PLAN
L1.03	ILLUSTRATIVE PLAN
L1.04	ILLUSTRATIVE PLANS
L1.05	PLANTING PLAN
L1.06	PLANT IMAGES
L1.07	PLANT IMAGES
L1.08	PLANT IMAGES

LOW VOLTAGE

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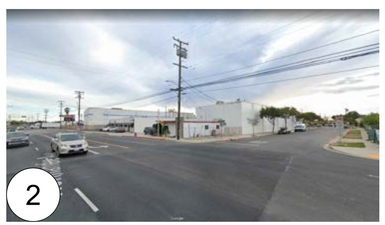
LVA1.00	BASEMENT B1 FLOOR PLAN
LVA1.01	FIRST FLOOR PLAN
LVA1.02	SECOND FLOOR PLAN
LVA1.03	THIRD FLOOR PLAN
LVA1.04	FOURTH FLOOR PLAN
LVA1.05	FIFTH FLOOR PLAN
LVA1.06	ROOF FLOOR PLAN
LVA2.00	ENLARGED UNIT PLANS
LVA2.01	ENLARGED UNIT PLANS
LVA2.02	ENLARGED UNIT PLANS
LVA2.03	ENLARGED UNIT PLANS
LVA2.04	ENLARGED UNIT PLANS
LVA2.05	ENLARGED UNIT PLANS
LVA2.06	ENLARGED UNIT PLANS
LVA2.07	ENLARGED UNIT PLANS
LVA2.08	ENLARGED UNIT PLANS
LVA2.09	ENLARGED UNIT PLANS
LVA2.10	ENLARGED UNIT PLANS

LIGHTING

LT-1.0	LIGHTING FIXTURE SCHEDULE
LT-2.0	SITE LIGHTING LAYOUT
LT-2.1	SITE PHOTOMETRIC AREA A
LT-2.2	SITE PHOTOMETRIC AREA B
LT-2.3	SITE PHOTOMETRIC AREA C
LT-2.4	SITE PHOTOMETRIC AREA D
LT-2.5	SITE LIGHTING RENDER
LT-3.0	2ND FLR COURTYARD LIGHTING PLAN
LT-3.1	2ND FLR COURTYARD PHOTOMETRIC
LT-3.2	2ND FLR COURTYARD LIGHTING RENDER
LT-4.0	2ND FLR POOL LIGHTING PLAN
LT-4.1	2ND FLR POOL PHOTOMETRIC
LT-4.2	2ND FLR POOL LIGHTING RENDER
LT-5.0	ROOF DECK LIGHTING PLAN
LT-5.1	ROOF DECK PHOTOMETRIC AND RENDER
LT-6.0	LIGHTING SPECS 1
LT-6.1	LIGHTING SPECS 2
LT-6.2	LIGHTING SPECS 3



PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

SAIKO INVESTMENT CORP.
+
NEXTGEN APARTMENTS LLC

134 LOMITA STREET
EL SEGUNDO | CA 90245

urban-architecture LAB
1657 alvira street second floor los angeles, ca 90035
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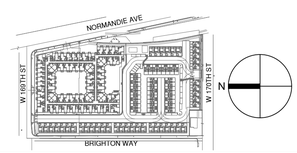
PHASE

ENTITLEMENT SET

11/01/2024

LEGEND

HALF SCALE (11X17): 50%



SHEET TITLE

SITE IMAGES AND SHEET INDEX

SHEET NO. **G0.00**

NORMANDIE APARTMENTS AND TOWNHOMES

APARTMENTS | TOWNHOMES | TOTAL

PROPERTY INFORMATION

SITE ADDRESS:	16829-16911 SOUTH NORMANDIE AVENUE, GARDENA, CA 90247
APN(s):	6106-030-011, 015, 016 & 017
TRACT:	MCDONALD TRACT SAN PEDRO RANCHO
BLOCK:	
LOT:	99

PROPERTY ZONING

CURRENT ZONING:	M1 & M2
PROPOSED ZONING:	NORMANDIE CROSSING SPECIFIC PLAN

SITE AREA

	SF	ACRE
SUBAREA A: APARTMENTS		
	93,032.0	2.14
SUBAREA B: TOWNHOMES	**SF**	**ACRE**
	135,527.0	3.11
TOTAL	**SF**	**ACRE**
TOTAL LOT SIZE	**228,559**	**5.25**

DENSITY

SUBAREA A: APARTMENTS

121 DWELLING UNITS PER ACRE

SUBAREA B: TOWNHOMES

24 DWELLING UNITS PER ACRE

BUILDING SETBACKS

APARTMENTS	
FRONT YARD (NORMANDIE AVE)	10'-0"
SIDE YARD (169TH ST)	10'-0"
TOWNHOMES	
FRONT YARD (NORMANDIE AVE)	10'-0"
REAR YARD (BRIGHTON WAY)	10'-0"
SIDE YARD (170TH ST)	10'-0"

BUILDING HEIGHT

APARTMENTS		
BUILDING HEIGHT	**69'-11"** TO HIGHEST POINT OF BUILDING (STAIR PROJECTIONS)	
TOWNHOMES		
BUILDING HEIGHT	**29'-6"** TO EAVE LINE	*SEE PLANS*
(VARIES PER BUILDING)	**36'-0"** TO PARAPET LINE	*SEE PLANS*

ALLOWABLE PROJECTIONS INTO YARDS / SETBACK AREAS

	FRONT	SIDE	REAR
BALCONIES	**N/A**	**4'-0"** 169TH STREET	**N/A**

FIRE SUPPRESSION SPRINKLER SYSTEM

THE BUILDING AND GARAGE MUST BE EQUIPPED WITH AN AUTOMATIC SPRINKLER SYSTEM, COMPLYING WITH PROVISIONS OF CBC 903.3.1.1 (**NFPA 13**).

FLOOR AREA BY PROGRAM

REFER TO GROSS FLOOR AREA DIAGRAM, SHEET G2.10 FOR ADDITIONAL INFORMATION

APARTMENTS	GROSS FLOOR AREA (SF)
CONSTRUCTION TYPE IA (L1)	
LOBBY (L1)	3,190
AMENITY I (L1)	2,400
TRASH ROOMS (L1)	1,108
CIRCULATION (L1)	578
STAIRS & ELEVATOR SHAFTS (B1 - L1)	3,520
COUNTED SEPARATELY	
PARKING (BASEMENT - L1)	125,900
BIKE ROOM (L1)	820
PROPOSED TYPE IA CONSTRUCTION	**10,796 SF**
PROPOSED TYPE IA CONSTRUCTION WITH PARKING	**137,516 SF**
CONSTRUCTION TYPE IIIA (L2-L5)	
APARTMENTS (L2-L5)	189,516
COVERED BALCONIES	5,500
AMENITY II (L2)	1,332
AMENITY II (L2)	1,382
AMENITY IV (L5)	725
CIRCULATION (CORRIDORS L2-L5)	29,920
STAIRS & ELEVATOR SHAFTS (L2-L5)	5,400
TRASH VESTIBULES (L2-L5)	400
PROPOSED TYPE IIIA CONSTRUCTION	**234,175 SF**
PROPOSED APARTMENTS GROSS FLOOR AREA	**244,971 SF**
PROPOSED APARTMENTS GROSS FLOOR AREA WITH PARKING	**371,691 SF**

TOWNHOMES	GROSS FLOOR AREA (SF)
CONSTRUCTION TYPE VA	
TOWNHOMES	119,480
COVERED BALCONIES (TYPE 2 & TYPE 4)	1,190
AMENITY (L1)	550
PROPOSED TOWNHOMES / TYPE VA CONSTRUCTION	**121,220 SF**

TOTAL	GROSS FLOOR AREA (SF)
PROPOSED BUILDING GROSS FLOOR AREA	**366,191 SF**
PROPOSED BUILDING GROSS FLOOR AREA WITH PARKING	**492,911 SF**

RESIDENTIAL AREA SUMMARY

UNIT TYPE		QUANTITY	GROSS FLOOR AREA (SF)	%	AVE. GSF
A1		39	21,333	15%	547
A1a		11	5,720	4%	520
A3		8	4,000	3%	500
B1	LARGE	72	51,840	28%	720
B2	SMALL	16	10,000	6%	625
B3	SMALL	48	32,880	19%	685
B4	SMALL	4	2,548	2%	637
B6	LARGE	4	2,800	2%	700
B7	LARGE	4	3,680	2%	920
B8 (L2 ONLY)	LARGE	1	896	0%	896
C2	LARGE	8	8,873	3%	1,109
C2a	LARGE	3	3,417	1%	1,139
C3	SMALL	27	27,567	10%	1,021
C3a	LARGE	9	9,882	3%	1,098
C5	SMALL	4	4,080	2%	1,020
TOTAL		**258**	**189,516**	**100%**	**735**

TOWNHOMES	QUANTITY	GROSS FLOOR AREA (SF)	%	AVE. GSF
TYPE 1 (3-BD)	32	52,800	43%	1,650
TYPE 2 (4-BD)	10	18,500	13%	1,850
TYPE 3 (3-BD)	17	23,460	23%	1,380
TYPE 4 (3-BD)	16	24,720	21%	1,545
TOTAL	**75**	**119,480**	**100%**	**1,593**

TOTAL	QUANTITY	GROSS FLOOR AREA (SF)
TOTAL UNITS	**333**	**308,996**

NORMANDIE APARTMENTS AND TOWNHOMES

APARTMENTS | TOWNHOMES | TOTAL

BICYCLE PARKING (GARDENA MUNICIPAL CODE, 18.18A.040 DEVELOPMENT STANDARDS, I - 4)

RESIDENTIAL	TOTAL UNITS	UNITS PER STALL	TOTAL PROVIDED
LONG-TERM (L1) - 1 PER 4 UNITS MIN REQUIRED	258	4	65
SHORT-TERM (L1) - 5% MIN OF VISITOR PARKING REQUIRED		5% OF 20 GUEST PARKING MIN	4
TOTAL BICYCLE PARKING			**69**

OPEN SPACE

APARTMENTS	SF
INTERIOR OPEN SPACE	
AMENITY I (L1)	2,400
AMENITY II (L2)	1,332
AMENITY II (L2)	1,382
AMENITY IV (L5)	725
TOTAL	**5,839**
EXTERIOR OPEN SPACE	
COURTYARD I (L2)	5,000
COURTYARD II (L2)	8,400
DOG PARK (L1)	1,100
ROOF DECK (L5)	1,400
TOTAL	**15,900**

	QTY	SF	
PRIVATE OPEN SPACE	155	50	7,750
			7,750

TOWNHOMES	SF
INTERIOR OPEN SPACE	
AMENITY (L1)	550
TOTAL	**550**
EXTERIOR OPEN SPACE	
OPEN SPACE 1	460
OPEN SPACE 2	3,300
OPEN SPACE 3	1,940
DOG PARK	880
TOTAL	**6,580**

	QTY	SF	
PRIVATE OPEN SPACE (RESIDENTIAL BALCONIES / PATIOS)	75	50	3,750
			3,750

TOTAL	SF
INTERIOR OPEN SPACE	**6,389**
EXTERIOR OPEN SPACE	**22,330**
TOTAL PRIVATE OPEN SPACE	**11,500**

PARKING

APARTMENTS	# UNITS	SPACE PER UNIT	TOTAL
STUDIO	58	1.0	58
1-BEDROOM	149	1.5	224
2-BEDROOM	51	1.5	76
TOTAL	**258**		**358**

PER SPACE TYPE	STANDARD	COMPACT	HC	EV	GUEST	TANDEM
FIRST FLOOR	34		9	61	29	54
BASEMENT	50			94		56
SUBTOTAL	**84**	**0**	**9**	**155**	**29**	**110**

TOWNHOMES	# UNITS	SPACES / UNIT	TOTAL
3-BEDROOM	65	2.0	130
4-BEDROOM	10	2.0	20
			GUEST
			19

TOTAL PARKING SPACES	**387**
TOTAL PARKING SPACES	**169**
TOTAL PARKING SPACES PROVIDED	**556**

EV PARKING (CGBC 4.106.4.2.2)

EVSE	**EV Capable** - Space w/ electrical panel space & load capacity	
	10% of total number of parking spaces provided	39
EV READY	Space w/ branch circuit, raceway, and receptacle	
	25% of total number of parking spaces provided	97
EVCS	**EV Chargers /EV Charging Station** - Level 2 EV Supply Equipment (28/240 Volt 40-amp circuit, and charger with plus, fittings, devices, outlets for full operation	
	5% of total number of parking spaces provided	19
EVCS VAN (1 in 25 EVCS = 1 EV Van CGBC 4.106.4.2.2.1.2, #3, CBC Table 11B-228.3.2.1)		1
EVCS HC (5-25 total EVCS = 1 Standard Accessible, CBC Table 11B-228.3.2.1)		1
TOTAL EV SPACES PROVIDED	**40%**	**155**

HC PARKING (CBC 1109A.3, CBC 1109A.8.6)

HC	
2% OF TOTAL PARKING PROVIDED	8
HC VAN	1
1 IN EVERY 8 HC spaces, BUT NOT LESS THAN 1	
TOTAL HC SPACES PROVIDED	**9**

PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

SAIKO INVESTMENT CORP.
+
NEXTGEN APARTMENTS LLC

134 LOMITA STREET
EL SEGUNDO | CA 90245

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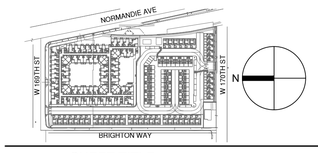
LEGEND

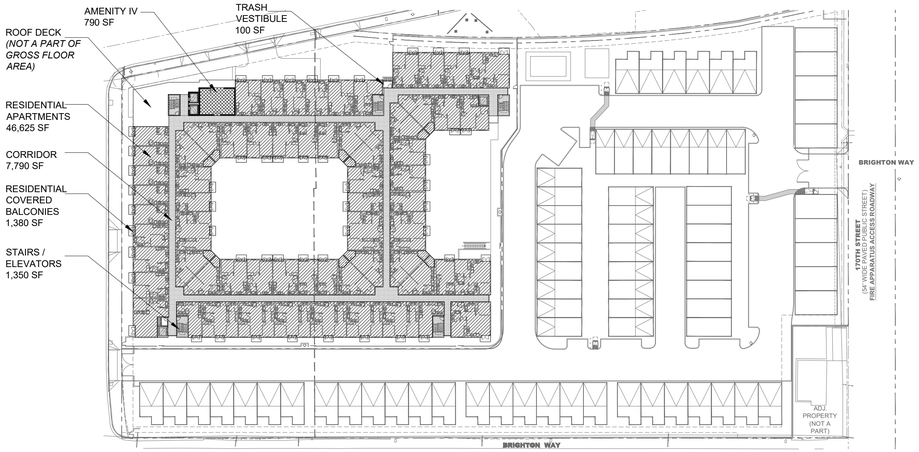
HALF SCALE (11X17): 50%



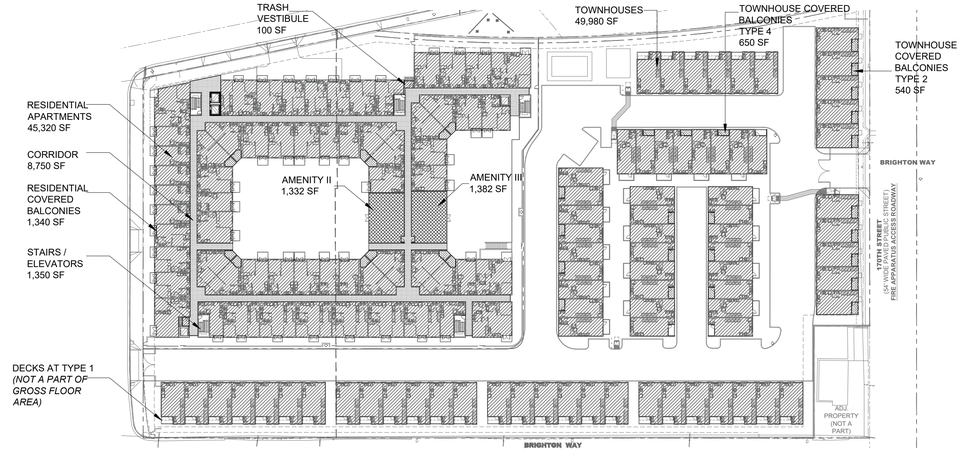
SHEET TITLE

PROJECT INFORMATION

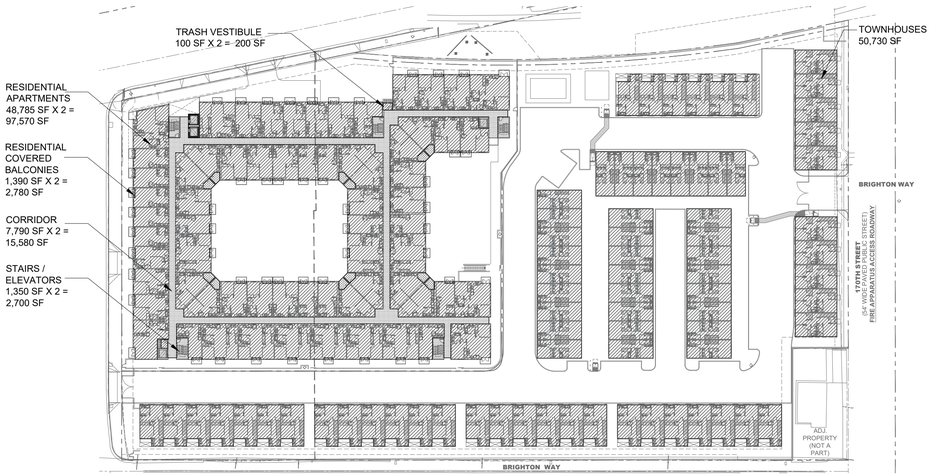
SHEET NO. **G0.01**



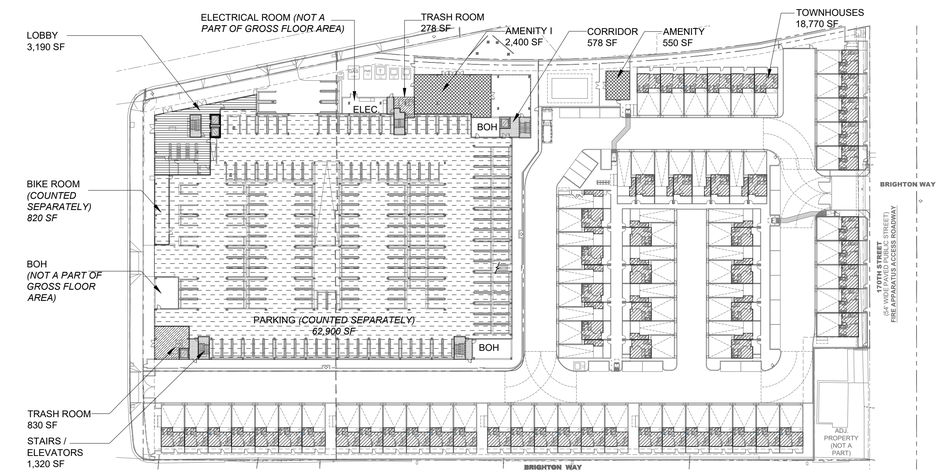
FIFTH FLOOR PLAN



SECOND FLOOR PLAN

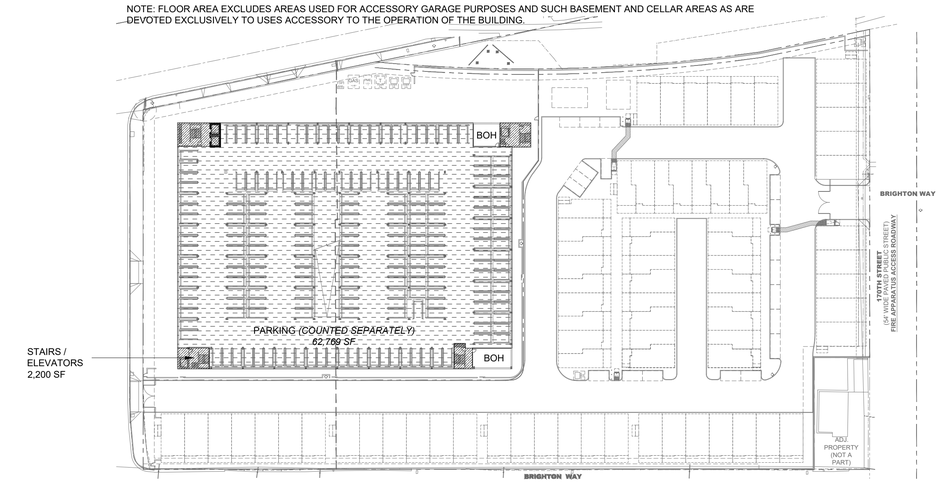


THIRD - FOURTH FLOOR PLANS



FIRST FLOOR PLAN

NOTE: FLOOR AREA EXCLUDES AREAS USED FOR ACCESSORY GARAGE PURPOSES AND SUCH BASEMENT AND CELLAR AREAS AS ARE DEVOTED EXCLUSIVELY TO USES ACCESSORY TO THE OPERATION OF THE BUILDING.



BASEMENT FLOOR PLAN

NOTE: FLOOR AREA EXCLUDES AREAS USED FOR ACCESSORY GARAGE PURPOSES AND SUCH BASEMENT AND CELLAR AREAS AS ARE DEVOTED EXCLUSIVELY TO USES ACCESSORY TO THE OPERATION OF THE BUILDING.

FLOOR AREA BY PROGRAM

REFER TO GROSS FLOOR AREA DIAGRAM, SHEET G2.10 FOR ADDITIONAL INFORMATION

APARTMENTS	GROSS FLOOR AREA (SF)
CONSTRUCTION TYPE IA (L1)	
LOBBY (L1)	3,190
AMENITY I (L1)	2,400
TRASH ROOMS (L1)	1,108
CIRCULATION (L1)	578
STAIRS & ELEVATOR SHAFTS (L1)	1,320
COUNTED SEPARATELY	
PARKING (BASEMENT - L1)	125,900
BIKE ROOM (L1)	820
PROPOSED TYPE IA CONSTRUCTION	**8,596 SF**
PROPOSED TYPE IA CONSTRUCTION WITH PARKING	**135,316 SF**
CONSTRUCTION TYPE IIIA (L2-L5)	
APARTMENTS (L2-L5)	189,516
COVERED BALCONIES	5,500
AMENITY II (L2)	1,332
AMENITY III (L2)	1,382
AMENITY IV (L5)	725
CIRCULATION (CORRIDORS L2-L5)	32,120
STAIRS & ELEVATOR SHAFTS (L2-L5)	5,400
TRASH VESTIBULES (L2-L5)	400
PROPOSED TYPE IIIA CONSTRUCTION	**236,375 SF**
PROPOSED APARTMENTS GROSS FLOOR AREA	**244,971 SF**
PROPOSED APARTMENTS GROSS FLOOR AREA WITH PARKING	**371,691 SF**

TOWNHOMES	GROSS FLOOR AREA (SF)
CONSTRUCTION TYPE VA	
TOWNHOMES	119,480
COVERED BALCONIES (TYPE 2 & TYPE 4)	1,190
AMENITY (L1)	550
PROPOSED TOWNHOMES / TYPE VA CONSTRUCTION	**121,220 SF**

TOTAL	GROSS FLOOR AREA (SF)
PROPOSED BUILDING GROSS FLOOR AREA	**366,191 SF**
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RESIDENTIAL AREA SUMMARY

UNIT TYPE		QUANTITY	GROSS FLOOR AREA (SF)	%	AVE. GSF
A1		39	21,333	15%	547
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B1	LARGE	72	51,840	28%	720
B2	SMALL	16	10,000	6%	625
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B6	LARGE	4	2,800	2%	700
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TYPE 4 (3-BD)	16	24,720	21%	1,545
TOTAL	**75**	**119,480**	**100%**	**1,593**

TOTAL	QUANTITY	GROSS FLOOR AREA (SF)
TOTAL UNITS	**333**	**308,996**

PROJECT:

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OWNER:

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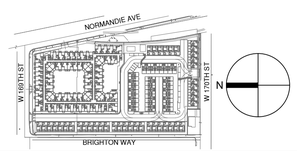
LEGEND

- RESIDENTIAL LOBBY
- AMENITY
- RESIDENTIAL
- RESIDENTIAL BALCONY
- CORRIDORS / STAIRS / ELEVATORS
- TRASH & RECYCLING ROOM
- NOT A PART OF GROSS FLOOR AREA
- PARKING (COUNTED SEPARATELY)

FULL SCALE (24X36): 1/64" = 1'-0"

0 32' 64' 128' 256'

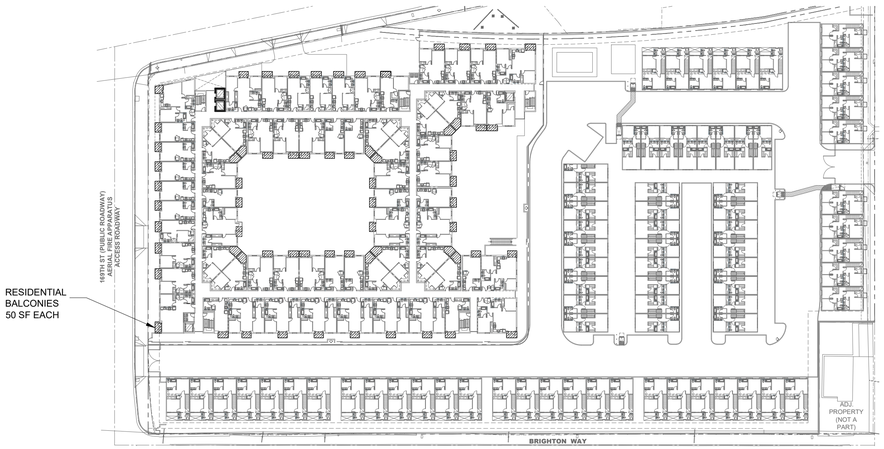
HALF SCALE (11X17): 50%



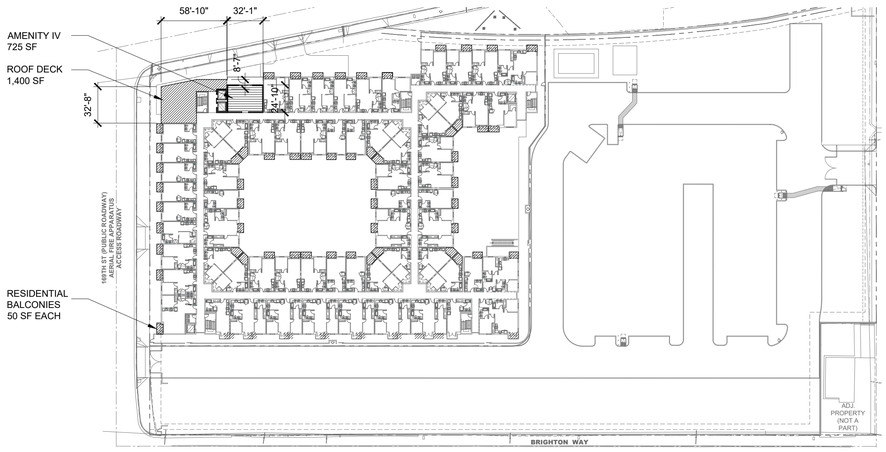
SHEET TITLE

GROSS FLOOR AREA DIAGRAM

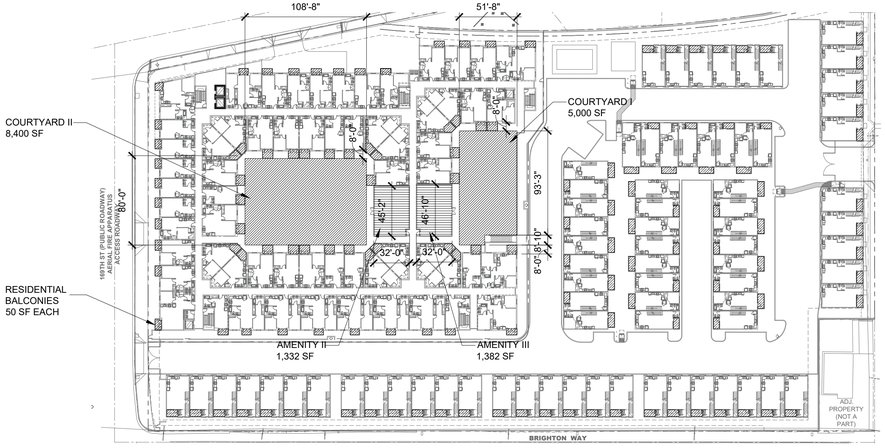
SHEET NO. **G2.10**



THIRD - FOURTH FLOOR PLANS



FIFTH FLOOR PLAN

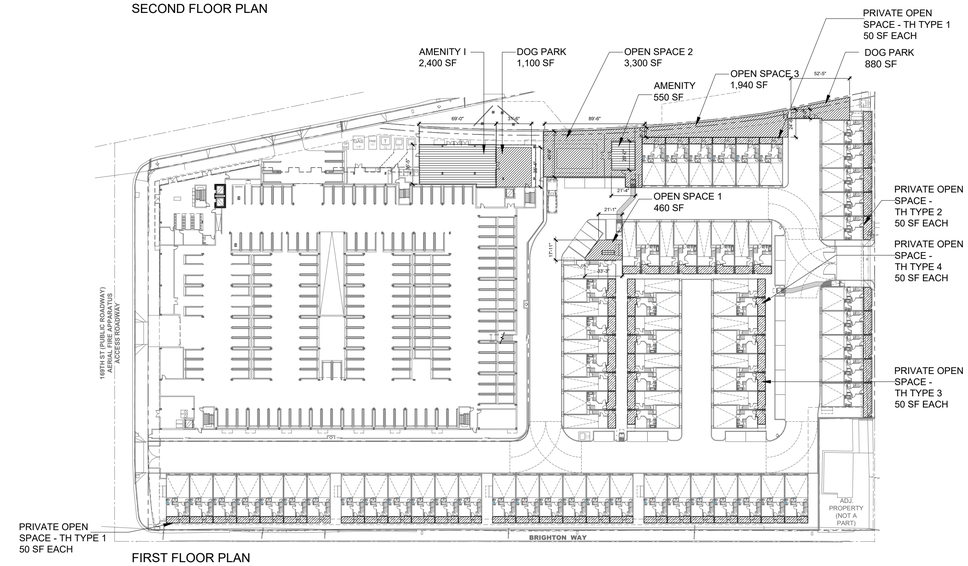


SECOND FLOOR PLAN

OPEN SPACE			
APARTMENTS			**SF**
INTERIOR OPEN SPACE			
AMENITY I (L1)			2,400
AMENITY II (L2)			1,332
AMENITY III (L2)			1,382
AMENITY IV (L5)			725
TOTAL			**5,839**
EXTERIOR OPEN SPACE			
COURTYARD I (L2)			5,000
COURTYARD II (L2)			8,400
DOG PARK (L1)			1,100
ROOF DECK (L5)			1,400
TOTAL			**15,900**
	QTY	**SF**	
PRIVATE OPEN SPACE	155	50	7,750
			7,750

TOWNHOMES			**SF**
INTERIOR OPEN SPACE			
AMENITY (L1)			550
TOTAL			**550**
EXTERIOR OPEN SPACE			
OPEN SPACE 1			460
OPEN SPACE 2			3,300
OPEN SPACE 3			1,940
DOG PARK			880
TOTAL			**6,580**
	QTY	**SF**	
PRIVATE OPEN SPACE (RESIDENTIAL BALCONIES / PATIOS)	75	50	3,750
			3,750

TOTAL	**SF**
INTERIOR OPEN SPACE	**6,389**
EXTERIOR OPEN SPACE	**22,330**
TOTAL PRIVATE OPEN SPACE	**11,500**



FIRST FLOOR PLAN

PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

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ENTITLEMENT SET

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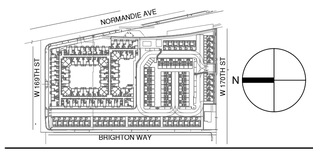
LEGEND

- INTERIOR OPEN SPACE
- EXTERIOR OPEN SPACE
- PRIVATE OPEN SPACE

FULL SCALE (24X36): 1/64" = 1'-0"

0 32' 64' 128' 256'

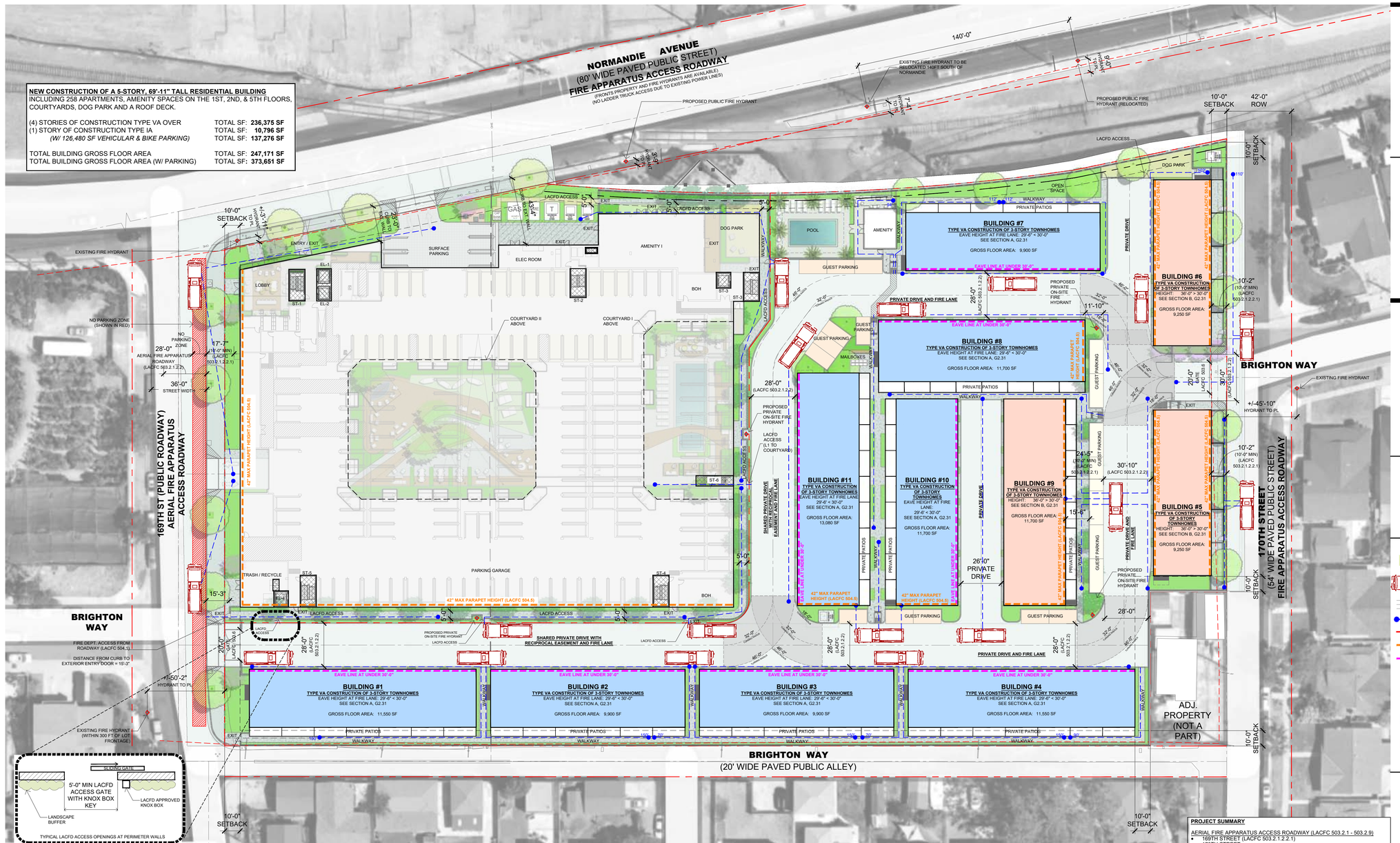
HALF SCALE (11X17): 50%



SHEET TITLE

OPEN SPACE DIAGRAM

SHEET NO. **G2.20**



NEW CONSTRUCTION OF A 5-STORY, 69'-11" TALL RESIDENTIAL BUILDING
INCLUDING 258 APARTMENTS, AMENITY SPACES ON THE 1ST, 2ND, & 5TH FLOORS, COURTYARDS, DOG PARK AND A ROOF DECK.

(4) STORIES OF CONSTRUCTION TYPE VA OVER	TOTAL SF: **236,375 SF**
(1) STORY OF CONSTRUCTION TYPE IA	TOTAL SF: **10,796 SF**
(W/ 126,480 SF VEHICULAR & BIKE PARKING)	TOTAL SF: **137,276 SF**
TOTAL BUILDING GROSS FLOOR AREA	TOTAL SF: **247,171 SF**
TOTAL BUILDING GROSS FLOOR AREA (W/ PARKING)	TOTAL SF: **373,651 SF**

GENERAL LOS ANGELES COUNTY FIRE NOTES

A. WHERE REQUIRED, FIRE APPARATUS ACCESS ROADS SHALL BE PROVIDED AND MAINTAINED IN ACCORDANCE WITH SECTION 503.1.1 THROUGH 503.1.3. FIRE CODE 503.1
B. 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 FACILITY AND 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 OF FACILITY.
C. SPECIFICATIONS. FIRE APPARATUS ACCESS ROADS SHALL BE INSTALLED AND ARRANGED IN ACCORDANCE WITH (FIRE CODE) SECTIONS 503.2.1 THROUGH 503.2.9.
D. DIMENSIONS. FIRE APPARATUS ACCESS ROADS SHALL HAVE AN UNOBSTRUCTED WIDTH OF NOT LESS THAN 20 FEET, EXCLUSIVE OF SHOULDERS, EXCEPT AS SPECIFIED IN SECTIONS 503.2.1.1 THROUGH 503.2.1.2.2.2, AND FOR APPROVED SECURITY GATES IN ACCORDANCE WITH SECTION 503.6. FIRE APPARATUS ACCESS ROADS SHALL HAVE AN UNOBSTRUCTED VERTICAL CLEARANCE CLEAR TO THE SKY.
E. COMMERCIAL, INDUSTRIAL, AND MULTI-FAMILY RESIDENTIAL DEVELOPMENTS. FIRE APPARATUS ACCESS ROADS FOR COMMERCIAL, INDUSTRIAL, AND MULTI-FAMILY DEVELOPMENTS SHALL BE INSTALLED AND ARRANGED IN ACCORDANCE WITH SECTIONS 503.2.1.2.1 THROUGH 503.2.1.2.2.2. 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, WHICHEVER IS GREATER. FIRE CODE 503.2.1.2
F. WHERE THE HIGHEST ROOF SURFACE EXCEEDS NOT EXCEED 30 FEET. FOR BUILDINGS WHERE THE VERTICAL DISTANCE BETWEEN THE ACCESS ROADWAY AND THE HIGHEST ROOF SURFACE DOES NOT EXCEED 30 FEET, FIRE APPARATUS ACCESS ROADS SHALL HAVE AN UNOBSTRUCTED WIDTH OF NOT LESS THAN 26 FEET, EXCLUSIVE OF SHOULDERS, AND AN UNOBSTRUCTED CLEARANCE CLEAR TO THE SKY. 503.2.1.2.1
G. 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 28 FEET, EXCLUSIVE OF SHOULDERS, SHALL BE PROVIDED IN THE IMMEDIATE VICINITY OF THE BUILDING OR PORTION THEREOF. THIS ROADWAY SHALL HAVE AN UNOBSTRUCTED CLEARANCE CLEAR TO THE SKY. 503.2.1.2.2.
H. 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 SHOULDERS, 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. 503.2.1.2.2.1.
I. OBSTRUCTIONS. OVERHEAD UTILITY AND POWER LINES SHALL NOT BE LOCATED OVER THE FIRE APPARATUS ACCESS ROAD AND THE BUILDING. OTHER OBSTRUCTIONS SHALL BE PERMITTED TO BE PLACED WITH THE APPROVAL OF THE FIRE CODE OFFICIAL. 503.2.1.2.2.2.
J. DIMENSIONS MAINTAINED. THE DIMENSIONS OF APPROVED FIRE APPARATUS ROADS SHALL BE MAINTAINED AS ORIGINALLY APPROVED BY THE FIRE CODE OFFICIAL. 503.2.2.1.
K. 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 ASPHALT, CONCRETE OR OTHER APPROVED DRIVING SURFACE CAPABLE OF SUPPORTING THE IMPOSED LOAD OF FIRE APPARATUS WEIGHING AT LEAST 75,000 POUNDS. 503.2.3.
L. TURNING RADIUS. THE MINIMUM TURNING RADIUS SHALL NOT BE LESS THAN 32 FEET MEASURED AT THE CENTERLINE OF THE REQUIRED ACCESS ROADWAY. 503.2.4.
M. DEAD ENDS. DEAD-END FIRE APPARATUS ACCESS ROADS IN EXCESS OF 150 FEET SHALL BE PROVIDED WITH AN APPROVED TURNAROUND. SEE FIGURES 503.2.5(1) AND 503.2.5(2). THE TURNAROUND SHALL BE ORIENTED ON THE ACCESS ROADWAY IN THE PROPER DIRECTION OF TRAVEL. 503.2.5.
N. GRADE. FIRE APPARATUS ACCESS ROADS SHALL NOT EXCEED 15 PERCENT IN GRADE. 503.2.7.
O. AREA OF FIREFIGHTING OPERATIONS. THE AREA OF FIREFIGHTING OPERATIONS SHALL NOT BE LOCATED UNDERNEATH HIGH VOLTAGE TRANSMISSION LINES. 503.2.9.
P. MARKING & SIGNAGE. WHERE REQUIRED BY THE FIRE CODE OFFICIAL, APPROVED SIGNS OR OTHER APPROVED NOTICES OR MARKING 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 CLEAR 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. 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 ROAD AS REQUIRED. 503.3
Q. MARKING OVERHEAD HIGH-VOLTAGE TRANSMISSION LINES. WHEN REQUIRED BY THE FIRE CODE OFFICIAL, FIRE APPARATUS ACCESS ROADS AND STRUCTURES LOCATED NEAR HIGH-VOLTAGE TRANSMISSION LINES SHALL BE POSTED WITH SIGNS, APPROVED BY THE FIRE CODE OFFICIAL, THAT INCLUDE THE WORDS "CAUTION OVERHEAD HIGH VOLTAGE TRANSMISSION LINES." 503.3.1.
R. 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 SECTION 503.2.1 AND 503.2.2 SHALL BE MAINTAINED AT ALL TIMES. 503.4.
S. 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. 503.4.1
T. 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. GATES SECURING THE FIRE APPARATUS ACCESS ROADS SHALL COMPLY WITH ALL OF THE FOLLOWING CRITERIA: 503.6.
T.1. WHERE A SINGLE GATE IS PROVIDED, THE GATE WIDTH SHALL NOT BE LESS THAN 20 FEET, EXCEPT ON A FIRE ACCESS ROADWAY APPROVED TO BE 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 BE NOT LESS THAN 15 FEET FOR RESIDENTIAL USE AND 20 FEET FOR COMMERCIAL / INDUSTRIAL USES.
T.2. GATES SHALL BE OF THE SWINGING OR SLIDING TYPE.
T.3. CONSTRUCTION OF GATES SHALL BE OF MATERIALS THAT ALLOW MANUAL OPERATION BY ONE PERSON.
T.4. GATE COMPONENTS SHALL BE MAINTAINED IN AN OPERATIVE CONDITION AT ALL TIMES AND REPLACED OR REPAIRED WHEN DEFECTIVE.
T.5. ELECTRIC GATES SHALL BE EQUIPPED WITH A MEANS OF OPENING THE GATE BY FIRE DEPARTMENT PERSONNEL FOR EMERGENCY ACCESS. EMERGENCY OPERATING DEVICES SHALL BE APPROVED BY THE FIRE CODE OFFICIAL.
T.6. METHODS OF LOCKING SHALL BE SUBMITTED FOR APPROVAL BY THE FIRE CODE OFFICIAL.
T.7. ELECTRIC GATE OPERATORS, WHERE PROVIDED, SHALL BE LISTED IN ACCORDANCE WITH UL 325.
T.8. GATES INTENDED FOR AUTOMATIC OPERATION SHALL BE DESIGNED, CONSTRUCTED, AND INSTALLED TO COMPLY WITH THE REQUIREMENTS OF ASTM F2200.
U. REQUIRED ACCESS. EXTERIOR DOORS AND OPENINGS REQUIRED BY THIS CODE OF THE CALIFORNIA BUILDING CODE SHALL BE MAINTAINED READILY ACCESSIBLE FOR EMERGENCY ACCESS BY THE FIRE DEPARTMENT. AN APPROVED ACCESS WALKWAY LEADING FROM FIRE APPARATUS ACCESS ROADS TO EXTERIOR OPENINGS SHALL BE PROVIDED WHERE REQUIRED BY THE FIRE CODE OFFICIAL. 504.1
V. 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 MANNER AS TO OBSTRUCT FIRE FIGHTER INGRESS OR EGRESS IN THE EVENT OF FIRE OR OTHER EMERGENCY. PARAPETS SHALL NOT EXCEED 42 INCHES ON AT LEAST TWO SIDES OF THE BUILDING. THESE SIDES SHOULD FACE AN ACCESS ROADWAY OR YARD SUFFICIENT TO ACCOMMODATE LADDER OPERATIONS. 504.5.
W. MULTIPLE RESIDENTIAL AND COMMERCIAL UNITS. MULTIPLE RESIDENTIAL AND COMMERCIAL BUILDINGS 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. 505.1.1
X. WHERE REQUIRED, WHERE ACCESS TO OR WITHIN A NEW OR EXISTING STRUCTURE OR AN AREA IS RESTRICTED BECAUSE OF SECURED OPENING OR WHERE IMMEDIATE ACCESS IS NECESSARY FOR LIFE-SAVING OR FIRE-FIGHTING PURPOSES, THE FIRE CODE OFFICIAL IS AUTHORIZED TO REQUIRE AN APPROVED KEY BOX OR OTHER LIMITED-ACCESS DEVICE TO BE INSTALLED IN AN APPROVED LOCATION. THE KEY BOX SHALL BE OF AN APPROVED TYPE LISTED IN ACCORDANCE WITH UL 1037 AND SHALL CONTAIN KEYS TO GAIN NECESSARY ACCESS AS REQUIRED BY THE FIRE CODE OFFICIAL. 506.1
Y. WATER CETRITICATE. EXCEPT AS OTHER PROVIDED BY THIS SECTION, EVERY APPLICATION FOR A BUILDING PERMIT SHALL BE ACCOMPANIED BY ONE OF THE FOLLOWING:
Y.1. EVIDENCE INDICATING TO THE FIRE CODE OFFICIAL THAT THE PROPOSED STRUCTURE WILL BE PROVIDED WITH A RELIABLE WATER SUPPLY. THE FIRE CODE OFFICIAL MAY ACCEPT AS SUFFICIENT EVIDENCE A CERTIFICATE FROM A WATER UTILITY THAT IT CAN SUPPLY WATER TO THE PROPOSED STRUCTURE IN COMPLIANCE WITH TITLE 20 OF THE LOS ANGELES COUNTY CODE, EXCEPT THAT IF THE FIRE CODE OFFICIAL KNOWS THAT SUCH WATER UTILITY CANNOT SO SUPPLY WATER, THE FIRE CODE OFFICIAL MAY REJECT SUCH CERTIFICATE.
Y.2. A CERTIFICATE FROM THE FIRE DEPARTMENT THAT THERE EXISTS, OR IS UNDER CONSTRUCTION, A PRIVATE WATER SUPPLY WHICH IN THE OPINION OF THE FIRE CODE OFFICIAL, IS ADEQUATE FOR FIRE PROTECTION. 507.1.
Z. ALL HYDRANTS SHALL MEASURE 6"X4"X2 1-2" BRASS OR BRONZE, CONFORMING TO CURRENT AWWA STANDARD C503 OR APPROVED EQUAL.
AA. PRIVATE HYDRANTS SHALL BE PROTECTED BY A 2HR RATED WALL (NOT OPENINGS) OR 10FT FROM AN APPROVED BUILDING

PROJECT SUMMARY

AERIAL FIRE APPARATUS ACCESS ROADWAY (LACFC 503.2.1 - 503.2.9)
- 169TH STREET (LACFC 503.2.1.2.2.1)
- 170TH STREET

PRIVATE DRIVE AND FIRE LANE WIDTH:
- 28'-0" (LACFC 503.2.1.2.2)

CENTERLINE RADII:
- 32'-0" MIN FOR FIRE LANE (LACFC 503.2.4)

FIRE SPRINKLERS:
- THE BUILDING AND GARAGE MUST BE EQUIPPED WITH AN AUTOMATIC SPRINKLER SYSTEM, COMPLYING WITH PROVISIONS OF CBC 903.3.1.1 (NFPA 13).

PRIVATE ON-SITE FIRE HYDRANTS:
- 9" X 4" X 2 1/2" FIRE HYDRANTS CONFORMING TO AWWS STANDARD C503 OR APPROVED EQUAL
- REQUIRED FIRE FLOW: 2,500 GPM @ 20 PSI FOR 2 HOURS

PUBLIC FIRE HYDRANTS:
- 9" X 4" X 2 1/2" FIRE HYDRANTS CONFORMING TO AWWS STANDARD C503
- REQUIRED FIRE FLOW: TBD GPM @ 20 PSI FOR TBD HOURS

BUILDING SUMMARY

APARTMENT:	HEIGHT = 87'-6", GROSS FLOOR AREA = 308,308 SF
BUILDING 1:	HEIGHT = 29'-6", GROSS FLOOR AREA = 11,550 SF
BUILDING 2:	HEIGHT = 29'-6", GROSS FLOOR AREA = 9,900 SF
BUILDING 3:	HEIGHT = 29'-6", GROSS FLOOR AREA = 9,900 SF
BUILDING 4:	HEIGHT = 29'-6", GROSS FLOOR AREA = 11,550 SF
BUILDING 5:	HEIGHT = 36'-0", GROSS FLOOR AREA = 9,250 SF
BUILDING 6:	HEIGHT = 36'-0", GROSS FLOOR AREA = 9,250 SF
BUILDING 7:	HEIGHT = 29'-6", GROSS FLOOR AREA = 9,900 SF
BUILDING 8:	HEIGHT = 29'-6", GROSS FLOOR AREA = 11,700 SF
BUILDING 9:	HEIGHT = 36'-0", GROSS FLOOR AREA = 11,700 SF
BUILDING 10:	HEIGHT = 29'-6", GROSS FLOOR AREA = 11,700 SF
BUILDING 11:	HEIGHT = 29'-6", GROSS FLOOR AREA = 13,080 SF

PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

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OWNER:

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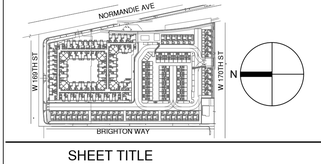
LEGEND
- PRIVATE DRIVE AND FIRE LANE (LACFC 503.2.1 - 503.2.9)
- FIRE TRUCK & ROADWAY ACCESS (LACFC 503.1, 503.2.1.2, 503.2.1.2.2, 503.2.1.2.2.1, 503.2.1.2.2.2, 503.2.9, 503.4)
- FIRE APPARATUS PATH / TURNING RADIUS (LACFC 503.2.4)
- 150' HOSE LENGTH MAX (LACFC 503.1)
- OUT OF COMPLIANCE LENGTH
- 42" PARAPET HEIGHT MAX (LACFC 504.5)
- EAVE LINE AT UNDER 30'-0"
- FIRE HYDRANT LOCATION WITHIN 300 FT OF THE LOT FRONTAGE (LACFC 507.5, C105.1)
- NO PARKING ZONE AT 169TH STREET
- 3-STORY TOWNHOME WITH EAVE UNDER 30'-0" IN HEIGHT. COMPLIES WITH LACFC 503.2.1.2.2. SEE SECTION A ON SHEET A2.31
- 3-STORY TOWNHOME OVER 30'-0" IN HEIGHT. COMPLIES WITH LACFC 503.2.1.2.2 & 503.2.1.2.2.1. SEE SECTION B ON SHEET A2.31

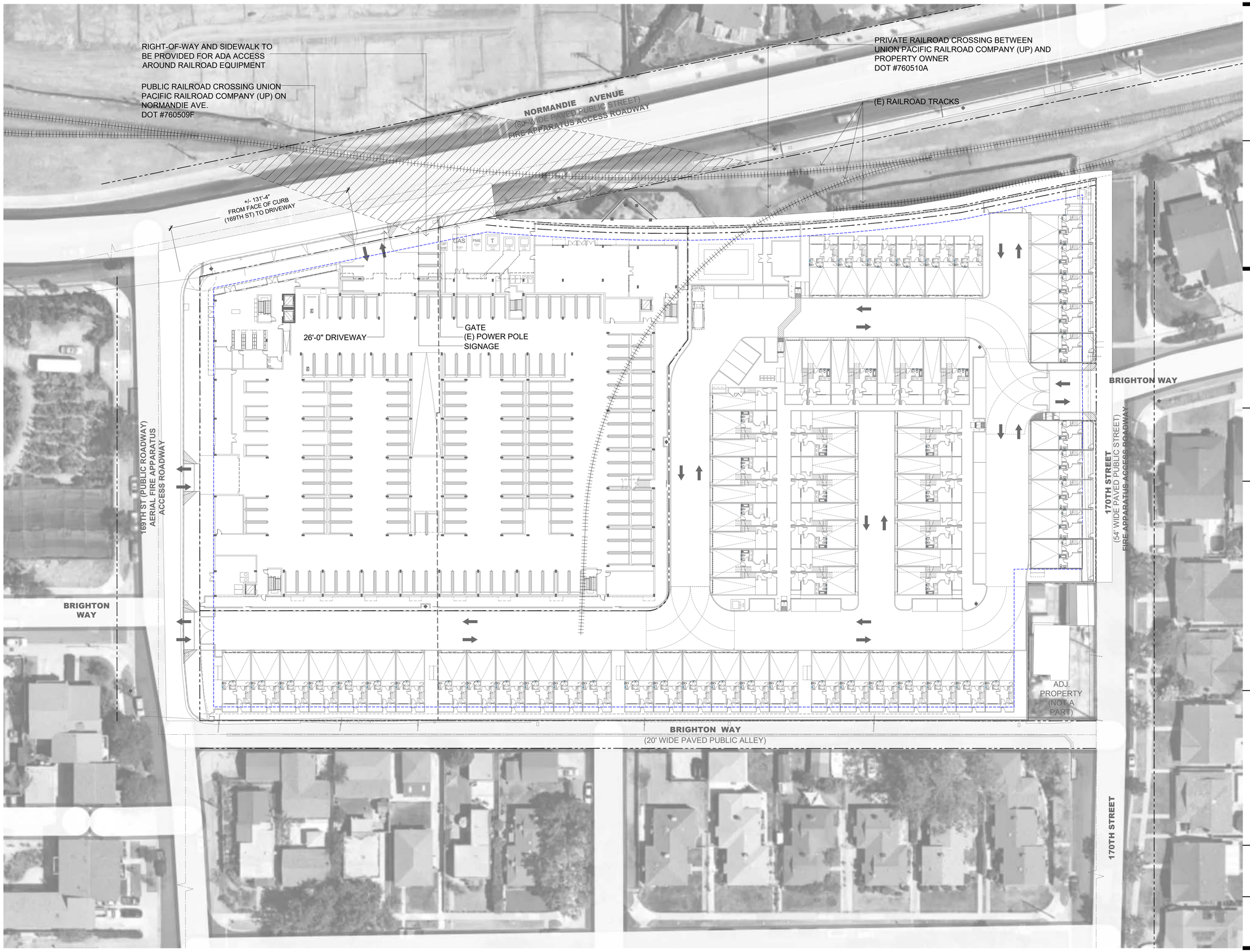
FULL SCALE (24X36): 1/32" = 1'-0"
0 16' 32' 64' 128'
HALF SCALE (11X17): 50%



SHEET TITLE

HYDRANTS AND FIRE ACCESS PLAN

SHEET NO. **G2.30**



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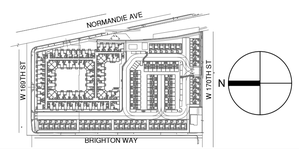
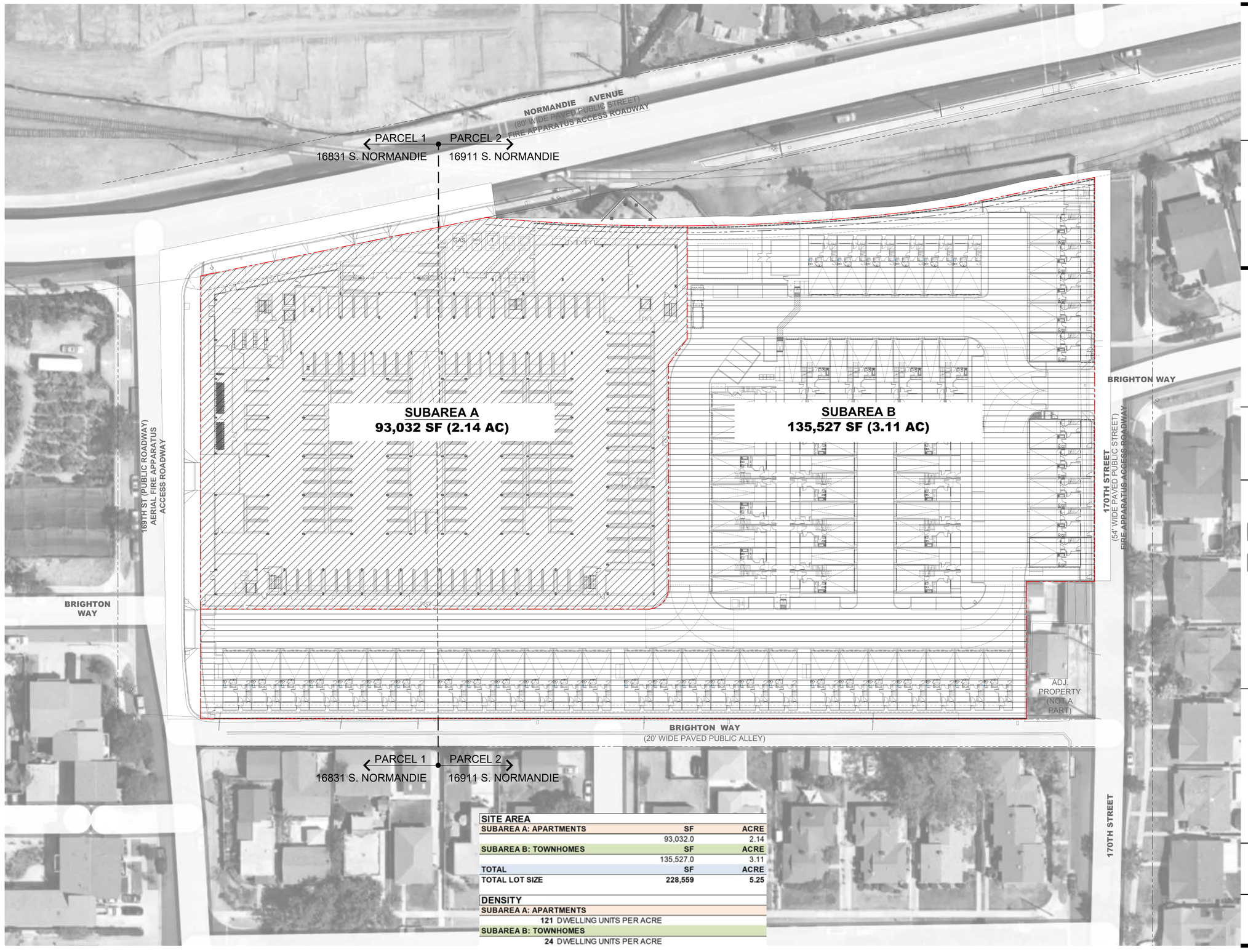


SHEET TITLE

RAILROAD TRACK OVERLAY PLAN

SHEET NO. **G2.40**



SITE AREA		
SUBAREA A: APARTMENTS	SF	ACRE
	93,032.0	2.14
SUBAREA B: TOWNHOMES	SF	ACRE
	135,527.0	3.11
TOTAL	SF	ACRE
TOTAL LOT SIZE	228,559	5.25

DENSITY
SUBAREA A: APARTMENTS
121 DWELLING UNITS PER ACRE
SUBAREA B: TOWNHOMES
24 DWELLING UNITS PER ACRE

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SUBAREA A: APARTMENTS

SUBAREA B: TOWNHOUSES

FULL SCALE (24X36): 1/32" = 1'-0"

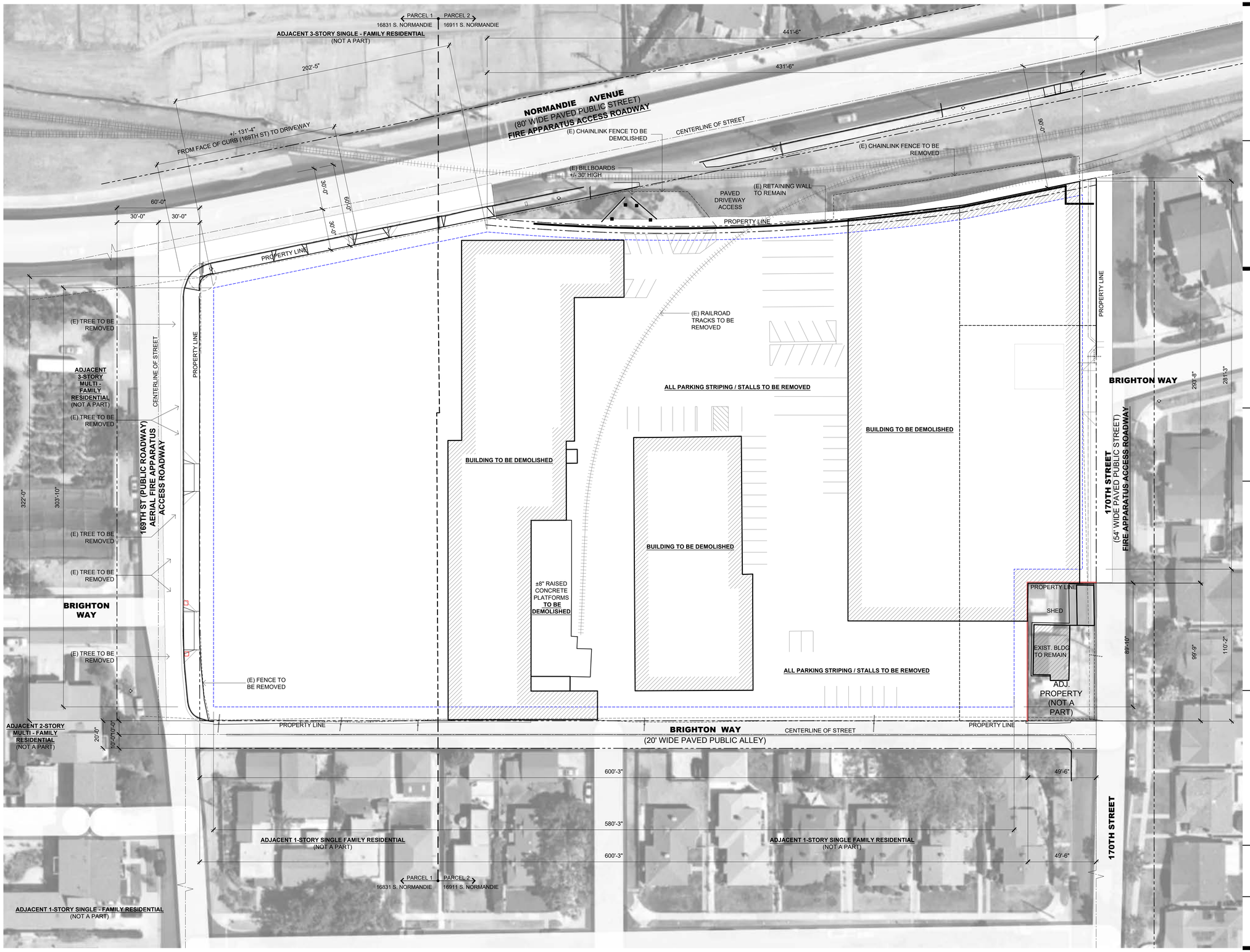
0 16' 32' 64' 128'

HALF SCALE (11X17): 50%

SHEET TITLE

SITE AREA - LOT SEPARATION

SHEET NO. **G2.50**



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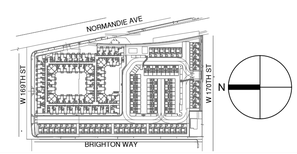
0 16' 32' 64' 128'

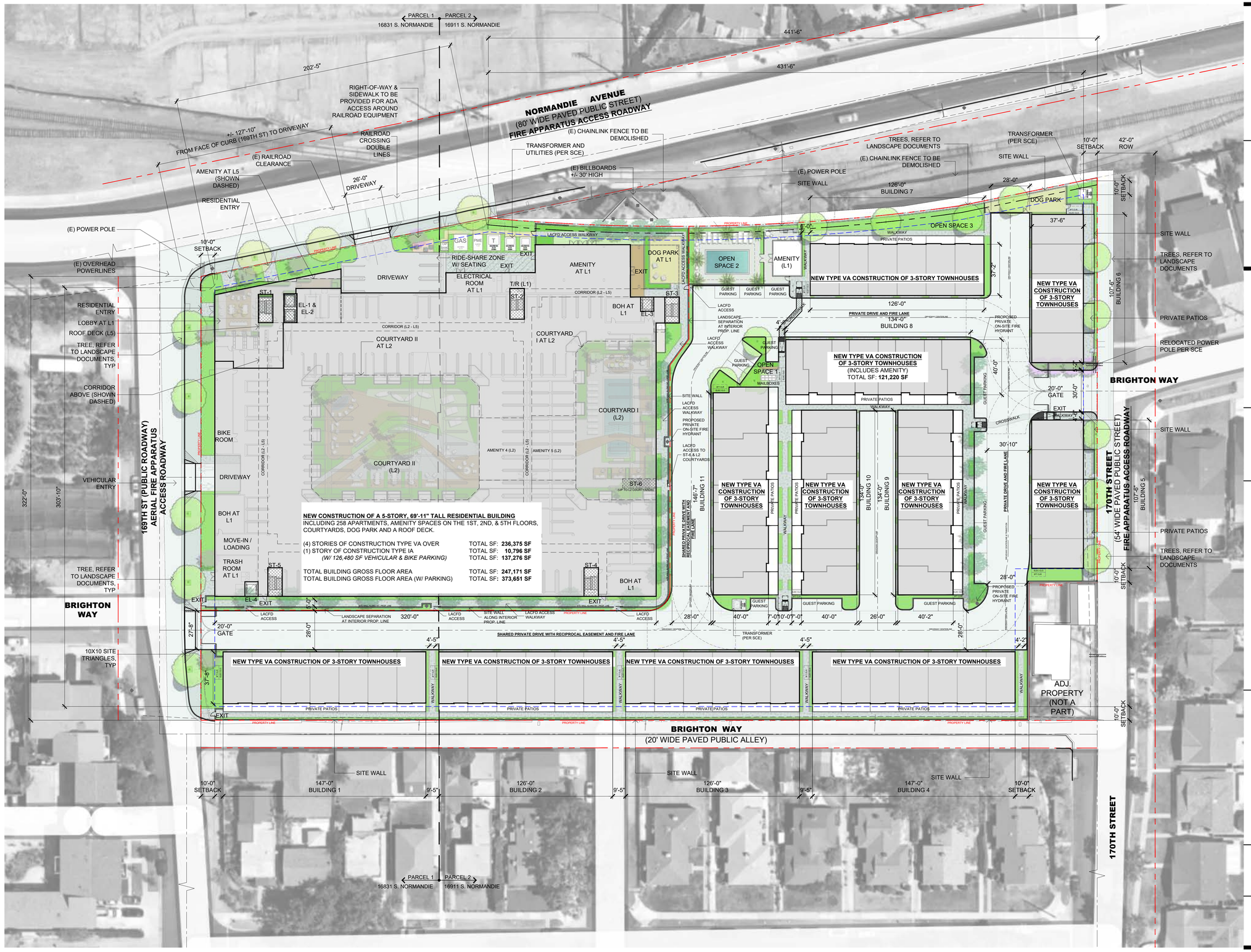
HALF SCALE (11X17): 50%



SHEET TITLE

PLOT PLAN

SHEET NO. **A0.01**



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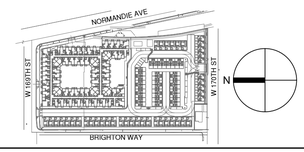
LEGEND

- BUILDING OUTLINE
- BUILDING ABOVE
- BUILDING AT GRADE
- STAIRS & ELEVATOR TOWERS

FULL SCALE (24X36): 1/32" = 1'-0"

0 16' 32' 64' 128'

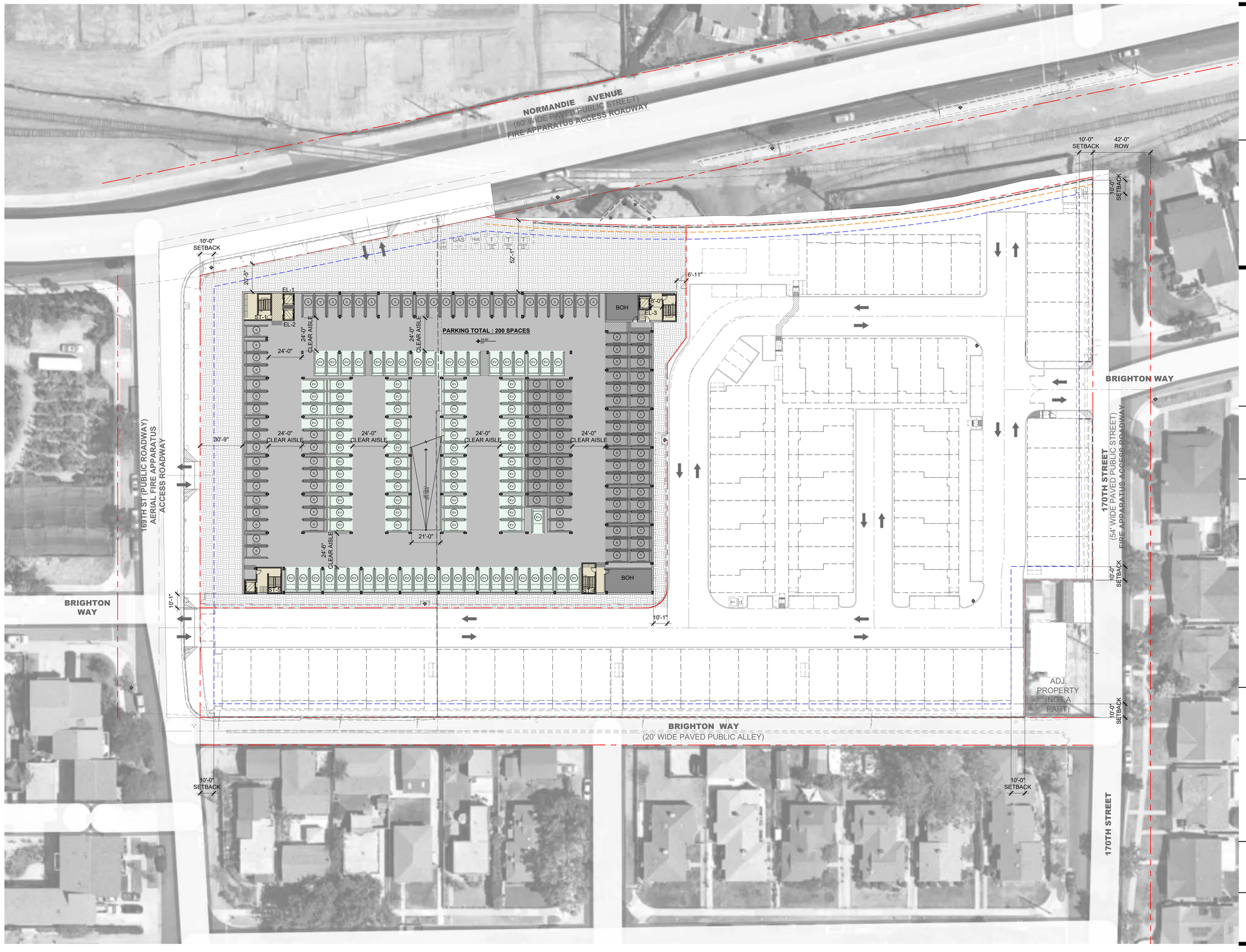
HALF SCALE (11X17): 50%



SHEET TITLE

SITE PLAN

SHEET NO. **A1.00**



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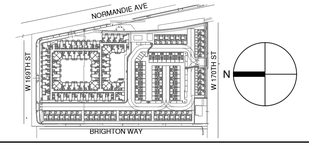
LEGEND

S 1B 2B	TH1 TH2 TH3 TH4
APARTMENT	TOWNHOUSE
LOBBY	COMMON / AMENITY
OFFICE	BOH
CARPARK / SERVICE	CIRCULATION
AMENITY TERRACE	LANDSCAPE
EV GUEST	HC TANDEM

FULL SCALE (24X36): 1/32" = 1'-0"

0 16' 32' 64' 128'

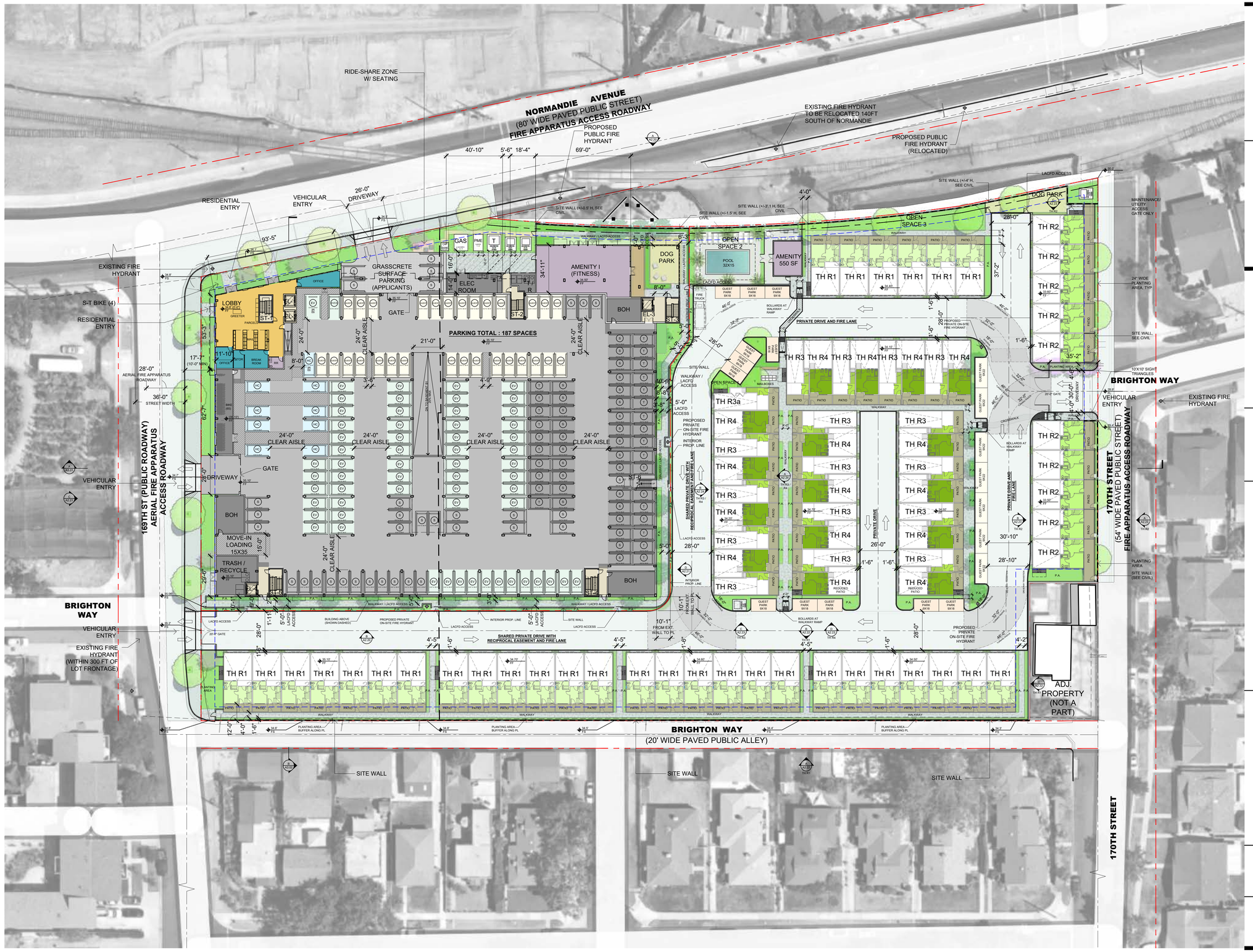
HALF SCALE (11X17): 50%



SHEET TITLE

BASEMENT B1 FLOOR PLAN

SHEET NO. **A1.10**



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LEGEND

S	1B	2B	APARTMENT
TH1	TH2	TH3	TH4 TOWNHOUSE
			LOBBY
			COMMON / AMENITY
			OFFICE
			BOH
			CARPARK / SERVICE
			CIRCULATION
			AMENITY TERRACE
			LANDSCAPE
EV	GUEST	HC	TANDEM

FULL SCALE (24X36): 1/32" = 1'-0"

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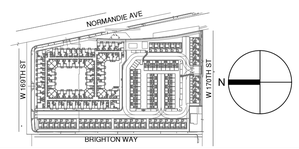
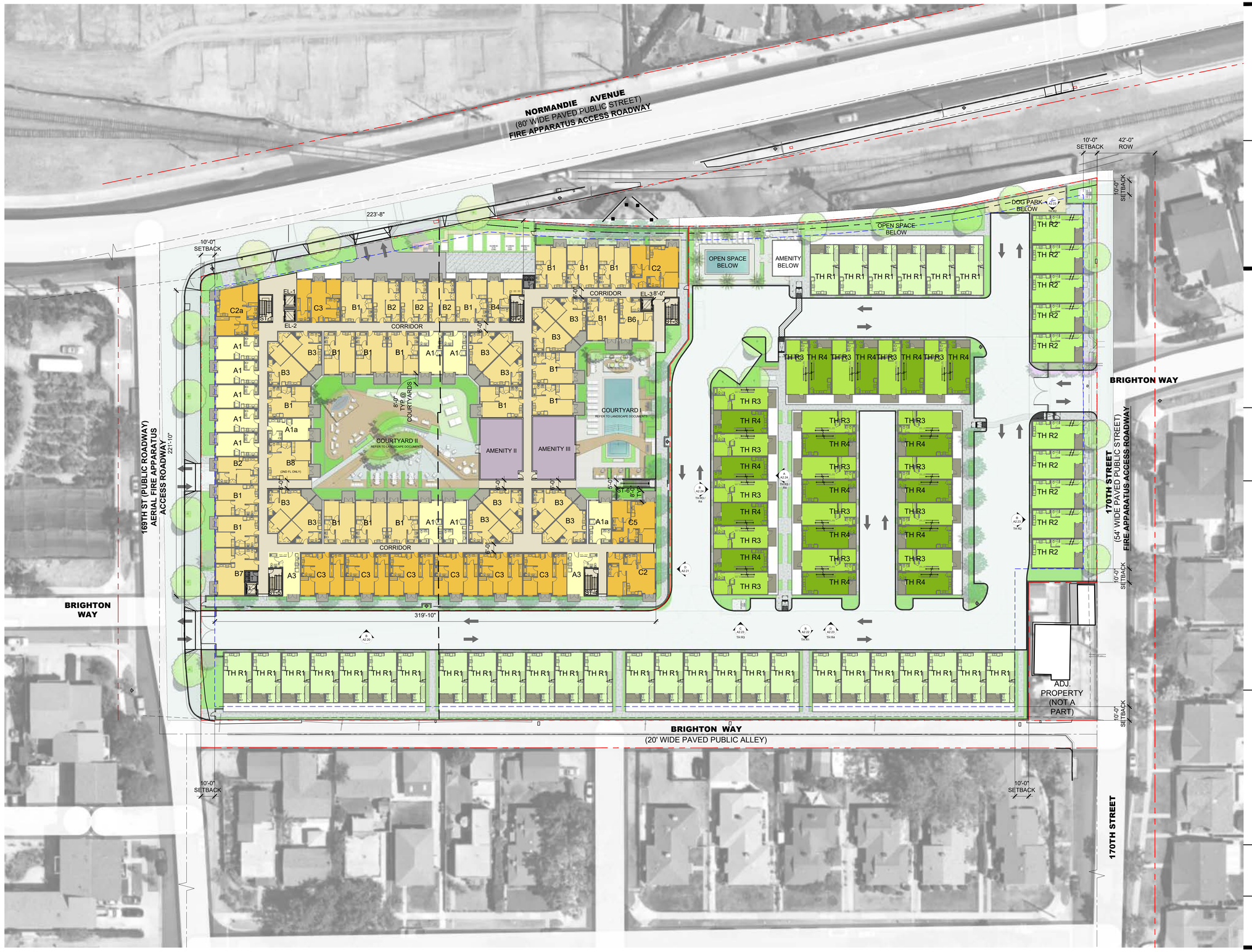
HALF SCALE (11X17): 50%



SHEET TITLE

FIRST FLOOR PLAN

SHEET NO. **A1.11**



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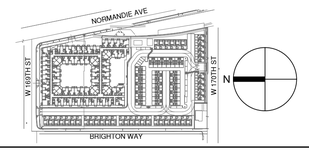
LEGEND

S	1B	2B	TH1	TH2	TH3	TH4
APARTMENT			TOWNHOUSE			
LOBBY			COMMON / AMENITY			
OFFICE			BOH			
CARPARK / SERVICE			CIRCULATION			
AMENITY TERRACE			LANDSCAPE			

FULL SCALE (24X36): 1/32" = 1'-0"

0 16' 32' 64' 128'

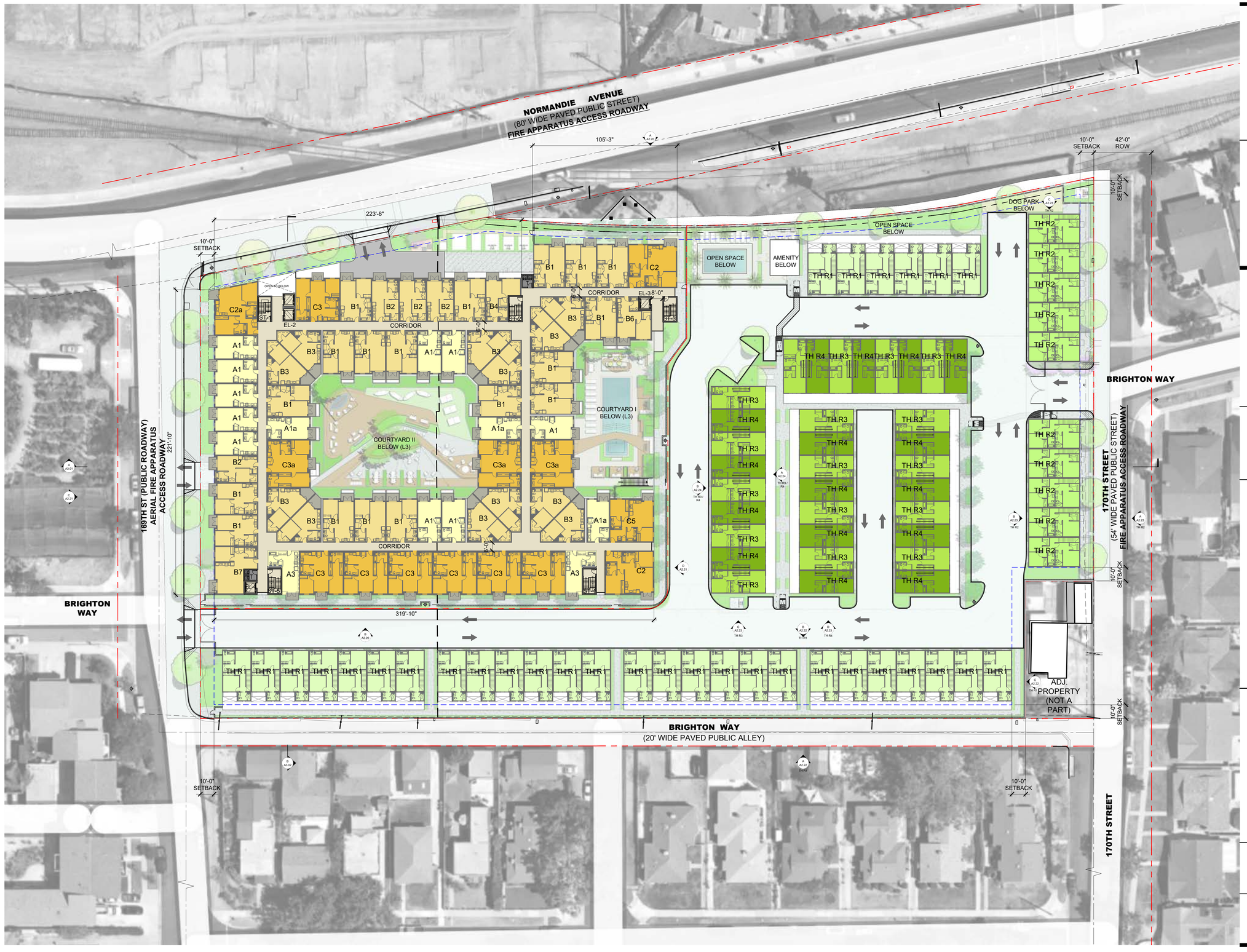
HALF SCALE (11X17): 50%



SHEET TITLE

SECOND FLOOR PLAN

SHEET NO. **A1.12**



PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

SAIKO INVESTMENT CORP.
+
NEXTGEN APARTMENTS LLC

134 LOMITA STREET
EL SEGUNDO | CA 90245

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PHASE

ENTITLEMENT SET

11/01/2024

LEGEND

S 1B 2B — APARTMENT	TH1 TH2 TH3 TH4 — TOWNHOUSE
LOBBY	COMMON / AMENITY
OFFICE	BOH
CARPARK / SERVICE	CIRCULATION
AMENITY TERRACE	LANDSCAPE

FULL SCALE (24X36): 1/32" = 1'-0"

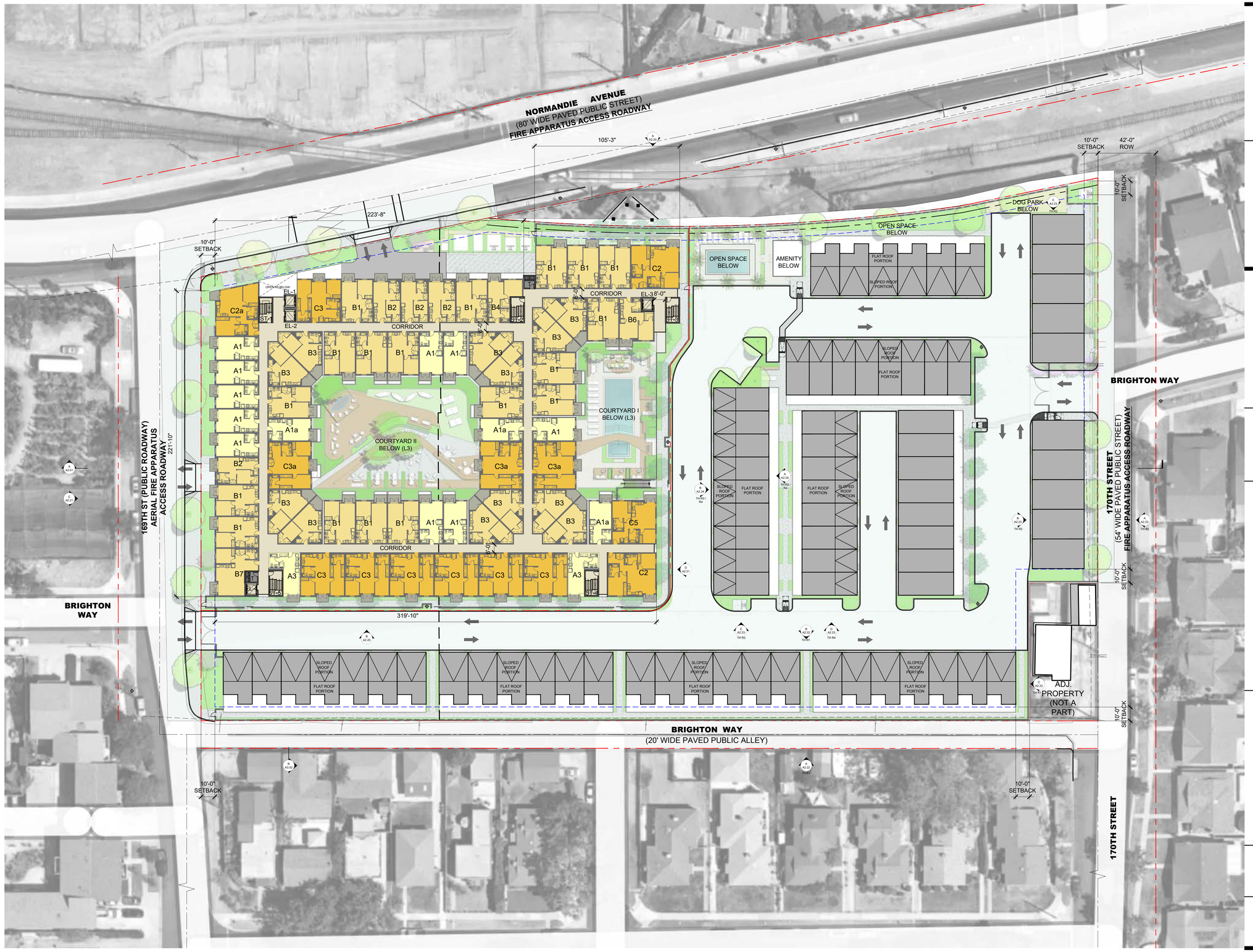
0 16' 32' 64' 128'

HALF SCALE (11X17): 50%

SHEET TITLE

THIRD FLOOR PLAN

SHEET NO. **A1.13**



PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

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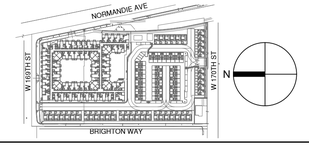
LEGEND

S 1B 2B	APARTMENT
TH1 TH2 TH3 TH4	TOWNHOUSE
	LOBBY
	COMMON / AMENITY
	OFFICE
	BOH
	CARPARK / SERVICE
	CIRCULATION
	AMENITY TERRACE
	LANDSCAPE

FULL SCALE (24X36): 1/32" = 1'-0"

0 16' 32' 64' 128'

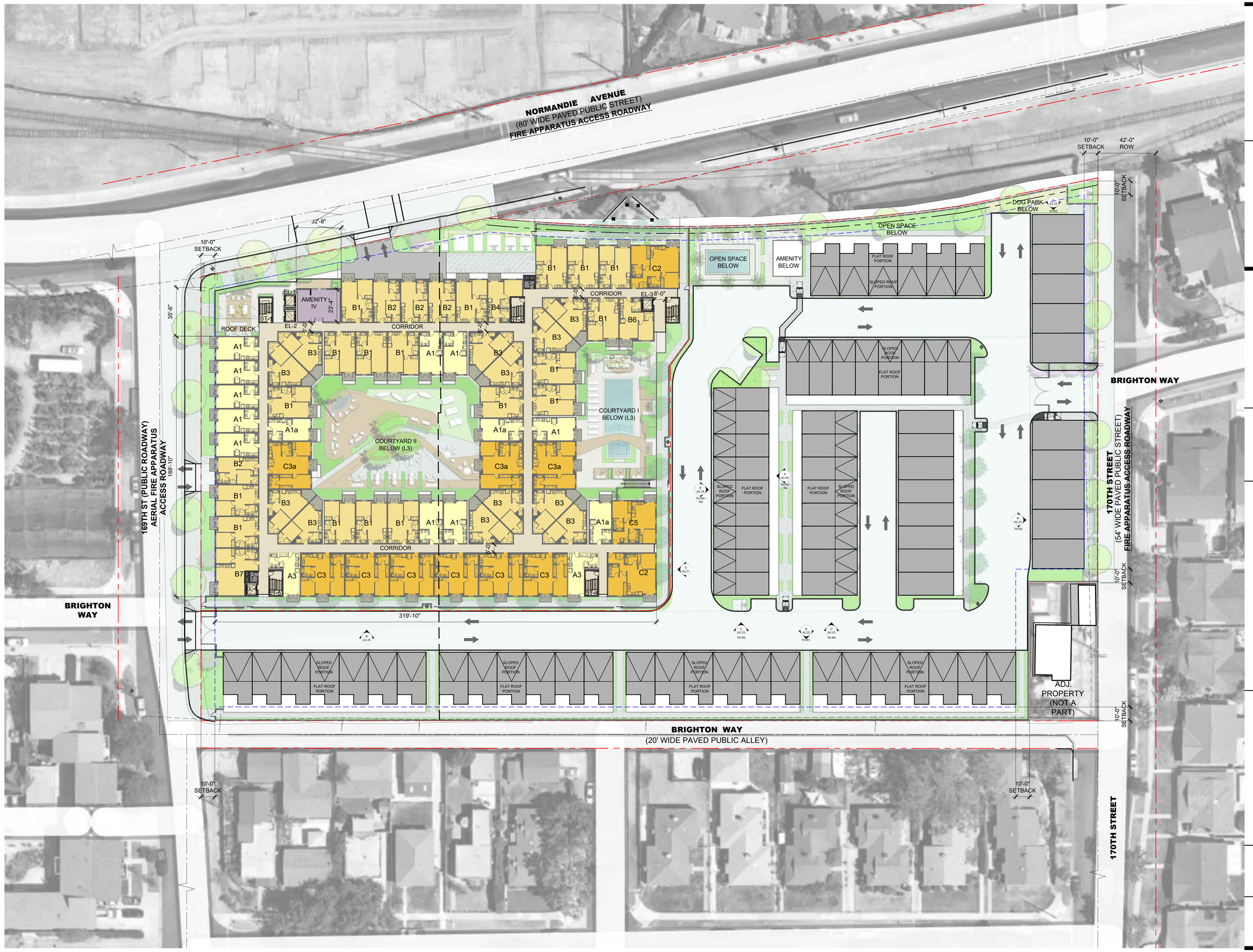
HALF SCALE (11X17): 50%



SHEET TITLE

FOURTH FLOOR PLAN

SHEET NO. **A1.14**



PROJECT:

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LEGEND

S 1B 2B	APARTMENT
TH1 TH2 TH3 TH4	TOWNHOUSE
	LOBBY
	COMMON / AMENITY
	OFFICE
	BOH
	CARPARK / SERVICE
	CIRCULATION
	AMENITY TERRACE
	LANDSCAPE

FULL SCALE (24X36): 1/32" = 1'-0"

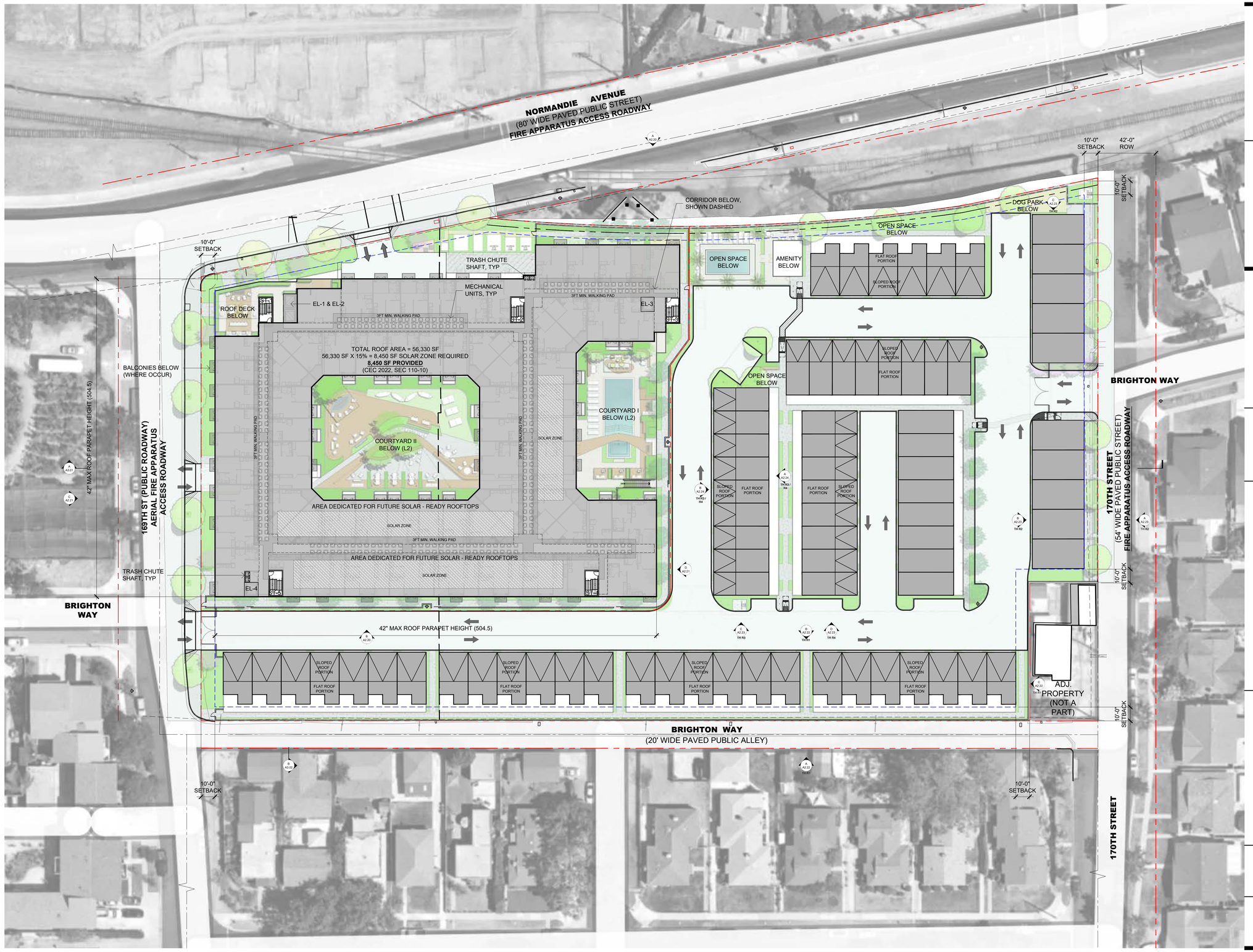
0 16' 32' 64' 128'

HALF SCALE (11X17): 50%

SHEET TITLE

FIFTH FLOOR PLAN

SHEET NO. **A1.15**



PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

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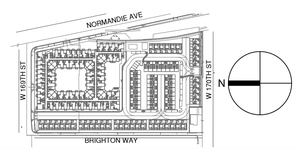
0 16' 32' 64' 128'

HALF SCALE (11X17): 50%



SHEET TITLE

ROOF PLAN

SHEET NO. **A1.16**

A - APARTMENTS - EAST ELEVATION

B - APARTMENTS - WEST ELEVATION

PL-101 CEMENT PLASTER COLOR 1
BEHR 75 - POLAR BEAR

PL-102 CEMENT PLASTER COLOR 2
BEHR MQ5-5 - LIMOUSINE LEATHER
MATCH RAILING / BALCONY ACCENT

PL-103 CEMENT PLASTER COLOR 3
BEHR 750C-3 - SANDSTONE CLIFF

PL-104 CEMENT PLASTER COLOR 4
BEHR PPU24-17 - HAILSTORM GRAY

PL-105 CEMENT PLASTER COLOR 5
BEHR PPU25-17 - EURO GRAY

PL-106 CEMENT PLASTER COLOR 6
WINDOW SPANDREL
MATCH ADJACENT WINDOW FRAME

PL-107 CEMENT PLASTER COLOR 7
BEHR 710D-4 - HARVEST BROWN

CB-102 CEMENT BOARD "WOOD" COLOR 1 HORIZONTAL
MATCH PL-107

CB-104 CEMENT BOARD PARKING SCREEN "WOOD" COLOR 1
MATCH PL-107

MT-101 VERTICAL SIDING

MT-102 METAL C-CHANNEL DARK

MT-103 METAL CANOPY, DOOR / FRAME & WINDOW MULLION DARK FINISH

MT-104 METAL PANEL WHITE

GR-101 GLASS GUARDRAIL GUARDRAIL TYPE 1

GR-101A GLASS POOL GUARDRAIL (3'-6" HIGH)

GR-102 VERTICAL PICKETS GUARDRAIL TYPE 2 DARK FINISH

GS-101 GLAZING SYSTEM

PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

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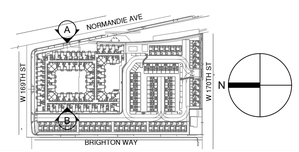
LEGEND

FULL SCALE (24X36): 1/16" = 1'-0"
0 8' 16' 32' 64'

HALF SCALE (11X17): 50%

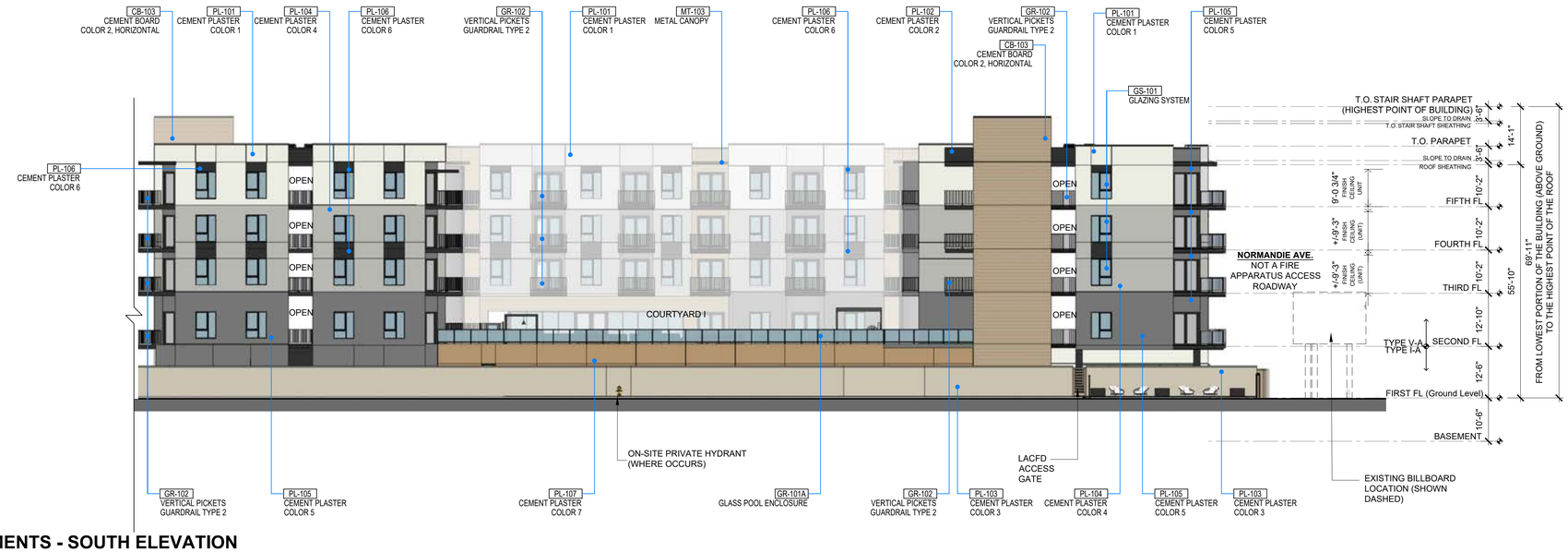


SHEET TITLE

APARTMENT ELEVATIONS

SHEET NO. **A2.20**

C - APARTMENTS - NORTH ELEVATION



D - APARTMENTS - SOUTH ELEVATION

PL-101 CEMENT PLASTER COLOR 1 — BEHR 75 - POLAR BEAR

PL-102 CEMENT PLASTER COLOR 2 — BEHR M26-5 - LIMOUSINE LEATHER MATCH RAILING / BALCONY ACCENT

PL-103 CEMENT PLASTER COLOR 3 — BEHR 730C-3 - SANDSTONE CLIFF

PL-104 CEMENT PLASTER COLOR 4 — BEHR PPU26-17 - HAILSTORM GRAY

PL-105 CEMENT PLASTER COLOR 5 — BEHR PPU26-17 - EURO GRAY

PL-106 CEMENT PLASTER COLOR 6 WINDOW SPANDREL — MATCH ADJACENT WINDOW FRAME

PL-107 CEMENT PLASTER COLOR 7 — BEHR 710D-4 - HARVEST BROWN

CB-102 CEMENT BOARD "WOOD" COLOR 1 HORIZONTAL — MATCH PL-107

CB-104 CEMENT BOARD PARKING SCREEN "WOOD" COLOR 1 — MATCH PL-107

MT-101 VERTICAL SIDING

MT-102 METAL C-CHANNEL DARK

MT-103 METAL CANOPY, DOOR / FRAME & WINDOW MULLION DARK FINISH

MT-104 METAL PANEL WHITE

GR-101 GLASS GUARDRAIL GUARDRAIL TYPE 1

GR-101A GLASS POOL GUARDRAIL (3'-6" HIGH)

GR-102 VERTICAL PICKETS GUARDRAIL TYPE 2 DARK FINISH

GS-101 GLAZING SYSTEM

PROJECT:

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LEGEND

FULL SCALE (24X36): 1/16" = 1'-0"
0 8' 16' 32' 64'

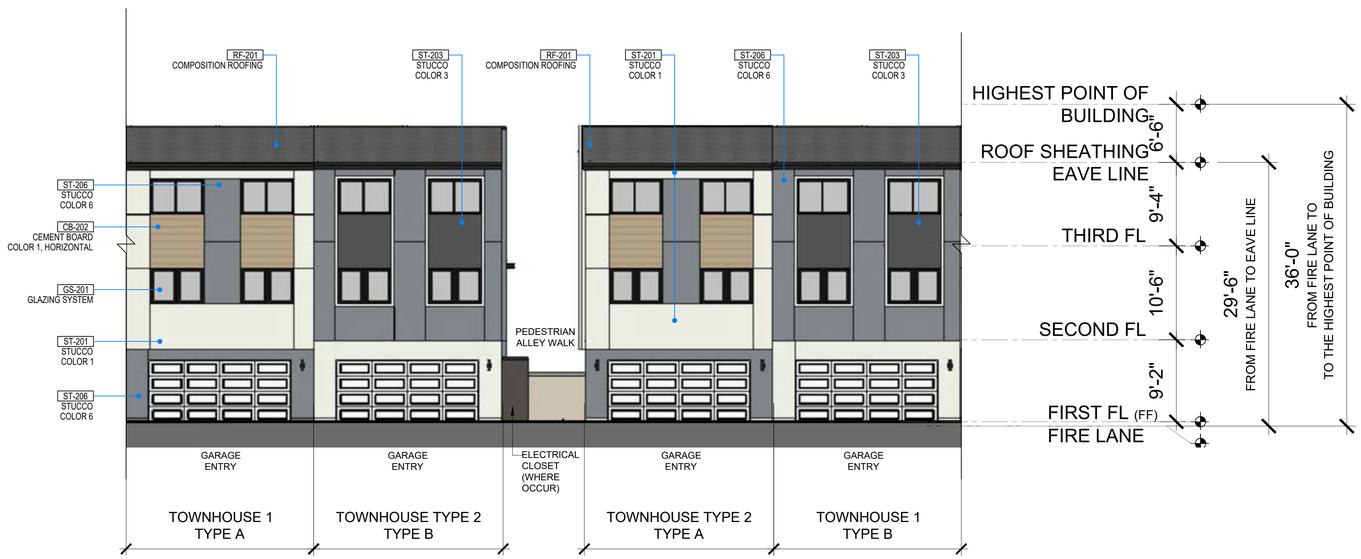
HALF SCALE (11X17): 50%

SHEET TITLE

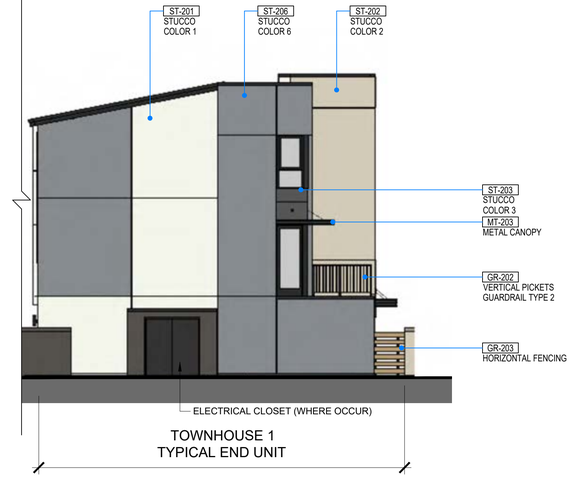
BUILDING ELEVATIONS

SHEET NO. **A2.21**

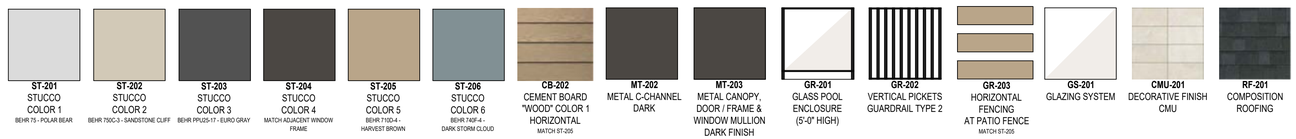
A - TOWNHOUSE 1
(FRONT ELEVATION - UNIT ENTRY)



B - TOWNHOUSE 1
(REAR ELEVATION - GARAGE ENTRY)



C - TOWNHOUSE 1
(SIDE ELEVATION - END CONDITION)



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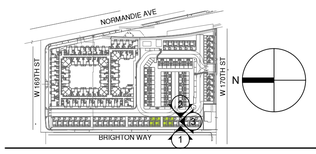
11/01/2024

LEGEND

FULL SCALE (24X36): 1/8" = 1'-0"
0 4' 8' 16' 32'

HALF SCALE (11X17): 50%

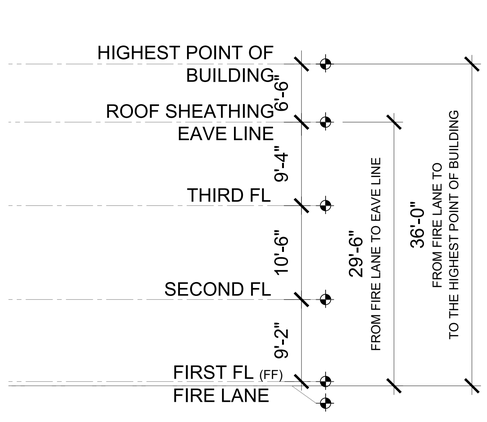


SHEET TITLE

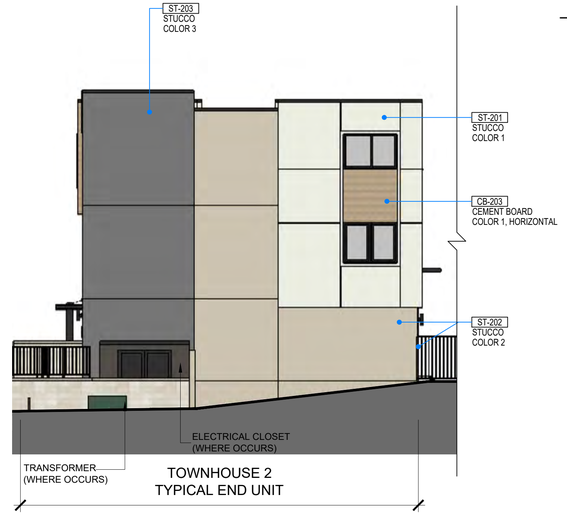
BUILDING ELEVATIONS

SHEET NO. **A2.22**

A - TOWNHOUSE 2
(FRONT ELEVATION - UNIT ENTRY)



B - TOWNHOUSE 2
(REAR ELEVATION - GARAGE ENTRY)



C - TOWNHOUSE 2
(SIDE ELEVATION - END CONDITION)

ST-201 STUCCO COLOR 1 BEHR 75 - POLAR BEAR	**ST-202** STUCCO COLOR 2 BEHR 750C-3 - SANDSTONE CLIFF	**ST-203** STUCCO COLOR 3 BEHR PPU25-17 - EURO GRAY	**ST-204** STUCCO COLOR 4 MATCH ADJACENT WINDOW FRAME	**ST-205** STUCCO COLOR 5 BEHR 710D-4 - HARVEST BROWN	**ST-206** STUCCO COLOR 6 BEHR 740F-4 - DARK STORM CLOUD	**CB-202** CEMENT BOARD "WOOD" COLOR 1 HORIZONTAL MATCH ST-205	**MT-202** METAL C-CHANNEL DARK	**MT-203** METAL CANOPY, DOOR / FRAME & WINDOW MULLION DARK FINISH	**GR-201** GLASS POOL ENCLOSURE (5'-0" HIGH)	**GR-202** VERTICAL PICKETS GUARDRAIL TYPE 2	**GR-203** HORIZONTAL FENCING AT PATIO FENCE MATCH ST-205	**GS-201** GLAZING SYSTEM	**CMU-201** DECORATIVE FINISH CMU	**RF-201** COMPOSITION ROOFING

PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

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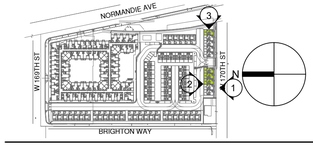
LEGEND

FULL SCALE (24X36): 1/8" = 1'-0"
0 4' 8' 16' 32'

HALF SCALE (11X17): 50%



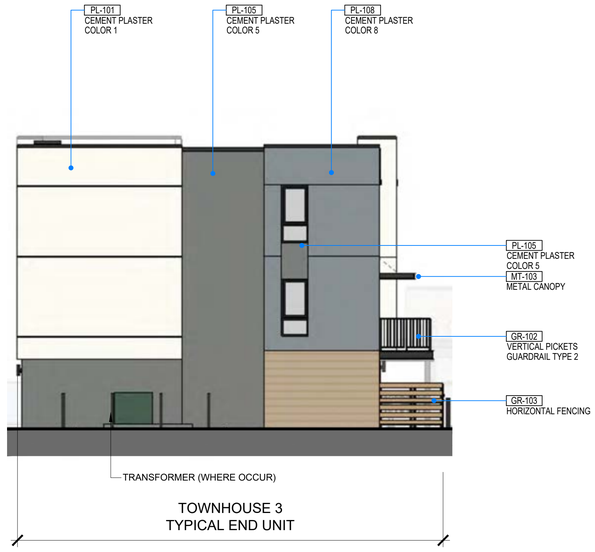
SHEET TITLE

BUILDING ELEVATIONS

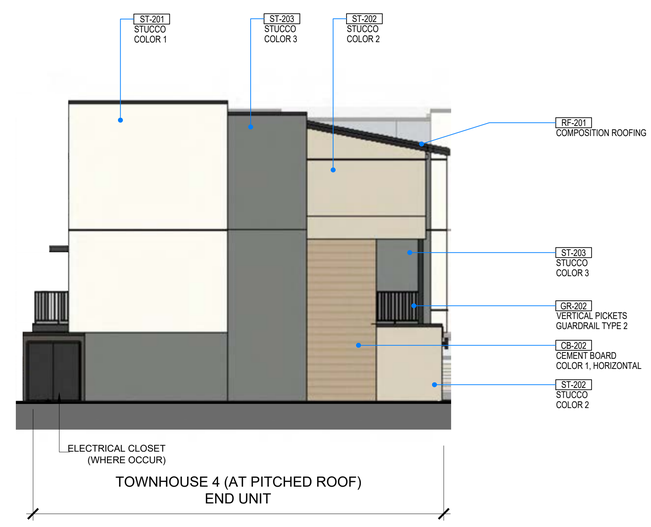
SHEET NO. **A2.23**

A - TOWNHOUSE 3 & 4
(FRONT ELEVATION - UNIT ENTRY)

B - TOWNHOUSE 3 & 4
(REAR ELEVATION - GARAGE ENTRY)



C - TOWNHOUSE 3
(SIDE ELEVATION - END CONDITION)



D - TOWNHOUSE 4 (AT PITCHED ROOF)
(SIDE ELEVATION - END CONDITION)

ST-201 STUCCO COLOR 1 BEHR 75 - POLAR BEAR	**ST-202** STUCCO COLOR 2 BEHR 750C-3 - SANDSTONE CLIFF	**ST-203** STUCCO COLOR 3 BEHR PPU25-17 - EURO GRAY	**ST-204** STUCCO COLOR 4 MATCH ADJACENT WINDOW FRAME	**ST-205** STUCCO COLOR 5 BEHR 710D-4 - HARVEST BROWN	**ST-206** STUCCO COLOR 6 BEHR 740F-4 - DARK STORM CLOUD	**CB-202** CEMENT BOARD "WOOD" COLOR 1 HORIZONTAL MATCH ST-205	**MT-202** METAL C-CHANNEL DARK	**MT-203** METAL CANOPY, DOOR / FRAME & WINDOW MULLION DARK FINISH	**GR-201** GLASS POOL ENCLOSURE (5'-0" HIGH)	**GR-202** VERTICAL PICKETS GUARDRAIL TYPE 2	**GR-203** HORIZONTAL FENCING AT PATIO FENCE MATCH ST-205	**GS-201** GLAZING SYSTEM	**CMU-201** DECORATIVE FINISH CMU	**RF-201** COMPOSITION ROOFING

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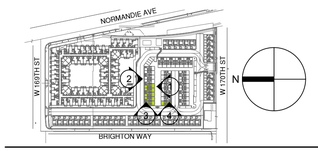
0 4' 8' 16' 32'

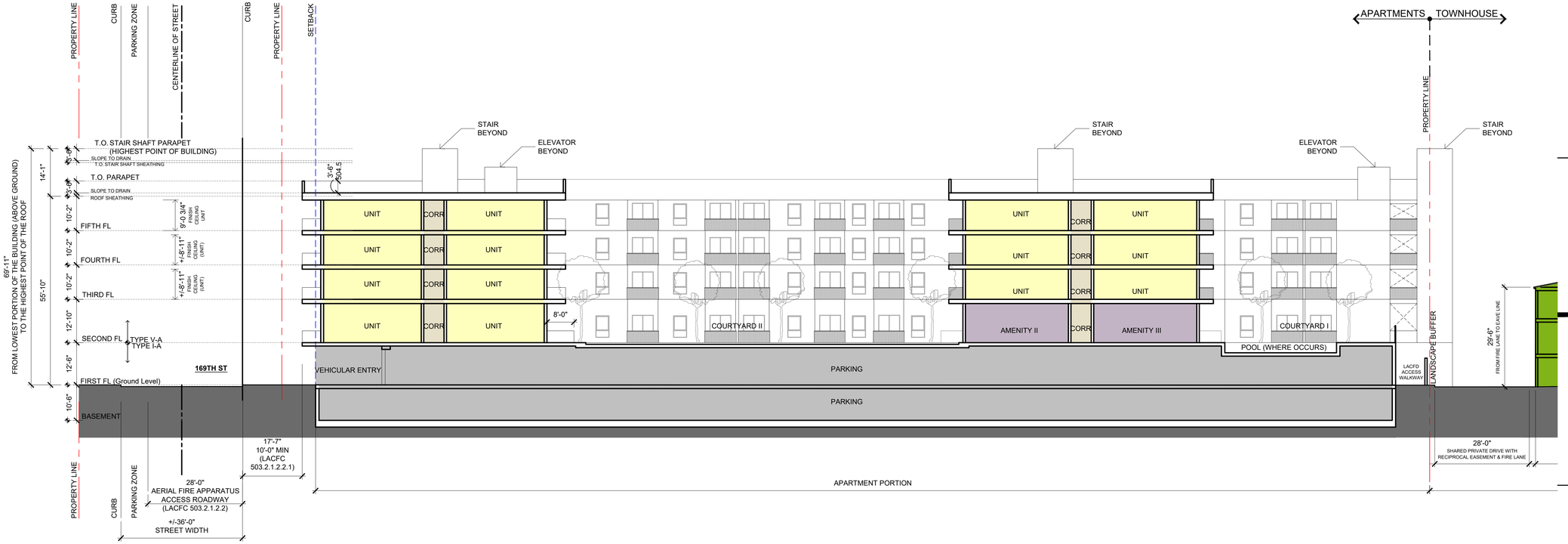
HALF SCALE (11X17): 50%



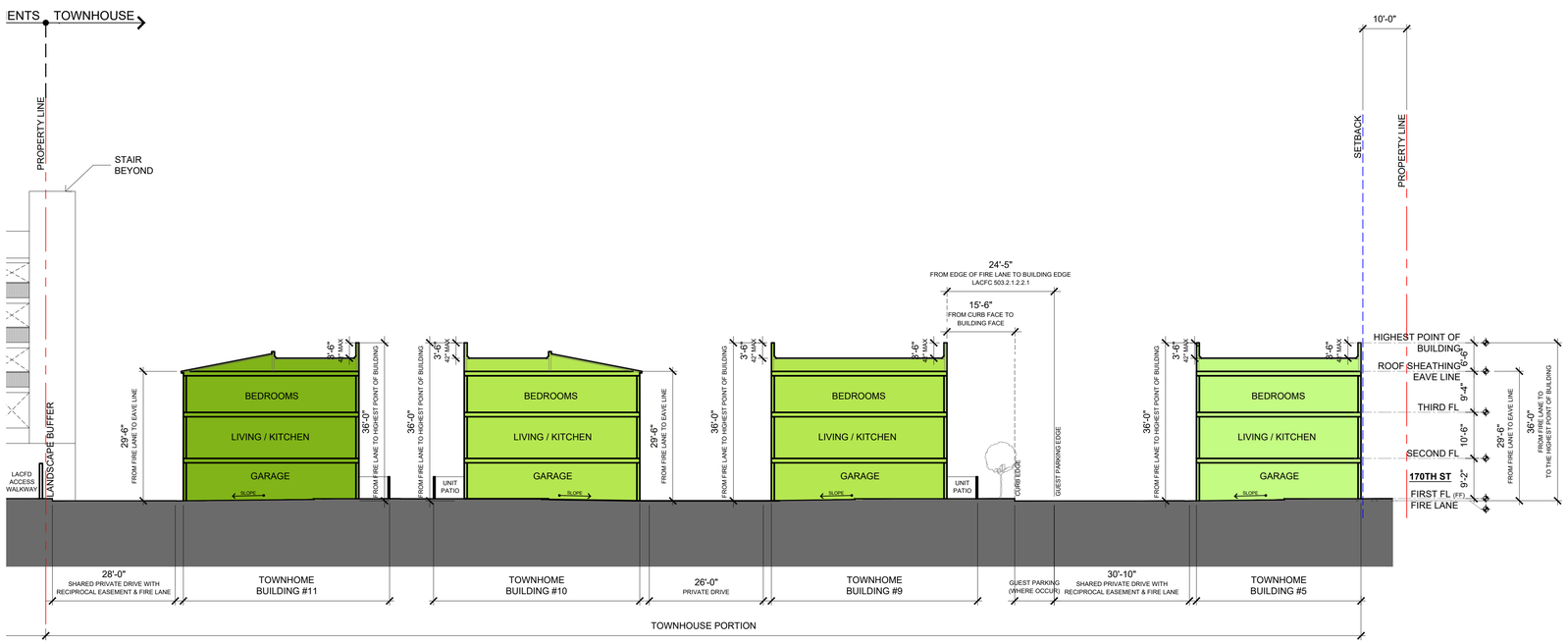
SHEET TITLE

BUILDING ELEVATIONS

SHEET NO. **A2.24**



BUILDING SECTION A



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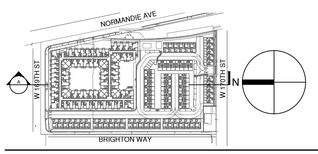
LEGEND

S 1B 2B	TH1 TH2 TH3 TH4
APARTMENT	TOWNHOUSE
LOBBY	COMMON / AMENITY
OFFICE	BOH
CARPARK / SERVICE	CIRCULATION
AMENITY TERRACE	LANDSCAPE

FULL SCALE (24X36): 1/16" = 1'-0"

0 8' 16' 32' 64'

HALF SCALE (11X17): 50%

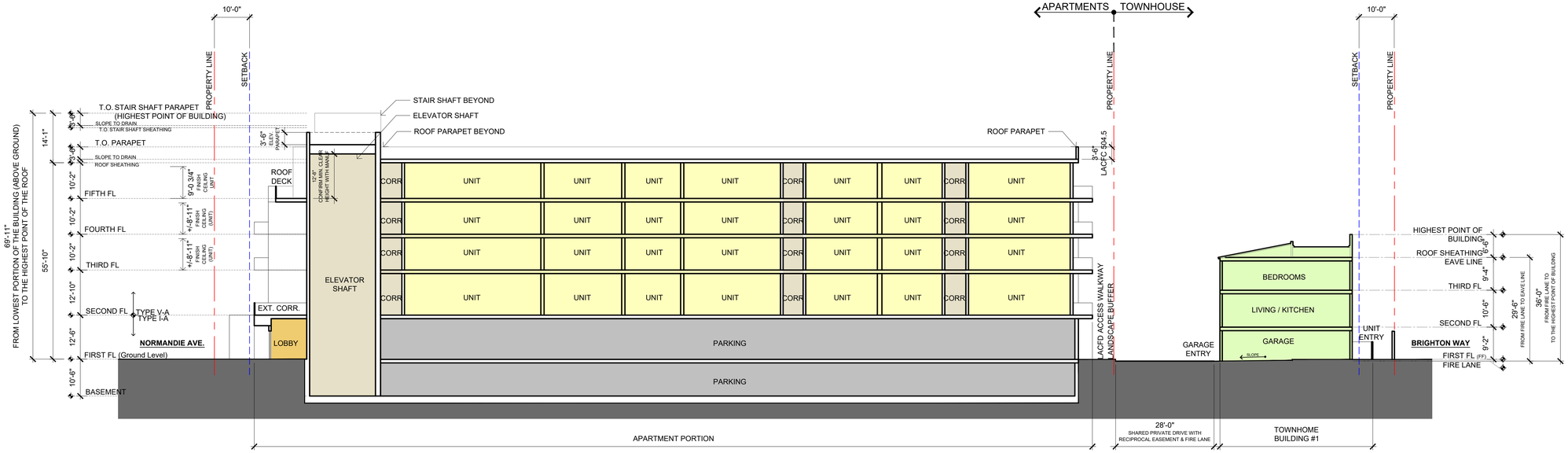


SHEET TITLE

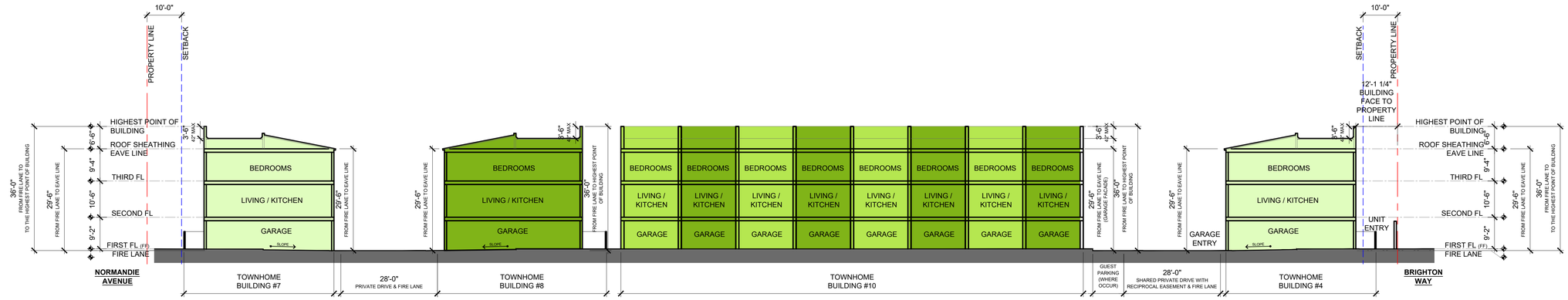
BUILDING SECTION

SHEET NO. **A3.01**

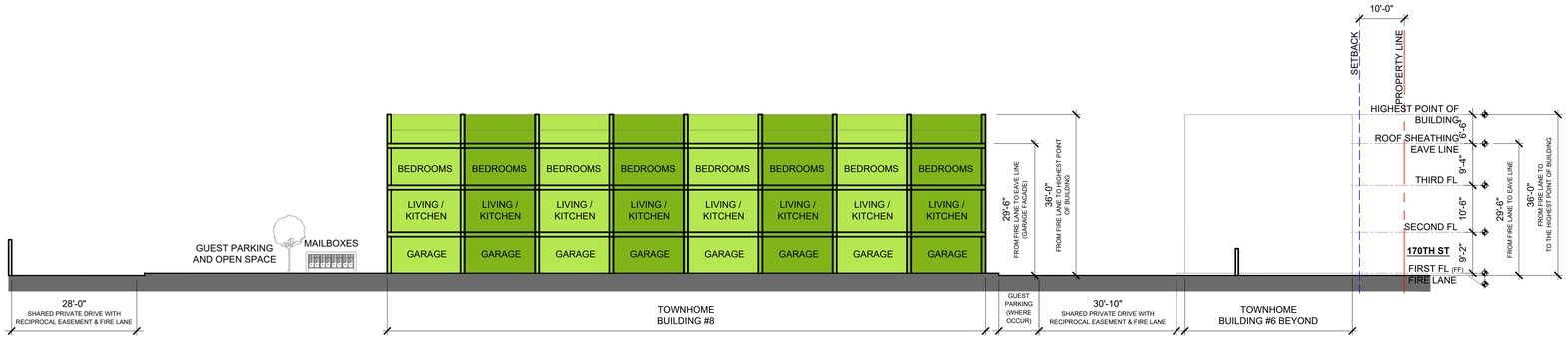
BUILDING SECTION B



BUILDING SECTION C



BUILDING SECTION D



PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

SAIKO INVESTMENT CORP.
+
NEXTGEN APARTMENTS LLC

134 LOMITA STREET
EL SEGUNDO | CA 90245

urban-architecture LAB
1657 alvira street second floor los angeles, ca 90035
tel. 323.954.9996 www.u-a-lab.com

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PHASE

ENTITLEMENT SET

11/01/2024

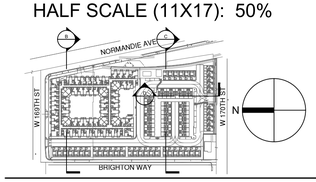
LEGEND

S 1B 2B — APARTMENT	TH1 TH2 TH3 TH4 — TOWNHOUSE
LOBBY	COMMON / AMENITY
OFFICE	BOH
CARPARK / SERVICE	CIRCULATION
AMENITY TERRACE	LANDSCAPE

FULL SCALE (24X36): 1/16" = 1'-0"

0 8' 16' 32' 64'

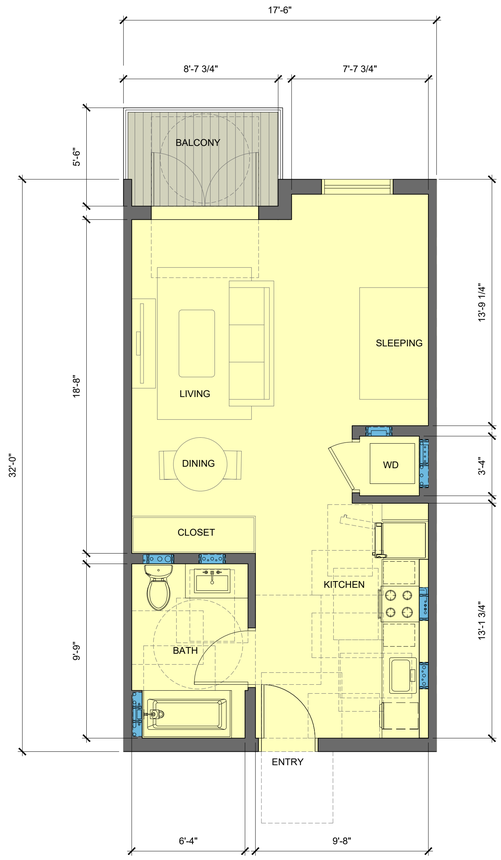
HALF SCALE (11X17): 50%



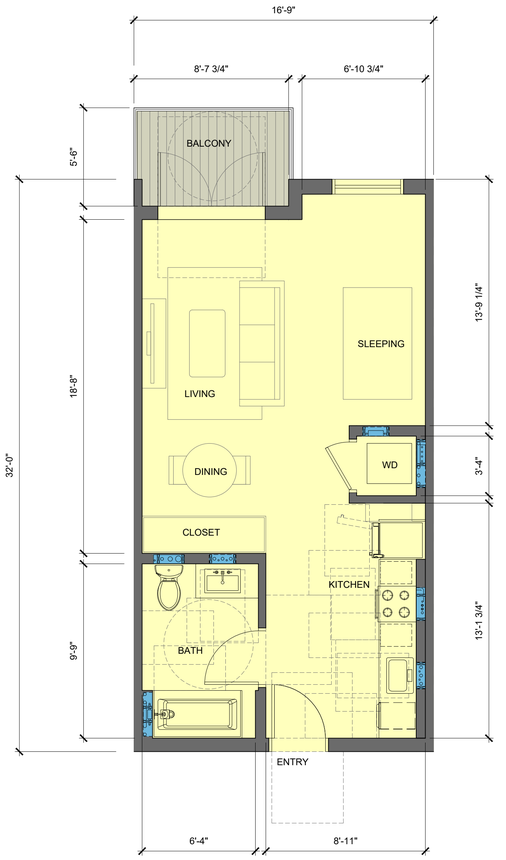
SHEET TITLE

BUILDING SECTION

SHEET NO. **A3.02**



STUDIO - A1
547 SF



STUDIO - A1a
520 SF

PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

SAIKO INVESTMENT CORP.
+
NEXTGEN APARTMENTS LLC

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PHASE

ENTITLEMENT SET

11/01/2024

LEGEND

S 1B 2B — APARTMENT	TH1 TH2 TH3 TH4 — TOWNHOUSE
LOBBY	COMMON / AMENITY
OFFICE	BOH
CARPARK / SERVICE	CIRCULATION
AMENITY TERRACE	LANDSCAPE

FULL SCALE (24X36): 1/4" = 1'-0"
0 2' 4' 8' 16'

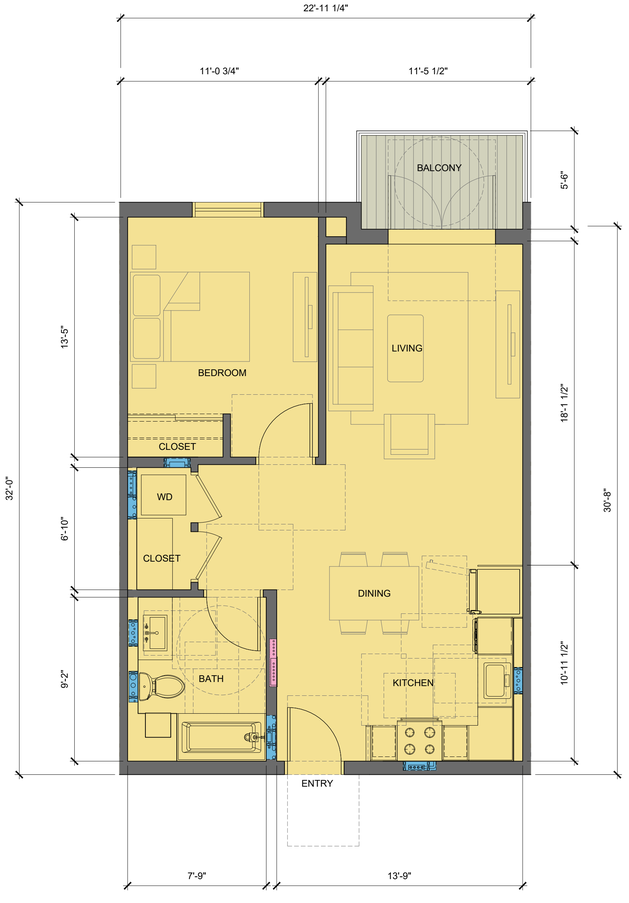
HALF SCALE (11X17): 50%

SHEET TITLE

ENLARGED UNIT PLANS

SHEET NO. **A5.01**

STUDIO - A3
500 SF



1 BD - B1
720 SF

PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

SAIKO INVESTMENT CORP.
+
NEXTGEN APARTMENTS LLC

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ENTITLEMENT SET

11/01/2024

LEGEND

S 1B 2B	TH1 TH2 TH3 TH4
APARTMENT	TOWNHOUSE
LOBBY	COMMON / AMENITY
OFFICE	BOH
CARPARK / SERVICE	CIRCULATION
AMENITY TERRACE	LANDSCAPE

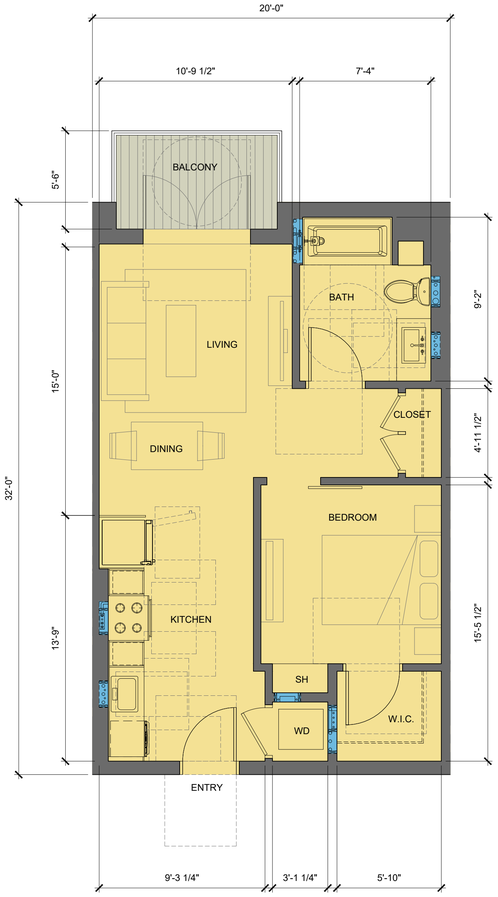
FULL SCALE (24X36): 1/4" = 1'-0"
0 2' 4' 8' 16'

HALF SCALE (11X17): 50%

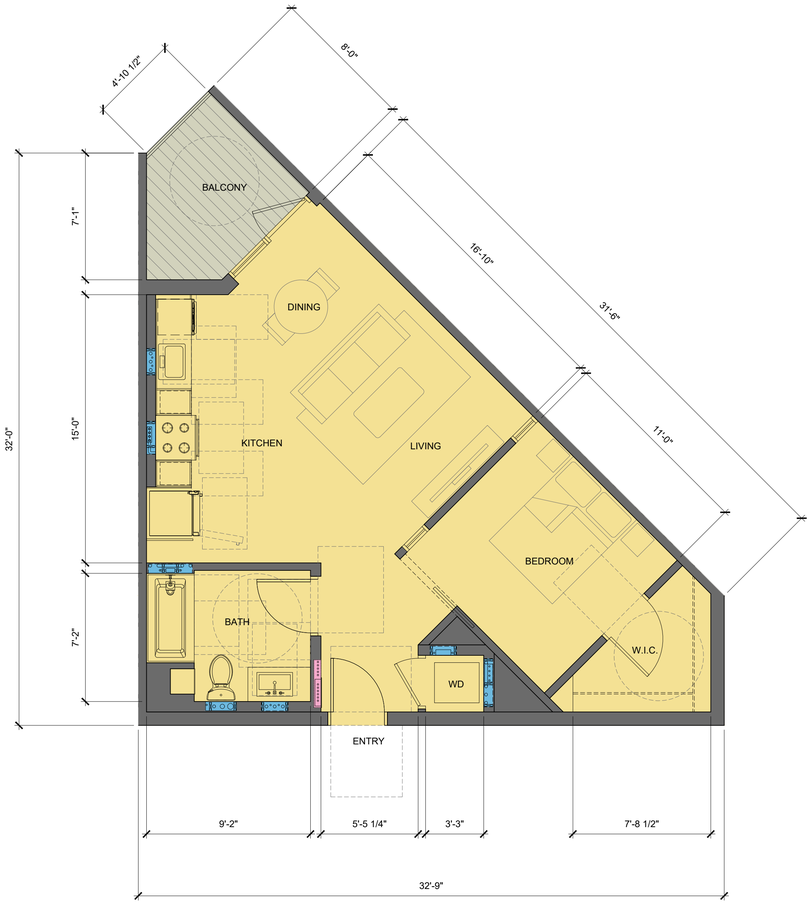
SHEET TITLE

ENLARGED UNIT PLANS

SHEET NO. **A5.02**



1 BD - B2 (INBOARD)
625 SF



1 BD - B3
685 SF

PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

SAIKO INVESTMENT CORP.
+
NEXTGEN APARTMENTS LLC

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PHASE

ENTITLEMENT SET

11/01/2024

LEGEND

S 1B 2B — APARTMENT	TH1 TH2 TH3 TH4 — TOWNHOUSE
LOBBY	COMMON / AMENITY
OFFICE	BOH
CARPARK / SERVICE	CIRCULATION
AMENITY TERRACE	LANDSCAPE

FULL SCALE (24X36): 1/4" = 1'-0"
0 2' 4' 8' 16'

HALF SCALE (11X17): 50%

SHEET TITLE

ENLARGED UNIT PLANS

SHEET NO. **A5.03**

1 BD - B4
637 SF

1 BD - B6
700 SF

PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

SAIKO INVESTMENT CORP.
+
NEXTGEN APARTMENTS LLC

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ENTITLEMENT SET

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LEGEND

S 1B 2B — APARTMENT	TH1 TH2 TH3 TH4 — TOWNHOUSE
LOBBY	COMMON / AMENITY
OFFICE	BOH
CARPARK / SERVICE	CIRCULATION
AMENITY TERRACE	LANDSCAPE

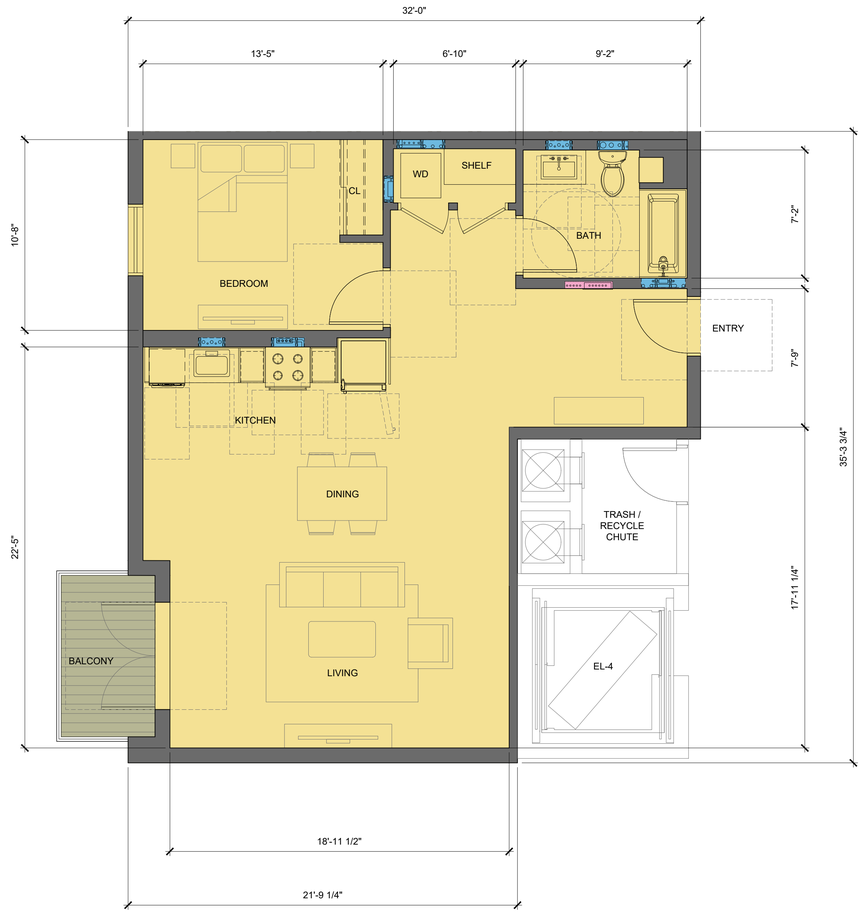
FULL SCALE (24X36): 1/4" = 1'-0"
0 2' 4' 8' 16'

HALF SCALE (11X17): 50%

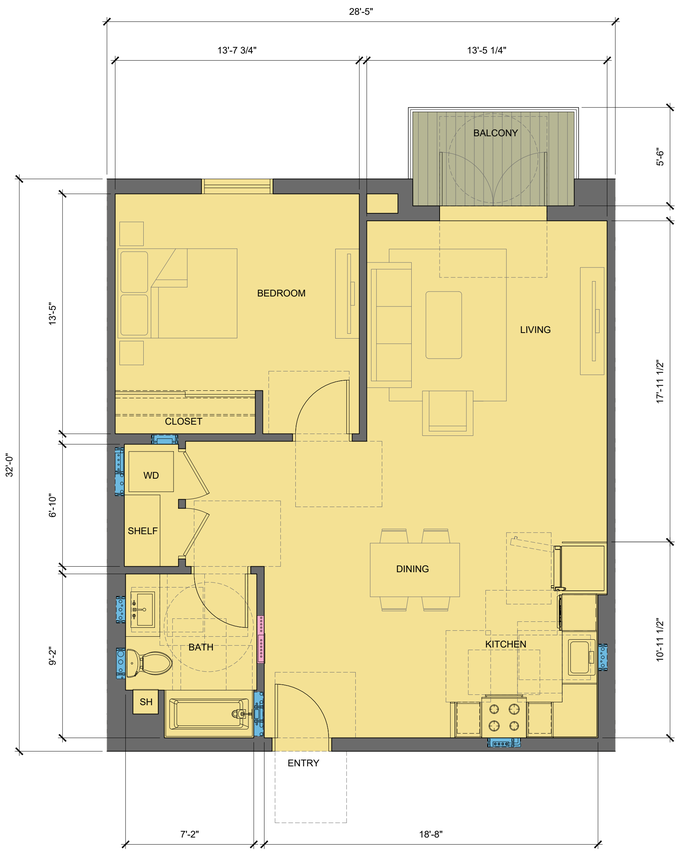
SHEET TITLE

ENLARGED UNIT PLANS

SHEET NO. **A5.04**



1 BD - B7
920 SF



1 BD - B8 (2RD FLOOR)
896 SF

PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

16911 S NORMANDIE AVE
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OWNER:

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NEXTGEN APARTMENTS LLC

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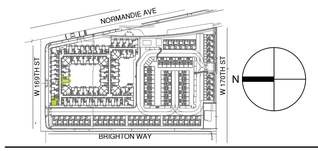
LEGEND

S 1B 2B — APARTMENT	TH1 TH2 TH3 TH4 — TOWNHOUSE
LOBBY	COMMON / AMENITY
OFFICE	BOH
CARPARK / SERVICE	CIRCULATION
AMENITY TERRACE	LANDSCAPE

FULL SCALE (24X36): 1/4" = 1'-0"
0 2' 4' 8' 16'

HALF SCALE (11X17): 50%



SHEET TITLE

ENLARGED UNIT PLANS

SHEET NO. **A5.05**

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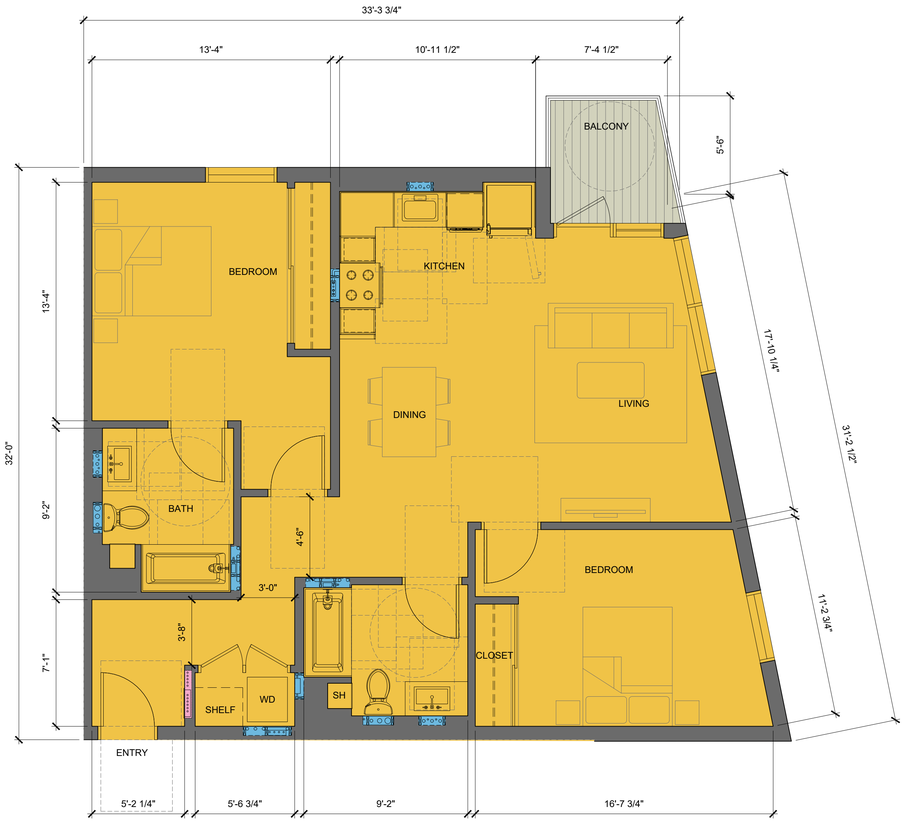
1,109 SF



2 BD - C2a
1,139 SF

PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

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OWNER:

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LEGEND

S 1B 2B — APARTMENT	TH1 TH2 TH3 TH4 — TOWNHOUSE
LOBBY	COMMON / AMENITY
OFFICE	BOH
CARPARK / SERVICE	CIRCULATION
AMENITY TERRACE	LANDSCAPE

FULL SCALE (24X36): 1/4" = 1'-0"
0 2' 4' 8' 16'

HALF SCALE (11X17): 50%

SHEET TITLE

ENLARGED UNIT PLANS

SHEET NO. **A5.06**

2 BD - C3
1,021 SF

2 BD - C3a
1,098 SF

PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

16911 S NORMANDIE AVE
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OWNER:

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+
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LEGEND

S 1B 2B — APARTMENT	TH1 TH2 TH3 TH4 — TOWNHOUSE
LOBBY	COMMON / AMENITY
OFFICE	BOH
CARPARK / SERVICE	CIRCULATION
AMENITY TERRACE	LANDSCAPE

FULL SCALE (24X36): 1/4" = 1'-0"
0 2' 4' 8' 16'

HALF SCALE (11X17): 50%

SHEET TITLE

ENLARGED UNIT PLANS

SHEET NO. **A5.07**

2 BD - C5
1,020 SF

PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

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+
NEXTGEN APARTMENTS LLC

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EL SEGUNDO | CA 90245

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LEGEND

S 1B 2B — APARTMENT	TH1 TH2 TH3 TH4 — TOWNHOUSE
LOBBY	COMMON / AMENITY
OFFICE	BOH
CARPARK / SERVICE	CIRCULATION
AMENITY TERRACE	LANDSCAPE

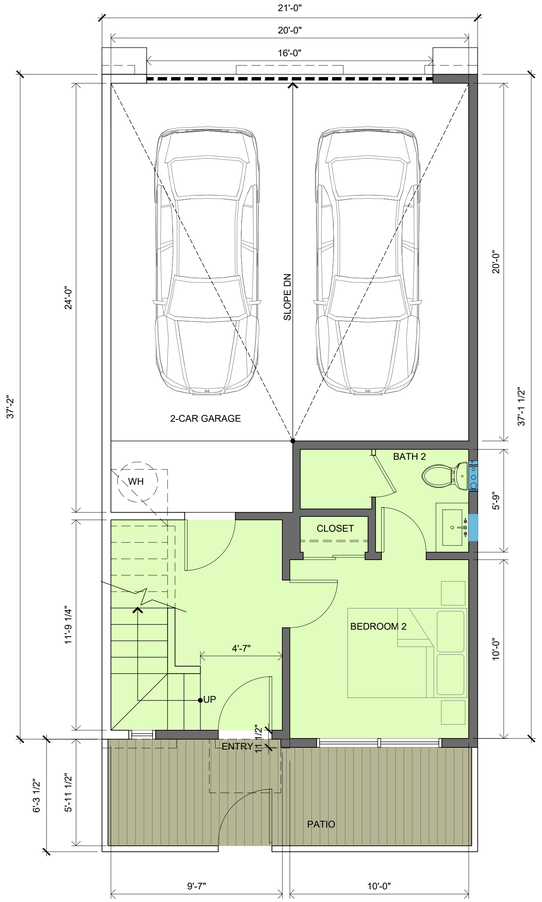
FULL SCALE (24X36): 1/4" = 1'-0"
0 2' 4' 8' 16'

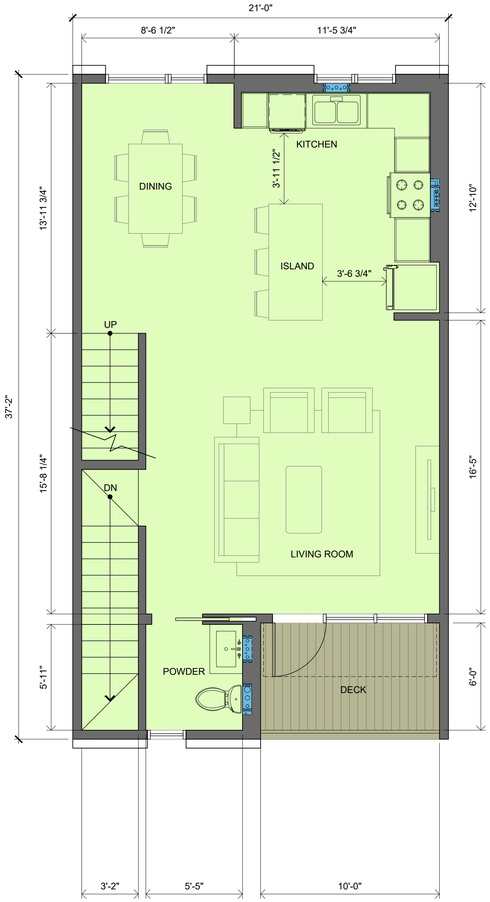
HALF SCALE (11X17): 50%

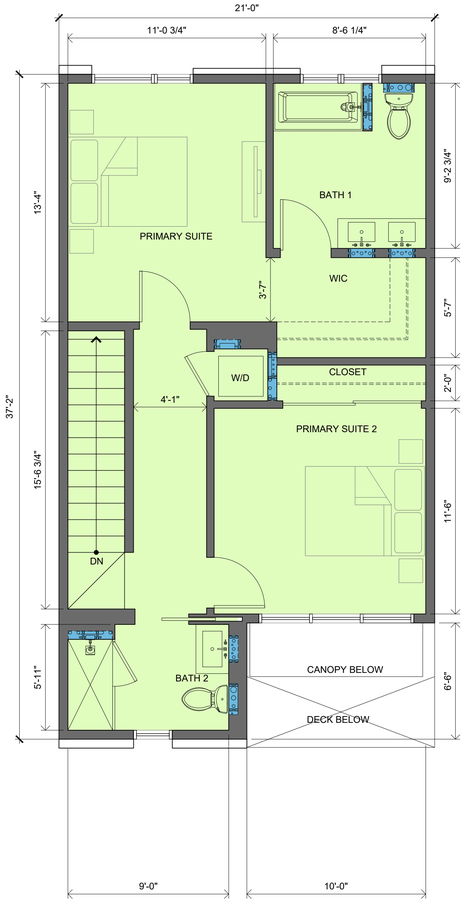
SHEET TITLE

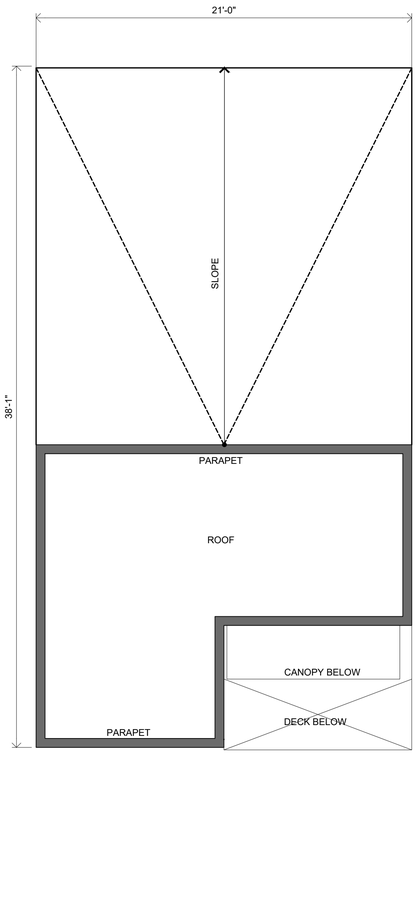
ENLARGED UNIT PLANS

SHEET NO. **A5.08**









FIRST FLOOR PLAN
290 SF
(EXCLUDES GARAGE)

SECOND FLOOR PLAN
680 SF

THIRD FLOOR PLAN
680 SF

ROOF PLAN

TOWNHOUSE TYPE 1
3-BEDROOM
1,650 SF
PRIVATE OPEN SPACE = 50 SF

1102A.3 MULTISTORY DWELLINGS

1102A.3.1 MULTISTORY APARTMENT OR CONDOMINIUM DWELLINGS IN BUILDINGS WITH NO ELEVATOR

THIS SECTION SHALL APPLY TO MULTISTORY DWELLING UNITS ON THE GROUND FLOOR OF BUILDINGS WITHOUT ELEVATORS FOR WHICH AN APPLICATION FOR A CONSTRUCTION PERMIT IS SUBMITTED ON OR AFTER JULY 1, 2005.

EXCEPTION: CARRIAGE UNITS AS DEFINED IN CHAPTER 2 AND REGULATED ONLY BY THE DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AS REFERENCED IN SECTION 1.8.2.1.2.

AT LEAST 10 PERCENT BUT NOT LESS THAN ONE OF THE MULTISTORY DWELLINGS IN APARTMENT BUILDINGS WITH 3 OR MORE DWELLING UNITS AND/OR CONDOMINIUMS WITH 4 OR MORE DWELLING UNITS SHALL COMPLY WITH THE FOLLOWING:

1. THE PRIMARY ENTRY TO THE DWELLING UNIT SHALL BE ON AN ACCESSIBLE ROUTE UNLESS EXEMPTED BY SITE IMPRACTICALITY TESTS IN SECTION 1150A.
2. AT LEAST ONE POWDER ROOM OR BATHROOM SHALL BE LOCATED ON THE PRIMARY ENTRY LEVEL, SERVED BY AN ACCESSIBLE ROUTE AND SHALL COMPLY WITH THE PROVISIONS IN DIVISION IV.
3. ALL ROOMS OR SPACES LOCATED ON THE PRIMARY ENTRY LEVEL SHALL BE SERVED BY AN ACCESSIBLE ROUTE AND SHALL COMPLY WITH THE PROVISIONS IN DIVISION IV. ROOMS AND SPACES LOCATED ON THE PRIMARY ENTRY LEVEL AND SUBJECT TO THIS CHAPTER MAY INCLUDE BUT ARE NOT LIMITED TO KITCHENS, POWDER ROOMS, BATHROOMS, LIVING ROOMS, BEDROOMS OR HALLWAYS.
4. COMMON USE AREAS COVERED BY THIS SECTION SHALL BE ACCESSIBLE AS REQUIRED BY THIS CHAPTER. PUBLIC USE AREAS AS DEFINED IN CHAPTER 2 OF THIS CODE ARE SUBJECT TO PROVISIONS OF THE DIVISION OF THE STATE ARCHITECT (DSA-AC) AND ARE REFERENCED IN SECTION 1.9.1.1.

THE MINIMUM NUMBER OF MULTIFAMILY DWELLING UNITS WHICH MUST COMPLY WITH THIS SECTION SHALL BE CALCULATED USING THE TOTAL NUMBER OF ALL MULTISTORY DWELLING UNITS IN BUILDINGS ON A SITE WHICH ARE SUBJECT TO THIS SECTION. ANY FRACTION THEREOF SHALL BE ROUNDED TO THE NEXT HIGHEST WHOLE NUMBER.

PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

SAIKO INVESTMENT CORP.
+
NEXTGEN APARTMENTS LLC

134 LOMITA STREET
EL SEGUNDO | CA 90245

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PHASE

ENTITLEMENT SET

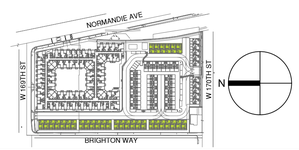
11/01/2024

LEGEND

S 1B 2B	APARTMENT
TH1 TH2 TH3 TH4	TOWNHOUSE
	LOBBY
	COMMON / AMENITY
	OFFICE
	BOH
	CARPARK / SERVICE
	CIRCULATION
	AMENITY TERRACE
	LANDSCAPE

FULL SCALE (24X36): 1/4" = 1'-0"
0 2' 4' 8' 16'

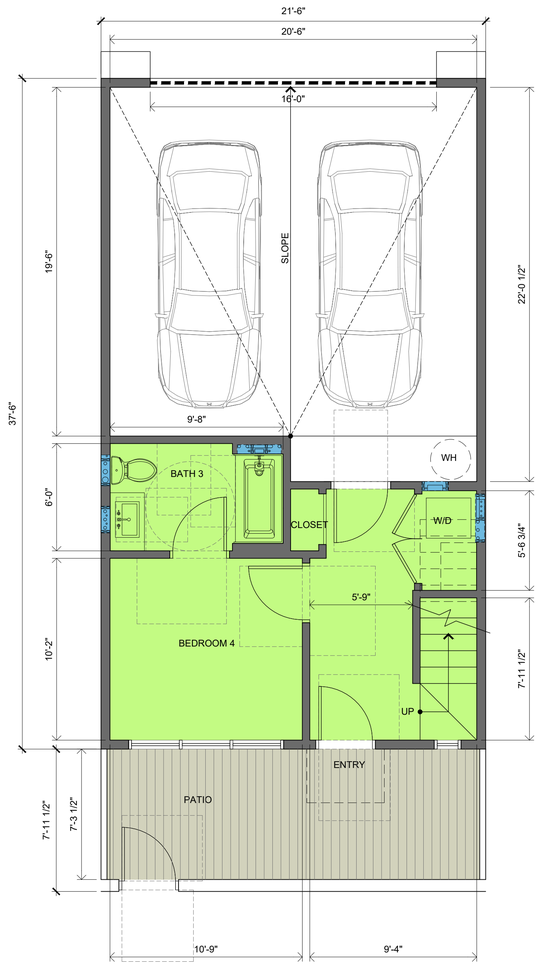
HALF SCALE (11X17): 50%



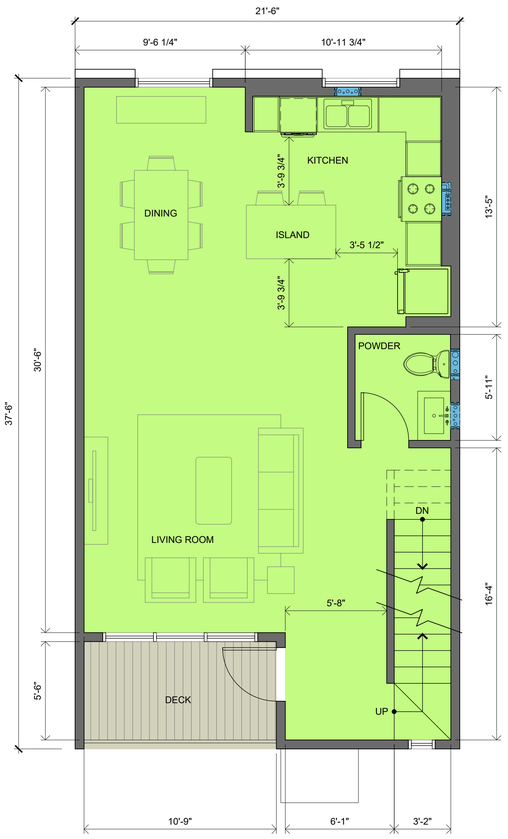
SHEET TITLE

ENLARGED UNIT PLANS

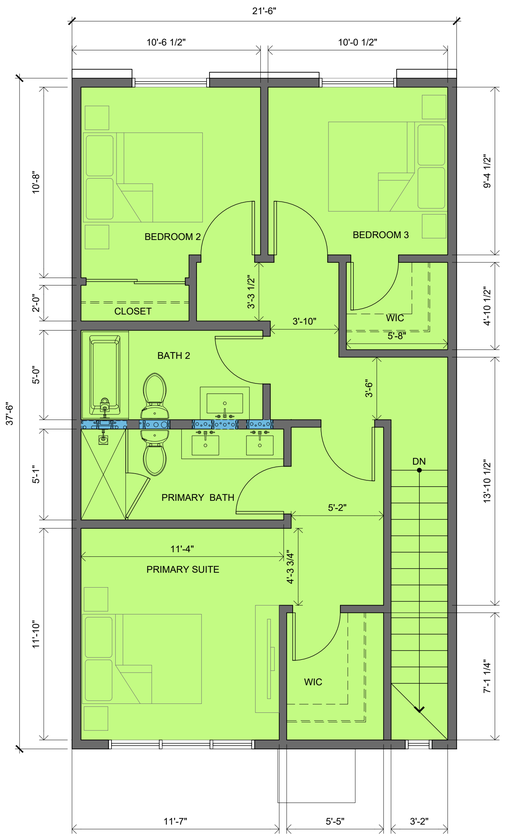
SHEET NO. **A5.09**



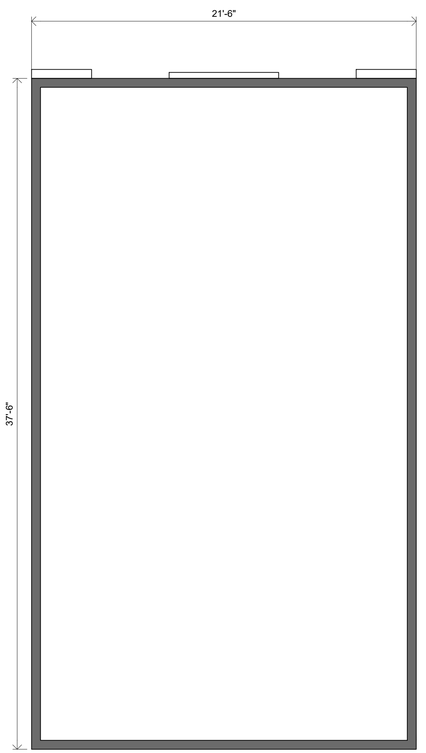
FIRST FLOOR PLAN
350 SF
(EXCLUDES GARAGE)



SECOND FLOOR PLAN
740 SF



THIRD FLOOR PLAN
760 SF



ROOF PLAN
(AREA NOT INCLUDED IN FLOOR AREA CALCULATION)

TOWNHOUSE TYPE 2
4-BEDROOM
1,850 SF
PRIVATE OPEN SPACE = 50 SF

1102A.3 MULTISTORY DWELLINGS

1102A.3.1 MULTISTORY APARTMENT OR CONDOMINIUM DWELLINGS IN BUILDINGS WITH NO ELEVATOR

THIS SECTION SHALL APPLY TO MULTISTORY DWELLING UNITS ON THE GROUND FLOOR OF BUILDINGS WITHOUT ELEVATORS FOR WHICH AN APPLICATION FOR A CONSTRUCTION PERMIT IS SUBMITTED ON OR AFTER JULY 1, 2005.

EXCEPTION: CARRIAGE UNITS AS DEFINED IN CHAPTER 2 AND REGULATED ONLY BY THE DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AS REFERENCED IN SECTION 1.8.2.1.2.

AT LEAST 10 PERCENT BUT NOT LESS THAN ONE OF THE MULTISTORY DWELLINGS IN APARTMENT BUILDINGS WITH 3 OR MORE DWELLING UNITS AND/OR CONDOMINIUMS WITH 4 OR MORE DWELLING UNITS SHALL COMPLY WITH THE FOLLOWING:

1. THE PRIMARY ENTRY TO THE DWELLING UNIT SHALL BE ON AN ACCESSIBLE ROUTE UNLESS EXEMPTED BY SITE IMPRACTICALITY TESTS IN SECTION 1150A.
2. AT LEAST ONE POWDER ROOM OR BATHROOM SHALL BE LOCATED ON THE PRIMARY ENTRY LEVEL, SERVED BY AN ACCESSIBLE ROUTE AND SHALL COMPLY WITH THE PROVISIONS IN DIVISION IV.
3. ALL ROOMS OR SPACES LOCATED ON THE PRIMARY ENTRY LEVEL SHALL BE SERVED BY AN ACCESSIBLE ROUTE AND SHALL COMPLY WITH THE PROVISIONS IN DIVISION IV. ROOMS AND SPACES LOCATED ON THE PRIMARY ENTRY LEVEL AND SUBJECT TO THIS CHAPTER MAY INCLUDE BUT ARE NOT LIMITED TO KITCHENS, POWDER ROOMS, BATHROOMS, LIVING ROOMS, BEDROOMS OR HALLWAYS.
4. COMMON USE AREAS COVERED BY THIS SECTION SHALL BE ACCESSIBLE AS REQUIRED BY THIS CHAPTER. PUBLIC USE AREAS AS DEFINED IN CHAPTER 2 OF THIS CODE ARE SUBJECT TO PROVISIONS OF THE DIVISION OF THE STATE ARCHITECT (DSA-AC) AND ARE REFERENCED IN SECTION 1.9.1.1.

THE MINIMUM NUMBER OF MULTIFAMILY DWELLING UNITS WHICH MUST COMPLY WITH THIS SECTION SHALL BE CALCULATED USING THE TOTAL NUMBER OF ALL MULTISTORY DWELLING UNITS IN BUILDINGS ON A SITE WHICH ARE SUBJECT TO THIS SECTION. ANY FRACTION THEREOF SHALL BE ROUNDED TO THE NEXT HIGHEST WHOLE NUMBER.

PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

SAIKO INVESTMENT CORP.
+
NEXTGEN APARTMENTS LLC

134 LOMITA STREET
EL SEGUNDO | CA 90245

urban-architecture LAB
1657 alvira street second floor los angeles, ca 90035
tel. 323.954.9996 www.u-a-lab.com © 2024

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PHASE

ENTITLEMENT SET

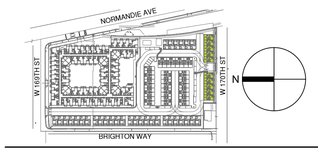
11/01/2024

LEGEND

S 1B 2B	TH1 TH2 TH3 TH4
APARTMENT	TOWNHOUSE
LOBBY	COMMON / AMENITY
OFFICE	BOH
CARPARK / SERVICE	CIRCULATION
AMENITY TERRACE	LANDSCAPE

FULL SCALE (24X36): 1/4" = 1'-0"
0 2' 4' 8' 16'

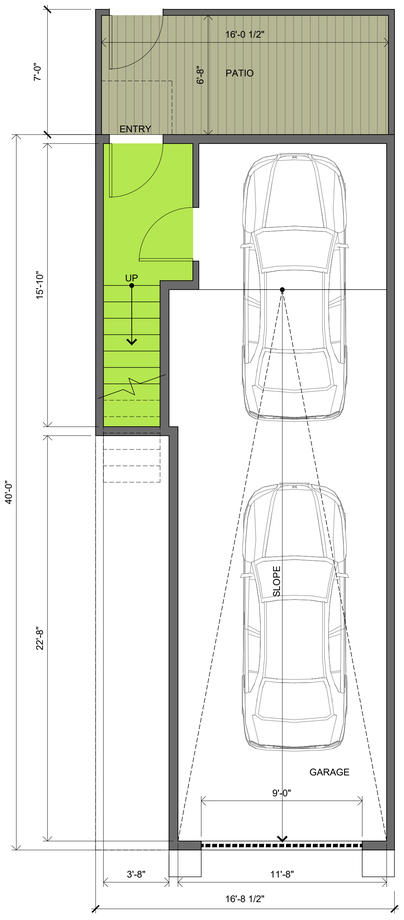
HALF SCALE (11X17): 50%



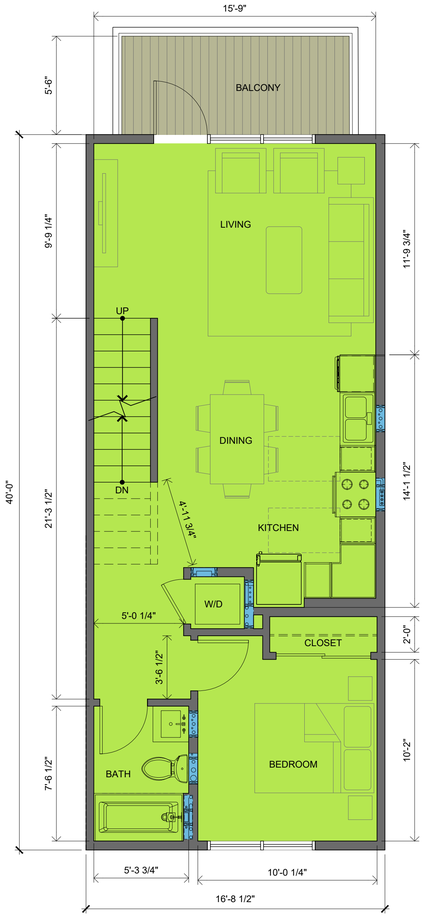
SHEET TITLE

ENLARGED UNIT PLANS

SHEET NO. **A5.10**

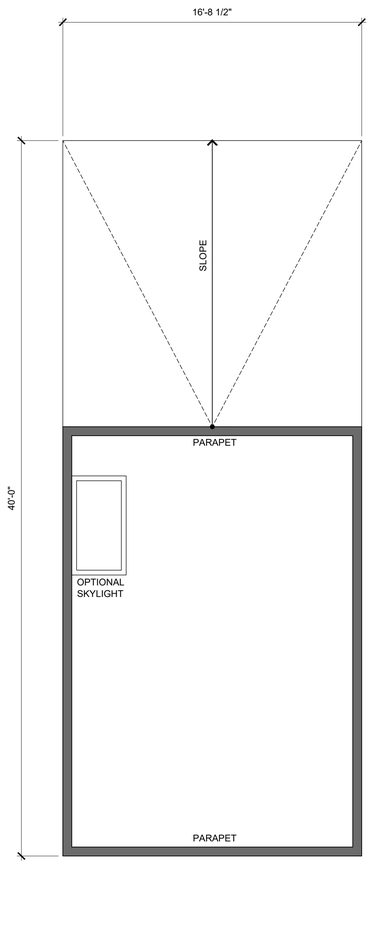


FIRST FLOOR PLAN
70 SF
(EXCLUDES GARAGE)



SECOND FLOOR PLAN
660 SF

THIRD FLOOR PLAN
650 SF



ROOF PLAN
(AREA NOT INCLUDED IN FLOOR AREA CALCULATION)

TOWNHOUSE TYPE 3
3-BEDROOM
1,380 SF
PRIVATE OPEN SPACE = 50 SF

1102A.3 MULTISTORY DWELLINGS

1102A.3.1 MULTISTORY APARTMENT OR CONDOMINIUM DWELLINGS IN BUILDINGS WITH NO ELEVATOR

THIS SECTION SHALL APPLY TO MULTISTORY DWELLING UNITS ON THE GROUND FLOOR OF BUILDINGS WITHOUT ELEVATORS FOR WHICH AN APPLICATION FOR A CONSTRUCTION PERMIT IS SUBMITTED ON OR AFTER JULY 1, 2005.

EXCEPTION: CARRIAGE UNITS AS DEFINED IN CHAPTER 2 AND REGULATED ONLY BY THE DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AS REFERENCED IN SECTION 1.8.2.1.2.

AT LEAST 10 PERCENT BUT NOT LESS THAN ONE OF THE MULTISTORY DWELLINGS IN APARTMENT BUILDINGS WITH 3 OR MORE DWELLING UNITS AND/OR CONDOMINIUMS WITH 4 OR MORE DWELLING UNITS SHALL COMPLY WITH THE FOLLOWING:

1. THE PRIMARY ENTRY TO THE DWELLING UNIT SHALL BE ON AN ACCESSIBLE ROUTE UNLESS EXEMPTED BY SITE IMPRACTICALITY TESTS IN SECTION 1150A.
2. AT LEAST ONE POWDER ROOM OR BATHROOM SHALL BE LOCATED ON THE PRIMARY ENTRY LEVEL, SERVED BY AN ACCESSIBLE ROUTE AND SHALL COMPLY WITH THE PROVISIONS IN DIVISION IV.
3. ALL ROOMS OR SPACES LOCATED ON THE PRIMARY ENTRY LEVEL SHALL BE SERVED BY AN ACCESSIBLE ROUTE AND SHALL COMPLY WITH THE PROVISIONS IN DIVISION IV. ROOMS AND SPACES LOCATED ON THE PRIMARY ENTRY LEVEL AND SUBJECT TO THIS CHAPTER MAY INCLUDE BUT ARE NOT LIMITED TO KITCHENS, POWDER ROOMS, BATHROOMS, LIVING ROOMS, BEDROOMS OR HALLWAYS.
4. COMMON USE AREAS COVERED BY THIS SECTION SHALL BE ACCESSIBLE AS REQUIRED BY THIS CHAPTER. PUBLIC USE AREAS AS DEFINED IN CHAPTER 2 OF THIS CODE ARE SUBJECT TO PROVISIONS OF THE DIVISION OF THE STATE ARCHITECT (DSA-AC) AND ARE REFERENCED IN SECTION 1.9.1.1.

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PHASE

ENTITLEMENT SET

11/01/2024

LEGEND

S	1B	2B	APARTMENT
TH1	TH2	TH3	TH4 TOWNHOUSE
			LOBBY
			COMMON / AMENITY
			OFFICE
			BOH
			CARPARK / SERVICE
			CIRCULATION
			AMENITY TERRACE
			LANDSCAPE

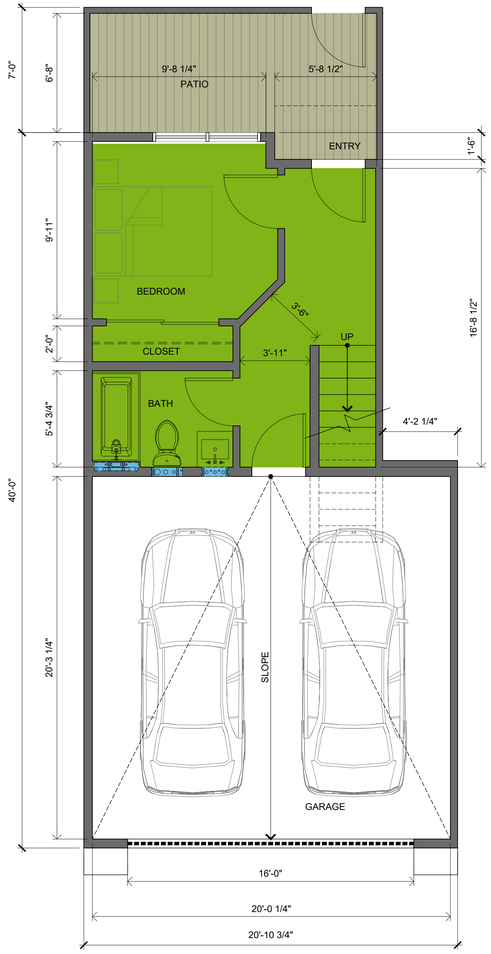
FULL SCALE (24X36): 1/4" = 1'-0"
0 2' 4' 8' 16'

HALF SCALE (11X17): 50%

SHEET TITLE

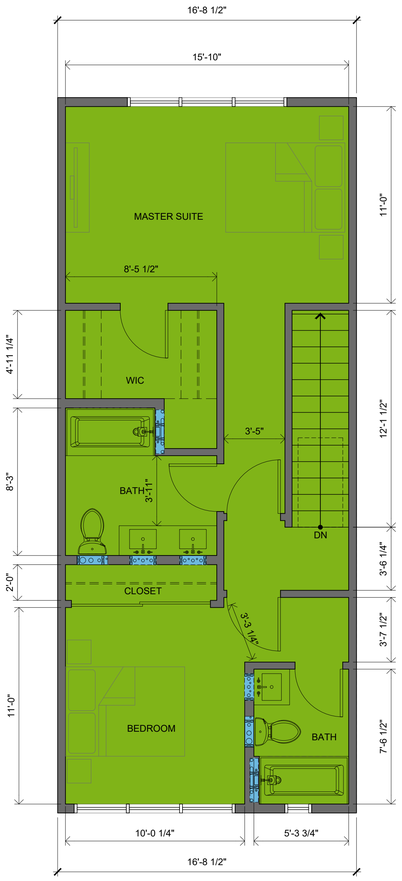
ENLARGED UNIT PLANS

SHEET NO. **A5.11**

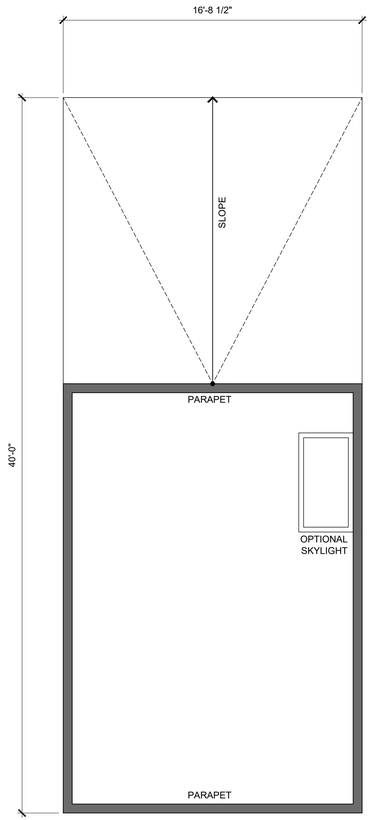


FIRST FLOOR PLAN
300 SF
(EXCLUDES GARAGE)

SECOND FLOOR PLAN
600 SF



THIRD FLOOR PLAN
645 SF



ROOF PLAN
(AREA NOT INCLUDED IN FLOOR AREA CALCULATION)

TOWNHOUSE TYPE 4
3-BEDROOM
1,545 SF
PRIVATE OPEN SPACE = 50 SF

1102A.3 MULTISTORY DWELLINGS

1102A.3.1 MULTISTORY APARTMENT OR CONDOMINIUM DWELLINGS IN BUILDINGS WITH NO ELEVATOR

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ENTITLEMENT SET

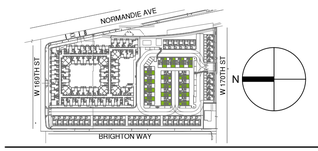
11/01/2024

LEGEND

S 1B 2B — APARTMENT	TH1 TH2 TH3 TH4 — TOWNHOUSE
LOBBY	COMMON / AMENITY
OFFICE	BOH
CARPARK / SERVICE	CIRCULATION
AMENITY TERRACE	LANDSCAPE

FULL SCALE (24X36): 1/4" = 1'-0"
0 2' 4' 8' 16'

HALF SCALE (11X17): 50%



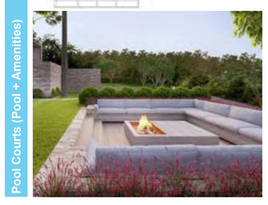
SHEET TITLE

ENLARGED UNIT PLANS

SHEET NO. **A5.12**

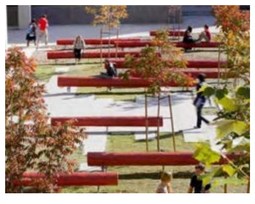
Pool Courts (Pool + Amenities)

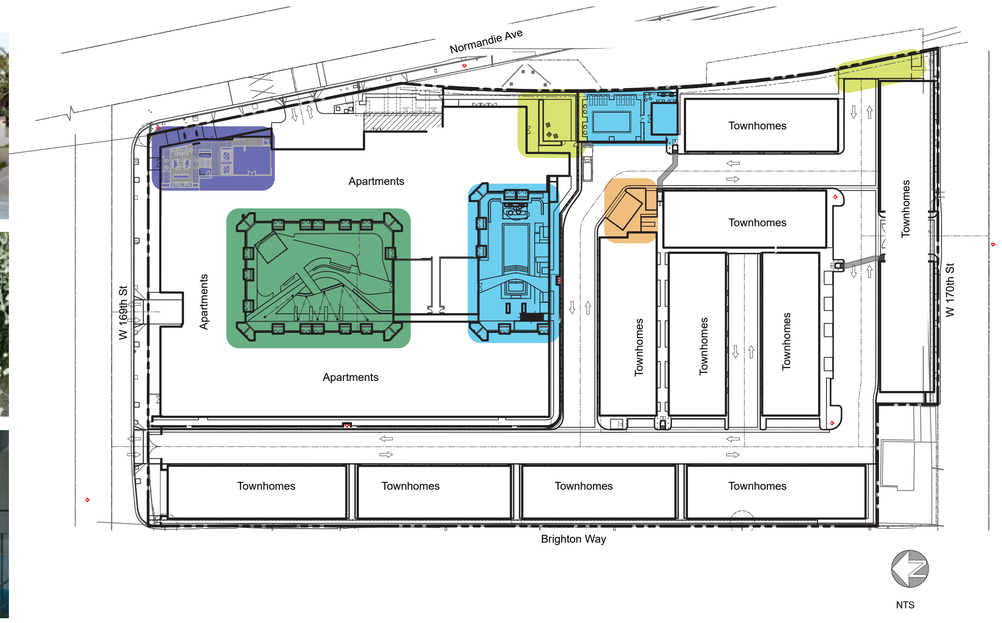
- Pool & Spa
- Restroom
- Lounge Furniture
- BBQ
- Firepit
- Pool Gate
- Cabanas
- Built-In Seating
- Overhead Structure
- Entertainment Wall (TV)



Pocket Park & Mailbox

- Mailbox
- Bench Seating
- Canopy Tree Grove

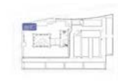


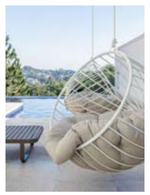


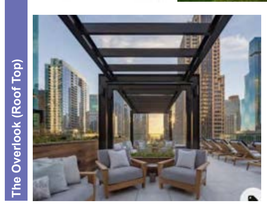
NTS

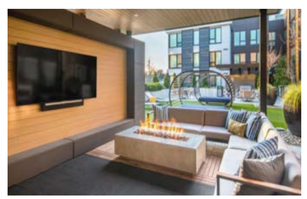
The Overlook (Roof Top)

- Entertainment Wall (TV)
- BBQ & Dining
- Fire Tables
- Lounge Seating
- Raised Planters



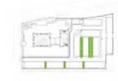


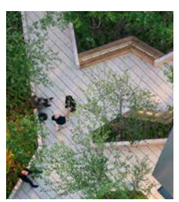


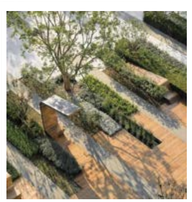


Alley Walks (Passive Spaces)

- Raised Planters
- Seating
- Broadwalk

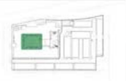






Central Green (Parks)

- Built-In Seating
- Broadwalk
- Sculptural Play Element
- Overhead Structure



Dog Runs

- Tree Grove
- Built-In Seating
- Tubular Steel Fence
- Festoon Lighting or Vine Planting

PROJECT:

NORMANDIE APARTMENTS

16911 S NORMANDIE AVE
GARDENA | CA 90247

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PHASE

ENTITLEMENT SET

09/27/2024

ZFREEDMAN
LANDSCAPE ARCHITECTURE

232 LINNIE CANAL
VENICE, CA 90291
TEL 310.955.4700
www.zfreedman.com

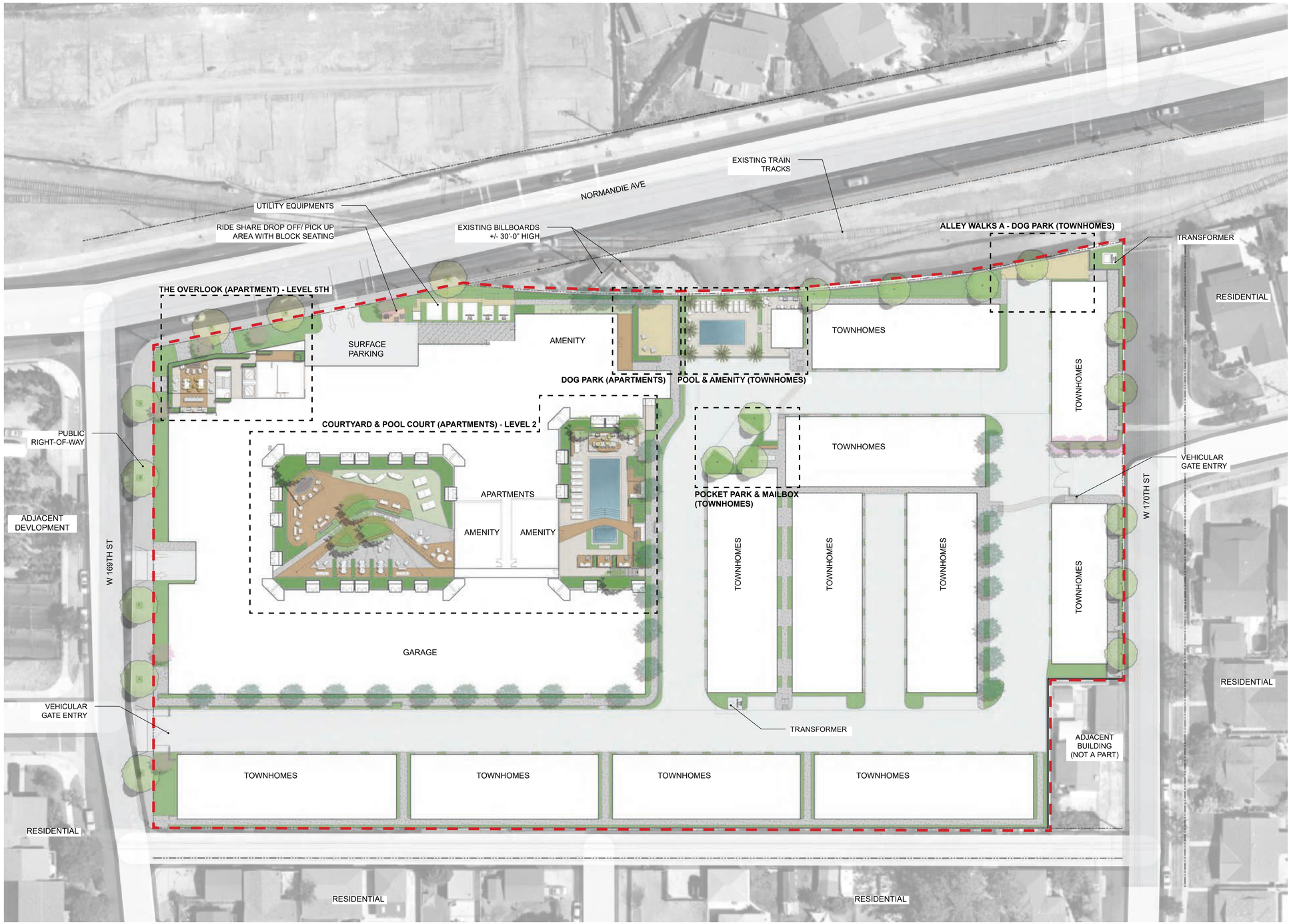
FULL SCALE (24X36):

HALF SCALE (11X17): 50%

SHEET TITLE

BUBBLE DIAGRAM & PRECEDENT IMAGERY

SHEET NO. **L1.01**



SCALE: 1/32" = 1'-0"

PROJECT:

NORMANDIE APARTMENTS

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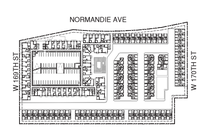
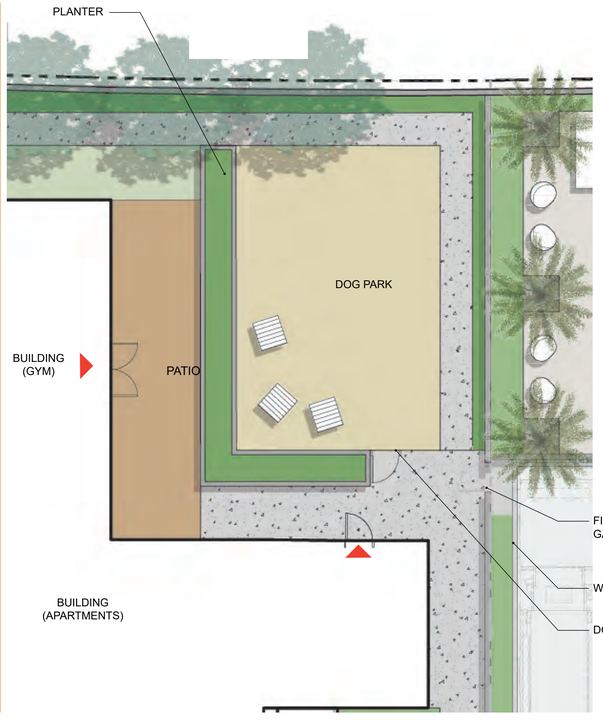


SHEET TITLE

OVERALL ILLUSTRATIVE PLAN

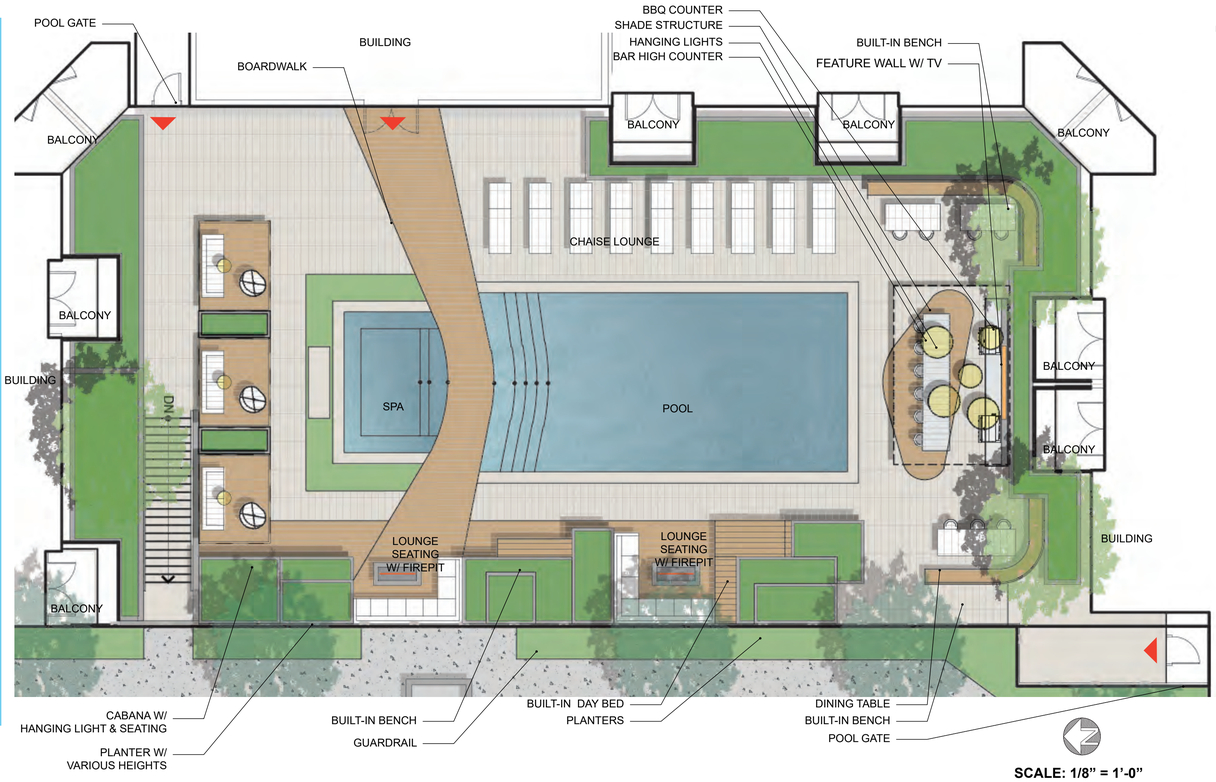
SHEET NO. **L1.02**

Dog Park (Apartment & Tot-Lot (Townhomes)



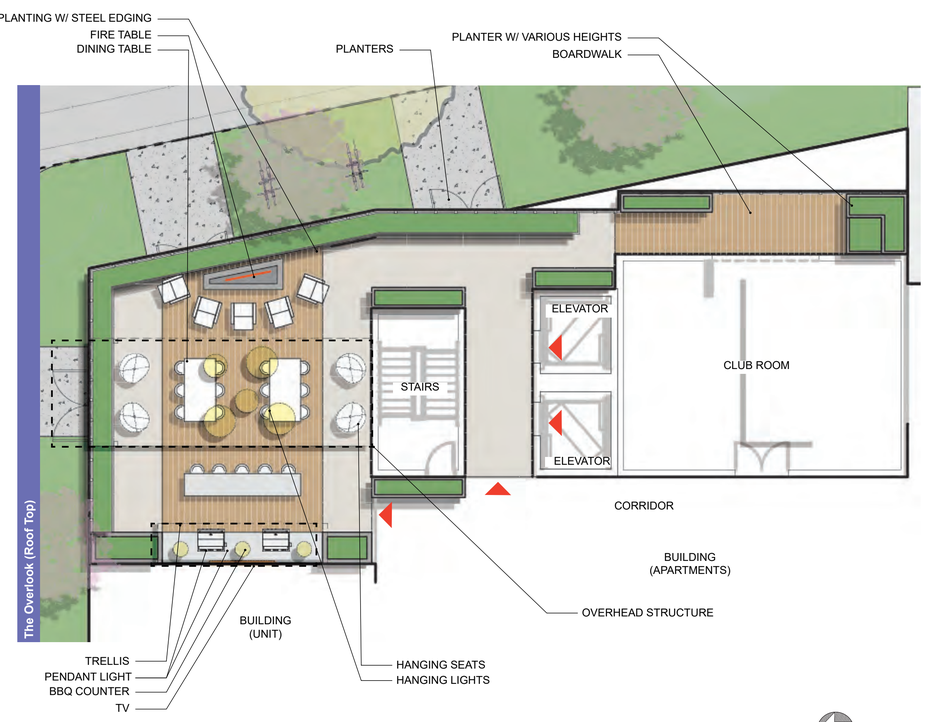
SCALE: 1/8" = 1'-0"

Pool Court - Apartment (Pool + Amenities)



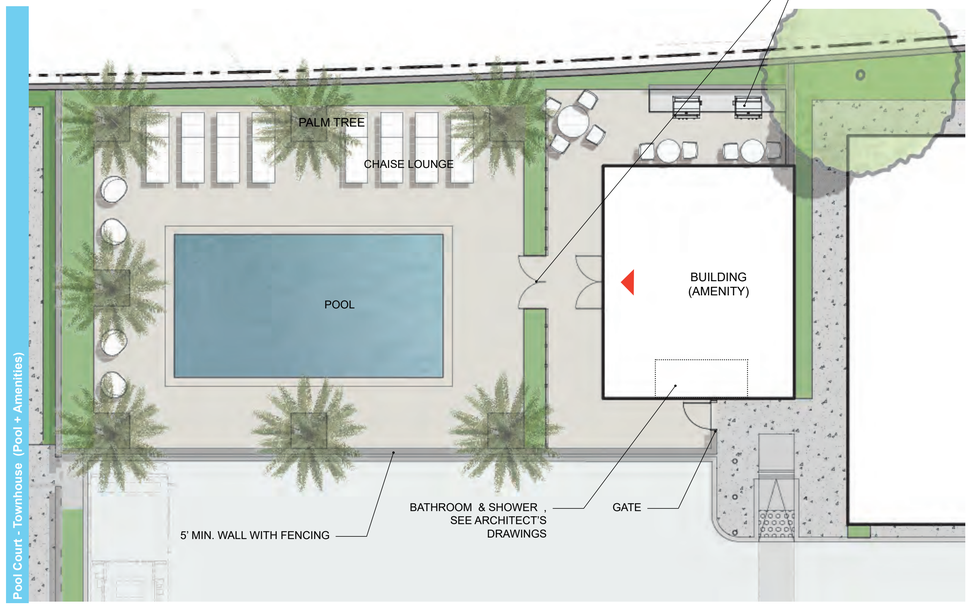
SCALE: 1/8" = 1'-0"

The Overlook (Roof Top)



SCALE: 1/8" = 1'-0"

Pool Court - Townhouse (Pool + Amenities)



SCALE: 1/8" = 1'-0"

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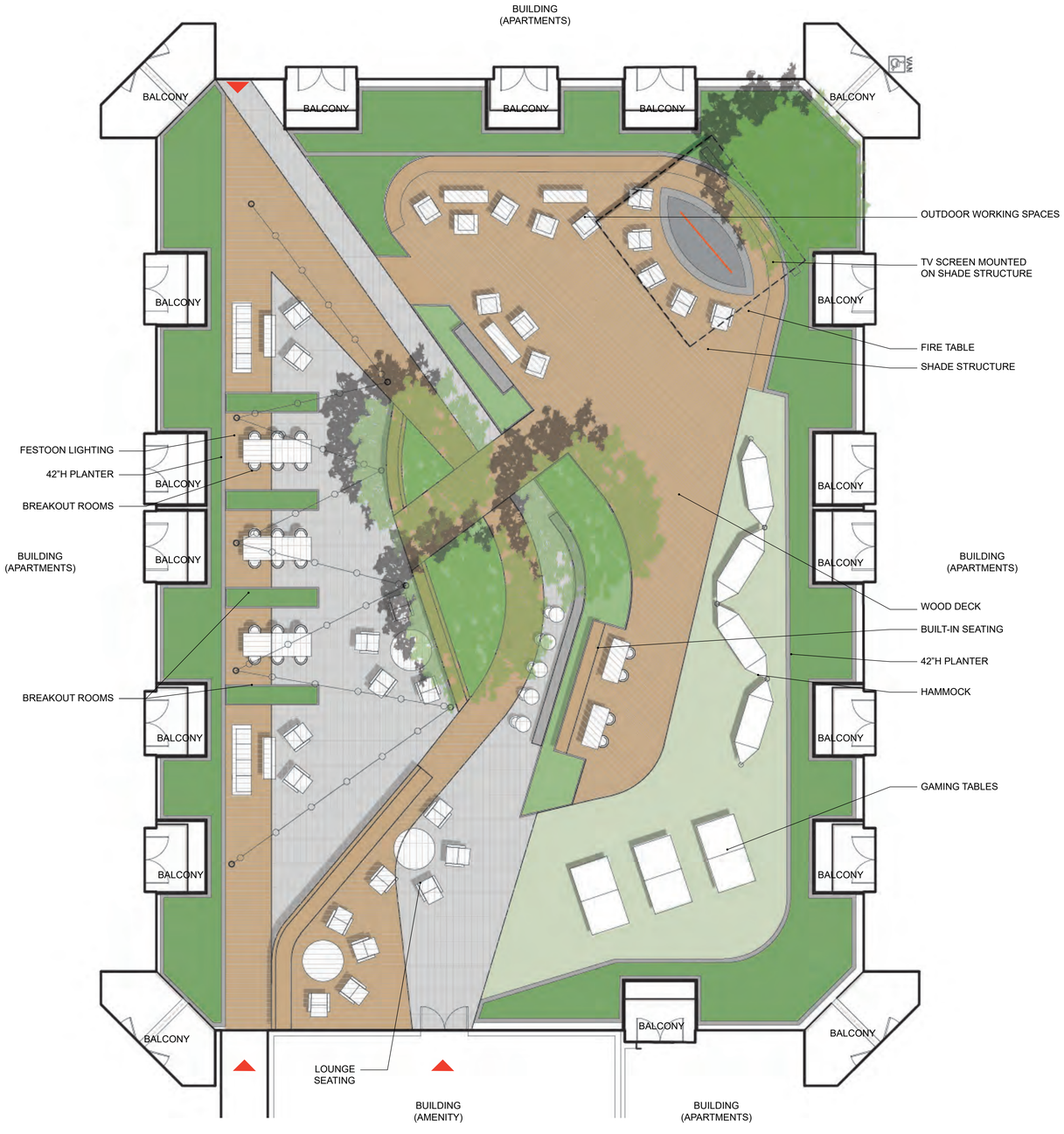
FULL SCALE (24X36):

HALF SCALE (11X17): 50%

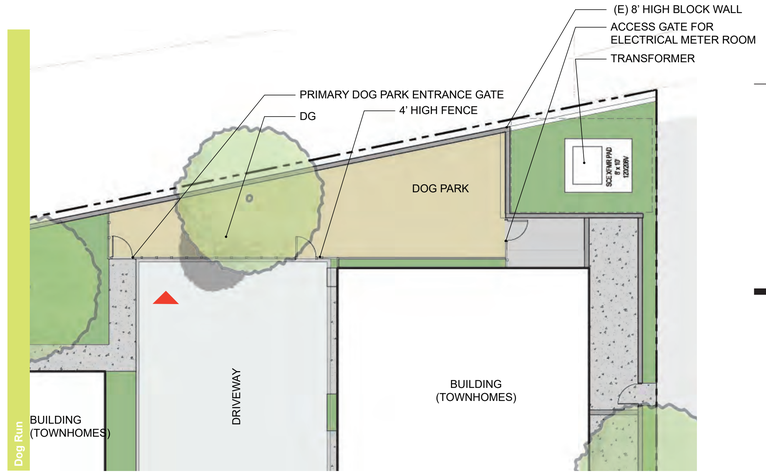
SHEET TITLE

ILLUSTRATIVE PLAN

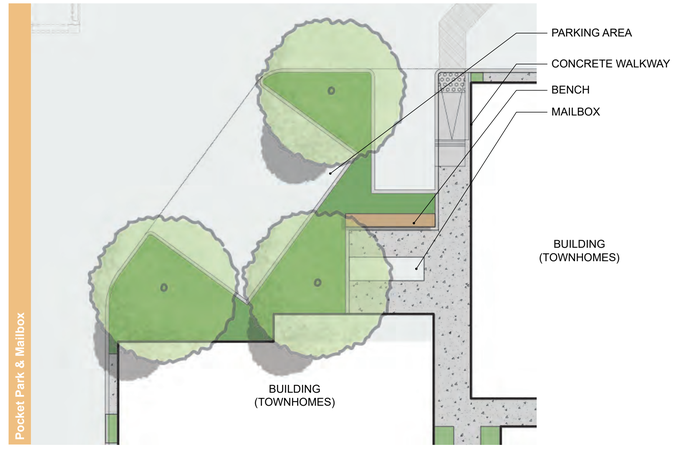
SHEET NO. **L1.03**



SCALE: 1/8" = 1'-0"



SCALE: 1/8" = 1'-0"



SCALE: 1/8" = 1'-0"

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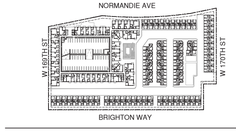
FULL SCALE (24X36):

HALF SCALE (11X17): 50%

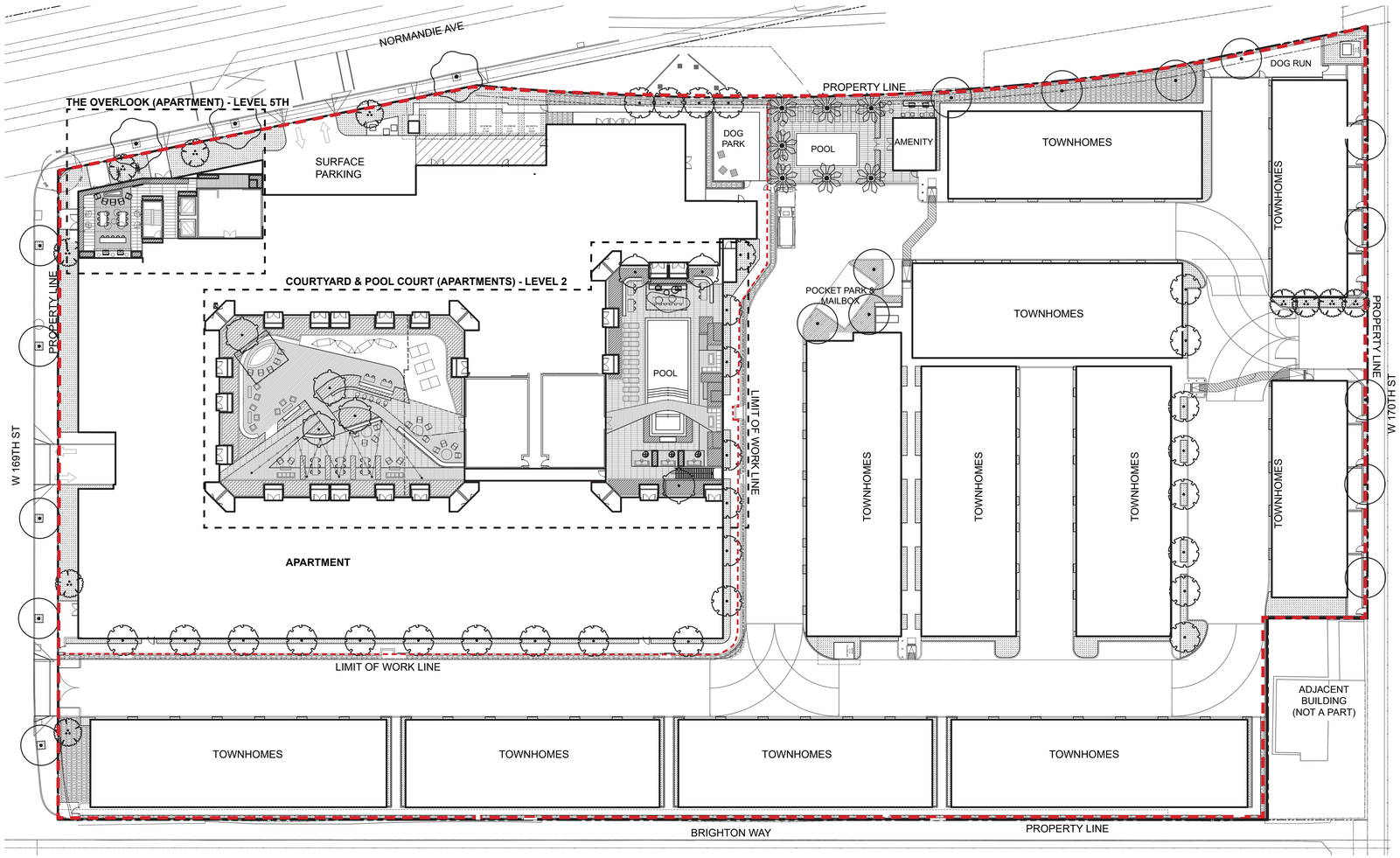


SHEET TITLE

ILLUSTRATIVE PLANS

SHEET NO. **L1.04**

PLANT_SCHEDULE				
TREES	QTY	BOTANICAL NAME	SIZE	WATER USE
	3	Bauhinia aculeata	24" BOX	
	10	Cercis canadensis `Forest Pansy'	24" BOX	Medium
	7	Geijera parviflora	24" BOX	Medium
	29	Liriodendron tulipifera 'Arnold'	24" BOX	Medium - High
	7	Phoenix canariensis	24" BOX	Low - Medium
	17	Tabebuia roseo-alba	24" BOX	



NORMANDIE APARTMENT & TOWNHOMES: LANDSCAPE INFORMATION

TREES PROPOSED:

169TH ST (RIGHT OF WAY):	5
NORMANDIE AVE (RIGHT OF WAY):	3
170TH ST (WITHIN PROPERTY):	5
RIGHT-OF-WAY (TOTAL):	8
ON GRADE TREES (APARTMENTS):	33
ABOVE GRADE TREES (APARTMENTS):	7
ON GRADE TREES (TOWNHOMES):	33
ABOVE GRADE TREES (TOWNHOMES):	0

TOTAL PROPOSED: 73

PLANTING AREAS PROPOSED:

GROUND LEVEL:	16,004 SF (APARTMENTS: 6,626 SF +TOWNHOMES: 9,378 SF)
LEVEL 2 COURTYARDS:	3,480 SF (APARTMENTS)
LEVEL 5 ROOF DECK:	300 SF (APARTMENTS)

TOTAL PROPOSED PLANTING AREAS (APARTMENTS & TOWNHOMES): 19,784 SF

GROUND COVERS	QTY	BOTANICAL NAME	SIZE	WATER USE
	1,069 sf	PARK & ALLEY WALKS: LOMANDRA LONGIFOLIA 'BREEZE' PENNISETUM 'FAIRY TAILS' AEONIUM SP. AGAVE SP. SENECIO CYLINDRICUS ACHILLEA MILLEFOLIUM EUPHORBIA RIGIDA HELICHRYSUM PATIOLARE VARIEGATA ROSMARINUS SP.	5 GAL	
	1,401 sf	POOLS + ENTRY+ ROOF DECK: AGAVE ATTENUATA ACACIA 'COUSIN ITT' CAREX DIVULSA CARPENTERIA CALIFORNICA HELICHRYSUM PATIOLARE VARIEGATA LOMANDRA LONGIFOLIA 'BREEZE' LEUCADENDRON SALIGNUM 'BLUSH' LIRIOPE 'GIGANTEA' NASSELLA TENUISSIMA MUHLENBERGIA 'WHITE CLOUD' RUSSELIA EQUISETIFORMIS PITTOSPORUM CLASSIFORIUM 'COMPACTUM' SENECIO VITALIS. AEONIUM SP.	5 GAL	
	2,379 sf	COURTYARD: AGAVE ATTENUATA ACACIA 'COUSIN ITT' CHONDROPETALUM TECTORUM CAREX 'EVERGOLD' DIETES GRANDIFLORA 'VARIEGATA' DIANELLA 'BABY BLISS' FATSIA JAPONICA LOMANDRA LONGIFOLIA 'BREEZE' NASSELLA TENUISSIMA PITTOSPORUM CLASSIFORIUM 'COMPACTUM' RUSSELIA EQUISETIFORMIS SENECIO VITALIS AEONIUM SP.	5 GAL	
	4,659 sf	SCREENING PLANTING: PODOCARPUS ELONGATUS 'MONMAL' PODOCARPUS MACROPHYLLUS PITTOSPORUM TENUIFOLIUM 'SILVER SHEEN'	15 GAL	Low - Medium
	10,276 sf	STREET PLANTING & PATIO: LOMANDRA LONGIFOLIA 'BREEZE' PENNISETUM 'FAIRY TAILS' ACHILLEA MILLEFOLIUM LIMONIUM PEREZII	5 GAL	

SCALE: 1/32" = 1'-0"

PROJECT:

NORMANDIE APARTMENTS

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

COASTLINE REAL ESTATE ADVISORS, INC.

134 LOMITA STREET
EL SEGUNDO | CA 90245

urban-architecture LAB
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PHASE

ENTITLEMENT SET

09/27/2024

ZFREEDMAN
LANDSCAPE ARCHITECTURE

232 LINNIE CANAL
VENICE, CA 90291
TEL 310.955.4700
www.zfreedman.com

FULL SCALE (24X36):

HALF SCALE (11X17): 50%

SHEET TITLE

PLANTING PLAN

SHEET NO. **L1.05**

BAUHINIA ACULEATA

CERCIS CANADENSIS 'FOREST PANSY'

GEIJERA PARVIFLORA

LIRIODENDRON TULIPIFERA 'ARNOLD'

PHOENIX CANARIENSIS

PLATANUS RACEMOSA

TABEBUIA ROSEO-ALBA

PODOCARPUS GRACILIOR

PODOCARPUS 'ICEE BLUE'

PITTOSPORUM 'SILVER SHEEN'

PODOCARPUS 'MONMAL'

PODOCARPUS MACROPHYLLUS

CHONDROPETALUM TECTORUM

NASSELLA TENUISSIMA

LOMANDRA LONGIFOLIA

CAREX DIVULSA

DIANELLA 'BABY BLISS'

PROJECT:

NORMANDIE APARTMENTS

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FULL SCALE (24X36):

HALF SCALE (11X17): 50%

SHEET TITLE

PLANT IMAGES

SHEET NO. **L1.06**

PENNISETUM 'FAIRY TAILS'

CAREX 'EVERGOLD'

ACHILLEA MILLEFOLIUM

ACACIA 'COUSIN ITT'

CARPENTERIA CALIFORNICA

DIETES GRANDIFLORA 'VARIEGATA'

HELICHRYSUM PATIOLARE VARIEGATA

PITTOSPORUM CLASSIFORIUM 'COMPACTUM'

ROSMARINUS SP.

LIRIOPE 'GIGABTEA'

MUHLENBERGIA 'WHITE CLOUD'

FATSIA JAPONICA

LIMONIUM PEREZII

AGAVE ATTENUATA

AGAVE SP.

EUPHORBIA RIGIDA

RUSSELIA EQUISETIFORMIS

PROJECT:

NORMANDIE APARTMENTS

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FULL SCALE (24X36):

HALF SCALE (11X17): 50%

SHEET TITLE

PLANT IMAGES

SHEET NO. **L1.07**

SENECIO VITALIS

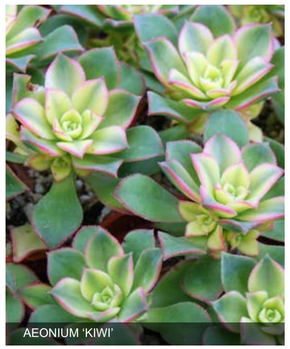
SENECIO CYLINDRICUS

LEUCADENDRON SALIGNUM 'BLUSH'

AEONIUM TABULIFORME

AEONIUM ARBOREUM 'ZWARTKOP'

AEONIUM 'SUNBURST'


AEONIUM 'KIWI'

PROJECT:

NORMANDIE APARTMENTS

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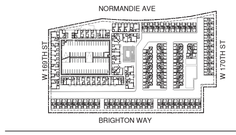

SHEET TITLE

PLANT IMAGES

SHEET NO. **L1.08**

GENERAL NOTES

1. THE COMMUNICATIONS CONTRACTOR RESPONSIBLE FOR ALL OF THE WORK DESCRIBED IN THE DRAWINGS AND SPECIFICATIONS SHALL BE PREFFERED TO THROUGHOUT THESE DOCUMENTS AS THE "CONTRACTOR".
2. THE CONTRACTOR SHALL ADHERE TO ALL BUILDING RULES AND REGULATIONS.
3. ALL CABLES SHALL BE HOMERUN FROM THE COMMUNICATIONS OUTLETS TO THE TELECOM ROOM IN SPACE ABOVE CEILING OR IN DESIGNATED PATHWAYS THROUGH FLOOR BELOW OR THROUGH OPEN CEILING AREAS.
4. THESE COMMUNICATIONS DRAWINGS ARE TO BE USED IN CONJUNCTION WITH THE COMMUNICATIONS SPECIFICATIONS DOCUMENT. SHOULD THERE BE ANY DISCREPANCIES BETWEEN THE DRAWINGS AND THE SPECIFICATIONS, THE CONTRACTOR SHALL BRING IT TO THE IMMEDIATE ATTENTION OF THE CONSTRUCTION MANAGER.
5. THE CONTRACTOR SHALL BE RESPONSIBLE FOR SURVEYING THE BUILDING AND LOCATING ALL BACKBOXES. CONDUITS, STUB-UPS DESIGNATED FOR THE SEQUENCE OF WORK WITH THE CONSTRUCTION MANAGER.
6. ALL CONDUITS AND SLEEVES DESIGNATED FOR COMMUNICATIONS USE, WHETHER THEY ARE UTILIZED BY THE CONTRACTOR OR NOT, SHALL BE FIRE STOPPED.
7. THE CONTRACTOR SHALL BE RESPONSIBLE FOR COORDINATION WITH OTHER TRADES AND DRAWINGS. FURTHERMORE, THE CONTRATOR SHALL COORDINATE THE SEQUENCE OF WORK WITH THE CONSTRUCTION MANAGER.
8. BACKBOXES, CONDUITS, STUB-UPS SHALL BE PROVIDED BY ELECTRICAL CONTRACTOR.
9. ALL CABLES SHALL BE INSTALLED IN CONDUIT AS DETAILED. WHERE INSTALLED ABOVE A SUSPENDED CEILING, CABLE MAY BE INSTALLED WITHOUT RACEWAY FROM THE CONDUIT STUB-UP TO THE NEAREST CABLE TRAY OR TELECOM ROOM. ALL CABLE INSTALLED ABOVE HUNG CEILINGS SHALL BE SUPPORTED WITH APPROVED CABLE SUPPORT DEVICES SUCH AS COMMUNICATIONS RATED J-HOOKS. ALL CABLE RUN ABOVE SUSPENDED CEILING SHALL BE PLENUM RATED, SHALL BE INSTALLED WITH AT LEAST 3" OF CLEAR VERTICAL SPACE ABOVE ANY COMPONENT OF THE SUSPENDED CEILING AND SHALL BE INSTALLED WITH MINIMUM OF 12" CLEAR OF FLUORESCENT LIGHT BALLASTS.
10. THE ENTIRE CABLE PLANT SHALL BE TESTED AS OUTLINED IN THE SPECIFICATIONS.
11. THE CONTRACTOR SHALL PROVIDE ALL CABLE, HARDWARE AND EQUIPMENT SHOWN ON THESE DAWINGS EXCEPT WHERE OTHERWISE NOTED.
12. THE CONTRACTOR MUST MAINTAIN A RUNNING UPDATED OF ALL FIELD OR CONTRACT DOCUMENT CHANGES AND UPDATE HIS "AS BUILT" DRAWINGS AS AN ONGOING PROCESS.
13. THE CONTRACTOR SHALL COORDINATE WITH ARCHITECTURAL ELEVATIONS FOR MOUNTING HEIGHTS OF ALL COMMUNICATIONS OUTLETS. UNLESS DIRECTED OTHERWISE, ALL WALL MOUNTED COMMUNICATIONS OUTLETS SHALL BE MOUNTED 18 INCHES ABOVE FINISHED FLOOR. UNLESS DIRECTED OTHERWISE, ALL MOUNTED TELEPHONE OUTLETS SHALL BE MOUNTED 42 INCHES ABOVE FINISHED FLOOR.
14. ALL EQUIPMENT, CABLING, RACEWAY, ETC. SHALL BE GROUNDED IN ACCORDANCE WITH THE SPECIFICATIONS AND ANSI J-ST-607-A, PROVIDE GROUND CONDUCTORS, GROUND CLAMPS, COMPRESSION TAPS, LUGS, ETC. AS REQUIRED FOR CONNECTION TO THE TELECOMMUNICATIONS GROUNDING AND BONDING SYSTEM (AS REQUIRED). TELECOMMUNICATIONS GROUNDING AND BONDING SYSTEM SHALL BE PROVIDED BY DIVISION 26, INCLUDING BUT NOT LIMITED TO BONDING CONDUCTOR FOR TELECOMMUNICATIONS, TELECOMMUNICATIONS MAIN GROUNDING BUSBAR, TELECOMMUNICATIONS BACKBONE, TELECOMMUNICATIONS GROUNDING BUSBAR(S), GROUNDING EQUALIZER AND BONDING CONDUCTORS TO BUILDING STEEL (WHERE APPLICABLE), POWER PANELS (WHERE APPLICABLE) AND CONDUITS.

ABBREVIATIONS

A	AMPERE
AFF	ABOVE FINISHED FLOOR
ALM	ALARM
AWG	AMERICAN WIRE GAUGE
BAS	BUILDING AUTOMATION SYSTEM
BLDG	BUILDING
CAT	CATEGORY
C	CONDUIT
CL	CLOSET
DN	DOWN
DWG	DRAWING
E	EXISTING
EA	EACH
EC	ELECTRICAL CONTRACTOR
EF	ENTRANCE FACILITY
ELEC	ELECTRICAL
EQUIP	EQUIPMENT
ER	EXISTING RELOCATED
EX	EXISTING TO REMAIN
FA	FIRE ALARM
FAS	FIRE ALARM SYSTEM
FBO	FURNISHED BY OTHERS
FL	FLOOR
FT	FEET OR FOOT
G	GROUND
HC	HUNG OR SUSPENDED CEILING
HCC	HORIZONTAL CONNECTION CABINET
HCP	HORIZONTAL CONNECTION PANEL
HZ	HERTZ
IN	INCH(ES)
JB	JUNCTION BOX
MAX	MAXIMUM
MECH	MECHANICAL
MER	MECHANICAL EQUIPMENT ROOM
MIN	MINIMUM
MM	MULTIMODE FIBER
MTD	MOUNTED
NIC	NOT IN CONTRACT
NTS	NOT TO SCALE
OC	ON CENTER
OD	OUTSIDE DIAMETER
PB	PULLBOX
PWR	POWER
R	EXISTING TO BE REMOVED
REX	RELOCATE EXISTING
RECEPT	RECEPTACLE
REQ	REQUIRED
RGS	RIGID GALVANIZED STEEL
SM	SINGLE-MODE FIBER
SPEC	SPECIFICATION
TBD	TO BE DETERMINED
TC	TECHNOLOGY CENTER
TEL	TELEPHONE
TER	TELECOMMUNICATIONS EQUIPMENT ROOM
TV	TELEVISION
TVSS	TRANSIENT VOLTAGE SURGE SUPPRESSION
TYP	TYPICAL
U.O.N.	UNLESS OTHERWISE NOTED
V	VOLT OR VOLTAGE
VA	VOLT AMPERE
W	WALL PHONE
WAP	WIRELESS ACCESS POINT
WP	WEATHERPROOF

SYMBOLS (AS APPLICABLE)

- DOOR BELL HORN STROBE
- HORN-STROBE FOR DWELLING UNIT SMOKE/FIRE ALARM NOTIFICATION @84" A.F.F.
- MUTING SWITCH FOR HORN-STROBES IN THE SLEEPING AREA IN HVI UNITS
- TTY TELEPHONE OUTLET
- TELEPHONE OUTLET
- TV TV COAX AND DATA RJ45 OUTLET IN ONE FACE PLATE
- DEDICATED ELECTRICAL OUTLET FOR TV
- KP KEYPAD
- DATA OUTLET
- TV CATV OUTLET
- TV+ CATV OUTLET + HDMI INPUT @55" A.F.F.
- HI HDMI INPUT
- WIFI - CEILING MOUNTED
- WM WIFI - WALL MOUNTED
- DS DOOR STATUS ALERT
- FL FOB LOCKSET
- FR FOB READER
- ATR PEDESTAL MOUNTED ADA TEL ENTRY DEVICE W/PROXIMITY READER + MICRO CAMERA
- MEDIA BOX
- WIRED DOOR BELL
- 2WMS TWO WAY COMMUNICATION MASTER STATION
- 2WCS TWO WAY COMMUNICATION CALL STATION
- 90 ° SR - SHORT RANGE LENS
- 90 ° LR - LONG RANGE LENS
- 180° 180 ° CCTV CAMERA - 2 DIRECTIONAL VIEW
- 360° 360 ° CCTV CAMERA - 4 DIRECTIONAL VIEW (CEILING MOUNTED)
- LPR - LICENSE PLATE CAMERA
- PTZ- MOTORIZED PAN-TILT ZOOM
- SATELLITE DISH
- ANTENNA
- CONDUIT RISER WITH WEATHER HEAD TO IDF ROOM.
- DTX DTX - DETEX KEYED AUDIBLE DOOR ALARM
- AMP SONOS WIFI AMPLIFIER
- SONOS SPEAKERS CEILING MOUNTED (WIRED)
- SONOS SPEAKERS WALL MOUNTED (WIRED)
- EML ELECTRIFIED RIM LATCH
- EP ELECTRIFIED PANIC HARDWRE
- OHR LONG RANGE OVERHEAD RFID READER
- BMXA BUTTERFLYMX VIDEO ENTRY INTERCOM (WALL MOUNTED)
- BMXA BUTTERFLYMX VIDEO ENTRY INTERCOM (PEDESTAL MOUNTED)
- DKS DOORKING TELEPHONE ENTRY SYSTEM
- DSP DOOR STATUS PANEL
- ACP ACCESS CONTROL PANEL
- REX REQUEST TO EXIT
- GDS GARAGE DOOR CONTACT

SHEET INDEX

SHEET NO.	DESCRIPTION
LVA0.00	GENERAL NOTES, ABBREVIATIONS, AND LEGENDS
LVA0.01	GUIDELINES AND SPECIFICATIONS
LVA1.00	BASEMENT B1 FLOOR PLAN
LVA1.01	FIRST FLOOR PLAN
LVA1.02	SECOND FLOOR PLAN
LVA1.03	THIRD FLOOR PLAN
LVA1.04	FOUTH FLOOR PLAN
LVA1.05	FIFTH FLOOR PLAN
LVA1.06	ROOF PLAN
LVA2.00	ENLARGE UNIT PLANS
LVA2.01	ENLARGE UNIT PLANS
LVA2.02	ENLARGE UNIT PLANS
LVA2.03	ENLARGE UNIT PLANS
LVA2.04	ENLARGE UNIT PLANS
LVA2.05	ENLARGE UNIT PLANS
LVA2.06	ENLARGE UNIT PLANS
LVA2.07	ENLARGE UNIT PLANS
LVA2.08	ENLARGE UNIT PLANS
LVA2.09	ENLARGE UNIT PLANS
LVA2.10	ENLARGE UNIT PLANS
TOTAL	20

PROJECT:

NORMANDIE APARTMENTS

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

COASTLINE REAL ESTATE ADVISORS, INC.

134 LOMITA STREET
EL SEGUNDO | CA 90245

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PHASE

ENTITLEMENT SET

09/27/2024

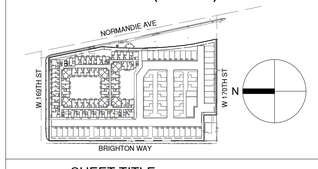
CONSULTANT:

Project Systems Group
Low Voltage+Communications+Security
Design Consultant
Rene.crisologo@projectsystemsgroup.com
(323) 363-1162

FULL SCALE (24X36): 1/32" = 1'-0"

0 16' 32' 64' 128'

HALF SCALE (11X17): 50%



SHEET TITLE

GENERAL NOTES, ABBREVIATIONS, AND LEGENDS

SHEET NO. **LV A0.00**

Date: August 7, 2018

FIRE PREVENTION & PUBLIC SAFETY BUREAU

REQUIREMENT #105

EMERGENCY RESPONDER RADIO SYSTEM (ERRS) COVERAGE

(Two-Way Radio Communications Enhancement Systems
Bi-Directional Amplifier System (BDA) Testing)

All testing procedures are performed in accordance with applicable portions of the 2016 California Fire Code Section / 2017 Los Angeles Fire Code, Section 510 (Emergency Responder Radio Coverage) and NFPA 72, 2016 Edition, Chapter 24, Section 24.9.2 Two-Way Radio Communications Enhancement Systems

GENERAL

Applicability – Section 510.1 of the 2016 California Fire Code / 2017 Los Angeles Fire Code shall be interpreted to mean any portion of a new building constructed where radio coverage signal strength levels are not consistent with Section 510.4.1 of the 2016 California Fire Code / 2017 Los Angeles Fire Code and meets any one of the following conditions:

1. There are more than 3-stories above grade plane.
2. The total building area is 50,000 square feet or more.
3. The total basement area is 10,000 square feet or more.
4. Any basement or level that extends 2 or more stories below grade plane.
5. Any building that is 20,000 square feet or greater and is equipped with a solar photovoltaic system.

Exception: R-3 Occupancy

Section 510.2 of the 2016 California Fire Code / 2017 Los Angeles Fire Code shall be interpreted to mean any existing building where the building's fire alarm system is replaced and the building meets any one of the conditions listed above for new buildings under Section 510.1 of the 2016 California Fire Code / 2017 Los Angeles Fire Code.

Non-Interference - No amplification system capable of operating on frequencies or causing interference on frequencies assigned to the Los Angeles Fire Department (LAFD) by the FCC shall be installed without prior coordination with and approval of the LAFD. The Building Manager/Owner shall suspend and immediately correct any other equipment installation(s) that degrade the performance of the public safety radio system or public safety radio enhancement system.

Cellular Distributed Antenna Systems – Cellular distributed antenna system amplifiers may share common passive devices as long as there is no compromise of the emergency responder radio system coverage. Engineering factors shall be considered in the design when using multi-band antennas and indicated on the as-built drawings.

Approval and Permit – LAFD plan review and approval is required for the installation or modification of ERRS.

Detailed as-built drawings including cable path(s), equipment location(s) and an 800 MHz Emergency Responder Radio System RF Test shall be submitted - prior to final inspection and acceptance test.

Technical Criteria

The following information is supplied in accordance with Section 510.4.2.2 of the 2016 California Fire Code / 2017 Los Angeles Fire Code for system planning purposes:

List of Assigned Frequencies – Any active amplification system installed to meet these requirements shall operate on the following LAFD frequencies in repeat analog conventional mode:

Uplink Frequency	Downlink Frequency	Uplink Frequency	Downlink Frequency
2	814.9375	859.9375	12	815.4375	860.4375
4	812.9375	857.9375	15	814.7625	859.7625
6	813.2375	858.2375	16	813.7625	858.7625
7	814.4375	859.4375	17	812.7625	857.7625

The list of assigned inbound/outbound frequency pairs is maintained by the LAFD for distribution to system designers and Regulation No. 4 certified testers and should be confirmed prior to final system design, installation and acceptance testing.

LAFD System Information – The following information is provided to building owners for planning purposes. The LAFD radio communications system is a City-wide, nine site simulcast system that operates in the analog mode. Primary transmitter locations are as follows:

	SITE NAME	ADDRESS	Latitude (WGS84)	Longitude (WGS84)	ELEV (ft)
1	100 Wilshire	100 Wilshire Blvd Santa Monica, 90401	34 01 00.60	-118 30 00.84	90
2	Baldwin Hills	4253 E. La Brea Ave, LA, 90008	34 00 24.07	-118 21 44.43	486

Date: August 7, 2018

FIRE PREVENTION & PUBLIC SAFETY BUREAU

REQUIREMENT #105

3	Beverly Glen	14240 Mulholland Dr, LA, 90077	34 07 44.84	-118 29 33.27	1380
4	City Hall	200 N. Spring St, LA, 90012	34° 3'12.397N	118°14'33.257W	287
5	KSAO Radio Site	4600 Carter Dr, LA, 90032	34 04 43.20	-118 11 08.12	760
6	Mt. Washington	4000 N. Glenalbyn Dr, LA, 90065	34 08 19.04	-118 12 53.92	930
7	Dat Mountain	721 Lark Court, LA, 90065 Oat Mountain Way, Northridge, 91326	34 19 41.90	-118 35 53.26	3656
9	San Pedro Hill	3960 Crest Road Rancho Palos Verdes, 90275	33 44 47.03	118 20 08.27	1450
9	Verdugo Peak	Verdugo Mountain Way Glendale, 91208	34 13 11.29	-118 17 35.93	2960

The LAFD shall provide the maximum acceptable propagation delay standard.

Additional Frequencies – Frequencies used by the LAFD may change as a result of FCC order or other operational requirements of the LAFD. In the event of such frequency change, and upon notification by the LAFD, the building owner shall modify or expand the emergency responder radio system coverage at their expense. The Authority Having Jurisdiction (AHJ) may require coverage in the future for FirstNet Broadband Services as NFPA 72, NFPA 1221 and Fire Code 510 are amended.

Labeling

1. Provide sign on all doors providing access to ERRS stating: "EMERGENCY RESPONDER RADIO SYSTEM EQUIPMENT INSIDE."
2. Provide sign on donor antennas stating: "EMERGENCY RESPONDER RADIO SYSTEM."

System Components

Section 510.4.2.4, Items 1 through 4 of the 2016 California Fire Code / 2017 Los Angeles Fire Code shall be enforced with the following additional clarifications:

Equipment
All equipment shall be listed by nationally recognized testing laboratory for its intended use.

External Filters – Permanent external filters and attachments shall not be permitted.

Signal Booster Components - If used, signal boosters shall meet the following requirements:

1. Signal boosters shall have FCC certification prior to installation and shall be NFPA 72 and/or IFC510.1 compliant.
2. All signal boosters shall be compatible with both analog and digital communications simultaneously at the time of installation.

Power Sources –At least two independent and reliable power sources shall be provided for all repeater, transmitter, receiver, and signal booster components, one primary and one secondary:

1. All repeater, transmitter, receiver, signal booster components, external filters and battery system components shall be contained in UL approved type 4 or 4X enclosure.
2. Donor antenna cabling and connections shall be weatherproof, protected from physically damage and properly supported.

Pathway Survivability – All system riser cables shall be in conduits and shall consist of one or more of the following:

1. Buildings where interior exit stairway and ramp enclosure are required to have fire-resistance rating of no less than two hours:
   - 2-hour fire-rated circuit integrity (CI) cable.
   - 2-hour fire rated-cable system.
   - 2-hour fire-rated enclosure or protected area.
   - 2-hour performance alternative approved by the AHJ.
2. Buildings where interior exit stairway and ramp enclosure are required to have fire-resistance rating of no less than one hour,
   - 1-hour fire-rated CI cable.
   - 1-hour fire rated-cable system.
   - 1-hour fire-rated enclosure or protected area.
   - 1-hour performance alternative approved by the AHJ.

Power Sources

a) **Primary Power Source –** The primary power source shall be supplied from a dedicated branch circuit and comply with NFPA 72, 2016 Edition, Section 10.6.5.1.

Date: August 7, 2018

FIRE PREVENTION & PUBLIC SAFETY BUREAU

REQUIREMENT #105

b) **Secondary Power source –** In the event of a fault or failure of the primary power supply, ERRS system shall automatically and immediately transfer to a secondary power source; while constantly maintaining all ERRS required functions and operation available without restarting the system. One the following secondary power sources can be used:

1. A storage battery dedicated to the system with at least 24-hours at 100% system operation capacity and arranged in accordance with NFPA 72, 2016 Edition, Section 10.6.10.
2. An automatic –starting engine driven emergency generator serving the dedicated branch circuit or the system with at least 24-hours of 100% system operation capacity and arranged in accordance with NFPA 72, 2016 Edition, Section 10.6.11.3. In addition to the generator, the ERRS shall be provided with a primary battery backup unit of no less than two hours of full system run-time, which shall ensure continuous coverage until the engine driven emergency generator starts.

c) All electrical breakers for ERRS shall be properly labeled and shall be provided with an approved breaker locking device.

System Monitoring – The public safety radio communications enhancement system shall include automatic supervisory and trouble reporting for malfunctions of the signal booster and power supplies that are annunciated by the fire alarm system and UL listed supervising station monitoring company or shall be monitored at a constantly attended location at the building and comply with the following:

1. The integrity of circuit monitoring signal boosters and power supplies shall comply with NFPA 72, 2016 Edition, Sections 10.6.9 and 12.6.
2. System and signal booster supervisory signals shall include the following:
   - Antenna malfunction
   - Signal booster failure
   - Low battery indication when 70% of the 24-hour operation capacity has been depleted
3. Power supply signals shall include the following for each signal booster:
   - Loss of normal power
   - Failure of battery charger

ERRS signals on fire alarm annunciator panel shall be labeled "EMERGENCY RESPONDER RADIO SYSTEM." There shall be one green LED signal indicating ERRS in normal mode and one yellow LED indicating system is in trouble.

Automatic smoke detection – Smoke detector shall be provided at the location of each ERRS control unit(s), storage battery unit(s) and monitoring panel.

Dedicated Panel – A dedicated monitoring panel shall be provided in an area acceptable and approved by the LAFD to annunciate the status of all signal booster locations. In buildings with fire alarm systems, a smoke detector shall be provided above monitoring panel. The monitoring panel shall provide visual and labeled indication of the following for each signal booster:

- Normal 120VAC power
- Signal booster trouble
- Loss of normal 120VAC power
- Failure of battery power
- Low battery capacity

In special circumstances where a dedicated panel cannot be installed, a request for modification must be submitted and approved to annunciate on FACP.

Installation Requirement – Hardware and cabling installation shall be in accordance with the applicable portions of NFPA 72, 2016 Edition, Section 10.4, Sections 510.5 through 510.5.4 of the 2016 California Fire Code / 2017 Los Angeles Fire Code and 2017 Los Angeles Electrical Code.

1. **Radio Coverage –** Radio coverage shall be provided throughout the building as a percentage of floor area as follows and shall be tested in accordance with Section 510.5.3 (1) through (7) with the following additional conditions:
   a. Critical Areas – Critical areas such as the fire command center(s), the fire pump room(s), exit stairs, exit passageways, elevator lobbies, standpipe cabinets, sprinkler valve locations and other areas deemed critical by the LAFD shall be provided with 99% floor area radio coverage.
   b. General Building Areas – General building areas shall be provided with 90% floor area radio coverage.
2. **Minimum Qualifications of Personnel -** The minimum qualifications of the system designer and lead installation personnel shall be in compliance with Section 510.5.2 of the 2016 California / 2017 Los Angeles Fire Code.

Date: August 7, 2018

FIRE PREVENTION & PUBLIC SAFETY BUREAU

REQUIREMENT #105

Acceptance Test - Acceptance and Operational testing shall be in accordance with Section 510.5.3 of the 2016 California Fire Code / 2017 Los Angeles Fire Code with the following clarifications:

1. The Fire Development Services Inspector(s) shall review the as-built drawings and link budget to ensure the physical installation is the same as the as-built drawings during the final system acceptance test.
2. ERRS shall be inspected, approved and pre-test sheet signed by LADBS Electrical Inspection prior to requesting an acceptance inspection from LAFD.
3. The final system acceptance test shall be witnessed by a Fire Development Services Inspector(s) or specific designee and shall include a visual inspection of the physical installation of the emergency responder radio system. Two Fire Development Services Inspectors shall conduct an on air test of the subject radio channels in all critical areas and spot tests in non-critical areas. A qualified Engineer or Technician from the designing or installing company shall be present with appropriate test equipment to verify all measurements are in compliance with Section 510.5.3 (1) through (5).
4. As part of the acceptance test, backup batteries and power supplies shall be tested in accordance with Section 510.6.1(3) of the 2016 California Fire Code / 2017 Los Angeles Fire Code.
5. 510.5.3(7) - As part of this installation a spectrum analyzer or other suitable test equipment shall be utilized to evaluate the system for the entire spectrum range of frequencies used by the LAFD (856.2375MHz – 860.0375MHz and 811.2375MHz – 815.9375MHz, inclusive) to ensure spurious oscillations are not being generated or received by the building signal booster(s). This test shall be conducted at time of installation and subsequent annual inspections.

Maintenance - The emergency responder radio system coverage shall be maintained operational at all times in accordance with Section 510.6.1 through §10.6.3 of the 2016 California Fire Code / 2017 Los Angeles Fire Code.

1. In the event of a service affecting failure of any portion of the emergency responder radio system, an initial evaluation shall be made by a qualified technician within 24 hours and repairs shall be complete within five working days. Building owner or designee shall notify LAFD forthwith of any service affecting outage.

2. In the event of a non-service affecting failure of any portion of the emergency responder radio system, an initial evaluation shall be completed by a qualified technician on the next business day and repairs shall be complete within 15-business days.

Annual Testing and Proof of Compliance – Annual testing and proof of compliance shall be in accordance with Section 510.6.1 of the 2016 California Fire Code / 2017 Los Angeles Fire Code with the following clarifications:

1. A Regulation No. 4 test shall be conducted by a person holding a valid Regulation No. 4 Certificate of Fitness in accordance with Section 117 of the Los Angeles Fire Code in the category of two-way radio communications enhancement systems bi-directional amplifier systems for this specific manufacturer and type of system being tested.
2. At the conclusion of the testing, a report, which shall verify compliance shall be submitted on an LAFD approved F-340R Fire Protection System Performance Report.
3. Information on obtaining a Regulation No. 4 Certificate of Fitness can be obtained from the "prospective applicant letter" link which is found on the LAFD Fire Prevention Regulation No. 4 website at: http://lafd.com/fire_prevention/chiefs-notification-4.

APPROVED BY:

Kristin M. Crowley, Deputy Chief
Fire Prevention & Public Safety Bureau

Date: 8/7/18

LOS ANGELES FIRE DEPARTMENT
RALPH M. TERRAZAS
FIRE CHIEF

October 21, 2020

TO: Fire Development Services

FROM: Dwayne Laurent, Fire Captain II
Los Angeles Fire Department
Fire Development Services Section

SUBJECT: Fire Alarm Annunciator Panel Requirements

This memorandum will serve to standardize the requirements for fire alarm annunciators for all buildings regulated by the LAFD. The purpose of fire alarm annunciators is to facilitate an efficient response by the LAFD to an emergency situation.

This memorandum applies to:

- New buildings and buildings that are replacing fire alarm systems, fire control panels or annunciators.
- Buildings that are replacing fire alarm control panel equipment which requires 100% of device testing or upgrading fire alarm control panel site specific software.

Fire alarm matrix annunciators are required for buildings three or more levels in height, including all levels both above and below grade.

Fire alarm graphic annunciators are required when more than one building has been approved by the LAFD to be connected to a single fire alarm system. The graphic annunciator shall:

- annunciate each building separately
- be properly orientated to match the site plan for the buildings and show the adjacent streets
- be approved by the LAFD field inspector prior to fabrication

Annunciator panel requirements:

1. Annunciators shall be located in readily accessible locations approved by the LAFD. High rise building matrix/graphic annunciators shall be located adjacent to the fire alarm control panel. Remote annunciators without control functions may be located at other locations such as security or engineering workstations.

2. Each floor level must be shown separately. Floor numbering must be approved by the LAFD field inspector and shall match between fire alarm, elevators, signage and smoke control (if provided)
3. In buildings of mixed use, indicate the occupancy use of the floor next to the floor level identification (examples: parking, office, residential, hotel, amenity)
4. Annunciator panels shall be provided with:
   - green "power on" LED (light emitting diode)
   - amber fire alarm system general "trouble" LED
   - a push to test button for all LEDs on the annunciator panel. Test button shall not be programmed as an alarm or monitoring point on the fire alarm control panel.
5. Fire alarm control panel shall monitor annunciator communication as a trouble point.
6. The following alarm initiating devices shall be provided with **red** LEDs:
   - **area smoke/heat detectors**
   - **manual pull stations** (if a single manual pull station is provided can use single red LED on panel)
   - **duct detectors** (not installed within residential units for HVAC shutdown or damper operation purposes)
   - **sprinkler waterflow**
   - **elevator lobby smoke detectors**
   - **special extinguishing systems** (non water based systems including but not limited to UL300, clean agent automatic extinguishing systems, foam extinguishing systems) if a potential for those systems exist in the building.
   - **sprinkler preaction** (if a potential for that system exists in the building)
   - **elevator machine or control room smoke/heat detectors**
   - **elevator hoistway smoke/heat detectors**
   - **beam detectors** (if provided for base building)
   - **aspirating smoke detection** (if provided for base building)
7. The following supervisory initiating devices shall be provided with **amber** LEDs:
   - **sprinkler control valves** (tampers)
   - **system duct detectors** installed in residential units for HVAC or damper operation purposes if provided for the building.
   - **system carbon monoxide detectors** (not installed within residential units)

8. The following supervisory initiating devices shall be provided with **blue** LEDs:
   - **system smoke alarms installed in residential units**
   - **system carbon monoxide detectors installed in residential units**

   System smoke alarms and carbon monoxide alarms installed within residential units can share the same properly labeled LED on the annunciator per floor.
9. The following systems shall be programmed as supervisory signals with LEDs at the bottom of the annunciator panel:
   - **fire pumps**: each fire pump shall be provided with a green "running" and amber general "trouble" LED. If a building is provided with multiple standpipe zones the zones and floors served by each zone shall be shown on the annunciator.
   - **water storage tank level** shall be provided with amber "low" and "high" tank level LEDs
   - **emergency generators**: each generator used for emergency or life/safety standby purposes shall be provided with green "running" and amber general "trouble" LEDs
   - **fuel tanks** used by diesel driven fire pumps or generators used for emergency or life/safety standby purposes shall be provided with amber "low level" and "fuel leak" LEDs.
   - **inverters** used for base building emergency/standby power for life safety purposes shall be annunciated with a green "operating" and amber general "trouble" LED
   - **emergency responder radio coverage systems** (if provided for building) shall be provided with a green "normal" and amber general "trouble" LED
   - **two-way communication systems** (if provided for building) shall be provided with a green "normal" and amber general "trouble" LED
   - **firefighter camera systems** (if provided for building) shall be provided with a green "normal" and amber general "trouble" LED.

Dwayne Laurent, Fire Captain II
Los Angeles Fire Department

PROJECT:

NORMANDIE APARTMENTS

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OWNER:

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PHASE

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09/27/2024

CONSULTANT:

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Low Voltage+Communications+Security
Design Consultant
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(323) 363-1162

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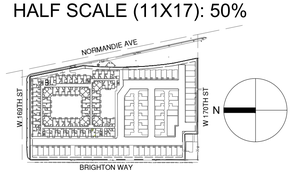
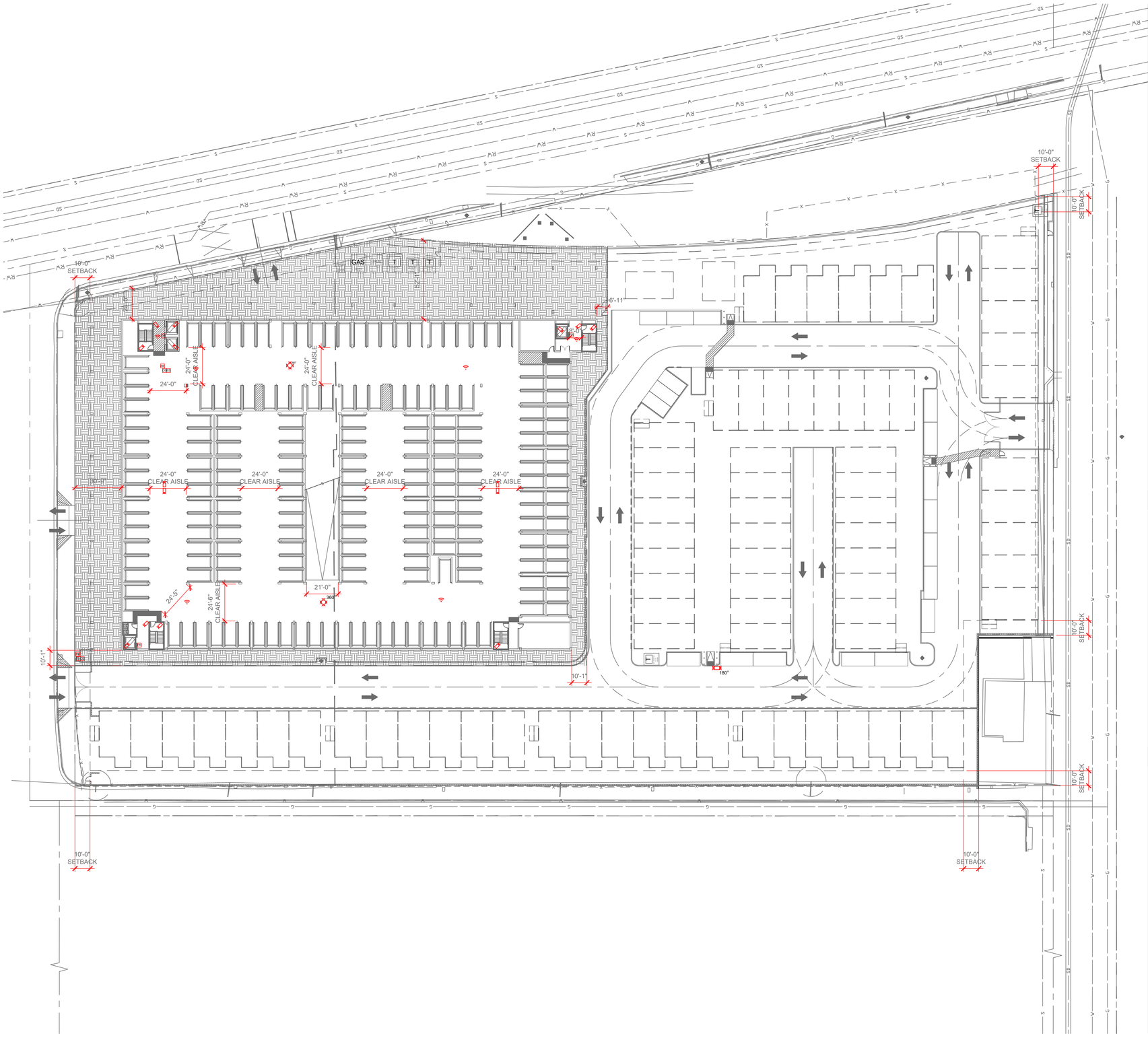


SHEET TITLE

GUIDELINES AND SPECIFICATIONS

SHEET NO. **LV A0.01**



SHEET NOTES

1. MEDIA BOX WILL BE AN EQUIVALENT OF THE LEGRAND - ONQ ENP3050-NA WIFI COMPATIBLE, ELECTRICAL BOX STRUCTURED MEDIA ENCLOSURE WITH TRIM AND COVER, 30 INCH, WHITE; TO CONTAIN CONNECTION MODULES FOR TELEPHONE, INTERNET, CABLE TV, SATELLITE TV WITH 364560-02-V1 SURGE PROTECTED DUPLEX POWER OUTLET.
2. POWER OUTLET INSIDE THE MEDIA BOX IS PROVIDED TO SUPPORT A ROUTER AND/OR NETWORK SWITCH.
3. ROUTE ALL CABLING THROUGH FRAMING AND SOFFITS PROVIDED.
4. EACH APARTMENT TO HAVE 1 TELEPHONE OUTLET, TV OUTLET (DATA, COAX + POWER) IN LIVING ROOM AND EVERY BEDROOM.
5. EACH APARTMENT UNIT FOR HEARING AND VISION IMPAIRED TENANTS ARE TO HAVE THE FOLLOWING AUDIO-VISUAL NOTIFICATION DEVICES: DOOR BELL; TELEPHONE; UNIT SMOKE ALARM: BUILDING FIRE ALARM.
6. ELECTRIC STRIKES AND ELECTRIFIED PANIC HARDWARE AND ASSOCIATED POWER SUPPLIES TO BE PROVIDED BY OTHERS.
7. HOMERUN CABLE TO EACH UNIT: ATT FIBER IN MICRODUCT, SPECTRUM RG-6 COAX, DIRECT TV+MATV SHARED RG-6 COAX AND CAT6.
8. REPLACE RG-6 COAX CABLES WITH RG-11 IF THE MEDIABOX IS BEYOND 150'.
9. INSIDE IDF ROOM OR CLOSET, PROVIDE A 3/4"X4'X8' FIRE RATED INSTALLATION BACKBOARD WITH SPACE FOR DISTRIBUTION EQUIPMENT OF AT&T, SPECTRUM, DIRECT TV, AND MATV. PROVIDE 2 QUAD OUTLETS ON A DEDICATED CIRCUIT, GROUNDING POINT AND SLEEVES IN THE FLOOR AND CEILING.
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KEYNOTES

LEGENDS

- DS - DOOR STATUS ALARM
- FR - FOB READER
- 2WCS - TWO WAY COMMUNICATION CALL STATION
- ES - ELECTRIC DOOR STRIKE
- 90° CCTV CAMERA
- 360° - 360 ° CCTV CAMERA - 4 DIRECTIONAL VIEW (CEILING MOUNTED)
- 180° CCTV CAMERA- 2 DIRECTIONAL VIEW
- WIFI IN CEILING
- RMX - OVERHEAD LONG RANGE RFID READER POLE MOUNTED
- OHP - BUTTERFLYMX VIDEO INTERCOM ENTRY SYSTEM PEDESTAL MOUNTED
- OHR - OVERHEAD LONG RANGE RFID READER CEILING SLAB MOUNTED
- OHR - BUTTERFLYMX VIDEO INTERCOM ENTRY SYSTEM WALL MOUNTED

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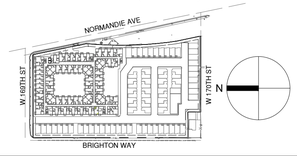

SHEET TITLE

BASEMENT B1 FLOOR PLAN

SHEET NO. **LV A1.00**

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KEYNOTES

LEGENDS

DS	-	DOOR STATUS ALARM
FR	-	FOB READER
2WCS	-	TWO WAY COMMUNICATION CALL STATION
ES	-	ELECTRIC DOOR STRIKE
	-	90° CCTV CAMERA
360°	-	360 ° CCTV CAMERA - 4 DIRECTIONAL VIEW (CEILING MOUNTED)
	-	180ª CCTV CAMERA- 2 DIRECTIONAL VIEW
	-	WIFI IN CEILING
BMX	-	OVERHEAD LONG RANGE RFID READER POLE MOUNTED
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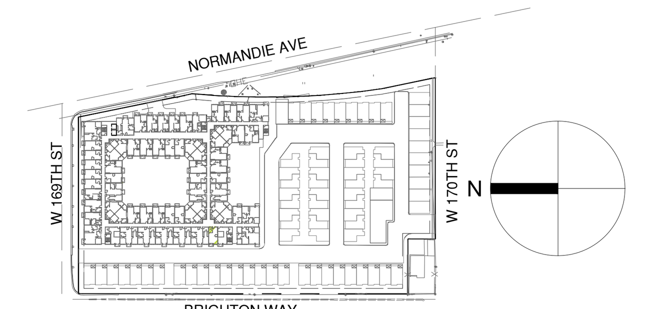
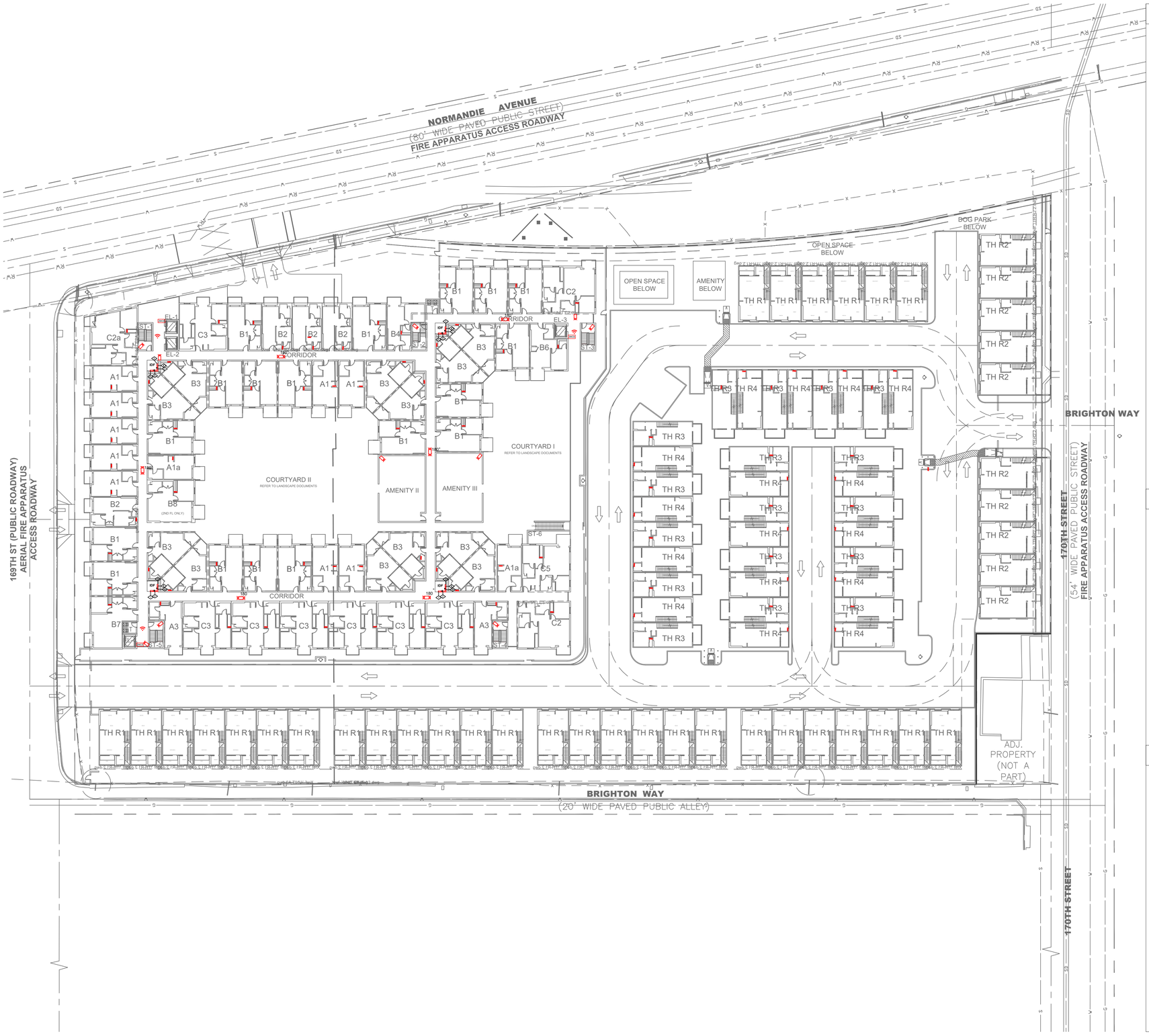


SHEET TITLE

FIRST FLOOR PLAN

SHEET NO. **LV A1.01**



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KEYNOTES

1. AT&T EQUIPMENT BOX
2. SPECTRUM EQUIPMENT BACK BOX
3. DIRECTV BACK BOX
4. MATV BACK BOX
5. PROVIDE 4' X 8' X 3/4" FIRE RATED BACKBOARD

LEGENDS

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- 2WCS - TWO WAY COMMUNICATION CALL STATION
- ES - ELECTRIC DOOR STRIKE
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Rene.crisologo@projectsystemsgroup.com
(323) 363-1162

FULL SCALE (24X36): 1/32" = 1'-0"

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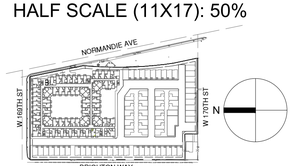
HALF SCALE (11X17): 50%



SHEET TITLE

SECOND FLOOR PLAN

SHEET NO. **LV A1.02**

SHEET NOTES

1. MEDIA BOX WILL BE AN EQUIVALENT OF THE LEGRAND - ONQ ENP3050-NA WIFI COMPATIBLE, ELECTRICAL BOX STRUCTURED MEDIA ENCLOSURE WITH TRIM AND COVER, 30 INCH, WHITE; TO CONTAIN CONNECTION MODULES FOR TELEPHONE, INTERNET, CABLE TV, SATELLITE TV WITH 364560-02-V1 SURGE PROTECTED DUPLEX POWER OUTLET.
2. POWER OUTLET INSIDE THE MEDIA BOX IS PROVIDED TO SUPPORT A ROUTER AND/OR NETWORK SWITCH.
3. ROUTE ALL CABLING THROUGH FRAMING AND SOFFITS PROVIDED.
4. EACH APARTMENT TO HAVE 1 TELEPHONE OUTLET, TV OUTLET (DATA, COAX + POWER) IN LIVING ROOM AND EVERY BEDROOM.
5. EACH APARTMENT UNIT FOR HEARING AND VISION IMPAIRED TENANTS ARE TO HAVE THE FOLLOWING AUDIO-VISUAL NOTIFICATION DEVICES: DOOR BELL; TELEPHONE; UNIT SMOKE ALARM: BUILDING FIRE ALARM.
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8. REPLACE RG-6 COAX CABLES WITH RG-11 IF THE MEDIABOX IS BEYOND 150'.
9. INSIDE IDF ROOM OR CLOSET, PROVIDE A 3/4"X4'X8' FIRE RATED INSTALLATION BACKBOARD WITH SPACE FOR DISTRIBUTION EQUIPMENT OF AT&T, SPECTRUM, DIRECT TV, AND MATV. PROVIDE 2 QUAD OUTLETS ON A DEDICATED CIRCUIT, GROUNDING POINT AND SLEEVES IN THE FLOOR AND CEILING.
10. ELEVATOR PROXIMITY READERS MUST BE COMPATIBLE WITH COMMON AREA ELECTRONIC LOCKSETS. SUBCONTRACTOR TO PROVIDE SUBMITTALS FOR APPROVAL.
11. FOR ACCESS CONTROL UNIT ENTRY DOORS; DORMA KABA ELECTRONIC FOB WILL BE USED.
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KEYNOTES

1. AT&T EQUIPMENT BOX
2. SPECTRUM EQUIPMENT BACK BOX
3. DIRECTV BACK BOX
4. MATV BACK BOX
5. PROVIDE 4' X 8' X 3/4" FIRE RATED BACKBOARD

LEGENDS

- DS - DOOR STATUS ALARM
- FR - FOB READER
- 2WCS - TWO WAY COMMUNICATION CALL STATION
- ES - ELECTRIC DOOR STRIKE
- 90° CCTV CAMERA
- 360° - 360 ° CCTV CAMERA - 4 DIRECTIONAL VIEW (CEILING MOUNTED)
- 180° CCTV CAMERA- 2 DIRECTIONAL VIEW
- WIFI IN CEILING
- RAX - OVERHEAD LONG RANGE RFID READER POLE MOUNTED
- CHS - BUTTERFLYMX VIDEO INTERCOM ENTRY SYSTEM PEDESTAL MOUNTED
- CHE - OVERHEAD LONG RANGE RFID READER CEILING SLAB MOUNTED
- CHE - BUTTERFLYMX VIDEO INTERCOM ENTRY SYSTEM WALL MOUNTED

PROJECT:

NORMANDIE APARTMENTS

16911 S NORMANDIE AVE
GARDENA | CA 90247

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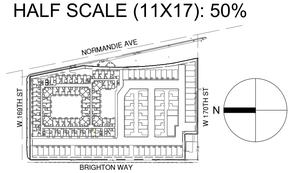
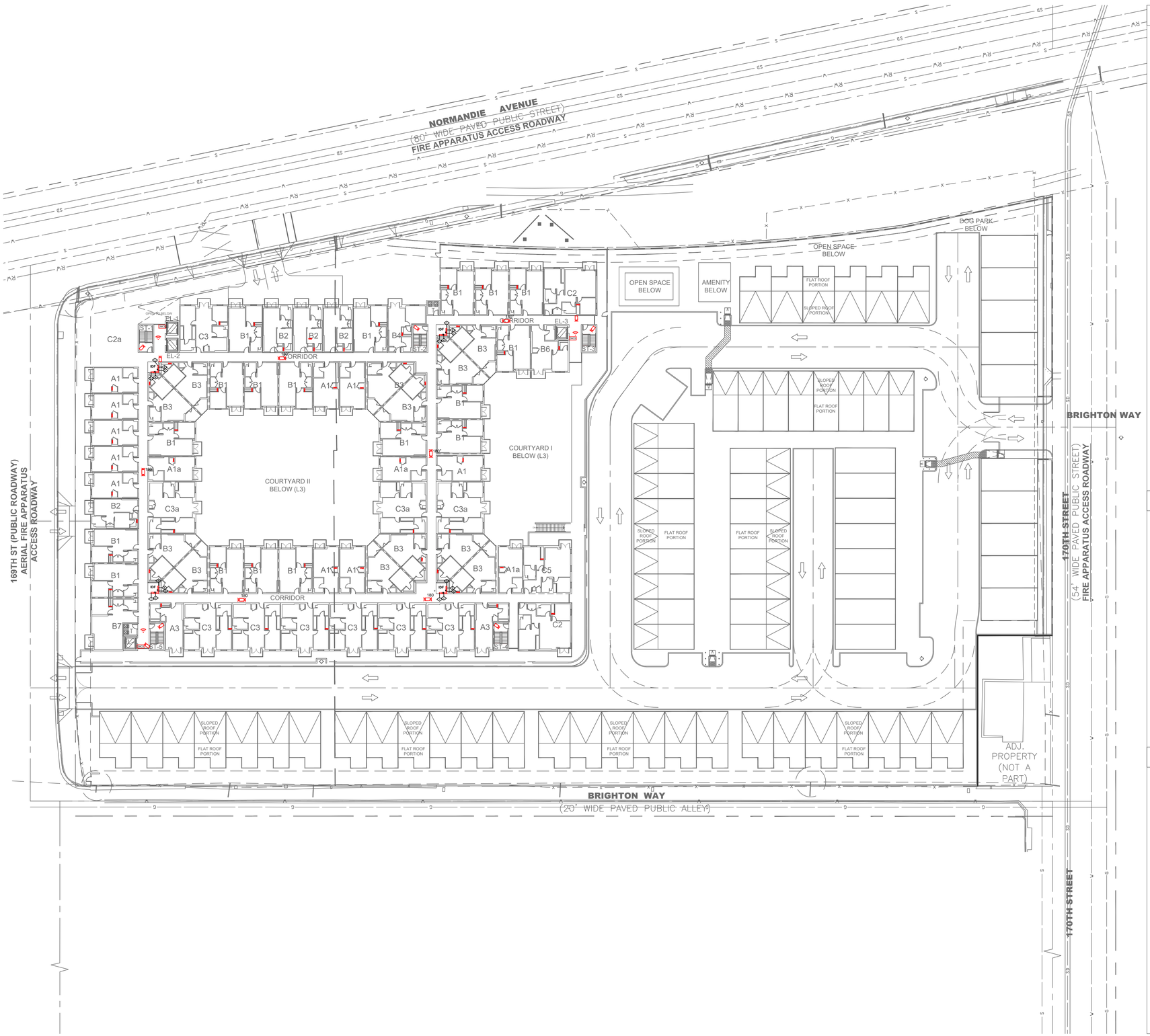


SHEET TITLE

THIRD FLOOR PLAN

SHEET NO. **LV A1.03**



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KEYNOTES

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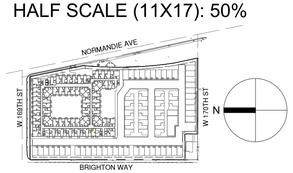
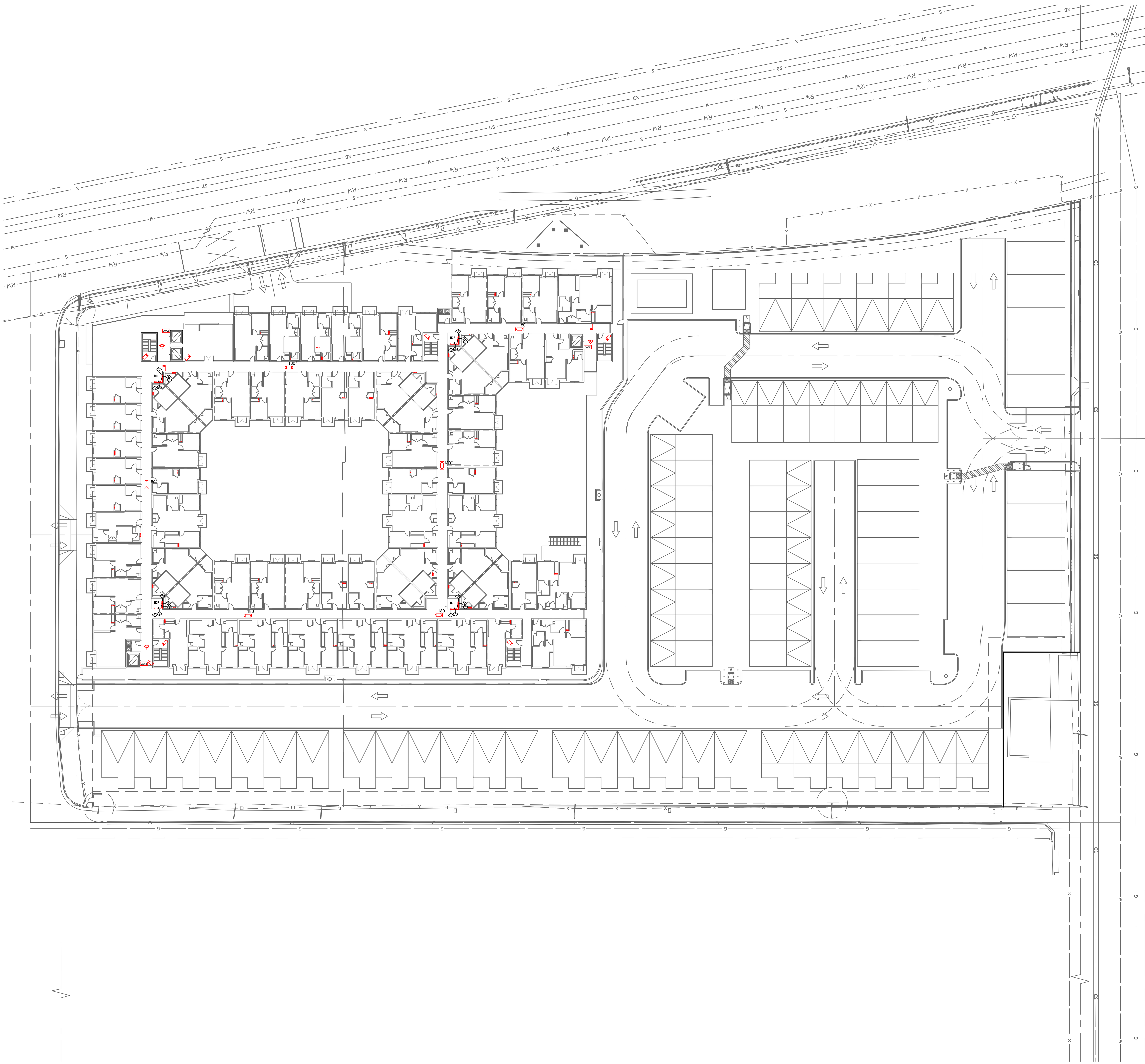


SHEET TITLE

FOUTH FLOOR PLAN

SHEET NO. **LV A1.04**



SHEET NOTES

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KEYNOTES

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LEGENDS

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FR	-	FOB READER
2WCS	-	TWO WAY COMMUNICATION CALL STATION
ES	-	ELECTRIC DOOR STRIKE
	-	90° CCTV CAMERA
360°	-	360 ° CCTV CAMERA - 4 DIRECTIONAL VIEW (CEILING MOUNTED)
	-	180ª CCTV CAMERA- 2 DIRECTIONAL VIEW
	-	WIFI IN CEILING
BMX	-	OVERHEAD LONG RANGE RFID READER POLE MOUNTED
OHR	-	BUTTERFLYMX VIDEO INTERCOM ENTRY SYSTEM PEDESTAL MOUNTED
OHR	-	OVERHEAD LONG RANGE RFID READER CEILING SLAB MOUNTED
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09/17/2024

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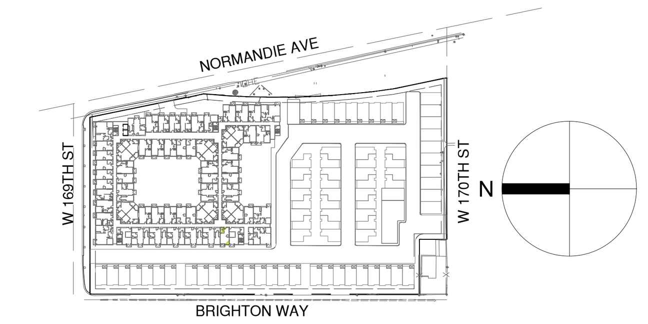
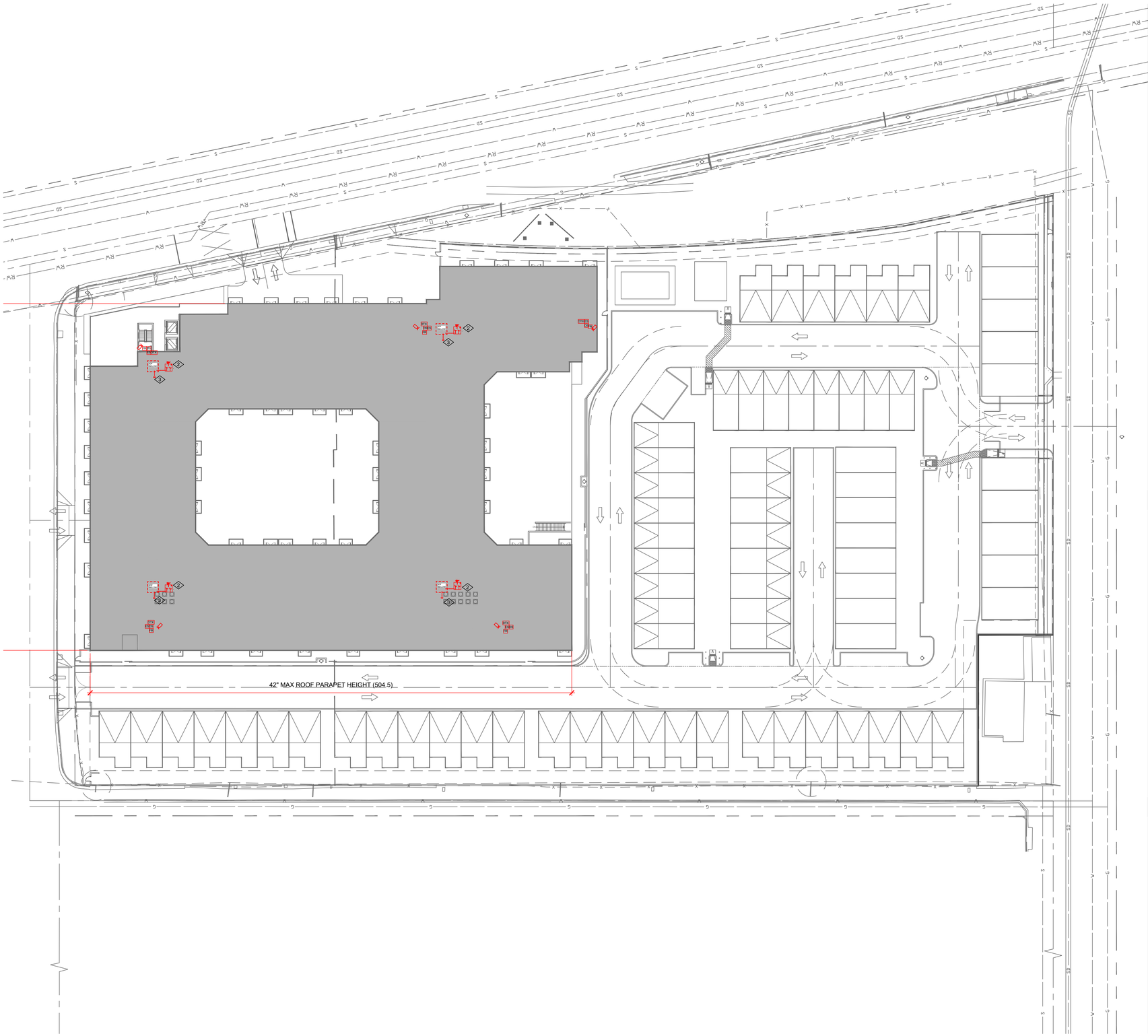


SHEET TITLE

FIFTH FLOOR PLAN

SHEET NO. **LV A1.05**



SHEET NOTES

1. ANTENNA PLATFORM TO SUPPORT 3 ANTENNAE: DIRECTV AND DISH NETWORK SATELLITE; MASTER DIGITAL ANTENNA. ANTENNAE TO HAVE A CLEAR VIEW OF THE SOUTHERN SKY.
2. GC TO PROVIDE: 3'X3'X6" PLATFORM AT DESIGNATED LOCATION TO BE FINISHED WITH ROOFING MATERIAL TO PROTECT THE ROOF; A 2" CONDUIT WITH A WEATHERHEAD, STUBBED UP WITHIN 2FT OF THE PLATFORM AND ROUTED TO THE NEAREST IDF; A GROUNDING POINT.
3. ANTENNA SUBCONTRACTOR TO PROVIDE AND BUILD: NECESSARY CABLING AND GROUNDING WIRE FROM IDF TO IDF TO SUPPORT ALL ANTENNAE; ALL NECESSARY MOUNTS, DISTRIBUTION SWITCHES, POWER MODULES AND ALL PARTS NECESSARY TO DISTRIBUTE OPTIMUM SIGNAL; TEST AND CORRECT SIGNAL STRENGTH ISSUES. POST CONSTRUCTION: TO PROVIDE SEPARATE SERVICES FOR MANAGMENT OF THE MDU ANTENNA SIGNAL DISTRIBUTION SYSTEM.
4. LV SUB TO PROVIDE A COMPLETE CCTV SYSTEM INCLUDING SPECIFIED SPEAKERS SPEAKERS FOR DEPLOYMENT AT ELDEN ELMS APTS. THERE WILL BE A TOTAL OF 7 EXCEPT FOR NETWORK VIDEO RECORDERS. ALL CAMERA AND SPEAKER WIRING AND PRE-WIRE LOCATIONS ARE TO BE IMPLEMENTED BY THE LV SUB. PLEASE CHECK FOR LATEST UPDATED SET FOR ANY LAST MINUTE CHANGES BY OWNERSHIP.
5. STEALTH MONITORING HAS SPECIFIED THE AXIS C3003E IT INSTALLED SPEAKERS AND 9 SPEAKER PRE-WIRES TO COMPLEMENT THE CCTV SYSTEM.

KEYNOTES

1. TO CONTROL USE OF UNLOCKED EGRESS EXITS, PROVIDE AND INSTALL ON INTERIOR SIDE OF THE DOOR, A LOCAL AUDIBLE ALARM THAT ACTIVATES IF OPENED. P/N DETEX ECL 2300 EXIT ALARM; INSTALL A DOOR STATUS CONTACT WIRED BACK TO THE DOOR STATUS PANEL.
2. LOCATION LOAD RATED FOR 450 LBS. PLATFORM MUST BE RISER CONDUIT + WEATHERHEAD TO IDF BELOW. ANTENNA 3'X3'X6" ANTENNA PLATFORM FOR SATELLITE & MATV. 2"X24" COVERED BY ROOFING MATERIAL.
3. STUB OUT AND CAP 2" CONDUIT FOR FUTURE 5G ANTENNA SYSTEM.

LEGENDS

- SATELLITE DISH
- ANTENNAE
- DTX - DETEX KEYED DOOR ALARM
- DS - FOB READER
- FR - FOB READER
- ES - ELECTRIC DOOR STRIKE
- 90° CCTV CAMERA

PROJECT:

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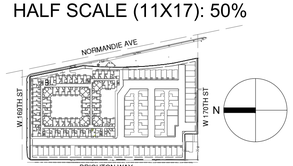
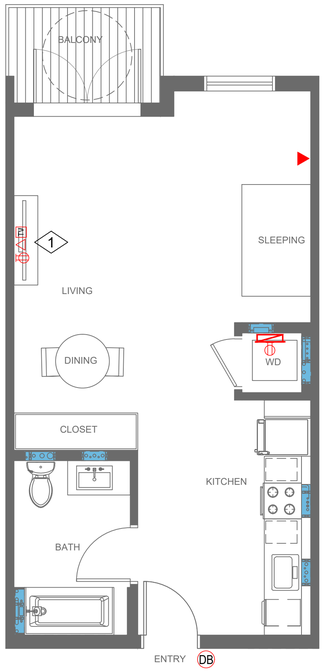


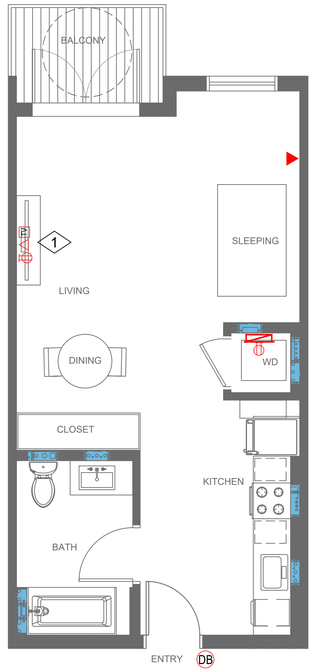
SHEET TITLE

ROOF PLAN

SHEET NO. **LV A1.06**



STUDIO - A1
547 SF



STUDIO - A1a
520 SF

SHEET NOTES

KEYNOTES

1. TV LOCATIONS TO BE PROVIDED WITH COAX, DATA, DUPLEX POWER OUTLETS

LEGENDS

- MEDIA BOX
- TELEPHONE OUTLET
- DATA OUTLET
- CATV OUTLET
- WIRED DOOR BELL
- ELECTRICAL OUTLET

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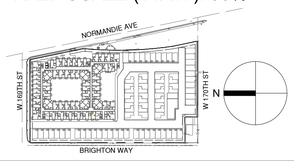
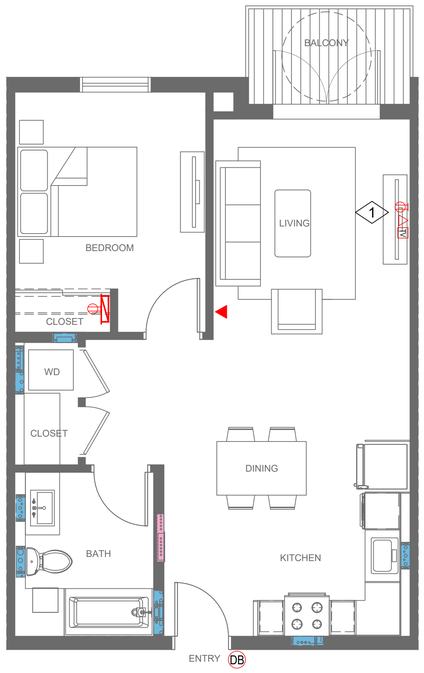


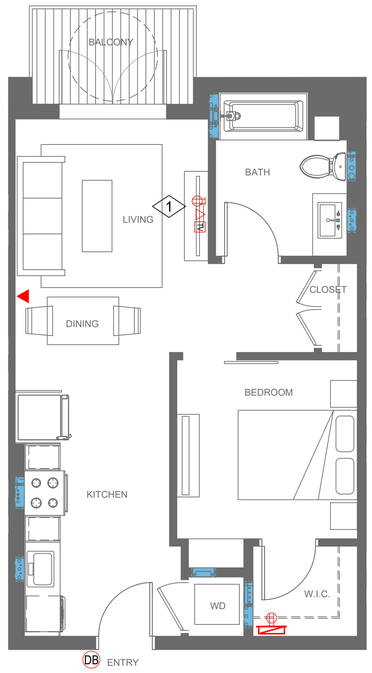
SHEET TITLE

ENLARGE UNIT PLANS

SHEET NO. **LV A2.00**



1 BD - B1
720 SF



1 BD - B2 (INBOARD)
625 SF

SHEET NOTES

KEYNOTES

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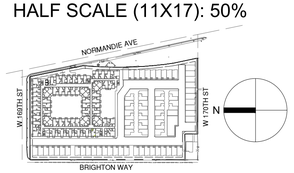
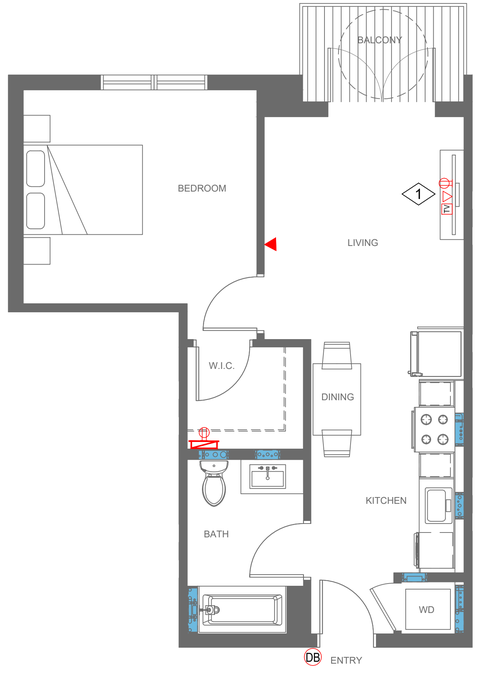


SHEET TITLE

ENLARGE UNIT PLANS

SHEET NO. **LV A2.01**

1 BD - B3
685 SF



1 BD - B4
637 SF

SHEET NOTES

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urban-architecture LAB
1657 alvira street second floor los angeles, ca 90035
tel. 323.954.9996 www.u-a-lab.com
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PHASE

ENTITLEMENT SET

09/27/2024

CONSULTANT:

Project Systems Group
Low Voltage+Communications+Security
Design Consultant
Rene.crisologo@projectsystemsgroup.com
(323) 363-1162

FULL SCALE (24X36): 1/4" = 1'-0"

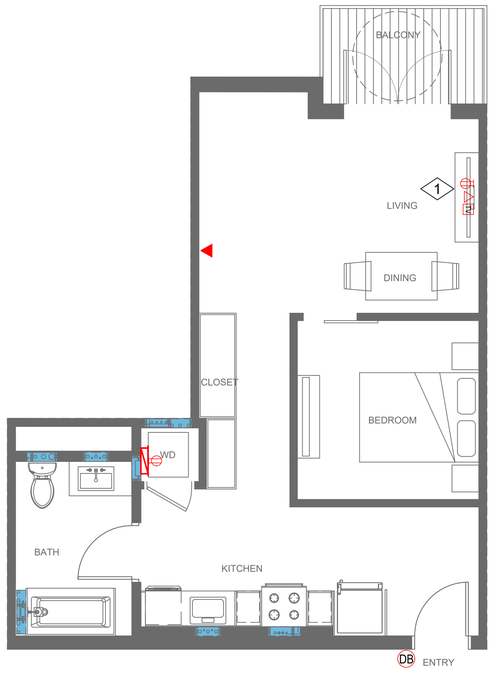
0 2' 4' 8' 16'

HALF SCALE (11X17): 50%

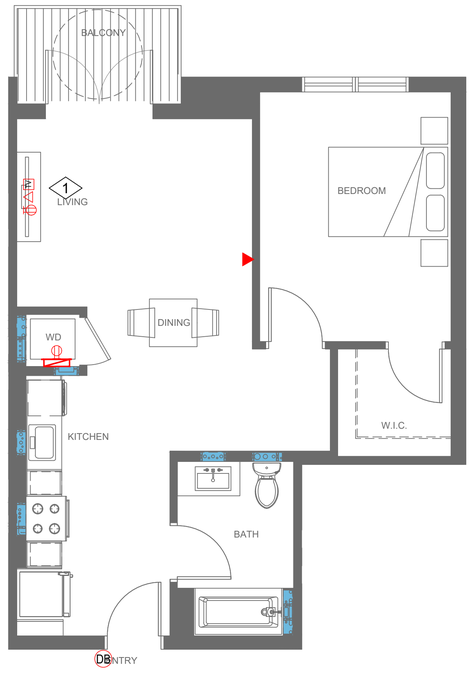
SHEET TITLE

ENLARGE UNIT PLANS

SHEET NO. **LV A2.02**



1 BD - B5
650 SF



1 BD - B6
700 SF

SHEET NOTES

KEYNOTES

1. TV LOCATIONS TO BE PROVIDED WITH COAX, DATA, DUPLEX POWER OUTLETS

LEGENDS

- MEDIA BOX
- TELEPHONE OUTLET
- DATA OUTLET
- CATV OUTLET
- WIRED DOOR BELL
- ELECTRICAL OUTLET

PROJECT:

NORMANDIE APARTMENTS

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

COASTLINE REAL ESTATE ADVISORS, INC.

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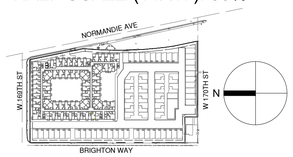

SHEET TITLE

ENLARGE UNIT PLANS

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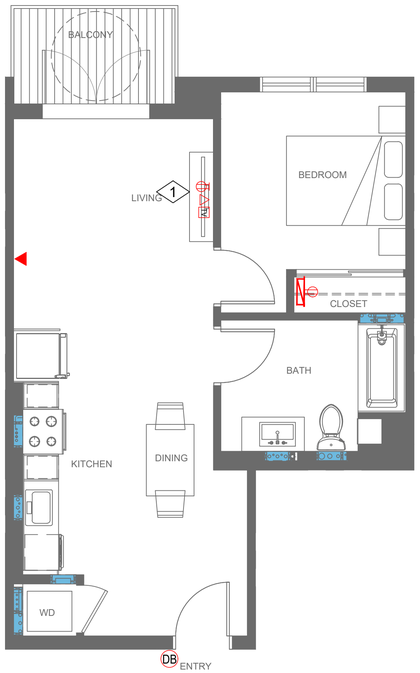
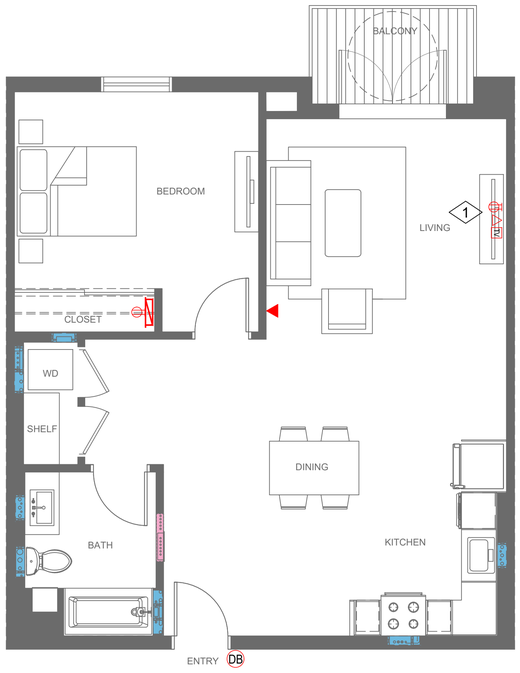


1 BD - B7
628 SF



1 BD - B8 (3RD FLOOR)
896 SF

SHEET NOTES

KEYNOTES

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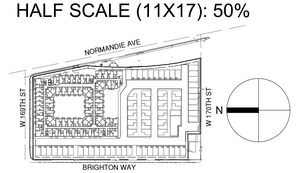

SHEET TITLE

ENLARGE UNIT PLANS

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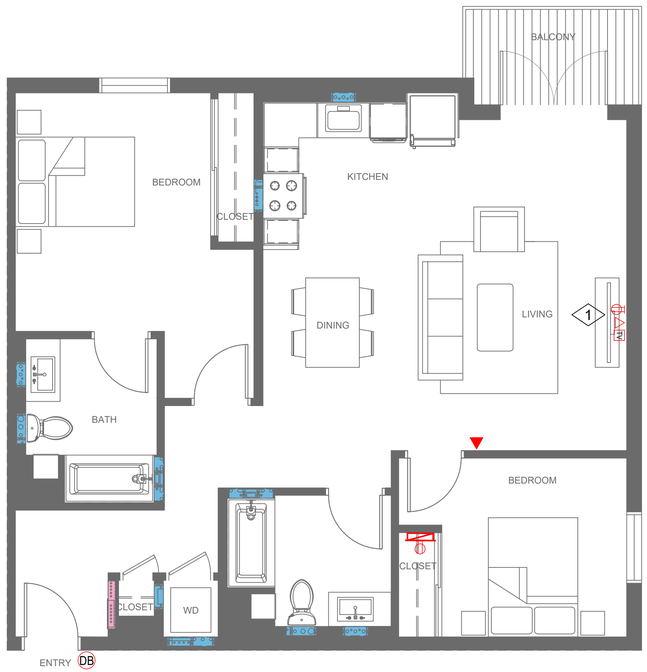
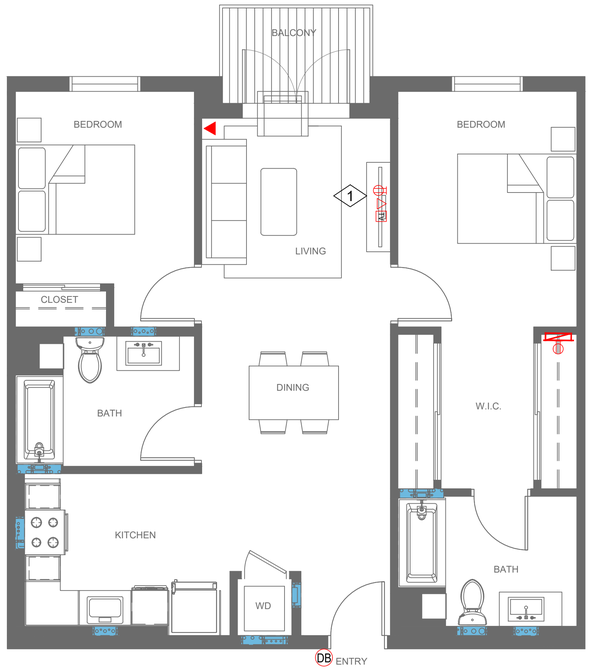
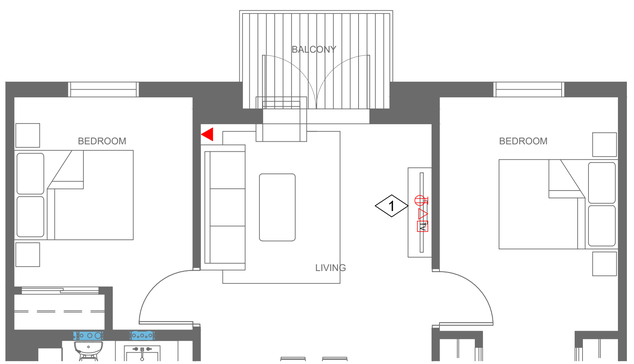


1 BD - C2
1,120 SF



1 BD - C3
1,021 SF



1 BD - C3a
1,098 SF

SHEET NOTES

KEYNOTES

1. TV LOCATIONS TO BE PROVIDED WITH COAX, DATA, DUPLEX POWER OUTLETS

LEGENDS

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- TELEPHONE OUTLET
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- WIRED DOOR BELL
- ELECTRICAL OUTLET

PROJECT:

NORMANDIE APARTMENTS

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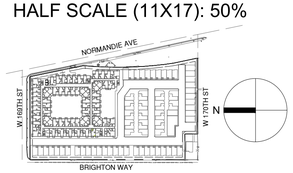
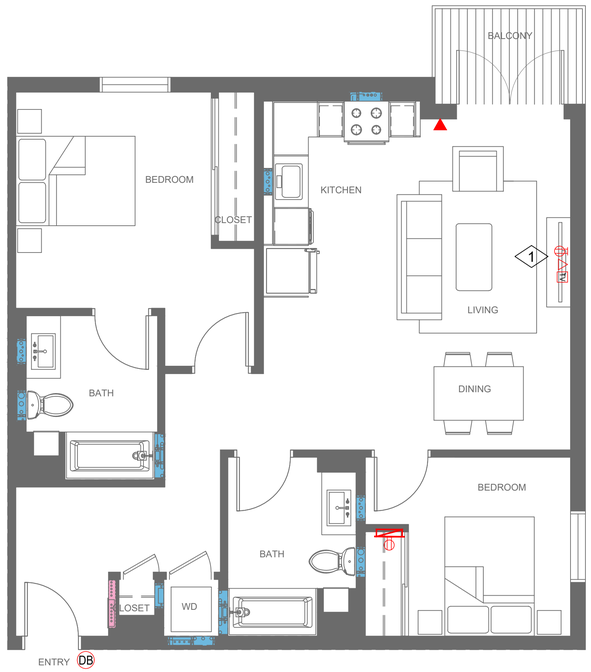


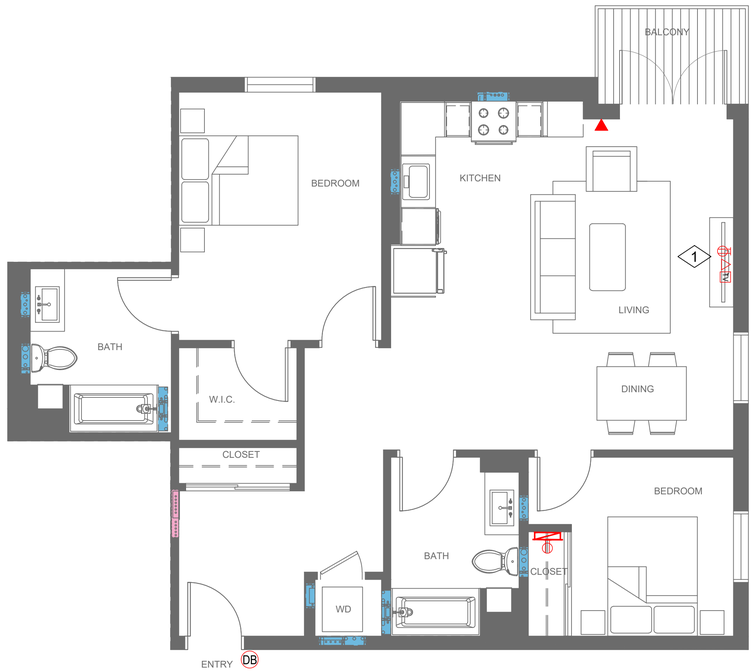
SHEET TITLE

ENLARGE UNIT PLANS

SHEET NO. **LV A2.05**



1 BD - C5
1,020 SF



1 BD - C6
1,112 SF

SHEET NOTES

KEYNOTES

1. TV LOCATIONS TO BE PROVIDED WITH COAX, DATA, DUPLEX POWER OUTLETS

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- CATV OUTLET
- WIRED DOOR BELL
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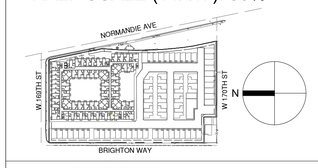
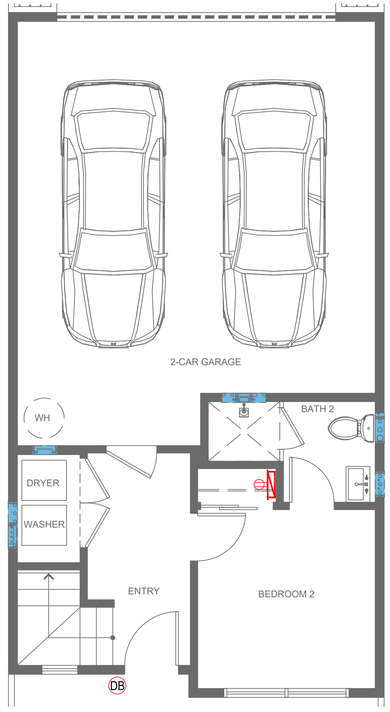


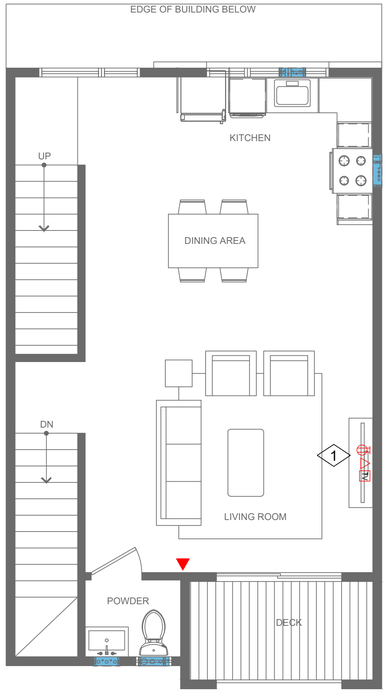
SHEET TITLE

ENLARGE UNIT PLANS

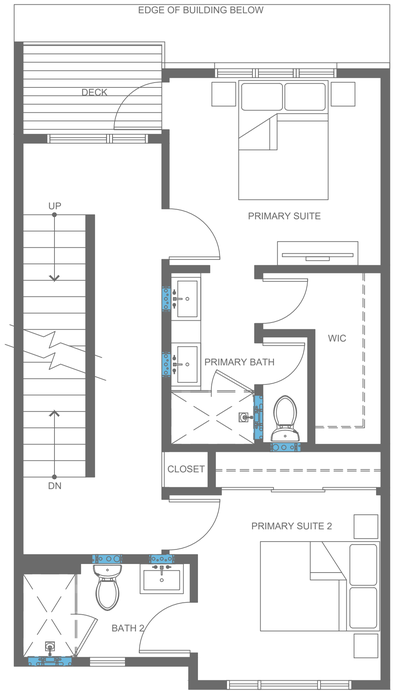
SHEET NO. **LV A2.06**



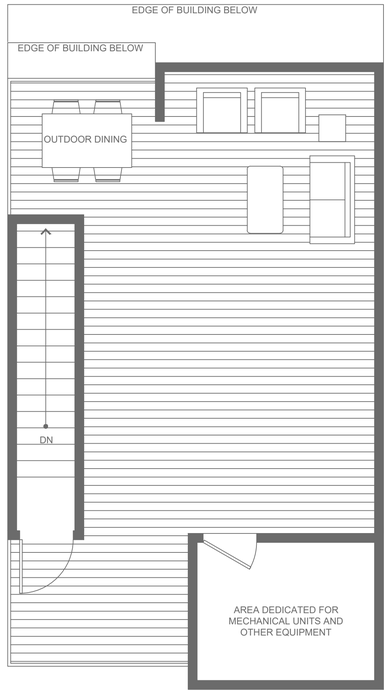
FIRST FLOOR PLAN
355 SF
(EXCLUDES GARAGE)



SECOND FLOOR PLAN
746 SF



THIRD FLOOR PLAN
790 SF



ROOF PLAN - DECK
(AREA NOT INCLUDED IN FLOOR AREA CALCULATION)

TOWNHOUSE TYPE 1
3-BEDROOM
1,642 SF

SHEET NOTES

KEYNOTES

1. TV LOCATIONS TO BE PROVIDED WITH COAX, DATA, DUPLEX POWER OUTLETS

LEGENDS

- MEDIA BOX
- TELEPHONE OUTLET
- DATA OUTLET
- CATV OUTLET
- WIRED DOOR BELL
- ELECTRICAL OUTLET

PROJECT:

NORMANDIE APARTMENTS

16911 S NORMANDIE AVE
GARDENA | CA 90247

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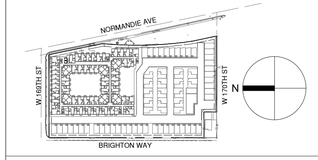
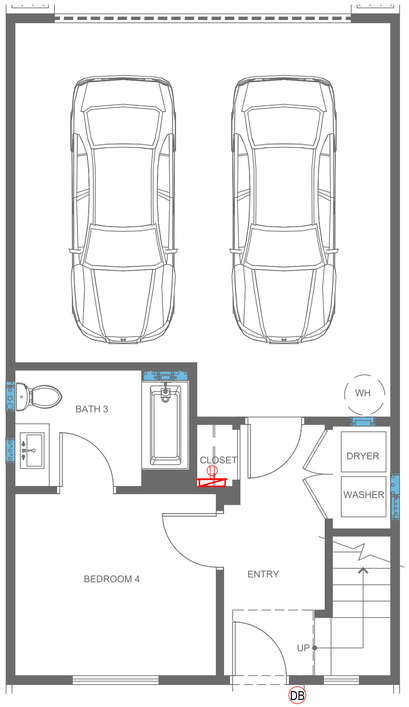


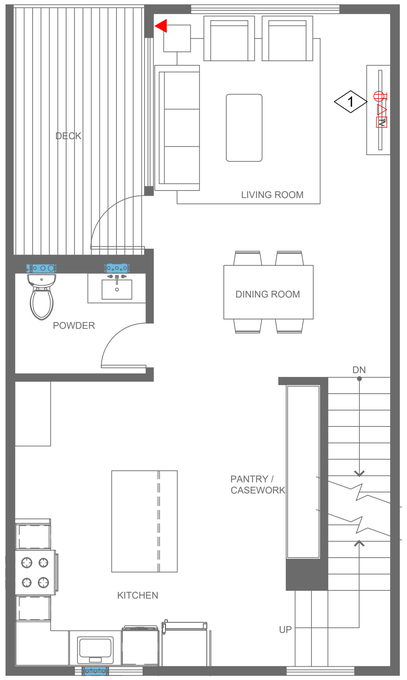
SHEET TITLE

ENLARGE UNIT PLANS

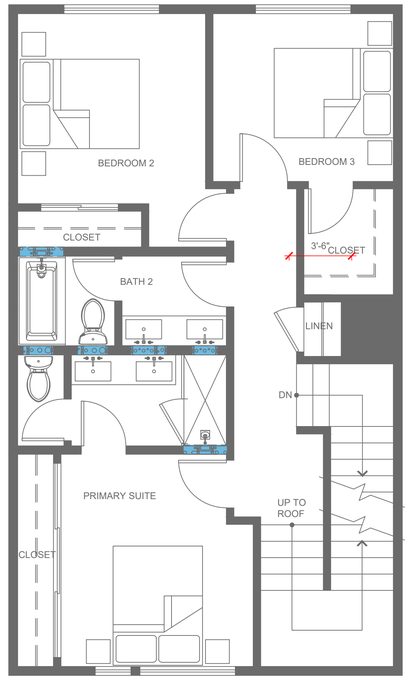
SHEET NO. **LV A2.07**



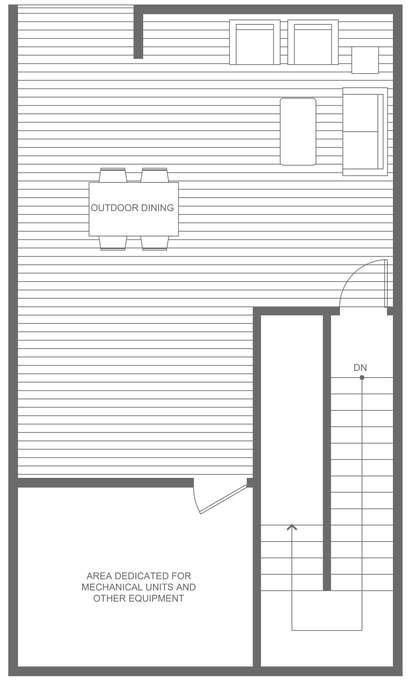
FIRST FLOOR PLAN
362 SF
(EXCLUDES GARAGE)



SECOND FLOOR PLAN
716 SF



THIRD FLOOR PLAN
825 SF



ROOF PLAN - DECK
(AREA NOT INCLUDED IN FLOOR AREA CALCULATION)

TOWNHOUSE TYPE 2
4-BEDROOM
1,903 SF

SHEET NOTES

KEYNOTES

1. TV LOCATIONS TO BE PROVIDED WITH COAX, DATA, DUPLEX POWER OUTLETS

LEGENDS

- MEDIA BOX
- TELEPHONE OUTLET
- DATA OUTLET
- CATV OUTLET
- WIRED DOOR BELL
- ELECTRICAL OUTLET

PROJECT:

NORMANDIE APARTMENTS

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

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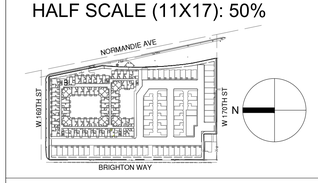
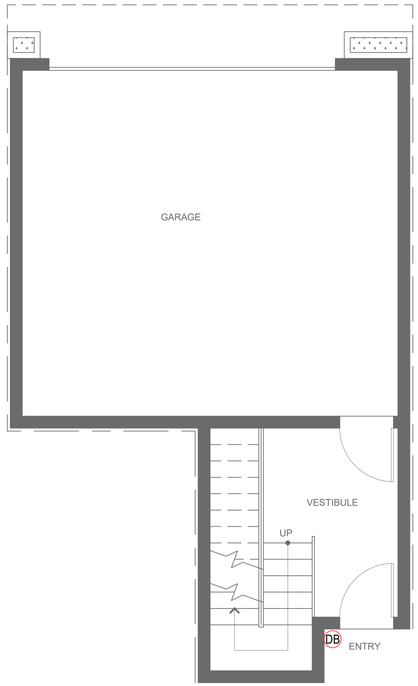


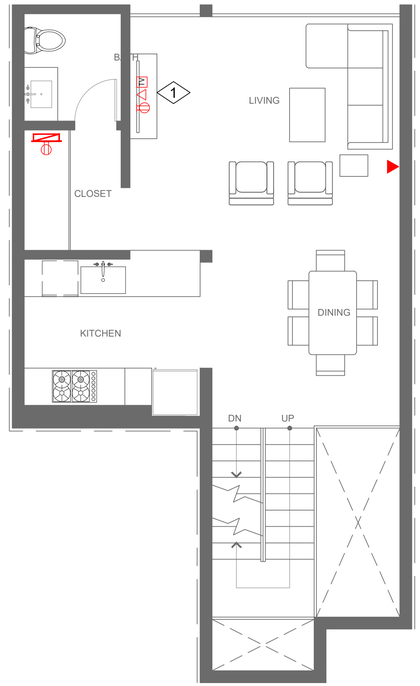
SHEET TITLE

ENLARGE UNIT PLANS

SHEET NO. **LV A2.08**

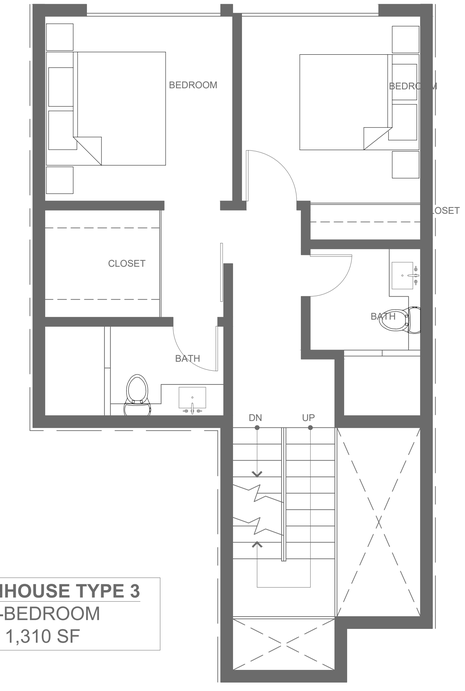
FIRST FLOOR PLAN
110 SF
(EXCLUDES GARAGE)

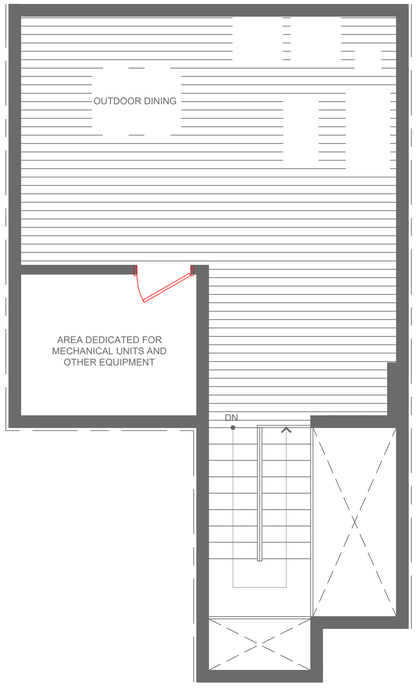




SECOND FLOOR PLAN
600 SF

THIRD FLOOR PLAN
600 SF





TOWNHOUSE TYPE 3
2-BEDROOM
1,310 SF

ROOF PLAN - DECK
(AREA NOT INCLUDED IN FLOOR AREA CALCULATION)

SHEET NOTES

KEYNOTES

1. TV LOCATIONS TO BE PROVIDED WITH COAX, DATA, DUPLEX POWER OUTLETS

LEGENDS

- MEDIA BOX
- TELEPHONE OUTLET
- DATA OUTLET
- CATV OUTLET
- WIRED DOOR BELL
- ELECTRICAL OUTLET

PROJECT:

NORMANDIE APARTMENTS

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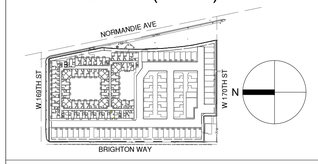
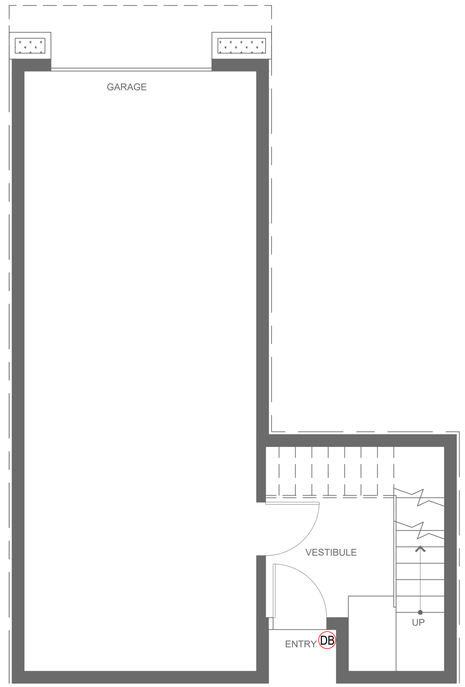


SHEET TITLE

ENLARGE UNIT PLANS

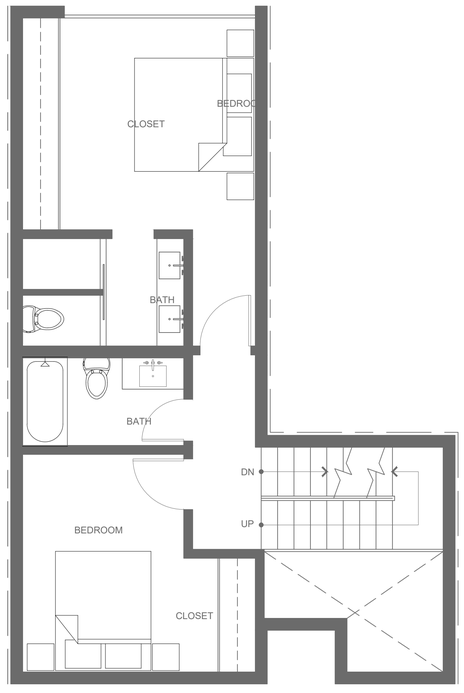
SHEET NO. **LV A2.09**

FIRST FLOOR PLAN
103 SF

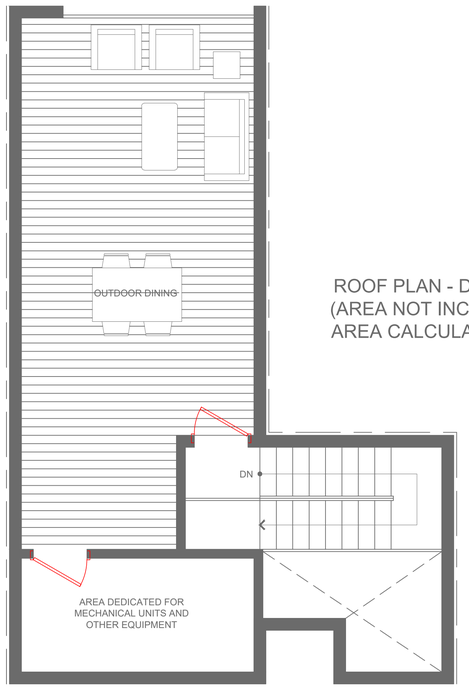


SECOND FLOOR PLAN
610 SF

THIRD FLOOR PLAN
610 SF



ROOF PLAN - DECK
(AREA NOT INCLUDED IN FLOOR AREA CALCULATION)



TOWNHOUSE TYPE 4
2-BEDROOM
1,323 SF

SHEET NOTES

KEYNOTES

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LEGENDS

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- TELEPHONE OUTLET
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- CATV OUTLET
- WIRED DOOR BELL
- ELECTRICAL OUTLET

PROJECT:

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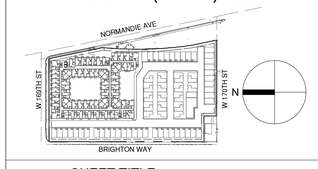
Rene.crisologo@projectsystemsgroup.com
(323) 363-1162

FULL SCALE (24X36): 1/4" = 1'-0"
0 2' 4' 8' 16'
HALF SCALE (11X17): 50%



SHEET TITLE

ENLARGE UNIT PLANS

SHEET NO. **LV A2.10**

LIGHTING SHEET INDEX

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NORMANDIE LIGHTING FIXTURE SCHEDULE
Date: 11-21-2024

IMAGE	TYPE	LOCATION	DESCRIPTION	MANUFACTURER	PART NUMBER	WATTAGE	CCT	VOLTAGE	DIMMING / CONTROLS NOTES	NOTES
	A3	LARGE COURTYARD	AREA LIGHT 3	LUMUX	BL344-TALL-10'-WHITE-3000K-120/277-(FINISH)-OCC	85 WATTS	3000K	120/277 V	INTEGRAL MOTION WITH DIM CAPABLE, ON TIMECLOCK	
	B1	VARIOUS SITE LIGHTING	BOLLARD	LUMUX	BL350-T2-WHITE-3000K-(FINISH)	39 WATTS	3000K	120/277 V	NO DIMMING REQUIRED, ON TIMECLOCK	
	B3	POOL	BOLLARD	LUMUX	BL350-T4-WHITE-3000K-(FINISH)-GFCI	39 WATTS	3000K	120/277 V	NO DIMMING REQUIRED, ON TIMECLOCK	
	D1	CEILINGS AT OVERHANGS/ ENTRY POINTS	DOWNLIGHT	DMF	M4CC / DRD2M12930SP0 / M4TRS(FINISH)	15 WATTS	3000K	120/277 V	0-10V, ON TIMECLOCK	CONFIRM CEILING MATERIAL
	D2	AWNINGS AT COURTYARDS	DOWNLIGHT CANOPY	WAC	3831-27/3040BK+ REMOTE TRANSFORMER	8 WATTS	3000K	12 V	HAS INTEGRAL DIMMING, NO DIMMING REQUIRED, ON TIMECLOCK	REQUIRES TRANSFORMER
	F1	VARIOUS TREES UPLIGHTING	TREE FLOOD 1	WAC	5011-30BZ + REMOTE TRANSFORMER	18 WATTS	3000K	12 V	HAS INTEGRAL DIMMING, NO DIMMING REQUIRED, ON TIMECLOCK	REQUIRES TRANSFORMER
	F2	VARIOUS TREES TREE MOUNTING	TREE FLOOD 2	WAC	5611-30BBR + TREE MOUNT 5000-TCP-BZ + REMOTE DRIVER	11 WATTS	3000K	12 V	NO DIMMING REQUIRED, ON TIMECLOCK	REQUIRES TRANSFORMER, MOUNTS INSIDE OF TREE BRANCHES
	F3	CABANA FLOOD LIGHT	CABANA FLOOD	BK LIGHTING	MM-LED-e71-21-BZP-12-C + MOUNTING: BC7-(FINISH) + REMOTE DRIVER: TRe20	3 WATTS	3000K	12 V	NO DIMMING REQUIRED, ON TIMECLOCK	CONFIRM FINISH, REQUIRES TRANSFORMER, MOUNTS INSIDE OF POOL TERRACE CABANAS
	F4	AWNINGS AT COURTYARDS	CANOPY FLOOD 1	BK LIGHTING	AR-LED-RM-e65-MFL-A9-WHP-12-A-3'-WM + REMOTE TRANSFORMER	7 WATTS	3000K	12 V	NO DIMMING REQUIRED, ON TIMECLOCK	REQUIRES TRANSFORMER, MOUNTS ON UNDERSIDE OF COURTYARD AWNING FOR FLOOD LIGHTING
	G1	VARIOUS INGROUND PATHS	INGROUND MARKER LIGHT	MP LIGHTING	L07-W30H-C-SS + REMOTE DRIVER	0.2 WATTS	3000K	12 V	NO DIMMING REQUIRED, ON TIMECLOCK	REQUIRES TRANSFORMER
	G2	RETAIL ENTRY UPLIGHTS	INGROUND UPLIGHT	WAC	5031-30BZ + REMOTE TRANSFORMER	12 WATTS	3000K	12 V	HAS INTEGRAL DIMMING, NO DIMMING REQUIRED, ON TIMECLOCK	REQUIRES TRANSFORMER
	L1	FESTOON LIGHTING COURTYARD	FESTOON LIGHTING	TEGAN	EXTON SYSTEM W/ GLOBES: EXS-K-C-GEF-BLK	5 WATT/ BULB	3000K		0-10V, ON TIMECLOCK	MOUNT 2 FOOT APART, MOUNT AT 10 FOOT TO 12 FOOT HIGH MAXIMUM. CONFIRM ELECTRICAL ACCESS FOR THE POLES
	L2	GARAGE ENTRY OFF STREET	LINEAR GARAGE ENTRY	ELITE MAXILUME	OLS-CM-LED-4-S-F-750L-DIM10-MVOLT-30K85-(FINISH) WITH DFCSJ-OEM-OCC	6.5 WATTS/ FT	3000K	120/277 V	0-10V, INTEGRATED OCCUPNACY AND DAYLIGHTING	DAMP LOCATION RATED, MAKE SURE TO MOUNT AT LEAST 4 FOOT AWAY FROM OPENNING OF GARAGE AND AWAY FROM ANY GATE OBSTRUCTIONS
	L3	VARIOUS BENCH UNDER LIGHTS	EXTERIOR LED TAPE LIGHT	CORE LIGHTING	LNT-85-HB-30K-24V-(LENGTH)-IP68BF-HW10 + AC39 CHANNEL + REMOTE DRIVER WITH 0-10V DIMMING	3.4 WATTS/FT	3000K	24 V	0-10V, ON TIMECLOCK	MAX RUN LENGTH IS 23 FT, REQUIRES DRIVER, CHANNEL TO BE CUT TO FIT ARC OF BENCH. SEE CHANNEL PROFILE FOR CUT OUT REQUIRED
	L5	LINEAR LIGHTING AT RETAIL ENTRY	LINEAR RECESSED WET	ALIGHT	ACLS-8'-LS-30-80-U-HE-XP-(FINISH)-D-Q	5 WATTS/FT	3000K	120/277 V	0-10V, ON TIMECLOCK	CONFIRM CEILING MATERIAL
	P1	AWNINGS AT COURTYARDS	TRELLIS DECORATIVE PENDANT 1	BOVER	3090410417 0U	14 WATTS	3000K	120/277 V	ELV. ON TIMECLOCK	CONFIRM FINISH AND SHADE MATERIAL
	P2	AWNINGS AT COURTYARDS	TRELLIS DECORATIVE PENDANT 2	BOVER	3090321416 8U	9.5 WATTS	3000K	120/277 V	ELV. ON TIMECLOCK	CONFIRM FINISH AND SHADE MATERIAL
	P3	AWNINGS AT COURTYARDS	TRELLIS LAGRE PENDANT	STRUCTURA	AURA-RCT-D-4X8-L3O-SO-(FINISH)-CEE	36 WATTS	3000K	120/277 V	0-10V, ON TIMECLOCK	CONFIRM FINISH , REVIEW CATENARY MOUNTING FOR PROPER MOUNTING LOCATION ON CANOPY
	W1	WALL SCONCE	WALL SCONCE	WAC	WS-W54614-(FINISH)	12 WATTS	3000K	120/277 V	ELV. ON TIMECLOCK	MOUNT AT 6.5' AFF
	W2	STEP LIGHT	STEP LIGHT	LUMUX	SLS1400 7W WHITE 3000K 120-277V (FINISH)	7 WATTS	3000K	120/277 V	0-10V,ON TIMECLOCK	DOES NOT NEED TO DIM
	W3	WALL SCONCE	WALL SCONCE	WAC	WS-W54620-(FINISH)	12 WATTS	3000K	120/277 V	ELV. ON TIMECLOCK	MOUNT AT 6.5' AFF
	W5	TOWNHOME GARAGE ENTRY	WALL LIGHT	WAC	WS-W2504-(FINISH)	16 WATTS	3000K	120/277 V	ON TIMECLOCK	WILL NEED TO BE ON HOUSE POWER
	W6	GATE ENTRY AT PROPERTY LINE	WALL LIGHT	LITHONIA	WPX1 LED P1-30K-MVOLT-(FINISH)	11 WATTS	3000K	120/277 V	0-10V, ON TIMECLOCK	DOES NOT NEED TO DIM
	W7	TOWNHOME UNIT ENTRY	WALL LIGHT	AFX	DEXW060612L30MVBK	12 WATTS	3000K	120/277 V	0-10V, ON TIMECLOCK	WILL NEED TO BE ON HOUSE POWER
	W8	AREA WALL LIGHT	WALL LIGHT	LUMUX	PL2014-T2-WHITE-3000K-120/277-(FINISH) -OCC	87 WATTS	3000K	120/277 V	0-10V, INTEGRAL MOTION WITH DIM CAPABLE, ON TIMECLOCK	WILL NEED TO BE ON HOUSE POWER

PROJECT:

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OWNER:

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NEXTGEN APARTMENTS LLC

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LITE RITE DESIGN
LONG BEACH, CA
562-430-6468

FULL SCALE (24X36): 1/16" = 1'-0"
0 8' 16' 32' 64'
HALF SCALE (11X17): 50%

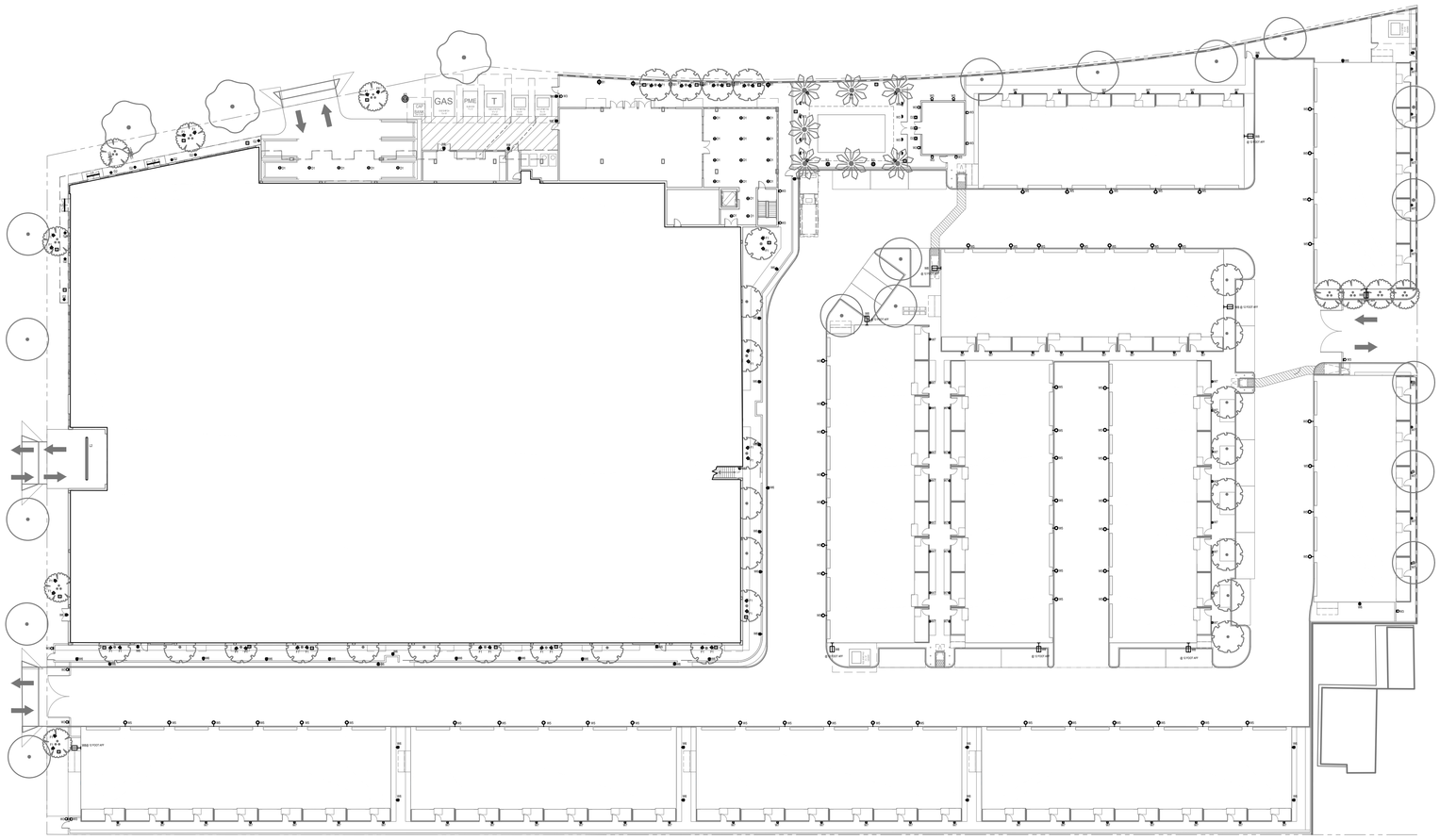
SHEET TITLE

LIGHTING FIXTURE SCHED

SHEET NO. **LT-1.0**

A

B



C

D

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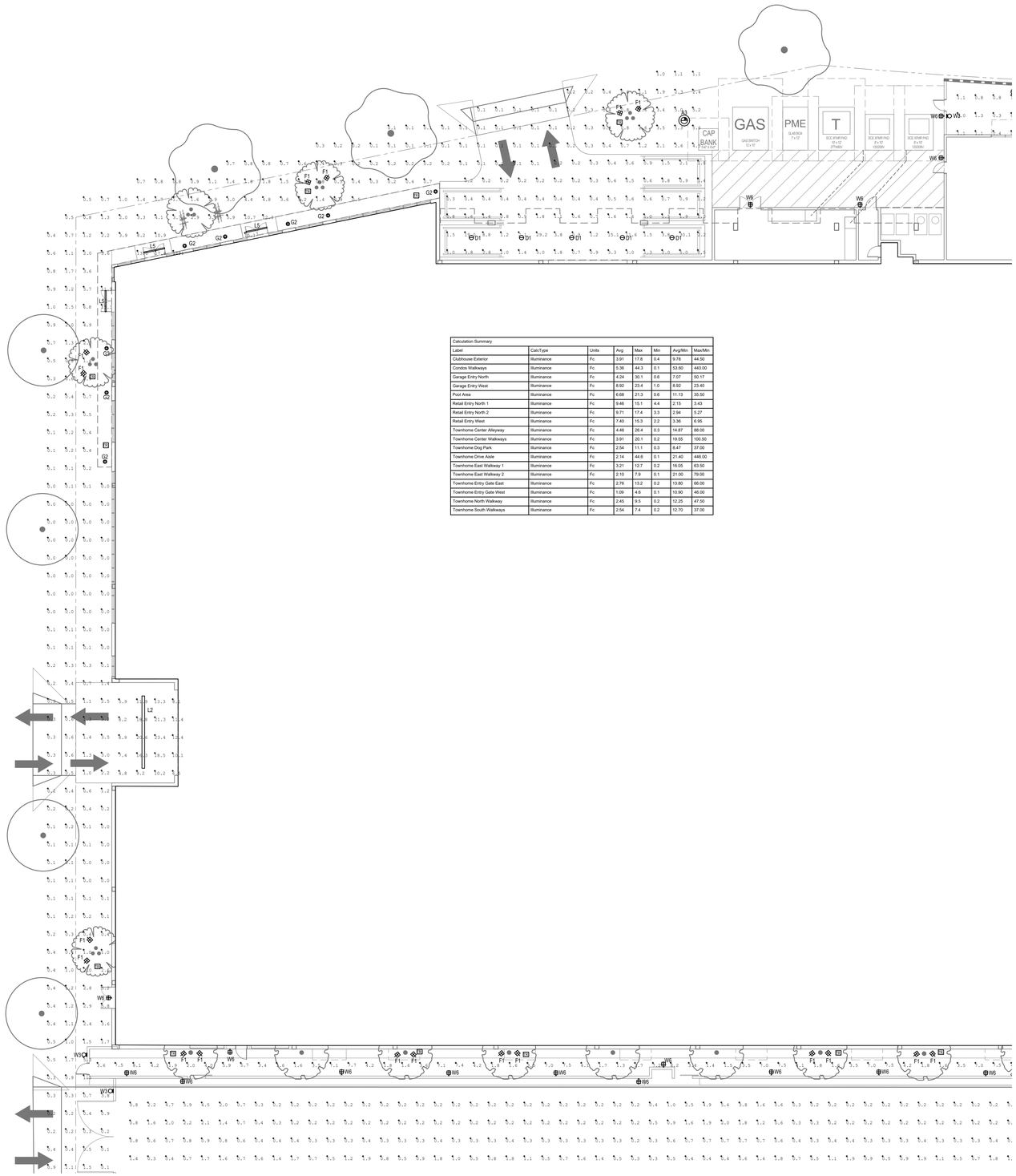
SHEET TITLE

SITE LIGHTING LAYOUT

SHEET NO. **LT-2.0**



Calculation Summary							
Label	CalcType	Units	Avg	Max	Min	Avg/Min	Max/Min
Clubhouse Exterior	Illuminance	Fc	3.91	17.8	0.4	9.78	44.50
Condos Walkways	Illuminance	Fc	5.36	44.3	0.1	53.60	443.00
Garage Entry North	Illuminance	Fc	4.24	30.1	0.6	7.07	50.17
Garage Entry West	Illuminance	Fc	8.92	23.4	1.0	8.92	23.40
Pool Area	Illuminance	Fc	6.68	21.3	0.6	11.13	35.50
Retail Entry North 1	Illuminance	Fc	9.46	15.1	4.4	2.15	3.43
Retail Entry North 2	Illuminance	Fc	9.71	17.4	3.3	2.94	5.27
Retail Entry West	Illuminance	Fc	7.40	15.3	2.2	3.36	6.95
Townhome Center Alleyway	Illuminance	Fc	4.46	26.4	0.3	14.87	88.00
Townhome Center Walkways	Illuminance	Fc	3.91	20.1	0.2	19.55	100.50
Townhome Dog Park	Illuminance	Fc	2.54	11.1	0.3	8.47	37.00
Townhome Drive Aisle	Illuminance	Fc	2.14	44.6	0.1	21.40	446.00
Townhome East Walkway 1	Illuminance	Fc	3.21	12.7	0.2	16.05	63.50
Townhome East Walkway 2	Illuminance	Fc	2.10	7.9	0.1	21.00	79.00
Townhome Entry Gate East	Illuminance	Fc	2.76	13.2	0.2	13.80	66.00
Townhome Entry Gate West	Illuminance	Fc	1.09	4.6	0.1	10.90	46.00
Townhome North Walkway	Illuminance	Fc	2.45	9.5	0.2	12.25	47.50
Townhome South Walkways	Illuminance	Fc	2.54	7.4	0.2	12.70	37.00

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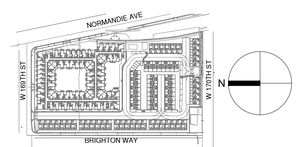
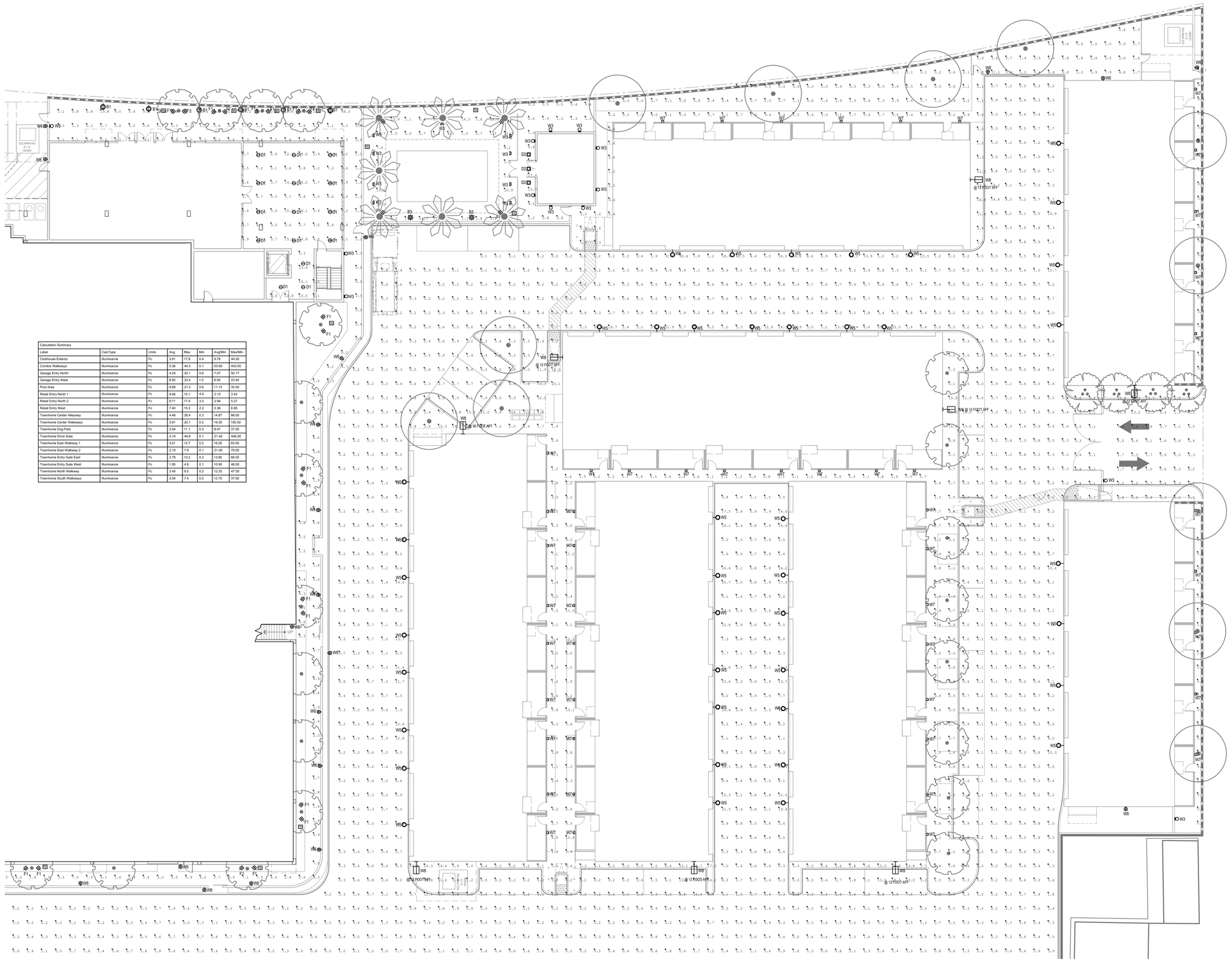


SHEET TITLE

SITE LIGHTING A PHOTOMETRIC

SHEET NO. **LT-2.1**



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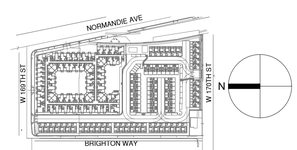
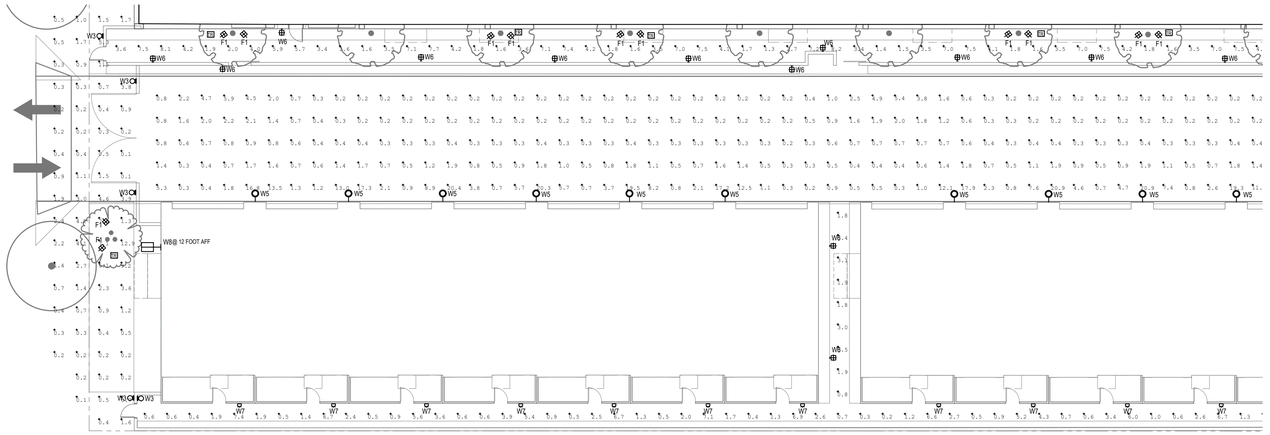


SHEET TITLE

SITE LIGHTING B PHOTOMETRIC

SHEET NO. **LT-2.2**



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Townhome Entry Gate East	Illuminance	Fc	2.76	13.2	0.2	13.80	66.00
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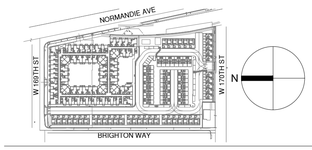
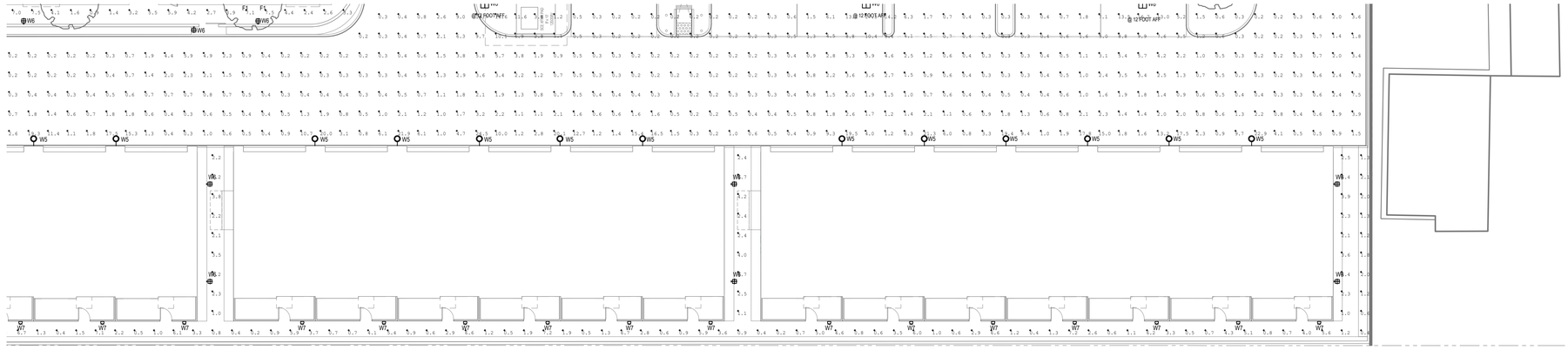


SHEET TITLE

SITE LIGHTING C PHOTOMETRIC

SHEET NO. **LT-2.3**



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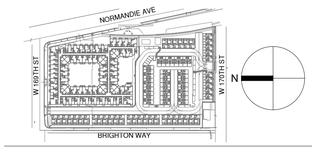
562-430-6468

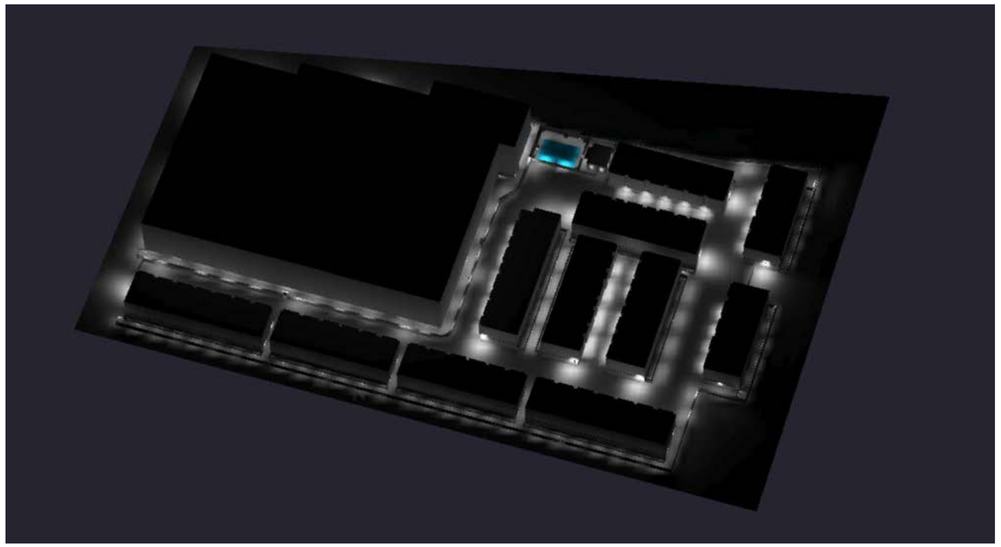
FULL SCALE (24X36): 1/16" = 1'-0"
0 8' 16' 32' 64'
HALF SCALE (11X17): 50%

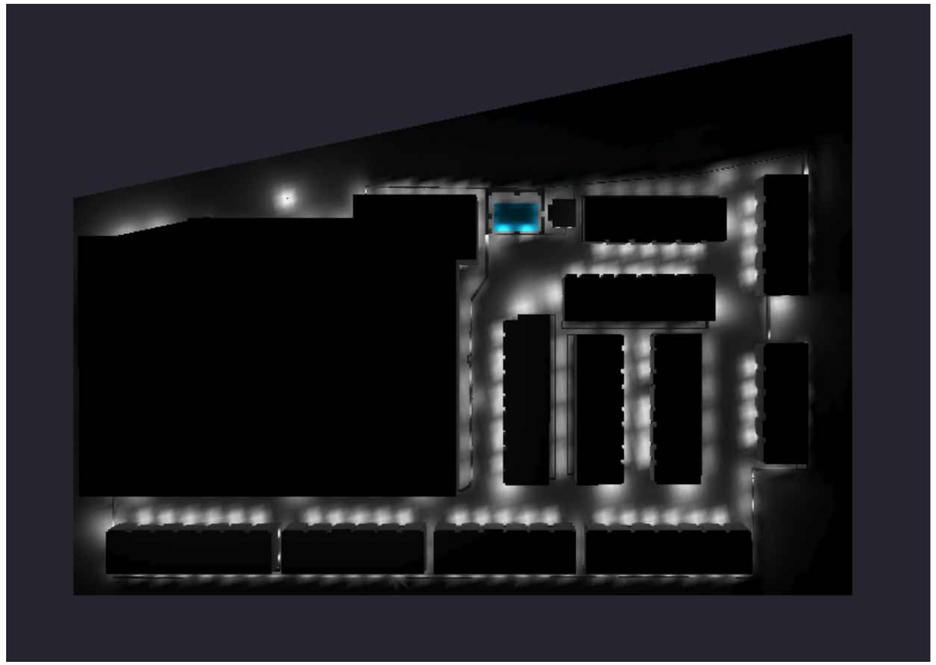


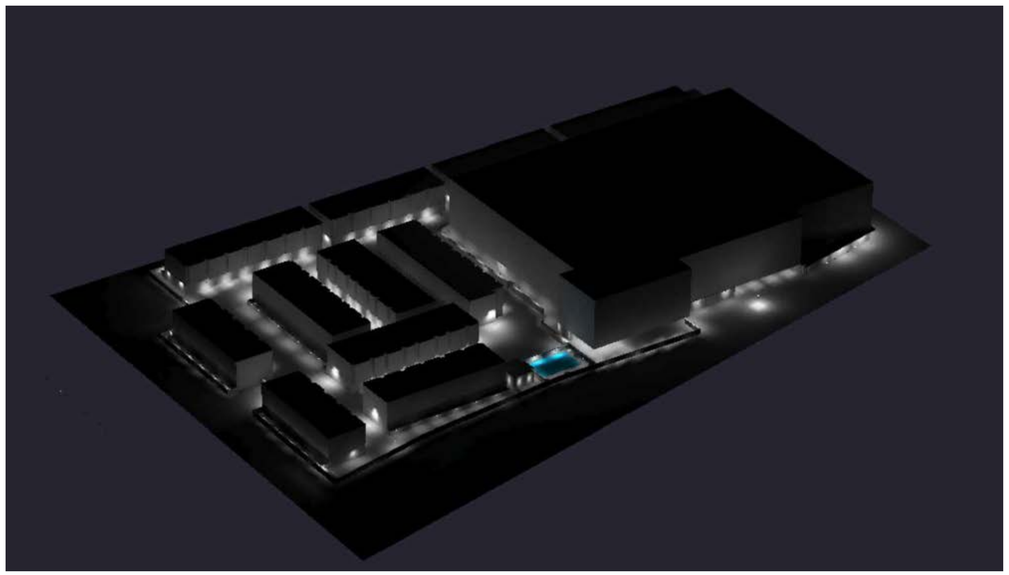
SHEET TITLE

SITE LIGHTING D PHOTOMETRIC

SHEET NO. **LT-2.4**







PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

SAIKO INVESTMENT CORP.
+
NEXTGEN APARTMENTS LLC

134 LOMITA STREET
EL SEGUNDO | CA 90245

urban-architecture LAB
1657 alvira street second floor los angeles, ca 90035
tel. 323.954.9996 www.u-a-lab.com
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PHASE

ENTITLEMENT SET

11/21/2024

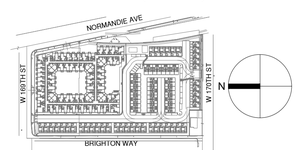
LITE RITE DESIGN

LONG BEACH, CA
562-430-6468

FULL SCALE (24X36): 1/16" = 1'-0"

0 8' 16' 32' 64'

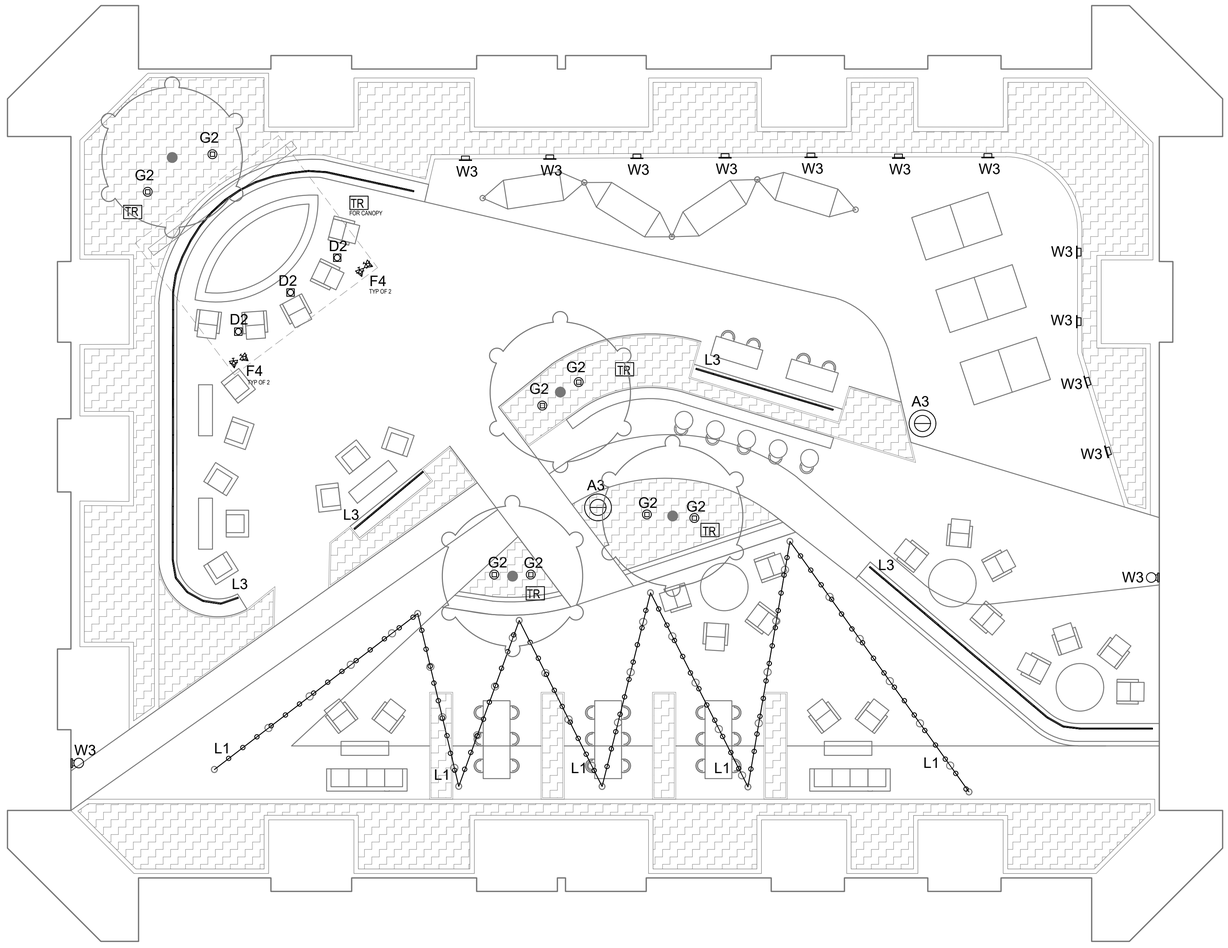
HALF SCALE (11X17): 50%



SHEET TITLE

SITE LIGHTING RENDER

SHEET NO. **LT-2.5**



PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

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PHASE

ENTITLEMENT SET

09/27/2024

LITE RITE DESIGN
LONG BEACH, CA
562-430-6468

FULL SCALE (24X36): 1/8" = 1'-0"

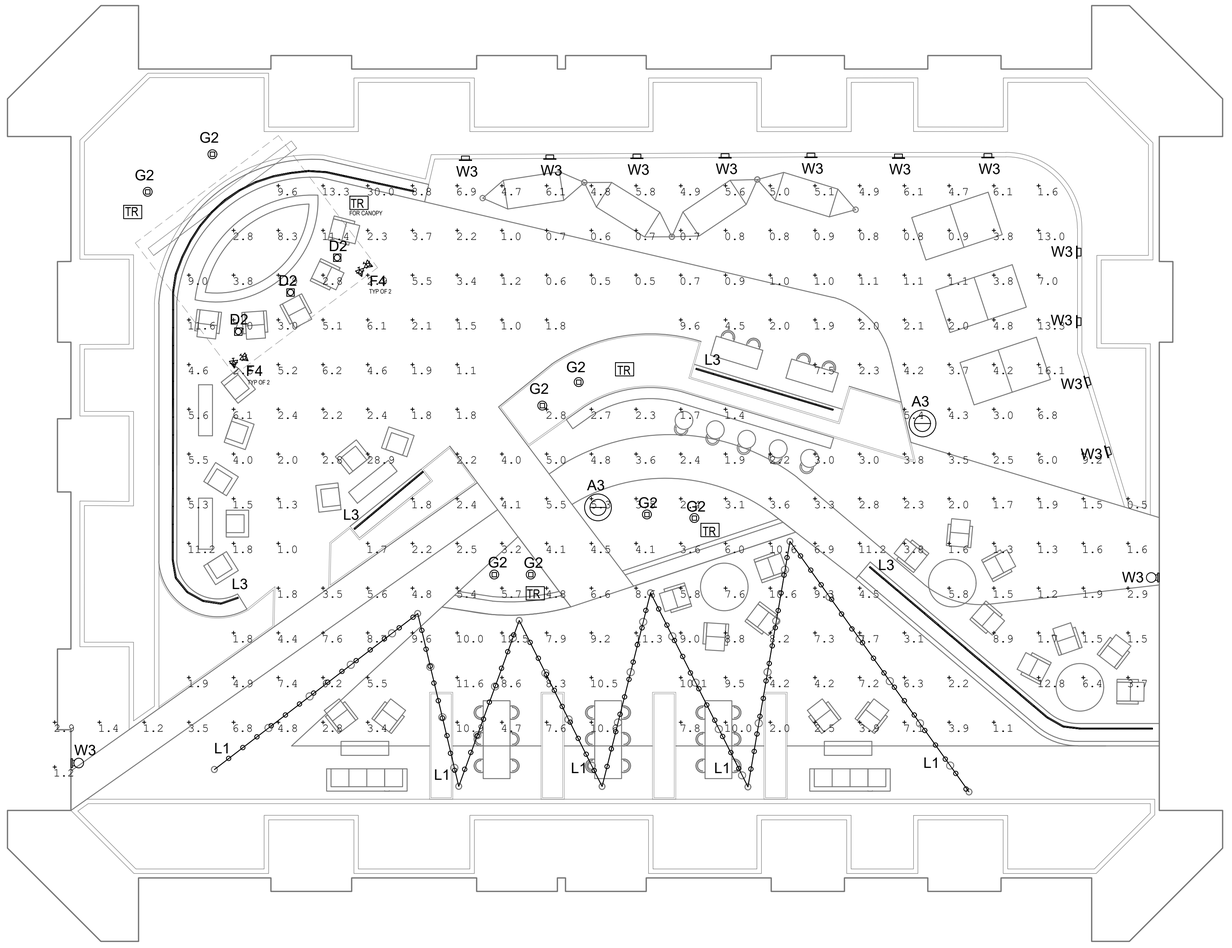
0 4' 8' 16' 32'

HALF SCALE (11X17): 50%

SHEET TITLE

2ND FLOOR COURTYARD LIGHTING

SHEET NO. **LT-3.0**



Calculation Summary							
Label	CalcType	Units	Avg	Max	Min	Avg/Min	Max/Min
2nd Floor Courtyard	Illuminance	Fc	4.71	30.0	0.5	9.42	60.00
2nd Floor Pool Area	Illuminance	Fc	5.64	42.6	0.2	28.20	213.00

PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

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09/27/2024

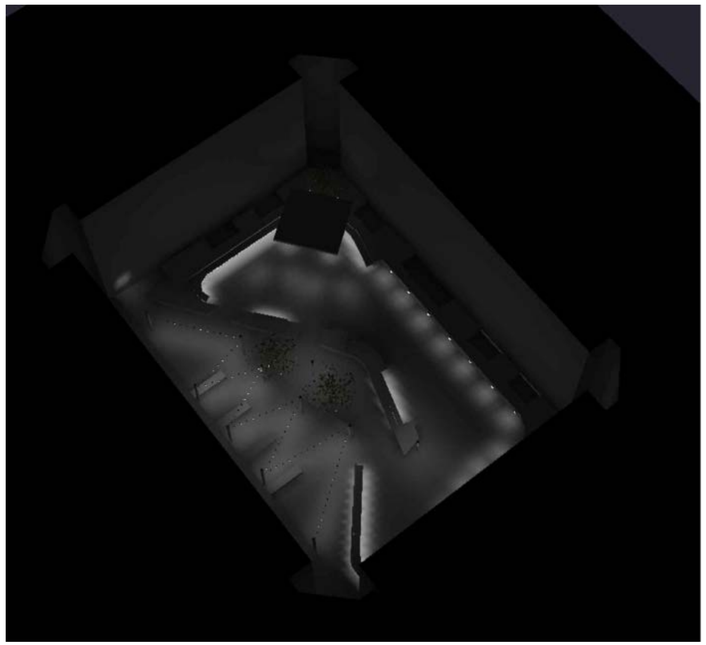
LITE RITE DESIGN
LONG BEACH, CA
562-430-6468

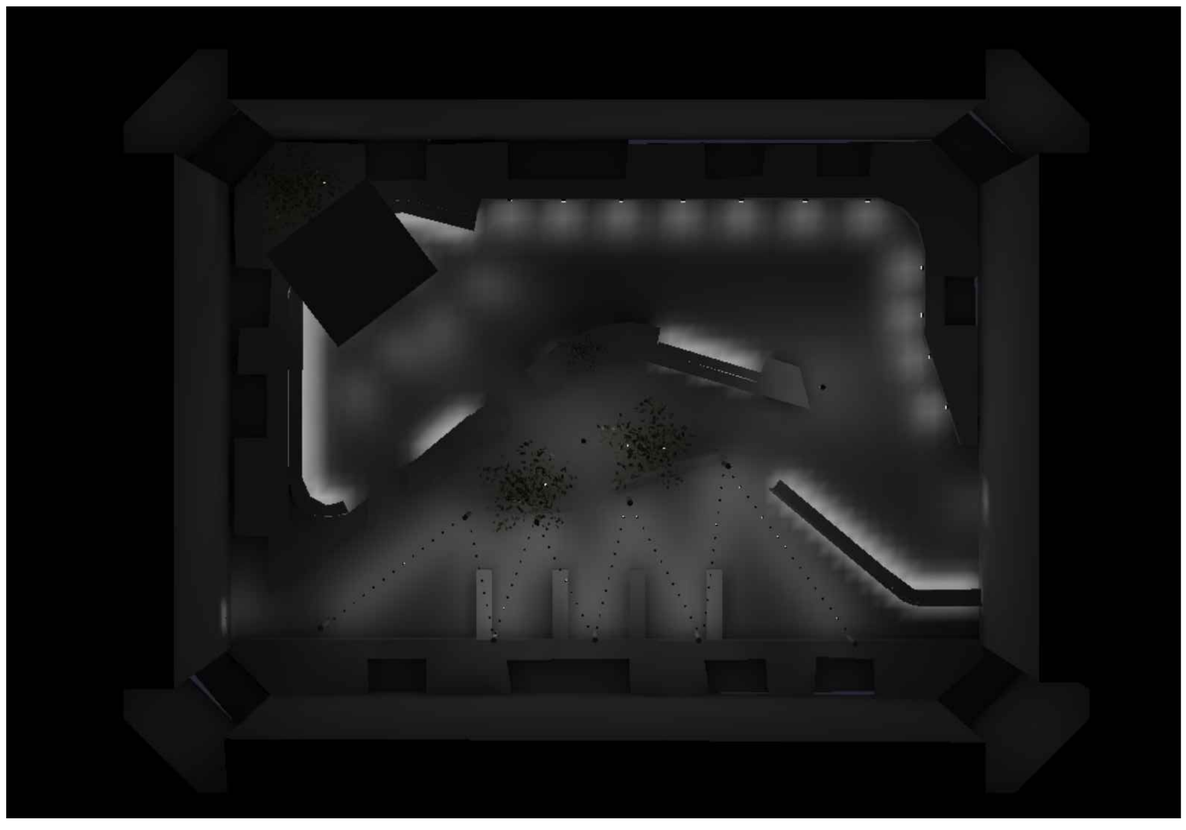
FULL SCALE (24X36): 1/8" = 1'-0"
0 4' 8' 16' 32'
HALF SCALE (11X17): 50%

SHEET TITLE

2ND FLR COURTYARD LTG PHOTO

SHEET NO. **LT-3.1**





PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

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LITE RITE DESIGN

LONG BEACH, CA
562-430-6468

FULL SCALE (24X36): 1/8" = 1'-0"

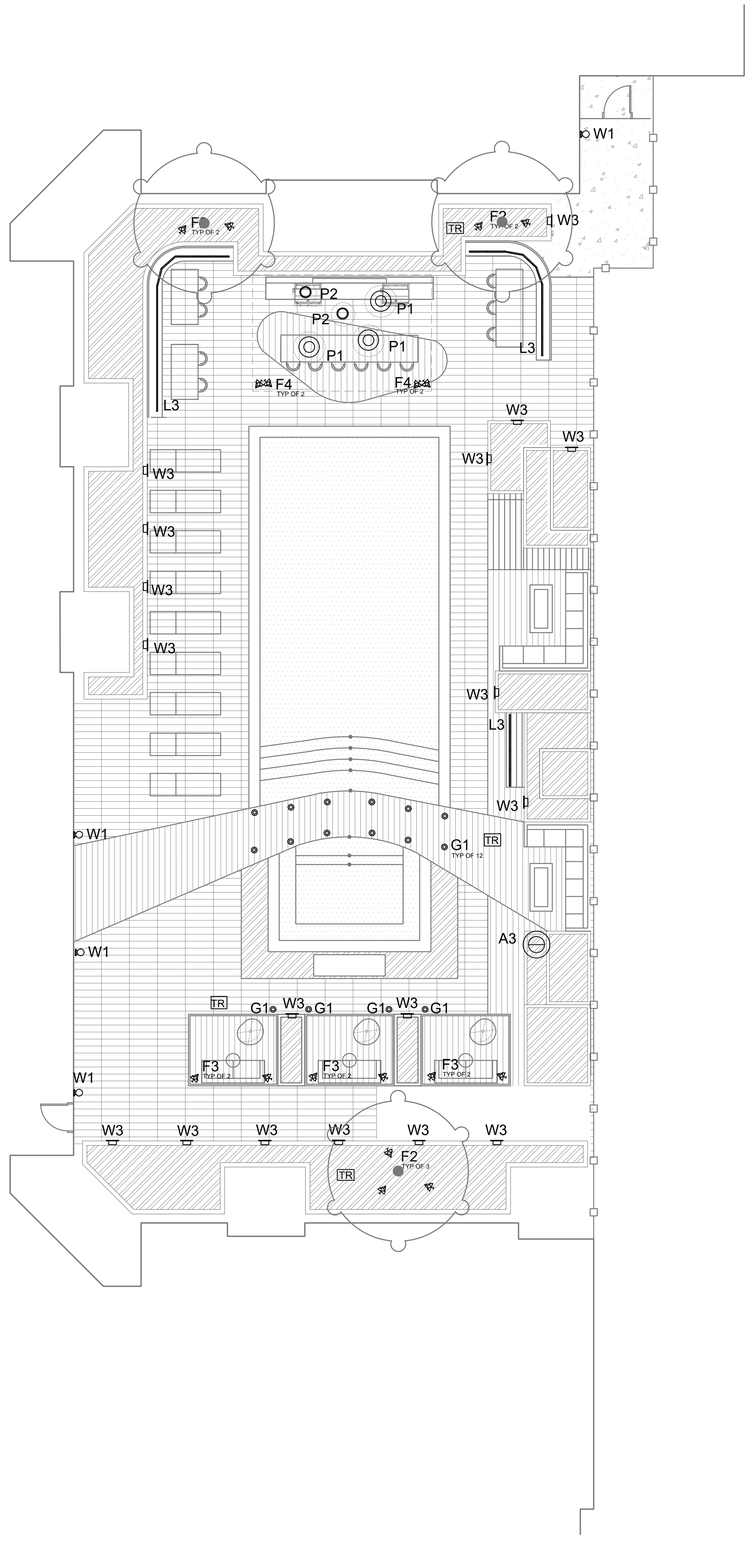
0 4' 8' 16' 32'

HALF SCALE (11X17): 50%

SHEET TITLE

COURTYARD RENDER

SHEET NO. **LT-3.2**



PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

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LONG BEACH, CA
562-430-6468

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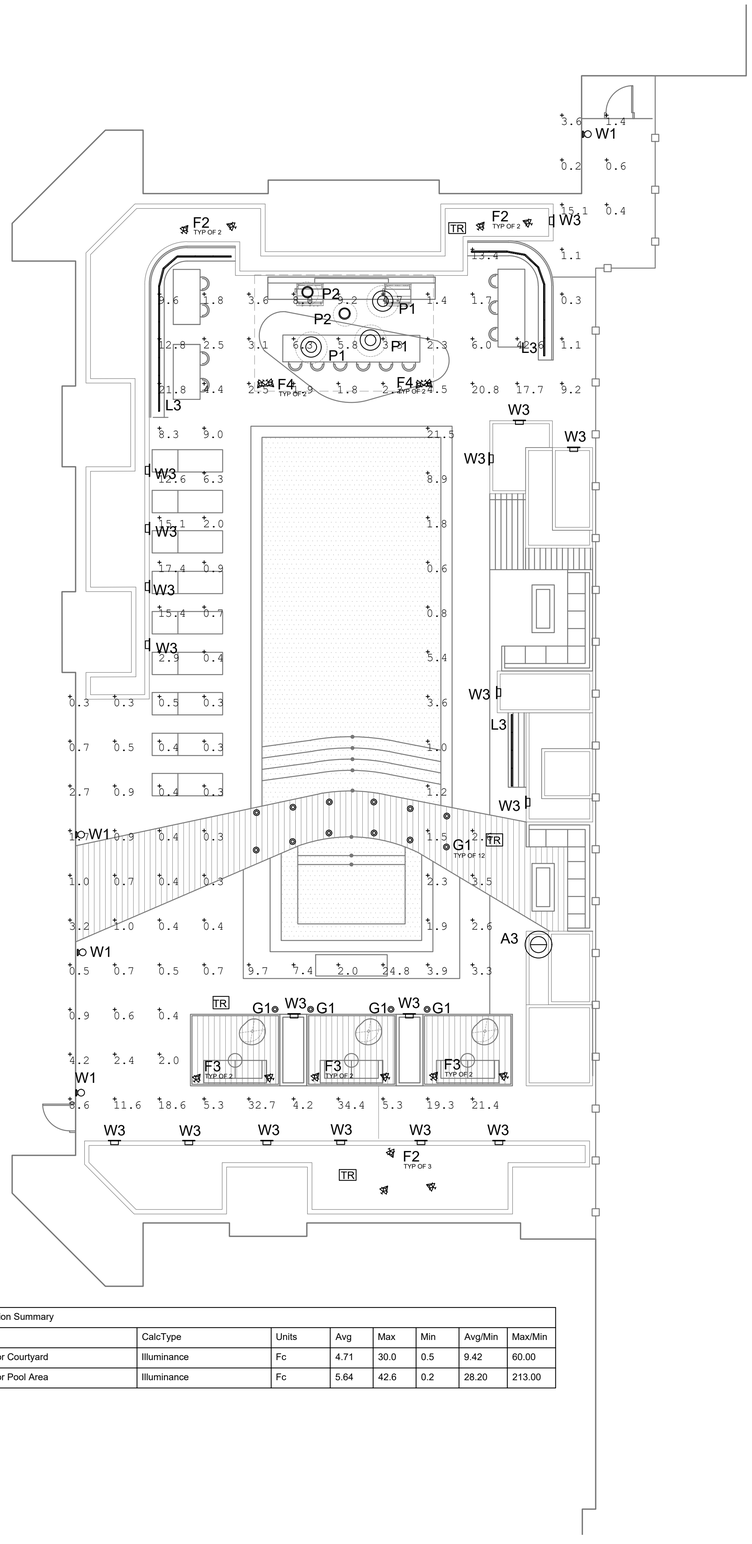
0 4' 8' 16' 32'

HALF SCALE (11X17): 50%

SHEET TITLE

2ND FLOOR POOL LIGHTING

SHEET NO. **LT-4.0**



Calculation Summary							
Label	CalcType	Units	Avg	Max	Min	Avg/Min	Max/Min
2nd Floor Courtyard	Illuminance	Fc	4.71	30.0	0.5	9.42	60.00
2nd Floor Pool Area	Illuminance	Fc	5.64	42.6	0.2	28.20	213.00

PROJECT:

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562-430-6468

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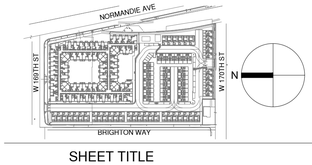
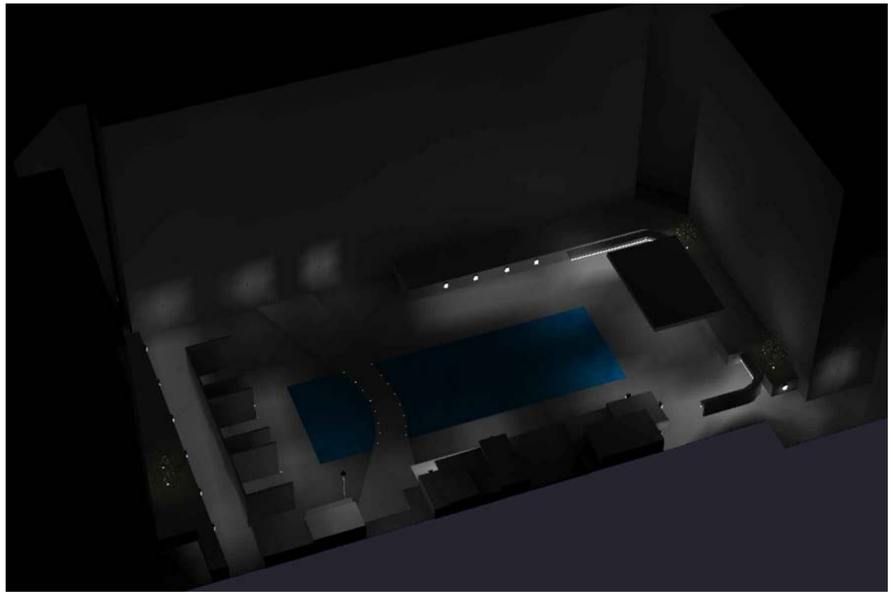


SHEET TITLE

2ND FLOOR POOL LTG PHOTO

SHEET NO. **LT-4.1**



PROJECT:

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LITE RITE DESIGN

LONG BEACH, CA
562-430-6468

FULL SCALE (24X36): 1/16" = 1'-0"

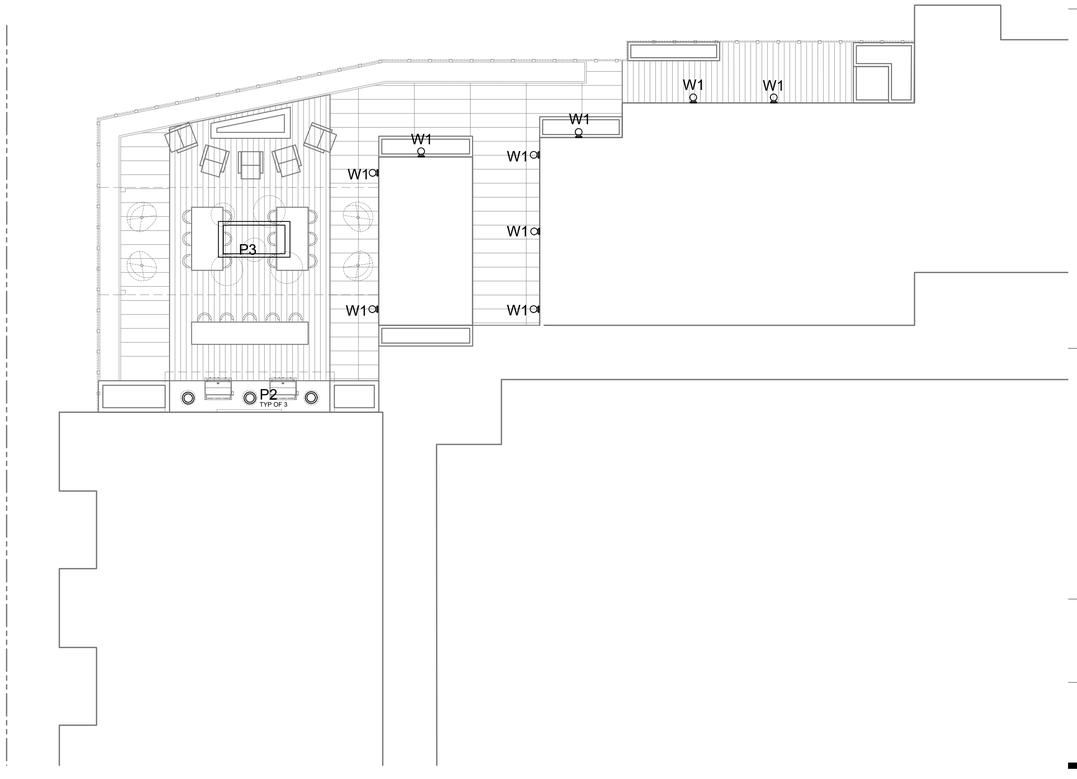
0 8' 16' 32' 64'

HALF SCALE (11X17): 50%

SHEET TITLE

POOL RENDER

SHEET NO. **LT-4.2**



PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

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LITE RITE DESIGN

LONG BEACH, CA
562-430-6468

FULL SCALE (24X36): 1/8" = 1'-0"

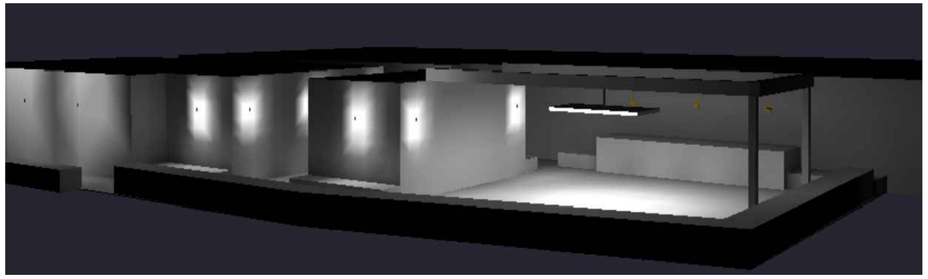
0 4' 8' 16' 32'

HALF SCALE (11X17): 50%

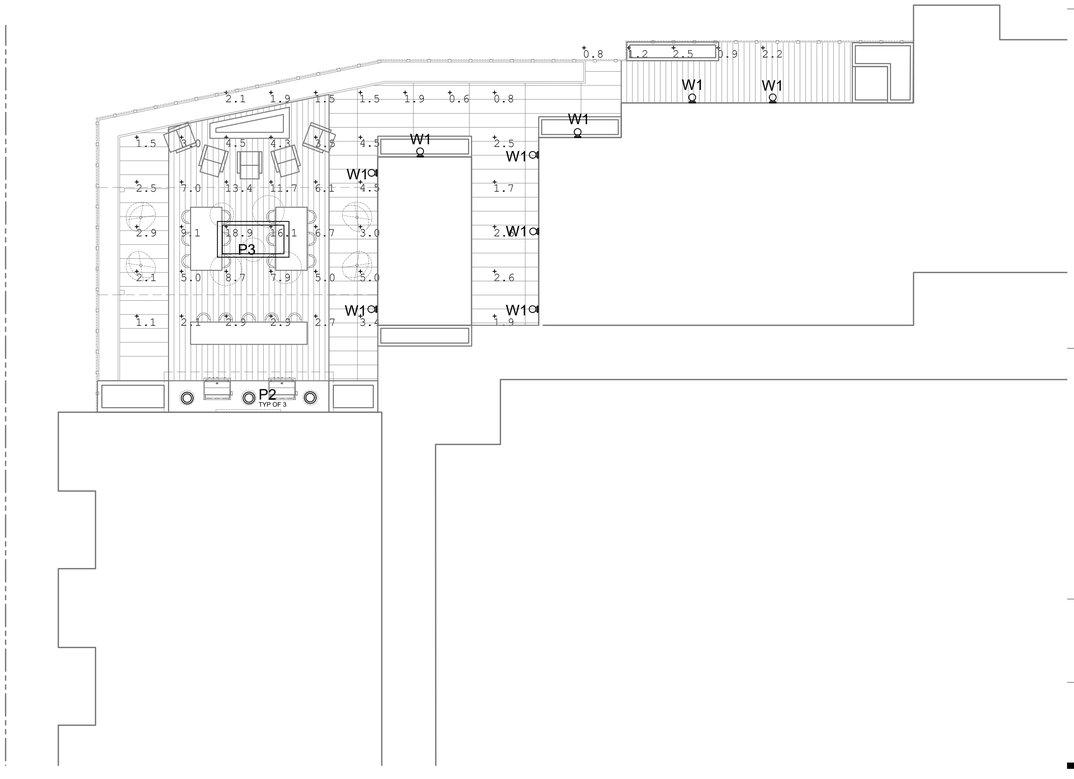
SHEET TITLE

ROOF DECK LIGHTING

SHEET NO. **LT-5.0**



Calculation Summary							
Label	CalcType	Units	Avg	Max	Min	Avg/Min	Max/Min
5th Floor Deck	Illuminance	Fc	4.28	18.9	0.6	7.13	31.50



PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

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PHASE

ENTITLEMENT SET

09/27/2024

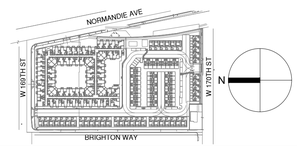
LITE RITE DESIGN

LONG BEACH, CA
562-430-6468

FULL SCALE (24X36): 1/8" = 1'-0"

0 4' 8' 16' 32'

HALF SCALE (11X17): 50%



SHEET TITLE

ROOF DECK LTG PHOTO

SHEET NO. **LT-5.1**

TYPE A3

DATE:
PROJECT:
FIRM:
CATALOG NO.: BL344-TALL / / White / / 120-277 /
COMMENTS:

LUMUX
LIGHT COLUMN
BL344-TALL

MADE IN USA | ETL | IP 65 | Dark Sky | Wet | ANSI C136.31 | 3G | 120-277V

BL344-TALL from Lumux is an elegant, architectural light column that excels at defining spaces, both during the day and at night.

BL344-TALL offers a distinctively contemporary design that highlights it purpose. Ideal for illuminating large areas and plazas, BL344-TALL is a powerful outdoor LED solution. BL344-TALL is constructed from heavy-duty aluminum extrusion, providing durability that meets the highest standards. This luminaire is offered up to 14' in height. BL344-TALL is part of a collection that includes BL340, BL344, PL3014 and WL-BL344.

up to **4,800** lm | **57**w | up to **85** lm/w

DATE:
PROJECT:
FIRM:
CATALOG NO.: BL344-TALL / / White / / 120-277 /
COMMENTS:

LUMUX
LIGHT COLUMN
BL344-TALL

BL344-TALL is a tall plaza, path and driveway light column, perfect for area lighting and defining spaces.

Ordering Guide

Catalog No.	Height	LED Color	Color Temp[1]	Voltage	Finish	Options[2]
BL344-TALL		White		120-277		
BL344-TALL	10'	White	2700K	120-277v	Black	☐ 0-10v Dimming
	12'		3000K		White	☐ Occupancy Sensor
	14'		3500K		Silver	☐ Photocell
	custom length		4000K		Bronze	☐ GFCI Dual Receptacle
					Custom RAL*	

*Consult factory for additional options
*Consult factory for additional pricing

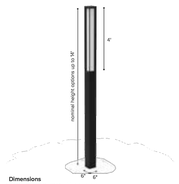
Catalog No.: BL344-TALL / / White / / 120-277 /

Performance Specifications	
Flux 4,800 lm (4000K)	LER 85 lm/W
Power 57W	120-277v input voltage
Starting temp. rated to -20°F	0-10v dimming driver option
Occupancy Sensor, Photocell, and GFCI Dual Receptacle options	
Lumen Maint*: L70 >60K, L90 >50K hrs	Constant Current

Environmental Specifications	
BUG rating: B1-U5-G2	
CRI 80	Color temperature options
IP65	ETL listed for wet-locations
Effective Projected Area ≤ 10 ft2	Marine Grade option
5-year limited warranty	Made in the USA

Delivered Lumens & Wattage per color temperature:

	2700K	3000K	3500K	4000K	WATTS
BL344-TALL	4,800 lm	4,800 lm	4,800 lm	4,800 lm	57W



Dimensions

Housing: Heavy-duty construction corrosion resistant, low-copper extruded aluminum. All fasteners are vandal resistant, stainless-steel.

Lens: Sealed one-piece, shatter-proof, UV-rated polycarbonate.

Mounting: Secures with galvanized anchor bolts.

Installation: Please refer to installation instructions below.

Finish: Zinc polyester powder coat finish In black, white, silver, bronze, or any custom RAL color. Consult factory for marine grade or anti-microbial finish.

*Lumen Maintenance Report (CREE CXA2530, https://cree-led.com/media/documents/LMRC_Results.pdf

TYPE B1 + B3

DATE:
PROJECT:
FIRM:
CATALOG NO: / / White / / 120-277 /
COMMENTS:

LUMUX
BOLLARD
BL350 SERIES

MADE IN USA | ETL | IP 65 | Dark Sky | Wet | ANSI C136.31 | 3G | 120-277v | Emergency Battery | DARK SKY COMPLIANT

Lumux BL350 Series bollards are elegant, architectural luminaires that excel at defining spaces, both during the day and at night.

Ideal for illuminating paths and plazas, BL350 is a powerful outdoor LED solution with a distinctive minimalistic design, offering broad, mid, and narrow light distribution patterns. BL350 is constructed from heavy-duty aluminum extrusion, providing durability that meets the highest standards. This luminaire is offered in single (BL350) or twin (BL350-2) versions, and the shorter BL350S-2 model. Part of the Lumux lighting collection that includes PL2014 light columns.

up to **2,900** lm | up to **36**w | up to **74** lm/w

DATE:
PROJECT:
FIRM:
CATALOG NO: / / White / / 120-277 /
COMMENTS:

LUMUX
BOLLARD
BL350 SERIES

The BL350 Series offers low and medium height gateway, path, and plaza luminaires with a modern design and forward beam angle options.

Ordering Guide

Catalog No.	Beam Angle	LED Color	Color Temp[1]	Voltage	Finish	Options[2]
		White		120-277		
BL350	T2 Type II	White	2700K	120-277v	Black	☐ Photocell
BL350-2	T3 Type III		3000K		White	☐ Occupancy Sensor
BL350S-2	T4 Type IV		3500K		Silver	☐ Emergency Battery
			4000K		Bronze	☐ GFCI Dual Receptacle
					Custom RAL*	

*Consult factory for additional options
*Consult factory for additional pricing; Emergency Battery and GFCI dual receptacle are not available for BL350S-2

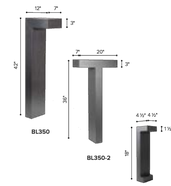
Catalog No.: / / White / / 120-277 /

Performance Specifications	
Up to: Flux 2,900 lm, 35W, LER 74 lm/W (4000K) per light source	
120-277v input voltage	Photocell option
Starting temp. rated to -20°F	Occupancy Sensor option
Integrated 0-10v Dimming	Integral Emergency Battery option
Lumen Maintenance*: L90 > 60K hrs	GFCI Dual Receptacle option

Environmental Specifications	
BL350-T3 (BUG rating: B0-U0-G0	**BL350-T2/4** (BUG rating: B1-U0-G1
CRI 80	Color temperature options
IP65	ETL listed for wet-locations
Effective Projected Area: ≤ 3.3 sq.ft.	Marine Grade option
5-year limited warranty	Made in the USA

Delivered Lumens & Wattage per color temperature:

PER SOURCE	2700K	3000K	3500K	4000K	WATTS
BL350-T2	2,900 lm	2,900 lm	2,900 lm	2,900 lm	35W
BL350-T3	2,900 lm	2,900 lm	2,900 lm	2,900 lm	35W
BL350-T4	2,100 lm	2,100 lm	2,100 lm	2,100 lm	28W
BL350S-2	900 lm	850 lm	850 lm	850 lm	29W



Dimensions

*Lumen Maintenance Report: CREE XLamp XP-G2

For higher lumen packages, please consult the Lumux sales team.

Housing: Heavy-duty construction of corrosion resistant, low-copper cleecast aluminum, secured with vandal-resistant, stainless steel screws.

Lens: Sealed one-piece shatter-proof clear glass barrier over polycarbonate optics.

Gasket: Closed-cell silicone foam gasket seals out moisture, dust, and insects, for weather-tight operation. IP65 - ETL listed for wet-locations.

Mounting: Secures with galvanized anchor bolts to pre-installed concrete footing.

Finish: Zinc polyester powder coat finish In black, white, silver, bronze, or any custom RAL color. Consult factory for marine grade or anti-microbial finish.

Light Engine: Constant Current driver with integrated 0-10v dimming, powering high quality LEDs.

Emergency Battery Pack: Optional integral 10W emergency battery pack provides 1,000 lumens with a 90 minute battery life.

PROJECT:

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PHASE

ENTITLEMENT SET

09/27/2024

TYPE D1

M Series

Project:	Type:
Product Code:	Date:

V080724

4" Round Downlight

Modular System Flexibility during and after installation with interchangeable modules, optics and trims

Quick Install Embedded driver and plug-and-play connection require no wiring

High Performance Precise lighting control without sacrificing stellar efficiency

Enhanced Dimming Smooth, Flicker-free dimming options down to 0.1%

INSTALLATION
New Construction: ½" up to 1 ½"
Spray Foam: ½" up to 2"
Standard Remodel: ½" up to 1 ¼"
Fire Rated Remodel: ¾" up to 1 ½"
Low Profile: ½" up to 1 ¼"
Extension Collar: 1 ¼" up to 3"
(For use with Standard New Construction Only)

Ceiling Material
Drywall, Millwork, Concrete

TRIMS

Aperture
4"

Shape
Round

Style
Standard, Hyperbolic, Pinhole, Wall Wash, Decorative, Flangeless

Finish
White, Black, Bronze, Clear Diffused, Warm Diffused, Custom

Module
Downlight

Lumens (Power)
750 lm (8.5W), 1000 lm (12.5W), 1250 lm (14.3W), 1500 lm (16.3W)

Color Quality
93 CRI, 2-step SDCM

Color Temperature
2700K | 3000K | 3500K | 4000K | Warm Dim (3000K~1800K) | Tunable White (6000K~1800K) | Tunable White (6500K~2700K)

Beam Spread
10° Narrow Spot | 25° Spot | 40° Flood | 60° Wide Flood | 90° General | 40° x 20° Linear Spread | Soft Focus

Input Voltage
120/277V

Dimming
0-10V (1%), DALI-2 (0.1%), TRIAC/ELV (1%), Lutron Athena Wireless Node (1%) (Coming Soon)

RATINGS & CERTIFICATIONS

Housing
IC (Insulation Contact) Rated
ASTM E283 Certified Air Tight
Code compliant for use in fire-rated assemblies up to a maximum of 2-hours
STC/IIC Sound Rated
Chicago Plenum
RoHS Compliant

Module and Trim
UL Listed for Wet Location (Standard trims and covered areas only)
NSF Listed (White and black finish only)

Warranty
6 year limited warranty; 50,000 hours

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dmf

M Series
4" Round Downlight

PRODUCT BUILDER - EMBEDDED TRIAC/ELV, 0-10V, & DALI-2

M SERIES HOUSING

PRODUCT CODE		INSTALLATION		SHAPE		RATING	
M4	4" Housing	NC	New Construction	R	Round	S	Standard
		CP	Chicago Plenum [1]			F	Fire Rated
		LT	Low Profile, TRIAC/ELV (3" Plenum) [2]				
		LO	Low Profile, 0-10V (3" Plenum) [2]				
		DH	Double Housing [1,2]				
		RM	Remodel [4]				
		SF	Spray Foam [1]				

M40C	Concrete Tight [2]

DRD MODULE

PRODUCT CODE		LUMENS		CRI		CCT *		BEAM SPREAD		DIMMING	
DRDDM	Downlight	07	750 lm	9	90 CRI	27	2700K	GA	General Ambient (60°+)	T	TRIAC/ELV
		10	1000 lm			30	3000K	NS	Narrow Spot (15°)*	O	0-10V
		13	1250 lm			35	3500K	SP	Spot (25°)	D	DALI-2 *
		15	1500 lm			40	4000K	FL	Flood (40°)		
						2W	Warm Dim (3000K~1800K) *	WF	Wide Flood (60°)		
						T1	Tunable White (4000K~1800K) *	LB	Linear Spread (40°x 20°)		
						T2	Tunable White (6500K~2700K) *	SF	Soft Focus		

M SERIES TRIM

PRODUCT CODE		FINISH		OPTION	
M4TRS	Standard	WH	White	(Blank)	None
M4TRH	Hyperbolic [18]	BK	Black	DOF	Decorative: Open, Frosted [13,15,16,17]
M4TRP	Pinhole [13,15]	BZ	Bronze	DCF	Decorative: Closed, Frosted [13,15,16,17]
M4TRL	Wall Wash [11]	CW	Clear Diffuse, White Flange	DCC	Decorative: Closed, Clear, Frosted Side [13,15,16,17]
M4TRC	Square Conversion [18]	WW	Warm Diffuse, White Flange	DCCF	Decorative: Closed, Clear, Frosted Inside [13,15,16,17]
		CC	Custom Color	FL	Flangeless [13,15,16]
				DF	Dead Front [13,15,17]

M4ERNUD	Flangeless Mud Plate (Required for Flangeless Trim drywall installation)
M4ERTEMPLATE	Router Template (Recommended for wood installation)
M4CREXT	Extension Collar (for ceiling install up to 3") [3]

* Only available in Standard rating
* Not Available for DALI-2
* Only available for 750 lm or 1000 lm
* Not available for flangeless applications
* Only available in 1000 lm, Available in configurations with CCT Options 2000K or less and not compatible with decorative trims
* Only available in 1000 lm
* Only available in 1000 lm, DALI-2
* Not available in Warm Dim CCT or Tunable White
* Only available in 1000 lm Tunable White or Warm Dim and 1250 lm static CCT
* Only available in White, Black or Bronze
* Only available in Tunable White and Warm Dim with Warm Dim CCT or Tunable White and Narrow Spot beam spread for all other CCT. Not available in Custom Color
* Only available in White or Black
* Only available in Standard style
** Not available for Square Conversion, Decorative, Concrete Construction or Remodel Housing
** Only available for 750 lm
** Only available in White
** Module is required for all FL trims except for wood ceiling applications
** Only available for General Ambient beam spread
** Not available for Square Conversion, Decorative, Concrete Construction or Remodel Housing
** Only available for 750 lm
** Only available in White
** Module is required for all FL trims except for wood ceiling applications

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TYPE D2

LANDSCAPE PENDANT LIGHT 12V
3811 / 3821 / 3831

WAC LANDSCAPE LIGHTING

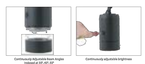
Fixture Type:
Catalog Number:
Project:
Location:

PRODUCT DESCRIPTION
Landscape 12V pendant with 3 CCT selection and adjustable beam angles, options available as hanging light or ceiling light

FEATURES
- Continuously Adjustable Beam Angles, Indexed at 35°, 49°, 55°
- IP66 rated, Protected against high-pressure water jets
- Corrosion resistant aluminum
- Factory sealed water tight fixtures
- Constant output for 9V-15V input
- Option available for hanging light or ceiling light
- 2700K/3000K/4000K selectable
- 10' lead wire and direct burial gel filled wire nuts included
- MLV dimmable with remote MLV dimmers
- On-board dimming with continuous brightness control

SPECIFICATIONS
Input: 9 -15VAC
Power: 1W to 7.5W / 2VA - 8VA (Use VA value for sizing the transformer and calculate voltage drop.)
Brightness: 45 lm to 380 lm
Beam Angle: 35° to 55°
CRI: 85
Rated Life: 50,000 hours

Transformer Required (order separately)



ORDERING NUMBER

			Color Temp	Finish
3811-27/30/40	12V	**27**	2700K Warm White	**BK** Black on Aluminum
6' Chain included		**30**	3000K Pure White	**BZ** Bronze on Aluminum
		40	4000 Cool White	
3821-27/30/40	12V	**27**	2700K Warm White	
6' Chain included		**30**	3000K Pure White	**BK** Black on Aluminum
		40	4000 Cool White	**BZ** Bronze on Aluminum
3831-27/30/40	12V	**27**	2700K Warm White	**BK** Black on Aluminum
		30	3000K Pure White	**BZ** Bronze on Aluminum
		40	4000 Cool White	**WT** White on Aluminum

3811-27/30/40_____
Example: **3811-27/30/40BZ**

TYPE F1

ACCENT 12V
5011

WAC LANDSCAPE LIGHTING

Fixture Type:
Catalog Number:
Project:
Location:

PRODUCT DESCRIPTION
Landscape accent luminaire. One fixture replaces all older halogen landscape accent lights

FEATURES
- Adjustable and lockable beam angle
- Integral dimmer
- IP66 rated, Protected against high-pressure water jets
- Includes a detachable shroud
- Die-cast aluminum alloy or corrosion resistant aluminum
- Factory sealed water tight fixtures
- Mounting stake, 6' lead wire and direct burial gel filled wire nuts included
- Maintains constant lumen output against voltage drop
- UL 1838 Listed
- MLV dimmable with remote MLV dimmers

SPECIFICATIONS
Input: 9 - 15VAC (Transformer is required)
Power: 11W to 18W / 21VA - 23VA
Brightness: 550 lm to 1160 lm
Beam Angle: 10° to 60°
CRI: 85
Rated Life: 70,000 hours

ORDERING NUMBER

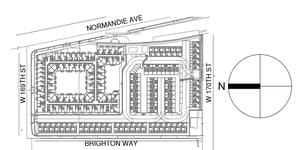
		Color Temp	Finish
5011	*Accent 12V*	**27** 2700K	**BK** *Black on Aluminum*
		30 3000K	**BZ** *Bronze on Aluminum*
		40 4000K	**BBR** *Bronze on Brass*

5011-____
Example: **5011-30BBR**

LITE RITE DESIGN

LONG BEACH, CA
562-430-6468

FULL SCALE (24X36): 1/16" = 1'-0"
0 8' 16' 32' 64'
HALF SCALE (11X17): 50%



SHEET TITLE

LIGHTING SPECS 1

SHEET NO. **LT-6.0**

TYPE F2

HORNET ACCENT 12V

5611

WAC LANDSCAPE LIGHTING

Fixture Type:

Catalog Number:

Project:

Location:

PRODUCT DESCRIPTION

Landscape hornet accent luminaire. One fixture replaces all older halogen landscape accent lights

FEATURES

- Continuously Adjustable Beam Angles, Indexed at 20°,35°, 45°,60°,70°
- IP66-rated, Protected against high-pressure water jets
- Corrosion resistant die-cast brass
- Factory sealed water tight fixtures
- Constant output for 9V-15V input
- Can be used as an uplight or downlight
- 2700K or 3000K color temperature
- Mounting stake, 12' lead wire and direct burial gel-filled wire nuts included
- MLV dimmable with remote MLV dimmers

SPECIFICATIONS

Input:	9 -15VAC
Power:	10.5W / 16VA
Brightness:	820 lm
Beam Angle:	20° to 70°
CRI:	80
Rated Life:	40,000 hours

ORDERING NUMBER

	Color Temp		Finish	
5611	12V	**27**	2700K Warm White	**BBR**	Bronze on Brass
		30	3000K Pure White		

5611-30____

Example: **5611-30BBR**

TYPE F3

MINI-MICRO LED

IP66 RATED

DATE: | PROJECT: | TYPE:

CATALOG NUMBER LOGIC:

*Designed for use with LED transformer

**The 3600L cowl is already included in the price of LRM, LRM dual, and Power Canopy.

CATALOG NUMBER LOGIC
Example: B - MM - LED - e70 - SP - BLP - 12 - 11 - C - 3605L
MATERIAL
(Blank) - Aluminum B - Brass S - Stainless Steel
SERIES
MM - Mini-Micro
SOURCE
LED - with Non-Dimming Integral Driver**
LED TYPE
e70 - 3W LED/2700K e72 - 3W LED/4000k
e71 - 3W LED/3000K e73 - 3W LED/Amber
OPTICS
NSP - Narrow Spot (7°) MFL - Medium Flood (28°)
SP - Spot (21°) ASY - Asymmetrical (7'x21')
FINISH (See page 2 for full-color swatches)
Standard Finishes (BZP, BZW, BLP, BLW, WHP, WHW, SAP, VER)
Premium Finish (ABP, AMG, AQW, BCM, BGE, BPP, CAP, CMG, CRI, CRM, HUG, MOS, NBP, OCP, RMG, SDS, SMG, TXF, WCP, WIR)
Also available in RAL Finishes
Brass Finishes (MAC, POL, MIT)
Stainless Steel Finishes (MAC, POL)
LENS TYPE
12 - Soft Focus 13 - Rectilinear
SHIELDING
11 - Honeycomb Baffle
CAP STYLE
A - 40°
B - 90°
C - Flush
D - 40° Less Weephole (Interior use only)
E - 90° Less Weephole (Interior use only)
OPTIONS
3605L - Rotational Knuckle Mounting System**

B-K LIGHTING | MADE IN THE USA | 559.438.5900 | INFO@BKLIGHTING.COM | BKLIGHTING.COM

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09/30/2020 SKU 458
SUBSSS600

TYPE F4

ARTISTAR LED (REMOTE TRANSFORMER)

IP66 RATED

DATE: | PROJECT: | TYPE:

CATALOG NUMBER LOGIC:

*Designed for use with LED transformer. Requires magnetic low voltage dimmer.

**Please see Adjust-a-Lume photometry to determine desired intensity.

***Base height limited to 6" max. with Brass and Stainless Steel Canopy.

CATALOG NUMBER LOGIC
Example: B - AR - LED - RM - e64 - NSP - AY - WHP - 12 - 11 - B - 3 - PP
MATERIAL
(Blank) - Aluminum B - Brass S - Stainless Steel
SERIES
AR - ArtStar
SOURCE
LED - with Integral Dimming Driver (25W min. load when dimmed)*
HOUSING
RM - Remote Transformer
LED TYPE
e64 - 7W LED/2700K e66 - 7W LED/4000K
e65 - 7W LED/3000K e74 - 7W LED/Amber
OPTICS
NSP - Narrow Spot (10°) MFL - Medium Flood (23°)
SP - Spot (16°) WFL - Wide Flood (31°)
ADJUST-A-LUME OUTPUT INTENSITY* **
A9 (Standard), A8, A7, A6, A5, A4, A3, A2, A1
FINISH (See page 2 for full-color swatches)
Standard Finishes (BZP, BZW, BLP, BLW, WHP, WHW, SAP, VER)
Premium Finish (ABP, AMG, AQW, BCM, BGE, BPP, CAP, CMG, CRI, CRM, HUG, MOS, NBP, OCP, RMG, SDS, SMG, TXF, WCP, WIR)
Also available in RAL Finishes
Brass Finishes (MAC, POL, MIT)
Stainless Steel Finishes (MAC, POL)
LENS TYPE
12 - Soft Focus 13 - Rectilinear
SHIELDING
11 - Honeycomb Baffle
CAP STYLE
A - 40°
B - 90°
C - Flush Lens
D - 40° Less Weephole (Interior use only)
E - 90° Less Weephole (Interior use only)
F - 90° with Flush Lens
BASE HEIGHT
3" (Standard), 6", 12", 18", & 24" with Anchor Base
MOUNTING OPTION
PP - 18" Power Pipe Stake Mount
SF - Stability Flange (For use with Power Pipe)
WM - Wall or Ceiling Mount with 5" dia. Machined Canopy***

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09/30/2020 SKU 458
SUBSSS600

TYPE G1

MP LIGHTING

L07

EXTERIOR | INTERIOR

In-grade | Indicator, marker light for deck, floor, and stairs

- Wet, Damp, and Dry location

Ordering Information — Clear Form

Date: | Quantity:

Project: | Note:

Type:

Specifications

Luminaire | Example Code: L07-WGW-C-S6

Product	CCT & CRI *	Lens	Trim Finish
L07	W22 2200K 90+ W27H 2700K 90+ W30 3000K 90+ W35H 3500K 90+ W40H 4100K 90+	C - clear F - frosted	S6 - stainless steel 316

System Components (Ordered Separately)

Remote Driver: * Consult MP Lighting Website or Factory.

Important Notes

Specification
1. Refer to pg 2 - for Light Quality & Colour Consistency details

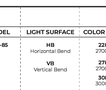
Warranty Notes & Disclaimer
1. Lumen maintenance is not warranted due to incompatible dimming system or mistake will not be covered under warranty. Consult MP Lighting for recommended Drivers. If the fixture has an option to be programmed with a dimming control system, consult a dimming system manufacturer with minimum load before installing. MP Lighting reserves the right, at its sole discretion, at any time and without notice, to make design changes to any of our products. Consult MP Lighting website for most updated documentation.

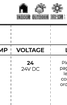
TYPE G2

3" INGROUND 12V

5031

WAC LANDSCAPE LIGHTING





Fixture Type:

Catalog Number:

Project:

Location:

PRODUCT DESCRIPTION

Landscape Wall Wash luminaire

FEATURES

- Tiltable and adjustable beam angle
- Integral dimmer
- IP67 rated, protected from temporary immersion under water
- Stainless steel 316/316L
- Solid diecast brass or corrosion resistant aluminum
- Available concrete pour kit
- 6' lead wire and direct burial gel filled wire nuts included
- Maintains constant lumen output against voltage drop
- UL 1838 Listed
- MLV dimmable with remote MLV dimmers

ORDERING NUMBER

	Color Temp		Finish	
5031	3" Inground 12V	**27**	2700K	**BZ**	Bronze on Aluminum
		30	3000K	**BBR**	Bronze on Brass

5031-_____

Example: **5031-30BBR**

SPECIFICATIONS

Input:	9 - 15VAC (Transformer is required)
Power:	2W to 12W / 2VA - 17VA
Brightness:	70 lm to 505 lm
Beam Angle:	13° to 60°
CRI:	85
Rated Life:	55,000 hours

IEC safety Standard	Walk over	Drive over
Resistance to static load test	Yes (1125lbs)	Yes (4496lbs)
Resistance to torque and shear loads test	N/A	Yes

Module Replacement

2700K	**MS031LE-27BZ**
3000K	**MS031LE-30BZ**

TYPE L1

NEW

Exton Powerspan Cable System

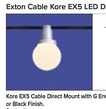
Kore EXS IP65
Direct Mount
"G" Envelopes & Gems
Remote Power, 0-10V DM

CATALOG NUMBER LOGIC

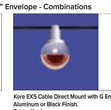
EXS – S – C – GEE – AL

Exton S-Mod Model	Kore LED Module 2700K	Cable Mounting	"G" Envelope Frosted	Finish, Aluminum

Exton Cable Kore EXS LED Direct Mount with "G" Envelope - Combinations



Kore EXS Cable Direct Mount with G Envelope Frosted, Aluminum or Black Finish.
Catalina Numbers
For use with Remote Power Supply(s) - See page 4 for links, ordered separately.
EXS-K-C-GSF-AL or BLK



Kore EXS Cable Direct Mount with G Envelope Copper Bowl, Aluminum or Black Finish.
Catalina Numbers
For use with Remote Power Supply(s) - See page 4 for links, ordered separately.
EXS-K-C-GSCB-AL or BLK

Kore EXS Cable Direct Mount with G Envelope Silver Bowl, Aluminum or Black Finish.
Catalina Numbers
For use with Remote Power Supply(s) - See page 4 for links, ordered separately.
EXS-K-C-GSSB-AL or BLK

Kore EXS Cable Direct Mount with G Envelope Grey Rain Bubble Pattern, Aluminum or Black Finish.
Catalina Numbers
For use with Remote Power Supply(s) - See page 4 for links, ordered separately.
EXS-K-C-GSGRPAL or BLK

NOTE: For Exton Powerspan Cable and Mounting (specified separately):
Refer to Mounting by Application Specification Sheets: Tension Mount, Surface Mount, Drape Mount

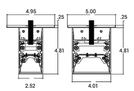
TYPE L2

ORACLE LINEAR COLLECTION By Elite Lighting

OLS-CM-LED 2" 4"
LED Architectural Ceiling Mount Direct Linear

FEATURES

FLEX Architectural LED Ceiling Mount Linear delivers an endless array of flexibility, from straight runs to complex 90° turns. Available in small standard profiles of 2" and 4", or custom lengths, it accommodates most surfaces and installations, with fully illuminated corners to provide seamless, continuous lengths of light. Be inspired to create a long-lasting impression with a unique design that complements corporate offices, educational, commercial, and retail spaces.



2" PROFILE — 4" PROFILE

LUMENS/FT	WATTS/FT
2000	17.5
1500	13.7
1250	10.9
1000	8.2
750	6.5
500	4.5

LUMENS PER FOOT	500, 750, 1000, 1250, 1500, 2000 or Custom
CCT & DYNAMIC PLATFORMS	27K, 30K, 35K, 40K, 50K, Tunable White, Dims to Warm, 1500 = White
CRI	90+ (Standard, 90+
COLOR QUALITY	3 Step MacAdam Ellipses
WIDTHS	2", 4"
LENGTHS	2', 4', 6', 8', Continuous with 1" Increments
DISTRIBUTION PATTERNS	Standard, Wall Wash
CONFIGURATION PATTERNS & LENGTHS	Single, Continous, Square, Rectangular, L-Shape, Custom with 90, 60, or 45 ° Angles
MOUNTING	Surface
FINISH	48 H (White), 5K (Black), SI (Silver), Custom RAL
DIMMING & CONTROLS	0-10V Flicker Free 1% Dimming Standard (DMV3), LUTH, LUTOW, DMDT, ELDO10/1, ELDOWB.1, DALI.1
EMERGENCY	10W - Up to 1000L Output 20W - Up to 2000L Output DALI LED DLT FOW-EOT - Self Diagnostic (Consult Factory)
LIFETIME	L70 at 50,000 Hours
PHOTOMETRIC TESTS	In Accordance with IES LM79-08, LM80 and TM-30, TM-21

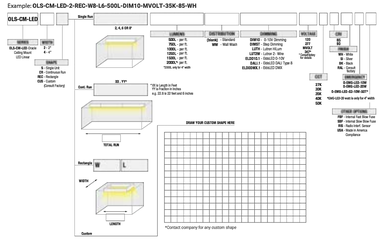
Wall Wash Standard

Wall Wash

ORACLE LINEAR COLLECTION By Elite Lighting

OLS-CM-LED 2" 4"
LED Architectural Ceiling Mount Direct Linear

Example: **OLS-CM-LED-2-REC-WB-L6-500L-DIM10-MVOLT-35K-85-WH**



- LUT2W available in 120V
- ELDO10, ELDOWB, LUTH available 120-277
- Consult Factory
- * See last page for sensor options

TYPE L3

LNT-85

IP68 FLEXIBLE LED NEON SERIES

CORE LIGHTING

The **LNT-85** is a high performance flexible LED fixture that is useful in a wide variety of indoor or outdoor applications where a smooth surface or continuous line of light is desired. It is a flexible strip light that can bend around contours or tight curves horizontally or vertically without being damaged.

Project:
Location:
Quote/ Ref #:

SPECIFICATIONS

INPUT VOLTAGE	24V DC Constant Voltage
POWER CONSUMPTION	5.1W
LUMEN OUTPUT	554 Lm./ Ft. (VB) 462 Lm./ Ft. (HB)
CRI	90+
COLOR TEMPERATURE	22K/ 27K/ 30K/ 35K/ 40K/ 50K
DIMMING/ CONTROL	MLV, ELV, 0-10, and TRIAC
MAXIMUM RUN LENGTH	23 Ft.
CUTTABLE	Every 55.6mm (2.19 in)
POWER FACTOR	≥ 1
STORAGE TEMPERATURE	-40°F (-40°C) to 140°F (60°C)
OPERATING TEMPERATURE	-40°F (-40°C) to 113°F (45°C)
BEAM ANGLE	120°
HUMIDITY	0-95% Non Condensing
IP RATING	IP68
CERTIFICATIONS	UL Listed
LUMEN MAINTENANCE	50,000 Hrs.

FEATURES

- High color consistency
- Smooth illumination
- Continuous run length up to 23 Ft.
- Dimmable with CORE dimmable drivers
- UV Resistant
- UL Listed

LUMENS

CCT	VERTICAL BEND (LM/FT)	HORIZONTAL BEND (LM/FT)	CRI
2200K	466	380	90+
2700K	494	412	90+
3000K	494	412	90+
3500K	533	444	90+
4000K	533	444	90+
5000K	554	462	90+

MODEL	LIGHT SURFACE	COLOR TEMP	VOLTAGE	LENGTH	POWER FEED	FEED LENGTH
LNT-85	**HB** Horizontal Bend **VB** Vertical Bend	**22K** 2700K **27K** 2700K **30K** 3000K **35K** 3500K **40K** 4000K **50K** 5000K	**24** 24V DC	Please refer to page 4 for exact lengths with corresponding ordering codes.	**IP68EF** End Feed **IP68SFL** Side Feed Left **IP68SFR** Side Feed Right **IP68BF** Bottom Feed	**HW3** 3 in. Power Feed **HW10** 10 in. Power Feed **HW15** 15 in. Power Feed **HW30** 30 in. Power Feed **HW50** 50 in. Power Feed

TYPE L5

ACL5 | SPECIFICATION GUIDE

HE TECH — DROP LENS

ORDERING CODE

ACL5

PROJECT INFO: | DATE | TYPE: | QUANTITY

DIRECT PERFORMANCE AT 3500K

SERIES	DISTRIBUTION	DIRECT PERFORMANCE - LUMENS PER FOOT	INPUT WATT	EFFICACY
LE SERIES	HE TECH™	1078 lm/ft	9.7 W / ft	109 lm / W
	FLAT BLADE LENS FREE	1162 lm / ft	9.7 W / ft	120 lm / W
	7° DROP LENS	840 lm / ft	9.7 W / ft	86 lm / W
	WELL BEAM	771 lm / ft	9.7 W / ft	79 lm / W
	BATWING BEAM	449 lm / ft	9.7 W / ft	46 lm / W
LO SERIES	HE TECH™	870 lm / ft	6.9 W / ft	126 lm / W
	FLAT BLADE LENS FREE	817 lm / ft	6.9 W / ft	118 lm / W
	7° DROP LENS	600 lm / ft	6.9 W / ft	87 lm / W
	BATWING BEAM	380 lm / ft	6.9 W / ft	55 lm / W
HO SERIES	HE TECH™	1337 lm / ft	15.5 W / ft	86 lm / W

Custom tuned output available from 20% to 100% of high output. Please consult factory for custom color output and wattage. Total tape cut reel runs often will lay flat down to 6 inch.

ORDERING OPTIONS

ACL5							
SERIES	LENGTH OR PATTERN TYPE	INTERSECTION TYPE	OUTPUT	LED CCT	LED CRI	VOLTAGE
ACL5	**__** Nominal Length* Exact Length**	**IT** "T" Intersection **IX** "X" Intersection **IY** "Y" Intersection*	**LS** Standard Output* **LH** High Output **C_** Custom Output*	**27** 2700K **30** 3000K **35** 3500K **40** 4000K **TW** Tunable White* **DW** Dim-to-warm*	**__** 80+ CRI **CRI** 90+ CRI*	**U** 120V - 277V **3** 347V*
	PL_ "L" Shape*** **PU_** "U" Shape*** **PR_** Rectangle / Square*** **CP** Custom Pattern****					

*Available with Tile Finish covers only in 90° shapes.
**Please contact factory for maximum run lengths.
***Please contact factory for minimum and maximum leg lengths.
****Please Provide Image

*Maximum CCT change is 2K kit. Contact design assist for custom CCT requirements.
**Tunable White CCT range is 2700K - 5000K

*Not available with 20% tile finish.

*Not available with 20% tile finish.

DIRECT OPTICS	MOUNTING	FINISH*	DIMMING	EMERGENCY
HE HE Tech™ **DL** 1° Drop Lens* **IV** Flat Blade Louvers** **FW** Polycarbonate Flush Wide Lens*** **WW** Wall Wash*** **DM** Direct Butwing White	**G** Flush Grip / Mud Over Flange **RG** 1" Regressed Grip / Mud Over Flange **ZP** 1/2" Trim Flange **T** T-Bar 9/16" **X** T-Bar 15/16" **N** T-Bar 9/16 Slot	**T** Titanium **W** White **B** Black **C_** Other** **CBD** **SPH** **SPA** **SBZ** **SCV** **LMS** **SMN**	**D-** Standard 0-10V dimming* **DS** Phase dimming** **DM** DMX 0.1% dim-to-dark **DF** DALI dim-to-off **NWA** nLight® Wired (dim-to-off)*** **NWB** nLight® Wireless (dim-to-off)***	**EC** Emergency - circuited **E_** Emergency - battery*

*Not available for SAPCheck technical dim for more information.
**Not available on lenses of 4" lengths.
***Please contact factory for nLight® Wired and Wireless specifications and lead times.

SENSORS	OPTIONS
OP "Occupancy Sensor" Fixture **PF** Photocell / Daylight Sensor - Fixture **OPF** Occupancy & daylight Sensor - Fixture	**M** Multi-Circuit* **K** Nokeberry Applicator** **G** Wet Location*** **PC** Canopy Plenum **MR** MR16****

*Does not meet emergency requirements.
**Does not meet center beam count. Not compatible with Drop Lens or Tile Glass Lenses.
***Not available in ACL5 with emergency and/or nLight® wireless applications (does not meet wet location requirements). Not available with Tile Finish. Not available with Drop Lens. Not available with Batwing Beam. Not compatible with Tile Lens. Not Dimm-to-Dark compatible.
****Please see MR Accessories for more information.

a·light — 3728 MARITIME WAY | OCEANSIDE, CA 92056 | 760.727.7470 | ALIGHTLCOM | REV: 2.4 04/2024

TYPE L6

urban-architecture LAB
1657 alvira street second floor los angeles, ca 90035
tel. 323.954.9996 www.u-a-lab.com

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PHASE

ENTITLEMENT SET

09/27/2024

LITE RITE DESIGN

LONG BEACH, CA
562-430-6468

PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

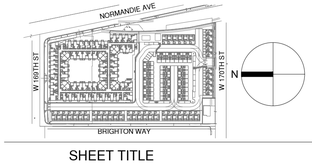
SAIKO INVESTMENT CORP.
+
NEXTGEN APARTMENTS LLC

134 LOMITA STREET
EL SEGUNDO | CA 90245

FULL SCALE (24X36): 1/16" = 1'-0"

0 8' 16' 32' 64'

HALF SCALE (11X17): 50%



SHEET TITLE

LIGHTING SPECS 2

SHEET NO. **LT-6.1**

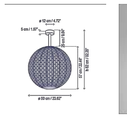
TYPE P1

Nans Sphere PF/60 Outdoor

Design / *Diseño:*
Joana Bover / 2022

Typology: Ceiling lamp
Tipología: Plafón

Environment: Outdoor
Ambiente: Exterior



Technical description / *Descripción técnica:*

Net Weight: 10.65 lbs
Peso Neto: 10.65 lbs

1 Box/Caja
26.38 x 26.38 x 24.02 inches / 0.669 ft³
Gross Weight / *Peso bruto:* 17.64 lbs

Materials: Stainless steel, Aluminum, Synthetic Fiber.
Materiales: Acero Inoxidable, Aluminio, Fibra Sintética.

Diffuser: Polycarbonate
Difusor: Policarbonato

Dali option: consult
Opción Dali: consultar

Customizable: consult
Personalizable: consultar

For Casambi dimmers, consult
Para regulaciones Casambi, consultar

Optional stem measures:
Total height: 44.57"
Medidas opcionales de tija:
Altura total: 113.2 cm

Certifications / *Certificaciones*

Lamps description / *Descripción lámparas:*

120V 60Hz | WET | IP 66 | 1x 14W LED / CRI 90 / 2700K (+200 lm light source / *fuente de luz*)

Ref	Finishing / *Acabados*	Ean13
3090410416BJ	Dimmable Triac - Graphite Brown Bead Shade *Regulable Triac - Marrón Grafito* *Pantalla Bola*	8435493705507
3090410416BJ	Dimmable Triac - Graphite Brown Bead Shade *Regulable Triac - Marrón Grafito* *Pantalla Marrón*	8435493705514
3090410417DU	Dimmable Triac - Graphite Brown Beige Shade *Regulable Triac - Marrón Grafito* *Pantalla Beige*	8435493705521

Lamps description / *Descripción lámparas:*

120V 60Hz | WET | IP 66 | 1x 14W LED / CRI 90 / 2700K (+200 lm light source / *fuente de luz*)

Ref	Finishing / *Acabados*	Ean13
3090410516BJ	Dimmable 0-10V - Graphite Brown Bead Shade *Regulable 0-10V - Marrón Grafito* *Pantalla Bola*	8435493705538
3090410516BJ	Dimmable 0-10V - Graphite Brown Shade *Regulable 0-10V - Marrón Grafito* *Pantalla Marrón*	8435493705545
3090410517DU	Dimmable 0-10V - Graphite Brown Beige Shade *Regulable 0-10V - Marrón Grafito* *Pantalla Beige*	8435493705552

Note of use: For environments with a high salinity, proper maintenance of the luminaire will be necessary. We recommend cleaning it with a soft brush and remove salt, dust, or dirt deposited by moisture or wind.
Nota de uso: Para ambientes con alto grado de salinidad, será necesario realizar un correcto mantenimiento de la luminaria. Recomendamos limpiar con un cepillo suave y retirar la sal, el polvo, o la suciedad depositada por la humedad o el viento.

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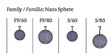
1331 Collier Road, Suite A
Atlanta, GA 30318
United States
T. +1 (404) 934 2342
info@boverusa.com
www.boverusa.com

Family / *Familia:* Nans Sphere



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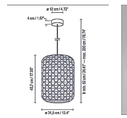
TYPE P2

Nans S/31.2 Outdoor

Design / *Diseño:*
Joana Bover / 2022

Typology: Pendant lamp
Tipología: Suspensión

Environment: Outdoor
Ambiente: Exterior



Technical description / *Descripción técnica:*

Net Weight: 4.32 lbs
Peso Neto: 4.32 lbs

1 Box/Caja
14.57 x 21.26 x 16.14 inches / 1.892 ft³
Gross Weight / *Peso bruto:* 7.21 lbs

Materials: Stainless steel, Aluminum, Synthetic Fiber.
Materiales: Acero Inoxidable, Aluminio, Fibra Sintética.

Diffuser: Polycarbonate
Difusor: Policarbonato

Hand woven with a recyclable and non-toxic synthetic polyethylene fiber.
Pantallas tejidas a mano con fibra de polietileno sintético reciclable y no tóxico.

Dali option: consult
Opción Dali: consultar

Customizable: consult
Personalizable: consultar

For Casambi dimmers, consult
Para regulaciones Casambi, consultar

Certifications / *Certificaciones*

Lamps description / *Descripción lámparas:*

120V 60Hz | WET | IP 66 | 1x 14 W LED / CRI 90 / 2700K (+200 lm light source / *fuente de luz*)

Ref	Finishing / *Acabados*	Ean13
3090331416BJ	Dimmable Triac - Graphite Brown Bead Shade *Regulable Triac - Marrón Grafito* *Pantalla Bola*	8435493705415
3090331416BJ	Dimmable Triac - Graphite Brown Shade *Regulable Triac - Marrón Grafito* *Pantalla Marrón*	8435493705422
3090331416GJ	Dimmable Triac - Graphite Brown Beige Shade *Regulable Triac - Marrón Grafito* *Pantalla Beige*	8435493705439

Lamps description / *Descripción lámparas:*

120V 60Hz | WET | IP 66 | 1x 14 W LED / CRI 90 / 2700K (+200 lm light source / *fuente de luz*)

Ref	Finishing / *Acabados*	Ean13
3090332416BJ	Dimmable 0-10V - Graphite Brown Bead Shade *Regulable 0-10V - Marrón Grafito* *Pantalla Bola*	8435493705446
3090332416BJ	Dimmable 0-10V - Graphite Brown Shade *Regulable 0-10V - Marrón Grafito* *Pantalla Marrón*	8435493705453
3090332416GJ	Dimmable 0-10V - Graphite Brown Beige Shade *Regulable 0-10V - Marrón Grafito* *Pantalla Beige*	8435493705460

Note of use: For environments with a high salinity, proper maintenance of the luminaire will be necessary. We recommend cleaning it with a soft brush and remove salt, dust, or dirt deposited by moisture or wind.
Nota de uso: Para ambientes con alto grado de salinidad, será necesario realizar un correcto mantenimiento de la luminaria. Recomendamos limpiar con un cepillo suave y retirar la sal, el polvo, o la suciedad depositada por la humedad o el viento.

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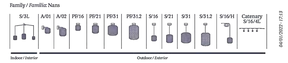
Family / *Familia:* Nans



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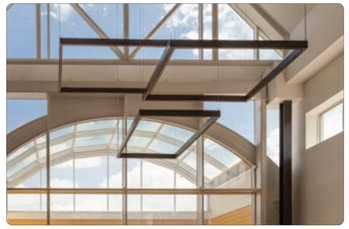
TYPE P3

Aura Illuminated Wooden Square and Rectangle Pendant

structura

FIXTURE TYPE: _____

PROJECT NAME: _____



Solid wood exterior/interior LED rectangular pendant.

FEATURES:
- Available in a wide variety of sizes
- HB/CRI smooth, dot free illumination
- Dimmable PNT power supply and IP67 luminaire
- Catenary cable, ceiling, and wall mounting options

SPECIFICATIONS:

HOUSING: Solid Accoya wood linear assembled through gluten construction and precision machined using CNC technology. Adhesive complies with ASTM D-2559 gluten construction specifications for extreme exposed weather conditions, waterproof, and rated for wet or dry use exposure.

ELECTRICAL: Powered by a standalone G-Train GZ, 120-277VAC primary/24VDC secondary outdoor rated remote dimmable power supply. Power supply features built-in short circuit protection, over load protection, and over temperature protection. System is forward phase, reverse phase, and 1-10V dimming. Consult factory for other driver options. Catenary mounted fixtures supplied with 1' infeed cable. A 40' leader cable supplied with infeed only fixtures. Ceiling canopy mounted fixtures supplied with 6' infeed cable. Operating temperature of -13°F to 120°F (0, 115°F HO, and 104°F HO).

OPTICAL SYSTEM: Available in 2700K, 3000K, 3500K, 4000K color temperatures with smooth, dot free illumination.

FINISHES AND MATERIALS: Wood is finished with a low VOC waterborne matte exterior finish containing UV and mildew inhibitors. Care and Maintenance

HARDWARE: All fasteners and non-wood components are stainless steel unless otherwise noted.

LISTINGS & RATINGS: Luminaire CSA listed according to CSA C22.2 No. 250.0-18/UL Standard 1598 and UL Standard 2108. Suitable for wet locations. UH-80 test calculated L70 > 40,000 hours. Luminaire not to be installed in chlorinated environment.

WARRANTY: 25-year wood warranty with a 2-year finish warranty, 5-year warranty on LED and driver.

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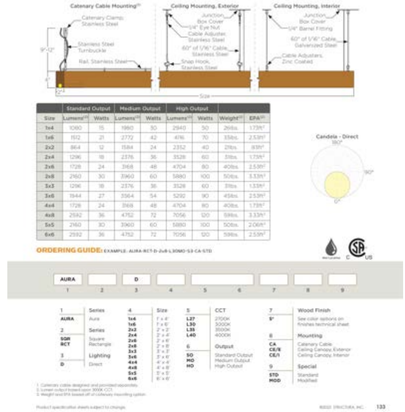
Aura Square and Rectangle - Direct Lighting

structura



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TYPE W1

WAC LIGHTING

Icon

Outdoor Wall Sconce 3000K

Model & Size	Color Temp	Finish	LED Watts	LED Lumens	Delivered Lumens
○ WS-W54614 14"	3000K	○ AL Brushed Aluminum ○ BK Black ○ BZ Bronze	11W	945	458

Example: **WS-W54614-BZ**
For custom requests please contact customs@waclighting.com

DESCRIPTION

Like a simple reference to something greater, the up and down lights accentuate linear architectural forms.

FEATURES
- Weather resistant powder coat finish
- Simple shape, simple idea, infinite applications
- Up & down light
- Shielded light source for great low-glare illumination
- Driver concealed within the fixture
- 5 year warranty

SPECIFICATIONS

Color Temp:	3000K
Input:	120-277V,50/60Hz
CRI:	90
Dimming:	ELV: 100-10%
Rated Life:	54000 Hours
Mounting:	Can be mounted on wall in all orientations
Standards:	ETL, cETLIP65,ADA Wet Location Listed
Construction:	Aluminum hardware with glass diffuser

Fixture Type:
Catalog Number:
Project:
Location:

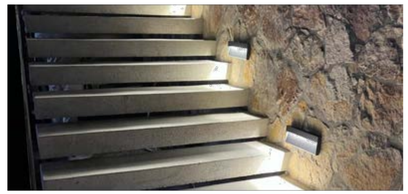
FINISHES:

LINE DRAWING:

TYPE W2

LUMUX
STEP LIGHT
SLS1400

DATE:
PROJECT:
FIRM:
CATALOG NO: SLS1400 / White / / 120-277 /
COMMENTS:



MADE IN USA | ETL | IP 65 | Dark Sky | Wet | CSA | 5 YEAR | 120-277v | DARK SKY COMPLIANT | ADA COMPLIANT

SLS1400

The SLS Series luminaires from Lumux are elegant architectural step lights, precision engineered for durability and performance.

SLS1400 is a low glare step light with a distinctively modern, minimalist design. Ideal for illuminating steps, facades, and walls along access ways, SLS Series step lights are powerful ADA LED solutions, energy-efficient for long-lasting indoor and outdoor applications. SLS1400 luminaires feature a durable powder coated diecast aluminum housing retaining an impact-resistant glass diffuser, with an integrated glare hood to shield the light source.

up to **525** lm | **15** w | up to **36** lm/w

TYPE W3

WAC LIGHTING

Icon

Outdoor Wall Sconce 3000K

Model & Size	Color Temp	Finish	LED Watts	LED Lumens	Delivered Lumens
○ WS-W54620 20"	3000K	○ AL Brushed Aluminum ○ BK Black ○ BZ Bronze	11W	847	478

Example: **WS-W54620-BZ**
For custom requests please contact customs@waclighting.com

DESCRIPTION

Like a simple reference to something greater, the up and down lights accentuate linear architectural forms.

FEATURES
- Weather resistant powder coat finish
- Simple shape, simple idea, infinite applications
- Up & down light
- Shielded light source for great low-glare illumination
- Driver concealed within the fixture
- 5 year warranty

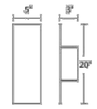
SPECIFICATIONS

Color Temp:	3000K
Input:	120-277V,50/60Hz
CRI:	90
Dimming:	ELV: 100-10%
Rated Life:	54000 Hours
Mounting:	Can be mounted on wall in all orientations
Standards:	ETL, cETLIP65,ADA Wet Location Listed
Construction:	Aluminum hardware with glass diffuser

Fixture Type:
Catalog Number:
Project:
Location:

FINISHES:

LINE DRAWING:



WS-W54620

TYPE W5

WAC LIGHTING

Rubix

Single & Double Wall Mount 3000K

Model & Size	Color Temp & CRI	Watts	Lumens	Finish
○ WS-W2504 5" - 1 Light	3 3,000K 90	16W 31W	945 1890	○ AL Brushed Aluminum ○ BK Black ○ BZ Bronze ○ GH Graphite ○ WT White
○ WS-W2505 5" - 2 Lights	3 3,000K 90			

Fixture Type:
Catalog Number:
Project:
Location:

Example: **WS-W2504-AL**

FEATURES
- 2504 Single, 2505 Double
- Driver concealed within the fixture
- 5 year warranty

SPECIFICATIONS

Construction:	Die-cast Aluminum
Power:	16W, 31W
Input:	120-277V,50/60Hz
Dimming:	ELV: 100-10% , 0-10V: 100-5%
Light Source:	Integrated LED
Rated Life:	70,000 Hours
Mounting:	Mounts directly to junction box, Can be mounted on wall in all orientations
Finish:	Electrostatically Powder Coated: Powder Coat Graphite Graphite, Powder Coat White White, Brushed Aluminum with Clear Powder Coat Brushed Aluminum, Black, Powder Coat Bronze Bronze
Operating Temp:	-40°F to 122°F (-40°C to 50°C)
Standards:	ETL, cETL, Wet Location Listed, IP65, Title 24 JA8 Compliant

FINISHES:

LINE DRAWING:

TYPE W6

WPX LED
Wall Packs

Specifications

Model	Width (A)	Height (B)	Depth (C)	Mounting Junction Box Dimensions	Weight
WPX1	8.5" (21.6 cm)	11.1" (28.3 cm)	5.2" (13 cm)	4.6" (10.5 cm)	5.6" (13.6 cm)	6.1 lbs (2.8kg)
WPX2	8.5" (21.5 cm)	12.2" (31.1 cm)	4.1" (10.3 cm)	4.5" (11.3 cm)	5.7" (13.7 cm)	8.2 lbs (3.7kg)
WPX3	8.5" (21.7 cm)	15.8" (33.8 cm)	5.7" (13.7 cm)	4.7" (12.0 cm)	6.7" (15.7 cm)	11.9 lbs (5.4kg)

Ordering Information — EXAMPLE: WPX2 LED 40K MVOLT DDBXD

Series	Color Temperature	Voltage	Options	Finish
WPX1 LED P1	1,100 Lumens, 1*10"	30K 3000K	MVOLT 120V - 277V	DDBXD Dark bronze
WPX1 LED P2	2,900 Lumens, 2*10"	40K 4000K	347 347V*	DWHXD White
WPX2 LED	6,000 Lumens, 4*10"	50K 5000K		DBLXD Black
WPX3 LED	9,200 Lumens, 6*10"			Note: For other options, consult factory.

Note: The lumen output and input power shown in the ordering tree are average representations of all configuration options. Specific values are available on request.

NOTES
1. All WPX wall packs come with 6kV surge protection standard, except WPX1 LED P1 package, which comes with 10kV surge protection standard. Add SPDWV option to get WPX1 LED P1 with 6kV surge protection.
   Sample number/future: WPX1 LED P1 40K MVOLT SPDWV DDBXD
2. *Not available with WPX1 LED P1 and WPX2 LED.
3. Battery pack options not available with 347V or PE options.

FEATURES & SPECIFICATIONS

INTENDED USE
The WPX LED wall packs are designed to provide a cost-effective, energy-efficient solution for both HID wall pack replacement and new construction. WPX1 and WPX2 are ideal for replacing up to 150W, 250W, and 400W HID luminaires respectively. WPX luminaires deliver a uniform, wide distribution. WPX is rated for -40°C to 40°C.

CONSTRUCTION
WPX features a die-cast aluminum main body with optimal thermal management that both enhances LED efficacy and extends component life. The luminaires are IP66 rated, and sealed against moisture or environmental contaminants.

ELECTRICAL
WPX offers multiple configurations consist of high-efficacy LEDs and LED driver maintenance of L80 (50,000 hours). Color temperature (CCT) options of 3000K, 4000K and 5000K with minimum CRI of 70. Electronic drivers ensure system power factor >90% and THD <20%. All luminaires have a standard 0-10V dimming to 10% (1%* dimming available). Luminaires with standard surge protection rating of L Line 1 can be ordered with an optional 6kV surge protection.
All photocell (PE) operate on MVOLT (120V - 277V) input.

Note: The standard WPX LED wall pack luminaires come with field-adjustable drive current feature. This feature allows tuning the output of the LED drivers to adjust the lumen output to dim the luminaire.

INSTALLATION
WPX can be mounted directly over a standard electrical junction box. Three 1/2 inch conduit ports are provided (one on the back, two on the bottom) for surface conduit wiring. The universal mounting plate allows for conduit wiring on surfaces that don't have an electrical junction box. Wiring can be made in the integral wiring compartment in all cases. WPX is only recommended for installations with LEDs in horizontal position.

LISTINGS
CSA Certified to meet U.S. and Canadian standards. Suitable for wet locations. IP66 Rated. Luminaire CSA listed according to CSA C22.2 No. 250.0-18/UL Standard 1598 and UL Standard 2108. Consult factory to check the DLC Qualified Features list at www.designlights.org to confirm which versions are qualified. International Dark Sky Association (IDA) Fixture Seal of Approval (FSA) is available for all products on this page utilizing 3000K color temperature only.

WARRANTY
5 year limited warranty. This is the only warranty provided and no other statements in this specification sheet create any warranty of any kind. All other express and implied warranties are disclaimed. Complete warranty terms located at:
www.acuitybrands.com/CustomerResources/Terms_and_conditions.aspx

Note: Actual performance may differ as a result of end-user environment and application. Specifications subject to change without notice. Luminaire under laboratory conditions at 25°C. Specifications subject to change without notice.

TYPE W7

AFX

LOCATION		DATE	
PREPARED BY		QUANTITY	
COMMENTS		FIXTURE TYPE	
CATALOG NUMBER			

Dakota LED Outdoor Sconce
DKTW Series

Features
Simplistic design. Down light with wall wash effect.
Ideal use in entrances or anywhere general outdoor lighting is needed. Provides lighting in residential, commercial and hospitality applications. Meets ADA requirements. Fixture mounts to standard junction box (not included).

Construction
Back plate is die-formed of 22-gauge steel. Standard mounting holes and hardware are included. Power supply connections must be made inside a junction box (not included).

Finish
All metal parts are powder coated in Black, Bronze or White.

Diffuser
Frosted white glass bottom diffuser.

Electrical
Input 120-277 VAC / 60Hz.
Compatible with 0-10V dimmers.
Minimum starting temp -4° F/-20° C

Lamping
Fixture includes an LED module capable of producing: 12W = 1000 source lumens, 537 delivered lumens 3000K (CCT). Rated for 50,000 Hrs., 90 CRI.

Certification
All fixtures are cETLus listed for wet locations.
ADA
Title 24JA8 Compliant

Warranty
Limited warranty: This fixture is free from defects in materials and workmanship for a period of 5 years from date of purchase.

Specifications and dimensions subject to change without notice.

Ordering Information:

Black	Bronze	White	Source	Delivered Lumens	CCT	H	W	D
DKTW05040XDL30D2BK	DKTW05040XDL30D2BZ	DKTW05040XDL30D2WH	1000 lm	537	3000K	4-3/8"	4-7/8"	2-1/2"

TYPE W8

LUMUX
DOWNLIGHT WALL SCONCE
WS-PL2014

DATE:
PROJECT:
FIRM:
CATALOG NO.: / White / / 120-277 /
COMMENTS:

WS-PL2014 is an elegant wall or column mount downlight with a modern design and forward beam angle options.

Ordering Guide

Catalog No.	Peak Beam Angle (horizontal)	LED Color	Color Temp[1]	Voltage	Finish	Options[2]
		White		120-277		
WS-PL2014-T2	Broad 140°	White	2700K	120-277v	Black	☐ 0-10v Dimming
WS-PL2014-T3	Mid 90°		3000K		White	☐ GFCI Dual Receptacle
WS-PL2014-T4	Narrow 0°		3500K		Silver	☐ Occupancy Sensor
			4000K		Bronze	☐ Photocell
					Custom RAL*	

[1]*Consult factory for additional options*
[2]*Consult factory for additional pricing*

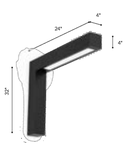
Catalog No.: / White / / 120-277 /

Performance Specifications		Environmental Specifications	
Flux 8,500 lm (WS-PL2014-T2 4000K)	LER 104 lm/W	BUG rating: zero uplight	
Power 82W	120-277v input voltage	CRI 80	Color temperature options
Starting temp. rated to -20°F	GFCI dual receptacle option	IP65	ETL listed for wet-locations
Dimmable driver (0-10v) option	Occupancy sensor option	Effective Projected Area 2 ft²	Marine Grade option
Lumen Maintenance*, L90 >36K hrs	Photocell option	5-year limited warranty	Made in the USA

Delivered Lumens & Wattage per color temperature:

	2700K	3000K	3500K	4000K	WATTS
WS-PL2014-T2	8,000 lm	8,500 lm	8,500 lm	8,500 lm	82W
WS-PL2014-T3	7,500 lm	8,000 lm	8,000 lm	8,000 lm	82W
WS-PL2014-T4	7,000 lm	7,500 lm	7,500 lm	7,500 lm	82W

Housing: Heavy-duty construction of corrosion resistant, low-copper extruded aluminum. All fasteners are vandal resistant stainless-steel.
Lens: Sealed one-piece, shatter-proof, UV-rated polycarbonate.
Gasket: Closed-cell silicone foam gasket that seals out moisture, dust, and insects, for weather tight operation.
Mounting: Mounting bracket provided fits any standard 3" or 4" junction boxes.
Installation: Please refer to installation instructions.
Finish: Zinc polyester powder coat finish in black, white, silver, bronze, or any custom RAL color. Consult factory for marine grade or anti-microbial finish.



Dimensions

*Lumen Maintenance Report: CREE XLamp XP-G2

PROJECT:

NORMANDIE CROSSING APARTMENTS & TOWNHOMES

16911 S NORMANDIE AVE
GARDENA | CA 90247

OWNER:

SAIKO INVESTMENT CORP.
+
NEXTGEN APARTMENTS LLC

134 LOMITA STREET
EL SEGUNDO | CA 90245

urban-architecture LAB
1657 alvira street second floor los angeles, ca 90035
tel. 323.954.9996 www.u-a-lab.com
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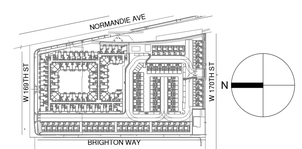
PHASE

ENTITLEMENT SET

09/27/2024

LITE RITE DESIGN
LONG BEACH, CA
562-430-6468

FULL SCALE (24X36): 1/16" = 1'-0"
0 8' 16' 32' 64'
HALF SCALE (11X17): 50%



SHEET TITLE

LIGHTING SPECS 3

SHEET NO. **LT-6.2**

EXHIBIT D

CITY OF GARDENA
CONDITIONS OF APPROVAL FOR:

ENVIRONMENTAL ASSESSMENT #20-21; GENERAL PLAN AMENDMENT #3-21; ZONE CHANGE #2-22; ZONE TEXT AMENDMENT #4-21; SPECIFIC PLAN #1-21; VESTING TENTATIVE MAP #4-21; SITE PLAN REVIEW #11-21; DEVELOPMENT AGREEMENT #2-21; AND AFFORDABLE HOUSING AGREEMENT

16829, 16835, 16907, 16911 South Normandie Avenue
(APNs: 6106-030-011, 015, 016, 017)

CONDITIONS APPLICABLE TO EACH SUBAREA OF DEVELOPMENT – THE APARTMENT BUILDING AND TOWNHOME DEVELOPMENT

For each subarea of development, the following conditions shall apply, unless otherwise indicated.

GENERAL CONDITIONS

GC 1. The applicant accepts all of the conditions of approval set forth in this document and shall sign the acknowledgment. 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. The applicant shall comply with all written policies, resolutions, ordinances, and all applicable laws in effect at time of the effective date of the development agreement. The conditions of approval shall supersede all conflicting notations, specifications, and dimensions which may be shown on the project development plans. The conditions of approval include any requirements set forth in the Development Agreement, regardless of whether they are specifically set forth herein.

GC 4. The site plan layout shall be in accordance with the plans approved by the City Council as may be modified by these conditions of approval. The final completed project shall be in substantial compliance with the plans upon which the City Council based its decision, as modified by such decision.

GC 5. In accordance with GMC Section 8.20.130.A, 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 6. There shall be no outdoor lighting for construction beyond 6:00 pm any day.

GC 7. In accordance with GMC Section 18.42.140, any and all roof-mounted equipment, devices or materials shall be completely 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 defend, indemnify, and hold harmless the City, its agents, officers, and employees from any claims, actions or proceedings, damages, costs (including without limitation attorneys' fees), injuries, or liabilities against the City or its agents, officers, or employees arising out of the City's approval of Environmental Assessment #20-21; General Plan Amendment #3-21; Zone Change #2-22; Zone Text Amendment #4-21; Specific Plan #1-21; Vesting Tentative Map #4-21; Site Plan Review #11-21; Development Agreement #2-21; And Affordable Housing Agreement. The City shall promptly notify the applicant of any claim, action, or proceeding and the City shall cooperate fully in the defense. If the City fails to promptly notify the applicant of any claim, action, or proceeding, or if the City fails to cooperate fully in the defense, the applicant shall not thereafter be responsible to defend, indemnify, or hold harmless the City. Although the applicant is the real party in interest in 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 of any obligation under this condition, including the payment of attorneys' fees.

GC 9. The applicant shall comply with all mitigation measures set forth in the Mitigation Monitoring and Reporting Program adopted for the Project under Resolution No. 6683.

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, except for the tentative map. Utilization for the tentative tract map shall mean the final tract map to be recorded with the Los Angeles County Recorder's (TM 2).

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 shall submit for review and approval detailed landscape and irrigation plans prepared by a licensed landscape architect to the Director of Community Development or designee 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 five (5) gallon size. Metal cages, painted green, shall be used to protect irrigation check valves and controller, and consistent with the landscape plans approved by the City Council.,

PL4. The applicant shall submit a site lighting plan, with photometrics, for review and approval to the Community Development Department 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. All light fixtures shall further comply with the requirements of the specific plan.

PL5. Colors and materials as shown on the development plans under Exhibit C, are approved. Deviation from colors and materials shall be in accordance with the Design Standards of the Specific Plan (#1-21). Any minor modifications to the materials used shall be subject to the review and approval of the Community Development Director. If the Director deems the modifications to be major changes, then it shall go before the Planning Commission for review and approval.

PL6. A master sign program shall be submitted to the Community Development Director for administrative approval. The master sign program shall include identification and wayfinding signage throughout the Specific Plan Area.

PL7. 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.

PL8. Each subarea of development shall comply with all development standards of the specific plan.

PL9. Applicant shall pay fees in accordance with the Development Agreement which includes:

- A multiple-unit residential development impact fee of $1,000 per unit for market rate units prior to building permit issuance in accordance with Gardena Municipal Code section 15.48.040.

PL10. 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.

Off-site Improvements

PL11. The applicant shall submit Street Improvement plans for to the City's Public Works Department for the review and process for all offsite railroad improvements as shown in Exhibit C to the Normandie Crossing Specific Plan. The plans shall be in accordance with the California Public Utilities Commission (CPUC) standards and Union Pacific Railroad (UPRR) guidelines.

PL12. The applicant shall submit Street Improvement plans to the City's Public Works Department for review and approval for the installation of a sidewalk along the south side of 169th Street, west of the Property, between the Brighton Way alleyway and the alley west of Brighton Avenue. Such work shall be completed with the first phase of development.

PROJECT DESIGN FEATURES

DF 1. The Project would utilize off-road diesel-powered construction equipment which would meet, at a minimum, the Tier 4 emission standards for nonroad diesel engines promulgated by the USEPA for equipment greater than 50 horsepower.

DF 2. The Project would comply with the California Green Building Standards Code (CALGreen Code) (California Code of Regulations Title 24, Part 11) for electric vehicle (EV) charging design. Compliance would provide 10% of parking stalls to be EV capable, 25% of parking stalls to be EV ready with Level 2 EV charging receptacles, and 5% of parking stalls to be equipped with Level 2 EV chargers. The final design may vary from this in compliance with the CALGreen Code.

DF 3. There would be no natural gas use by any of the Project land uses.

DF 4. Prior to the start of construction, a Construction Traffic Management Plan would be prepared and submitted to City for review and approval. The Construction Traffic Management Plan would minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, the Construction Traffic Management Plan will include, but not be limited to, the following measures.

a. Identified routes for vehicular traffic, bicyclists, and pedestrians around traffic lane, parking lane and/or sidewalk closures as they are required;

b. Provisions to ensure that access remains unobstructed for land uses near the Project site during construction;

c. Provisions to accommodate parking for construction workers either on-site or at offsite, off-street locations. Parking would be prohibited on streets in the vicinity of the Project site; and

d. Prior to the start of construction, the Applicant would coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project site and neighboring businesses and residences.

BUILDING & SAFETY

BS1. The applicant shall comply with all applicable portions of the most current California Building Standards Code (Title 24, California Code of Regulations) in effect at the time of permit application.

BS2. The applicant shall obtain separate Building Division including permits for Demolition, Grading, Building, Electrical, Plumbing, Mechanical, and Fences and Walls if required.

BS3. The applicant shall comply with all conditions set forth by other departments and agencies, including but not limited to: Gardena Planning, Gardena Public Works, and Los Angeles County Fire Department.

BS4. The applicant shall comply with the latest adopted Los Angeles County Fire Code and Fire Department requirements, as applicable.

BS5. The applicant 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 Chief 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.

BS6. The applicant 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, evaporation, or bio-treat storm water runoff. Sheet flowing storm-water, without filtering, is no longer acceptable.

BS7. 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).

BS8. A grading plan shall be submitted by the applicant/developer to the Building Official for review and approval. Grading shall be in substantial conformance

with the proposed project plans.

BS9. The applicant shall provide a complete hydrology and hydraulic study prepared by a qualified engineer, and comply with the recommendations of the engineer, to the satisfaction of the Building Official.

BS10. The applicant shall submit a 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 will review construction plans to verify compliance with standard engineering practices, the GMC/CBSC, and the Geotechnical Investigation's recommendations.

BS11. The applicant shall prepare construction and demolition waste recycling plans for review and approval by the Building Division. The applicant shall enroll in the city's waste diversion program.

BS12. The applicant shall post procedures and phone numbers at the construction site for notifying the City, local Police Department, and construction contractor (during regular construction hours and off- hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.

BS13. The applicant shall notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.

BS14. The applicant shall designate an on-site construction complaint and enforcement manager for the project.

BS15. The applicant shall ensure that all construction equipment is properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.

PUBLIC WORKS – ENGINEERING DIVISION

PW1. All work in the public right of way shall be constructed in accordance with the Standard Plans and Standard Specifications for Public Works Construction, latest edition and the City and State Codes as applicable. This includes supplements thereto and City of Gardena Standard Drawings. All work shall be designed and signed by a registered Civil Engineer or other applicable professional license engineer(s).

PW2. Prior to the issuance of demolition or construction permits, the applicant shall prepare and implement a construction management plan that shall be reviewed and approved by the Public Works Director. Any approvals shall be revocable at the discretion of the Public Works Director if significant impacts develop. The plan shall include restriction on allowing the parking of construction vehicles on 169th Street only within parking lane where not prohibited by red curb or signage during working hours for the purpose of receiving materials. The street parking must be open for all during non-working hours. No vehicles may be stopped/parked on Normandie Avenue. No barriers shall be placed on the asphalt at any time. Parked vehicles must conform to all rules and regulations, such as distance from the curb. Pedestrian access must be always unimpeded. There shall be no staging of materials in any public right-of-way.

PW3. Before undertaking any Encroachment/Excavation within the public right of way, the applicant must first obtain the applicable permit from the Public Works Engineering Division.

PW4. Parking for construction workers shall be provided on-site or at off-site, off-street locations. Vehicles of construction workers shall be prohibited from parking within the residential areas.

PW5. Prior to issuance of permits, all public improvements shall be guaranteed to be installed by the execution of an Agreement for Public Improvements secured by sufficient bond sureties or cash, complete indemnification form, Certification of Insurance (General Liability, Auto & Workers Compensation) naming City of Gardena as additional insured, contractor State License and City Business License.

PW6. The applicant shall remove and replace all sidewalk, curb, gutter, curb ramps, driveways, traffic signs, curb drains, marked pavement, and spandrel fronting the property along Normandie Avenue, West 170th Street, and West 169th Street.

PW7. The applicant submit improvement plans for trees to be located in the sidewalks on 169th Street and Normandie Avenue to the City Public Works Department for review and approval

PW8. Developer shall provide a ten-foot radii corner cut-off at the northwest corner of Brighton Way alleyway and 169th Street and shall make all improvements necessary to maintain and/or widen public access and put in public improvements in accordance with engineering plans to be approved by the City Public Works Department.

PW9. The applicant shall provide traffic control plans per WATCH (Work Area Traffic Control Handbook) and/or California MUTCD (California Manual on Uniform

Traffic Control Devices) per the latest standard pending proposed controls (permanent-overnight or temporary). The temporary/permanent traffic control plans shall be prepared by, or under the direction of, a licensed civil engineer or other authorized to practice traffic engineering.

PW10. The applicant shall provide Street Improvement Plans showing all requirements and submit them to the Public Works Department for review and approval. The Street Improvement Plan shall be stamped and signed by a Civil Engineer Registered in the state of California. As-built plan signed and stamped by the Engineer of Record shall be submitted to the Public Works Department prior to finalizing and closing permit. Any deviations from the approved plan will require a submittal of plan revision for the City review and approval.

PW11. The applicant is responsible for all applicant permit, plan check, surety, and other incidental fees pertaining to the proposed project.

PW12. Pedestrian access to all surrounding public sidewalks shall be provided at all times, except during such times as improvements are being made to the sidewalks as required by these conditions.

STANDARD CONDITIONS TO REDUCE IMPACTS (Gardena Municipal Code Section 18.42.210. C, D, and E)

GMC1. 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.

GMC2. 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 and full-time paleontological monitoring shall occur for the remainder of ground disturbance for the project.

GMC3. If Native American or tribal cultural resources are found on the site, the applicant shall enter into a cultural resources treatment agreement with a local Native American tribe traditionally and culturally affiliated with Gardena that is acknowledged by the Native American Heritage Commission, which shall address the following:

a. Treatment and disposition of cultural resources;

b. Designation, responsibilities, and participation of professional tribal monitors during grading, excavation and ground disturbing activities;

c. Project grading and development scheduling;

d. Terms of compensation for the tribal monitors;

e. Treatment and final disposition of any cultural resources, sacred sites, and human remains discovered on site;

f. Tribal monitor's authority to stop and redirect grading in order to evaluate the significance of any potential resources discovered on the property, and to make recommendations as to treatment; and

g. The applicant's agreement to relinquish ownership of all cultural resources, including all archaeological artifacts that are found on the project area, to the tribe for proper treatment and disposition; and the applicant's agreement that all tribal sacred sites are to be avoided and preserved.

GMC4. In compliance with state law, if human remains are unearthed, the project developer, pursuant to State Health and Safety Code Section 7050.5, will contact the county coroner and ensure no further disturbance occurs until the county coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98.

GMC5. If the remains are determined to be of Native American descent, the Native American Heritage Commission (NAHC) must be notified within twenty-four hours.

GMC6. Construction, grubbing, brushing, or tree removal shall be conducted outside of the state identified nesting season for migratory birds (typically March 15th through September 1st) if possible. If construction is conducted during nesting season, a pre-construction nesting bird survey shall be conducted within and immediately adjacent to the project site by a qualified professional biologist no more than seven days prior to the beginning of any project-related physical activity that is likely to impact migratory birds. If active nests are found during the pre-construction nesting bird survey, a nesting bird plan (NBP) shall be prepared by a qualified biologist and implemented during construction. At a minimum, the NBP shall include guidelines for addressing active nests, establishing buffers, monitoring, and reporting. The size, location and duration of all buffer zones, if required, shall be based on the nesting species, nesting stage, nest location, its sensitivity to disturbance, and intensity and duration of the disturbance activity. The buffers shall be maintained until the breeding

season has ended or until a qualified professional biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

GOLDEN STATE WATER COMPANY

GS1. The applicant shall contact Golden State Water Company for review of the existing water main once Los Angeles County Fire Department has issued their fire protection requirements on the project to initiate application for new service installation.

LOS ANGELES COUNTY FIRE DEPARTMENT

FD1. The applicant shall submit plans and specifications to the County of Los Angeles Fire Department Fire Prevention Engineering Section Building Plan Check Unit for review prior to building permit issuance.

FD2. A digital copy of the Final Tract Map shall be submitted to the Fire Department's Land Development Unit for review and approval prior to recordation.

FD3. A digital copy of a water systems improvement plan from the local water purveyor to the County of Los Angeles Fire Department Fire Prevention Division Land Development Unit for the require public fire hydrant.

FD4. Install 1 public fire hydrant as noted on approved Tentative Map/Hydrants and Fire Access Plan. The required fire flow for the public fire hydrants for the proposed development is 3,000gpm at 20 psi residual pressure for 3 hours. All required public fire hydrants shall be installed, tested and accepted prior to beginning construction. All fire hydrants shall measure 6”x 4"x 2-1/2" brass or bronze, conforming to current AWWA standard C503 or approved equal, and shall be installed in accordance with the County of Los Angeles Fire Code. Fire Code 501.4.

FD5. Install 4 new on-site private fire hydrants as noted on the fire access plan mark up. The required fire flow from the private fire hydrants is 2,500gpm at 20 psi residual pressure for 2 hours. Each private fire hydrant shall be capable to supply of fire flow no less than 1250gpm at 20psi residual pressure for 2 hours duration. Fire Code 507.3 & Appendix C106.1. Submit underground piping plans for the private fire hydrant infrastructure for review and approval to the County of Los Angeles Fire Department Fire Prevention Division Engineering Section Sprinkler Plan Check Unit via EPIC-LA.

FD6. Traffic calming devices, including but not limited to, speed bumps and speed humps shall be prohibited unless approved by the fire code official. Provide a note on the site plan and resubmit for additional Fire Department review. Provide a note on the Fire Access Plan and resubmit for additional Fire Department review.

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.

CONDITIONS APPLICABLE ONLY TO APARTMENT BUILDING

Subarea A (Apartments)

PL13. 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 on private property shall be permitted to grow to their maximum height.

PL14. The apartment management shall ensure that when units become available for rent, new residents who commence a 12-month lease shall be offered a one-time free monthly Zone 1 EZ Transit pass.

PL15. The applicant shall be required to enter into an agreement for affordable housing in the form attached hereto as Exhibit F, as may be modified by the City Attorney.

PL16. Unbundled Parking. The apartment manager shall charge for residential vehicle parking spaces for Rental Units within Subarea A. The Developer shall unbundle automobile parking charges from the rents or other fees charged for leasing residential units. None of the parking spaces will be allowed to be leased to non-residents of the apartment building.

PL17. Pre-Leasing for Area Employees. Rental Units within Subarea A shall be marketed exclusively for a thirty-day period to residents who are employees working within a 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 and demonstrate compliance prior to issuance of a certificate of occupancy.

PL18. Transit Information. To ensure that residential tenants of Rental Units within Subarea A are aware of transit options and TDM programs available to them, an information board or kiosk shall be posted in a central location in Subarea A. Developer shall also provide transit information online, and the website will

be advertised on the information board or kiosk. This information shall also be included on the website for Rental Units within Subarea A.

PL19. The applicant shall fund and complete the railroad track and roadway improvements along South Normandie Avenue pursuant to current California Public Utilities Commission standards and Union Pacific Railroad guidelines as set forth in Development Agreement #2-21.

PL20. The applicant shall provide five parking spaces to the public for use on a first come, first serve basis along Normandie Avenue.

CONDITIONS APPLICABLE ONLY TO TOWNHOMES

The following conditions apply to the townhome style development regardless of whether applicant chooses to rent or sell the units.

Subarea B (Townhomes)

PL21. The applicant shall provide the City with a copy of the Covenants, Conditions and Restrictions (CC&Rs) for the townhome development within Subarea B, which shall apply to the townhomes for review and approval prior to approval of the final map or issuance of a certificate of occupancy, not including model homes. The CC&Rs shall include all items listed in these conditions which are required to be included in the CC&Rs or items for which the HOA is responsible. At a minimum, the following provisions shall be included, as may be further detailed by these conditions. The failure to include a condition on the list below does not relieve the responsibility to include it in the CC&Rs if otherwise provided herein:

a. Any revisions to the CC&Rs shall require prior city approval.

b. All landscaping to be kept in a healthy condition.

c. Maintenance and repair obligations of all private streets/driveways.

d. The re-slurring and re-striping of the driveway and parking areas shall happen every five years at a minimum. The Director of Community Development or designee may require more frequent slurry and re-striping if the parking area is not maintained in good condition.

e. The building shall be maintained in good condition at all times and shall be repainted every eight years at a minimum. The Director of Community Development or designee may require more frequent painting if the improvements are not maintained in good condition.

f. Maintenance and repair obligations of all open spaces and Common Areas.

g. Prohibition against outdoor storage.

h. Prohibition against alterations to architectural treatments.

i. Prohibition against parking in driveway areas and in front of garages.

j. A requirement that trash cans shall be kept in the garage or out of public view.

k. Residents' vehicles shall be stored in the garages at all times while on the site.

l. Residents shall not be allowed to use Guest Parking for their own vehicles.

m. The entire site, all walls and fencing, and all building walls shall be maintained at all times free and clear of litter, rubbish, debris, weeds, and graffiti. Graffiti shall be removed within 24 hours and if paint is used to cover the graffiti, it shall be of the same color and texture as the building wall.

When the draft is provided to the City for review, it shall be accompanied by a table specifying where all conditions required can be found.

PL22. The CC&Rs shall provide that the homeowner's association 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.

PL23. The CC&Rs shall contain a prohibition against modifying the exterior colors and materials of any unit without approval by the Community Development Director.

PL24. The applicant shall re-slurry and re-stripe the driveway and parking areas every five years at a minimum. The Director of Community Development or designee may require more frequent slurry and re-striping if the parking area is not maintained in good condition.

PL25. The applicant shall maintain the building in good condition at all times and shall repaint the approved buildings and accouterments every eight years at a minimum. The Director of Community Development or designee may require more frequent painting if the improvements are not maintained in good condition.

PL26. There shall be no outdoor storage permitted within the Common Areas.

PL27. The architecture of each building shall be in accordance with the plans under Exhibit C. A substantial deviation, as determined by the Community

Development Director, from the architecture approved shall be processed in accordance with the applicable provisions of state law provided in California Government Code sections 65450. Any minor modifications to the materials used shall be subject to the review and approval of the Community Development Director.

PL28. All trash cans shall be kept in the garage or out of public view.

PL29. All vehicles shall be prohibited from parking in driveway areas and in front of garages.

PL30. All residents' vehicles shall be stored in the garages at all times while on the site. Residents shall not be allowed to use Guest Parking for their own vehicles.

PL31. Any revisions to the CC&Rs shall require prior city approval.

TM 1. Applicant shall be required to record a final map to merge the four existing lots and subdivide the lots into two as well as provide for 75 condominium units, regardless of whether applicant desires to sell or rent the townhouse style condominium units. Nothing in this condition shall prohibit applicant from filing a lot line adjustment to separate Subareas A and B prior to the recording of the final map at applicant's discretion.

TM 2. The final tract map shall be recorded with the Los Angeles County Recorder's office within a period not to exceed the term of the Development Agreement or any extension thereof. If said map is not recorded within such time, the life of the map shall be deemed expired and said approval shall be considered null and void.

TM 3. In accordance with Section 17.08.170 of the Gardena Municipal Code, the applicant shall dedicate all necessary rights-of-way for public improvements and shall construct such improvements at no cost to the City. Such improvements may include, but not be limited to, site grading and drainage, new sidewalk, curb and gutter, driveways, street trees, roadway paving, street lights, traffic control devices, gas mains, electric power lines, telephone and cable lines, all of which shall be installed in accordance with the specifications of the Public Works Department. All utilities shall be underground.

TM 4. Pursuant to Government Code § 66495, at least one exterior boundary line of the land being subdivided must be adequately monumented or referenced before the map is recorded.

TM 5. In accordance with Government Code § 66473.1, the design of the subdivision shall provide, to the extent feasible, for future passive/natural heating or cooling opportunities.

TM 6. Private driveways shall be indicated on the final map as “Private Driveway and Fire lane” with the widths clearly depicted and shall be maintained in accordance with the Fire Code. All required fire hydrants shall be installed, tested, and accepted prior to construction.

TM 7. Prior to initial phase associated with building construction, all above ground and underground infrastructure shall be installed.

TM 8. The applicant shall pay in lieu park fees in accordance with Chapter 17.20 of the Gardena Municipal Code at the rate of $10,000 per unit prior to the recording of the final map.

TM 9. Model homes may be permitted prior to final map recordation provided that all Fire Department requirements for health and safety are satisfied prior to issuance of a building permit.

Saiko Investment Corporation, certifies that it has read, understood, and agrees to the Project Conditions listed herein.

_____

Saiko Investment Corporation, Representative

By_____

Dated_____

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 Section 6103

DEVELOPMENT AGREEMENT
BY AND BETWEEN
THE CITY OF GARDENA
AND
16911 NORMANDIE ASSOCIATES, LLC

THIS AGREEMENT SHALL BE RECORDED WITHIN TEN DAYS OF EXECUTION BY ALL PARTIES HERETO PURSUANT TO THE REQUIREMENTS OF GOVERNMENT CODE SECTION 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 16911 NORMANDIE ASSOCIATES, LLC, a Delaware legal entity authorized to do business in California ("Developer") as of this ___ day of_____, 2025. 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.

"Affordable Unit" means the seven (7) units affordable to Moderate Income Households located in Subarea A.

"Agreement" means this Development Agreement.

"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 _____, 2025 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, landscaping and irrigation plans, which are approved by 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 Section 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, Section 15000 *et seq.*

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"City" means the City of Gardena, a municipal corporation.

"City Council" means the City Council of the City of Gardena.

"Developer" means 16911 Normandie Associates, LLC, a Delaware legal entity authorized to do business in California, and its Transferees. In the event Subarea A and Subarea B, are separately sold, assigned, or transferred, "Developer" can refer to the owner of Subarea A and Subarea B, individually or collectively.

"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 Section 36937.

"EIR" means the environmental impact report prepared for the Project pursuant to California Public Resources Code Section 21100 *et seq.*

"Enabling Ordinance" means Ordinance No. 1878, approving this Development Agreement on _____, 2025.

"Fee" means any of the following:

- The impact fee required by Chapter 15.48 of the GMC, currently set at one thousand dollars ($1,000) per unit as of the Effective Date, intended to cover the burden of the new multi-family residential facilities on open space, drainage and other public facilities and services ("Impact Fee"). The Impact Fee is applicable to all units in the development.

- The in-lieu fee required by Chapter 17.20 of the GMC, currently set at ten thousand dollars ($10,000) per unit as of the Effective Date, intended to cover the burden of new residential subdivisions on park or recreational resources and facilities related to the For-Sale Units ("Quimby Fee"). The Quimby Fee is applicable only to the For-Sale Units and is not applicable to any apartment unit.

"Final Map" means the final map associated with Vesting Tentative Tract Map. No. 2-21.

"For-Sale Units" means the 75 for-sale townhome units contained in Subarea B identified in the Site Plan.

"Future Approvals" means such subsequent discretionary and ministerial entitlements, including but not limited to a ministerial lot line adjustment and building permits, which are required to develop the Project in addition to the Project Approvals, and which are applied for by Developer and approved by City. Once approved, a Future Approval becomes part of the Project Approvals.

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"General Plan" means the City's general plan adopted pursuant to California Government Code Section 65350 *et seq.*

"GMC" means the Gardena Municipal Code.

"Moderate income household" means a household earning up to one hundred twenty percent (120%) of area median income adjusted for family size as defined in Health & Safety Code Section 50093.

"Mitigation Measures" means the mitigation measures set forth in the Mitigation Monitoring and Reporting Plan contained in the Project Approvals (EIR SCH# 2023050241).

"Off-Site Improvement Area" refers to either of the following (together "Off-Site Improvement Areas"):

- The area located along the south side of 169th Street, west of the Property, between Brighton Way and the alley west of Brighton Avenue where improvements would be constructed pursuant to Section 4.6.1 of this Agreement, as shown in Exhibit E.

- The area located along South Normandie Avenue on the Property frontage where improvements would be constructed pursuant to Section 4.6.2 of this Agreement, as shown in Exhibit E.

- The areas located along the south side of 169th Street, the west side of Normandie Avenue and the north side of 170th Street on the Property frontage where improvements would be constructed pursuant to Section 4.6.3 of this Agreement, as shown in Exhibit E.

"Party" means City or Developer.

"Parties" shall mean both City and 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:

- EIR pursuant to California Public Resources Code Section 21100 *et seq.*, No. EA–20-21, as certified by Resolution No. 6683 on _____, 2025 including the Mitigation Measures;

- General Plan Amendment No. 3-21, as approved by Resolution No. 6684 on _____, 2025 including a change in the Land Use Map;

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- Normandie Crossing Specific Plan No. 1-21, as adopted by Ordinance No. 1878 on _____, 2025;

- Zone Change No. 4-21, as approved by Ordinance No. 1878 on _____, 2025 including a change in the Zoning Map;

- Zoning Code Amendment No. 6-21, as approved by Ordinance No. 1878 on _____, 2025;

- Development Agreement No. 2-21 as approved by Ordinance No. 1878 on _____, 2025;

- Site Plan Review No. 11-21, as approved by Ordinance No. 1878 on _____, 2025;

- Vesting Tentative Tract Map No. 2-21, as approved by Resolution No. 6685 on _____, 2025; and

- Affordable Housing Agreement as approved by Ordinance No. 1878 on _____, 2025.

"Property" refers to that approximate 5.25 acres which is described in Exhibit A, attached hereto, and incorporated herein by reference. Property is divided into Subarea A and Subarea B.

"Rental Units" means the 258 rental units contained in Subarea A identified in the Site Plan.

"Site Plan" refers to the development plans for the Property as shown on Exhibit B, attached hereto, and incorporated herein by reference.

"Specific Plan" or "NCSP" means the Normandie Crossing Specific Plan, as may be amended over time.

"Subarea" refers to either of the following (together "Subareas"):

- "Subarea A" refers to the ground lot and the improvements located on the 2.14-acre northeastern portion of the Property that will be developed with 258 Rental Units as identified in the Site Plan; and

- "Subarea B" refers to the separate 3.11-acre ground lot located on the southern portion of the Property that will be developed with 75 For-Sale Units as identified in the Site 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

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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 of Developer under this Agreement with respect to all or a portion of the Property through sale, assignment, or transfer. In the event Subarea A and Subarea B, are sold, assigned, or transferred independently, "Transferee" can refer to the Transferee of Subarea A and Subarea B, individually or collectively. Transferee, however, does not include future owners of the individual For-Sale Units located within Subarea B.

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 Section 65865 *et seq*., 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 NCSP.

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, 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 City's General Plan, as amended pursuant to the Project Approvals.

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, including seven (7) Affordable Units;

2.7.2. Providing individual home ownership opportunities by selling the townhome units in Subarea B.

2.7.3 Providing fiscal benefits to City's general fund in terms of increased utility, business license, and property and sales tax revenue;

2.7.4 Providing transit passes pursuant to Section 5.6;

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2.7.5 Providing short-term construction employment within City;

2.7.6 Providing a Local Hiring/Local Buying Program for Construction pursuant to Section 5.7, as outlined in Exhibit C;

2.7.7 Providing millions of dollars in local spending, benefiting businesses within the City; and

2.7.8 Providing five (5) vehicle parking spaces within Subarea A, accessible from Normandie Avenue, that are also available to the public.

2.8 On December 3, 2024, 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, including the EIR.

2.9 On January 14, 2025, 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. 6684 approving the FEIR.

2.10 All of the Property and Off-Site Improvement Areas are subject to this Agreement. This Agreement assigns certain rights and obligations specifically to either Subarea A or Subarea B, and such rights and obligations are explicitly identified herein. Rights and obligations that are not explicitly assigned only to Subarea A or to Subarea B, apply to both Subarea A and Subarea B.

3. Binding Effect. The burdens of this Agreement are binding upon, and the benefits of the Agreement inure to, City and Developer and each successive Transferee in interest thereto and constitute covenants that run with the land during the term of the Agreement.

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 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 and Obligations Upon Sale, Assignment, or Transfer.

3.2.1 Developer may sell, 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 upon approval of City.

3.2.2 In the event either Subarea is sold, assigned, or transferred independently, Transferee of such Subarea, or portion thereof, is not responsible for any and all rights and obligations that are assigned to the other Subarea.

3.3 Liabilities Upon Transfer. Upon the delegation of the rights and obligations under this Agreement and the sale, transfer, or assignment of all or any portion of the Property or Subarea,

Developer will be automatically released from its obligations under this Agreement with respect to the Property, Subarea, or portion thereof, so transferred arising prior and subsequent to the effective date of such transfer, if: (i) Developer has provided to 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 or Subarea so transferred by executing an Assignment and Assumption Agreement in the form of Exhibit D attached hereto and incorporated herein by reference. Upon any sale, assignment, or transfer of any portion of the Property or Subarea and the express assumption of Developer's rights and obligations under this Agreement by such Transferee, City shall look solely to the Transferee for compliance with the provisions of this Agreement as such provisions relate to the portion of the Property or Subarea 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 portion of the Property or Subarea transferred. A default by any Transferee shall only affect that portion of the Property or Subarea 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 or Subarea 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 or Subarea owned by such Transferee, and any amendment to this Agreement between City and a Transferee shall only affect the portion of the Property or Subarea owned by such Transferee.

3.4 Resumption of Rights. If Transferee defaults with respect to any provision of this Agreement that relate to the portion of the Property or Subarea acquired by such Transferee, Developer or Transferee in control of the rest of the Property or Subarea/other Subarea may, but is not obligated to, resume Transferee's obligations and cure Transferee's default 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.

4.2 Entitlement to Develop. Developer is granted the vested right to develop the Project subject to 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 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 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 Project Approvals and any Future Approvals.

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4.4 Subsequent Rules. Subsequent Rules cannot be applied by City to any part of the Property unless Developer gives 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 and Conditions.

4.5.1 Subject to Sections 4.5 and 5.3 of this Agreement, all fees, exactions, Mitigation Measures and conditions that are applicable to the Project are set forth in the Applicable Rules, Project Approvals, any Future Approval, and this Agreement. In the event of a conflict between the fees, exactions and/or Mitigation Measures specified in the Applicable Rules, Project Approvals other than this Agreement and this Agreement, this Agreement shall control.

4.5.2 Except as otherwise provided in this Agreement, and specifically excluding fees set by entities not controlled by City that are collected by City, 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 Developer shall pay the amount of the application and permit 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.

4.5.4 Developer shall not be required to pay any new or increased fees dedicated to the same purposes as the Impact Fee that is in effect at the time of the Effective Date or that conflict with the Project Approvals or this Agreement. For any avoidance of doubt, any fee dedicated to the same purposes as the Impact Fee not in effect at the time of the Effective Date or any fee that conflicts with the Project Approvals or this Agreement adopted by the City Council shall not be assessed against the Project. Developer shall not be required to pay any new impact fee for a purpose other than that set forth in GMC section 15.48.080 that is not in effect at the time of the Effective Date.

4.5.5 Calculation and Payment of Fees.

4.5.5.1 Developer shall pay the Impact Fee of one thousand dollars ($1,000) for each For-Sale Unit and for each Rental Unit in both Subarea A and Subarea B consistent with Chapter 15.48 of the GMC. The Impact Fee for Subarea A shall be paid prior to the issuance of the building permit for the Rental Units; and the Impact Fee for Subarea B shall be paid prior to the issuance of the building permit for each building for the For-Sale Units.

4.5.5.2 Developer shall pay the Quimby Fee of ten thousand dollars ($10,000) for each of the 75 For-Sale Units located in Subarea B consistent with GMC Chapter 17.20. Notwithstanding GMC Chapter 17.20 , the Developer shall pay the Quimby Fee at the issuance of the building permit for each For-Sale Unit.

4.5.5.3 In the event Subarea A and Subarea B are sold, assigned, or transferred independently, the Impact Fees required by this Section 4.5 for each Subarea shall be assigned independently so that Developer or Transferee in control of Subarea A shall be solely

responsible for the fees associated with Subarea A and Developer or Transferee in control of Subarea B be solely responsible for the fees associated with Subarea B.

4.5.6 This Section 4.5 shall not be construed to limit the authority of 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 City.

4.6 Off-Site Improvements. Off-site improvements described in this section and shown in the Site Plan shall be funded and constructed as follows and as shown in Exhibit E.

4.6.1 169th Street Sidewalk Improvements. Developer of Subarea A shall fund and construct approximately 266 linear feet of off-site sidewalk improvements along the south side of 169th Street, just west of the Property, between Brighton Way and the alley just west of Brighton Avenue as outlined in Exhibit E attached. The sidewalk improvements shall be constructed pursuant to Municipal Code Section 17.08.170 and designed to be consistent with the City General Plan Circulation Element requirements for a Local Street. Notwithstanding the foregoing, it is understood that these improvements shall be limited to installation of sidewalk and shall not include replacing existing curbs, gutters, storm drains and culverts or installing street trees or streetlights.

4.6.2 Normandie Avenue Railroad Improvements.

The railroad improvements fronting South Normandie Avenue contemplated in the approved GO 88-B shall be completed before the earlier of (1) expiration of the CPUC GO 88-B approval, subject to any permitted extensions granted by the CPUC, or (2) issuance of a certificate of occupancy for the apartment building located in Subarea A of the Normandie Crossing Specific Plan. These improvements require the following:

4.6.2.1 Developer shall fund and construct approximately 210 linear feet of sidewalk improvements along the west side of Normandie Avenue identified as "REALIGNED SIDEWALK F 60-DEGREE CROSSING OVER TRACKS WITH CHANNELIZING HANDRAILING" in Exhibit E, attached.

4.6.2.2 Developer shall fund and complete the following railroad track and roadway improvements along South Normandie Avenue pursuant to current California Public Utilities Commission standards and Union Pacific Railroad guidelines as outlined in Exhibit E attached:

- Removing approximately 170 linear feet of railroad spur tracks, which enters the Project site and formerly served the southernmost industrial building (i.e., 16911 South Normandie Avenue), upon approval from the Union Pacific Railroad.

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- Removing approximately 830 linear feet of railroad spur track, which enters the Project site and formerly served the central industrial building (i.e., 16907 South Normandie Avenue).

- Constructing a new median both north and south of the track alignment.

- Installing new warning devices and tactile warning strips on the South Normandie Avenue west sidewalks.

- Refreshing (i.e., adding a slurry seal) the railroad crossing pavement markings immediately north and south of the track alignment.

These changes require replacing all sidewalk, curb, gutter, curb ramps, driveways, traffic signs, curb drains, marked pavement and spandrel front the Property along Normandie Avenue that are impacted by the railroad improvements.

4.6.2.3 If Developer sells, assigns, or transfers either Subarea, the transfer agreement shall make clear that the obligation to install the Normandie Avenue improvements is required of the first Subarea to be developed.

4.6.3 Other Off-Site Improvements. The following offsite improvements required pursuant to Conditions of Approval PW6, PW7 and PW8 shall be the sole responsibility of each Subarea as depicted in Exhibit E:

- Condition of Approval PW6. Developer shall remove and replace all sidewalk, curb, gutter, curb ramps, driveways, traffic signs, curb drain, marked pavement, and spandrel fronting the Property along 170th Street, 169th Street and the portion of Normandie Avenue north of the improvements required by Section 4.6.2 of this Agreement.

- Condition of Approval PW7. Developer shall submit improvement plans for trees to be located in the sidewalks on 169th Street and Normandie Avenue as shown Exhibit E to the City Public Works Department for review and approval.

- Condition of Approval PW8. Developer shall provide a ten (10)-foot radii corner cut-off at the northwest corner of Brighton Way and 169th Street, and shall make all improvements necessary to maintain and/or widen public access.

4.7 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.

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4.8 Timing of Development.

4.8.1 Construction of development within Subarea A and Subarea B may begin independently of each other. There shall be no restriction regarding the phasing of construction.

4.8.2 Issuance of building permits for demolition, grading or construction within Subarea A and Subarea B, as well as issuance of a certificate of occupancy for the 258 Rental Units located within Subarea A, may all occur prior to recordation of the Final Map. However, Developer must record the Final Map prior to the issuance of a certificate of occupancy for any of the 75 For-Sale Units located within Subarea B. In the event Subarea A and Subarea B are sold, assigned, or transferred independently prior to recordation of the Final Map, the obligation to record the Final Map shall be assigned to the Developer or Transferee of Subarea B. The City shall not unreasonably withhold certificate of occupancy for any residential unit.

4.8.3 In *Pardee Construction Co. v. City of Camarillo* (*Pardee*) (1984) 37 Cal.3d 465, 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, including Section 4.8.1.

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.

4.8.4 The Developer is under no obligation to develop the Project, including the improvements planned for either Subarea A or B. Developer (or any future Transferee) shall determine in its sole and absolute discretion whether to proceed with construction and development of Subarea A, Subarea B or both.

4.9 Moratorium.

4.9.1 City shall not impose a moratorium on any portion of the Property unless such is necessary to protect a significant threat to the immediate health, safety and welfare of the City.

4.9.2 Except as provided in Section 4.9.1 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

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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 City's compliance with moratoria or other limitations mandated by other governmental agencies or court-imposed moratoria or other limitations.

4.10 Term. This Agreement shall be in effect for a period of five (5) years from the Effective Date of the Enabling Ordinance. However, Developer or City shall be entitled to, by written notice to the other Party prior to the Agreement's expiration, one (1) five-year (5-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 five-year (5-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. All Project Approvals shall be extended for the full and complete length of the Term, including any extensions thereof, and shall not expire during the Term of this Agreement. The term of Vesting Tentative Tract Map No. 2-21 shall be the longer of the following: 1) the term of this Agreement, including extensions; or 2) the term that Vesting Tentative Tract Map No. 2-21 would otherwise be entitled to under the applicable provisions of the Subdivision Map Act.

4.11 Future Approvals.

4.11.1 Minor Modifications to Project. Developer may make minor changes to the Project/Project Plans, the Project Approvals other than this Agreement, ("Minor Modifications") which shall be processed ministerially 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 that the Site Plan is substantially similar to the approved Site Plan attached hereto as Exhibit B and complies with the Specific Plan.

(ii) Changes not listed as a Major Modification as defined below.

(b) City shall not unreasonably withhold or delay approval of any Minor Modification. 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.

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(c) A Minor Modification approved by City shall continue to constitute a Project Approval as referenced herein.

4.11.2 Major 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) A modification to the Site Plan where the Director cannot determine that the Site Plan is substantially similar to the approved Site Plan attached hereto as Exhibit B, or where the Director cannot determine that the Site Plan complies with the Specific Plan. Approval of the revised Site Plan shall also require compliance with Chapter 18.44 of the Gardena Municipal Code.

(b) Any change which constitutes a "significant modification" to the Specific Plan as identified in Chapter 7, Section VI thereof.

4.11.3 Ministerial Lot Line Adjustment. Nothing in this Agreement prevents the Developer from filing an application for a ministerial Lot Line Adjustment prior to the recording of the final map at Developer's discretion pursuant to the provisions of the Subdivision Map Act (Government Code Section 66410 *et seq.*).

4.11.4 Issuance of Building Permits. No building permit, final inspection or Certificate of Occupancy will be unreasonably withheld, conditioned, or delayed from 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 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.

4.11.5 Street Closure Permits. City hereby recognizes that certain street closures and/or sidewalk closures are required to physically construct the Project. As such, the following shall apply:

(a) Parking along the south side of 169th Street and the north side of 170th Street shall be allowed to be restricted to construction vehicles only for the parking lane along the property boundaries where not prohibited by red curb or signage during working hours. Parked vehicles must conform to all rules and regulations, such as distance from the curb.

(b) The sidewalks along the south side of 169th Street and the north side of 170th Street may be closed by the applicant for up to 12 months each during construction, with pedestrian access diverted to the opposite side of the street. The Public Works Director may extend the closure upon written application. The closed sidewalks may be used for the temporary staging of materials.

(c) At all times developer must maintain 20 feet of clear asphalt for the passage of vehicles, including emergency vehicles, on both 169th Street and 170th Street. No storage of materials on, or blockage of, the streets shall be allowed.

(d) Developer shall not use Brighton Way at any time for the parking of any vehicles, including construction worker vehicles, or for the loading or unloading of materials.

5. Developer Agreements.

5.1 General. Developer shall be responsible for all obligations assigned to the portion of the Property or Subarea under Developer's control contained in: (i) this Agreement; (ii) the Project Approvals, including, without limitation, all conditions and 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. To the extent any conditions of approval or requirement imposed by any Project Approval, other than the Mitigation Measures, conflicts with the Agreement, the terms of the Agreement shall control. The Mitigation Measures shall control over any other Project Approval, including this Agreement.

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 and the Project Approvals. If any such Mitigation Measures or conditions are rejected by a governmental agency with jurisdiction, Developer may implement reasonably equivalent substitute mitigation, consistent with CEQA, to 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 Affordable Housing.

5.2.1 Developer of Subarea A shall provide a total of seven (7) of the Rental Units for persons who qualify as Moderate income households, at or below one hundred twenty percent (120%) of the Area Median Income, for 55 years as further detailed in accordance with the housing covenant to be recorded against the property as set forth in Exhibit F (Affordable Housing Agreement [Including Rental Restrictions]), attached hereto. The recordation of the affordable housing covenant shall occur before the issuance of the first building permit for Subarea A or immediately after the recording of the tract map or a lot line adjustment, whichever occurs first. If the tract map or lot line adjustment is recorded prior to issuance of building permits for Subarea A, the covenant need only be recorded against Subarea A. The Affordable Units shall consist of: two (2) studio units; four (4) one-bedroom units; and one (1) two-bedroom unit all located within Subarea A.

5.2.2 Developer shall pay for City's costs related to the drafting of the affordable housing agreement and rental restrictions and the affordable housing guidelines upon submission of any invoices by the City.

5.2.3 Developer shall pay for actual costs of an independent third-party affordable housing consultant, chosen by City, to provide income limit verification that meets the affordable housing requirements of this Section 5.2. The independent third-party consultant shall charge Developer rates that are competitive to the market area. Developer shall provide the necessary tenant documentation to the selected third-party affordable housing consultant.

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5.2.4 In the event Subarea A and Subarea B, are sold, assigned, or transferred independently, the Affordable Units required under this Section 5.2 shall exclusively be assigned to Developer or Transferee of Subarea A.

5.2.5 In the event Subarea A is not constructed, there is no obligation to provide the Affordable Units required under this Section 5.2.

5.2.6 The requirement to provide Affordable Units required under this Section 5.2 is mandatory whether or not the For-Sale Units are developed in Subarea B.

5.3 Fees. Subject to the provisions of Section 4.5 above, Developer shall pay the fees in effect at the time of the Effective Date of this Agreement that do not conflict with this Agreement and/or the other Project Approvals. Developer waives any and all rights it may have to challenge development fees that are in effect at the time of the Effective Date. However, 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 Sale of Subarea B – Townhome Units. Developer shall be required to sell the townhome units developed in Subarea B. Lease or rental of these units by the Developer, or by an assignee, purchaser, or transferee of all of the townhome units, shall not be allowed. Nothing herein prevents an individual homeowner from renting or leasing the unit after acquisition from Developer.

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 Section 7051.3 or State Board of Equalization Compliance Policy and Procedure Manual Section 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.

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5.6 Transportation Demand Management. Developer shall implement the following Transportation Demand Management measures in Subarea A pursuant to the Specific Plan.

5.6.1 Unbundled Parking. There shall be a charge for residential vehicle parking spaces for Rental Units within Subarea A. The Developer shall unbundle automobile parking charges from the rents or other fees charged for leasing residential units.

5.6.2 Pre-Leasing for Area Employees. Market rate Rental Units within Subarea A shall be marketed exclusively for a thirty-day period to employees working within a five-mile radius of the development, before the Rental 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 certificate of occupancy for Subarea A, Developer shall demonstrate compliance with the pre-leasing marketing plan. Affordable rental units shall be subject to a separate pre-leasing marketing plan.

5.6.3 Transit Information. To ensure that residential tenants of Rental Units within Subarea A are aware of transit options and TDM programs available to them, an information board or kiosk shall be posted in a central location in Subarea A. Developer shall also provide transit information online, and the website will be advertised on the information board or kiosk. This information shall also be included on the website for Rental Units within Subarea A.

5.6.4 On-site Residential Bicycle Parking. Developer shall provide bicycle parking spaces for the residents of the Rental Units within Subarea A (69 spaces, including 65 long-term and 4 short-term spaces). All bicycle parking shall be located in a safe, convenient location, encouraging the use of bicycle transportation by residents and guests of Subarea A.

5.6.5 Ride-Sharing Pick-Up/Drop-Off. A designated loading area within Subarea A 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.

5.6.6 One-time Free Monthly Pass. In accordance with the Specific Plan, during the term of this Agreement, Developer shall offer all new residents of the Rental Units within Subarea A who commence a 12-month lease a one-time free monthly Zone 1 EZ Transit Pass.

5.6.7 In the event Subarea A and Subarea B, are sold, assigned, or transferred independently, the Transportation Demand Management measures required under this Section 5.6 shall be assigned to Developer or Transferee of Subarea A.

5.7 Local Hire. Developer shall use best efforts to hire locally-based construction workers as set forth in the Local Hiring/Local Buying Program for Construction attached hereto as Exhibit C.

5.8 Maintenance Obligations. 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.

5.9 Parking for Public Use. In recognition of the loss of parking spaces on the south side of 169th Street fronting the Property to permit said section of 169th Street frontage to qualify as a fire aerial apparatus lane per Section 6.6 of this Agreement, Developer shall provide five (5) vehicle parking spaces for public use in the surface parking area within Subarea A accessible from Normandie Avenue prior to the issuance of the Certificate of Occupancy for the Rental Units. No vehicle may be parked in these public parking spaces for more than twenty-four (24) consecutive hours.

5.10 Fire Lane on 169th Street. If Subarea B develops first, Developer of Subarea B shall not red-stripe any more spaces than required to ensure adequate space for a fire aerial apparatus lane on the south side of 169th Street as may be required by the Fire Department or to ensure necessary sight distance on the south side of 169th Street.

6. City Agreements.

6.1 Expedited Processing. City shall process, at Developer's expense, in an expedited manner, all plan checking, excavation, grading, building, street closure, 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 City's accelerated plan check process under the Applicable Rules. Without limiting the foregoing, if requested by Developer, 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, City shall reasonably cooperate with 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, City shall reasonably cooperate with Developer in any dealings with federal, state and other local governmental and quasi-governmental entities concerning issues affecting the Property. City shall keep Developer fully informed with respect to its communications with such agencies which could impact the development of the Property. 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 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 City or 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. City must not stipulate to or cooperate in the issuance of any such order.

6.4 Performance of Director Duties. City shall ensure that a person or persons are

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designated at all times to carry out the duties of the Director set forth in this Agreement.

6.5 No Amendment to Specific Plan. City shall not initiate any amendment to the Specific Plan during the Term of this Agreement without Developer or its successor's written agreement and consent.

6.6 Removal of Street Parking. In exchange for Developer providing five (5) vehicle parking spaces within Subarea A that may also be used by the public per Section 5.9 of this Agreement, the City shall prohibit parking on the south side of 169th Street fronting the Property to permit said section of 169th Street frontage to qualify as a fire aerial apparatus lane as required by the Los Angeles County Fire Department.

6.7 Termination of Easements on 170th Street. In light of the conflicts between the Site Plan and the instruments listed in Sections 6.7.1 and 6.7.2 of this Agreement, City shall record a covenant terminating all responsibilities and rights granted under said instruments immediately after execution of this Agreement.

6.7.1 "Street Easement" recorded August 16, 1967 between James G. Bowie and the City granted for "public road, street and highway purposes and also for storm drain and surface water drainage purposes and all incidental purposes" (Record No. 2818).

6.7.2 "Quitclaim Deed" recorded November 25, 1968 between James G. Bowie and the City granted for "vehicular access rights to 170th Street across the southerly boundary" of the real property described therein (Record No. 2905).

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 Wildlife, 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

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Effective Date ("Periodic Review"), the Director shall review the extent of Developer's good faith substantial compliance with the terms and provisions of this Agreement, as well as the performance by City of its obligations under this Agreement. Developer responsibilities required under the substantial compliance review pursuant this Section 8 terminates when certificates of occupancy have been issued for all buildings in both Subarea A and Subarea B.

8.2 Good Faith Compliance. During each Periodic Review, 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 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 Developer's material obligations under this Agreement. In the event Subarea A and Subarea B, or any portion thereof, are sold, assigned, or transferred independently, obligations under this Section 8 shall be performed independently for each Subarea and Developer or Transferee of each Subarea shall be responsible for the obligations under this Section 8 for its respective Subarea.

8.3 City Report - Information to be Provided to Developer. At least fourteen (14) days before the annual anniversary of the Effective Date, City must deliver to 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 City Report provided to Developer in accordance with Section 8.3 above.

8.5 Notice of Non-Compliance; Cure Rights. If, after reviewing 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 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 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 City's issuance of any final decision pursuant to Code of Civil Procedure Section 1094.5 without complying with the procedures set forth in Section 10.4 below.

8.7 Failure of Periodic Review. City's failure to review, at least annually, compliance by 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 City fails to provide the City

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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 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 City determines that a Default by Developer may have occurred, City shall give written notice to Developer of its intention to terminate this Agreement as to the rights and obligations assigned to Developer 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, Developer shall be given an opportunity to be heard. If the City Council finds, based upon the evidence, that Developer is in Default under this Agreement, the City Council may modify or terminate this Agreement as to the rights and obligations assigned to the defaulting Developer. If the defaulting 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 as to the rights and obligations assigned to the defaulting Developer 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

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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. City and 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 City and 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. City and 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 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. 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 Developer and representatives of such lender(s) to provide within a reasonable time period City's response to such requested interpretations. 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 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 City in the manner specified herein for giving notices, shall be entitled to receive a copy of any Notice of Violation delivered to Developer.

11.3 Mortgagee's Time to Cure. 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 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 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 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. A Mortgagee that takes title to Subarea A or B, independently, shall only secure rights under this Agreement with respect to that particular Subarea.

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 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 Developer or its property, 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 City to enter into a new development agreement pursuant to this Section.

12. Estoppel Certificate. At any time and from time to time, Developer may deliver written notice to City and City may deliver written notice to Developer requesting that such Party certify in writing that, to the knowledge of the certifying Party: (i) this Agreement is in full force and

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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 City to deliver such a written notice within such time shall constitute a conclusive presumption against City that, except as may be represented by Developer, this Agreement is in full force and effect without modification, and that there are no uncured breaches or Defaults in the performance of Developer. The Director shall be authorized to execute, on behalf of City, any Estoppel Certificate requested by Developer. City acknowledges that a certificate may be relied upon by successors in interest to 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 Developer to the Planning Commission, and thereafter, if necessary, to the City Council pursuant to the GMC. 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 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, 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 (i.e., Subarea A or B), or upon completion of performance of this Agreement or its earlier revocation and termination, City shall provide Developer, upon Developer's request, with a statement ("Certificate of Performance") evidencing said completion or revocation and the release of Developer from further obligations hereunder, except for any ongoing obligations hereunder. The Certificate of Performance shall be signed by

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the appropriate agents of Developer and 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 Section 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 Developer, and upon compliance with the provisions of Government Code Section 65867. A future Transferee with title to Subarea A or B may only amend or terminate the Agreement with the mutual consent of the City with respect to Subarea owned by the Transferee.

15. Indemnification/Defense.

15.1 Indemnification. Developer agrees to indemnify and hold City harmless from and against any claim, action, damages, costs (including, without limitation, attorney's fees), injuries, or liability, arising from 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 City's sole negligence or intentional misconduct. Should 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 City (at City's request and with counsel satisfactory to City) and will indemnify 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 City's sole negligence or intentional misconduct. For purposes of this Section, "City" includes the City of Gardena's elected officials, appointed officials, officers, consultants, and employees.

15.2 Defense of Agreement. If City accepts Developer's indemnification and defense as provided in Section 15.1 above, 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 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 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.

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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: gtsujiuchi@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:
16911 Normandie Associates, LLC
134 Lomita Street
El Segundo, CA 90245
Attention: Fred Shaffer
Phone: 310-213-6560
Email: fshaffer@saikoinv.com

With a Copy to:
Rand|Paster|Nelson
633 W. Fifth Street, Ste. 5880
Los Angeles, CA 90071
Attention: Dave Rand
Phone: 213-557-7224
E-mail: dave@rpnllp.com

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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

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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 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 Section 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. 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 City by Developer as provided herein shall be held and used by City only for the purposes contemplated herein or otherwise provided in such conveyance, and City shall not take or permit to be taken (if within the power or authority of City) any action or activity with respect to such portion of the Property that would deprive 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.

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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, 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, 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:

16911 Normandie Associates, LLC

By:_____
Steven Ludwig, Manager

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EXHIBIT A

LEGAL DESCRIPTION

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EXHIBIT B

SITE PLAN

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EXHIBIT C

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EXHIBIT D

LOCAL HIRING/LOCAL BUYING PROGRAM FOR CONSTRUCTION

Local Hiring and Buying Policy for Construction. Developer shall implement a local hiring and buying policy (the "Local Hiring and Buying Policy") for construction of the Project, consistent with the following guidelines:

1. Purpose. The purpose of the Local Hiring and Buying Policy is to 1) 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; and 2) during Active Construction, encourage the use construction related materials and supplies for the Project that come from businesses based in the City of Gardena whenever possible.

2. Definitions. Unless provided in this Local Hiring and Buying Policy, the definitions contained in the Development Agreement by and between the City of Gardena ("City") and 16911 Normandie Associates, LLC dated [DATE] shall apply."

   a. "Active Construction" means the time during which permits issued by the Building & Safety Division for any building within the Project are active, and does not mean any subsequent permit issued by the Building & Safety Division for any building within the Project after a certificate of occupancy has been issued for that building.

   b. "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.

   c. "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).

   d. "Low Income Individual" means a resident of the City of Gardena whose household income is no greater than 80% of the Median Income.

   e. "Median Income means the median family income published from time to time by HUD for the Los Angeles-Long Beach Metropolitan Statistical Area.

   f. "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.

Local Hiring Program for Targeted Job Applicants.

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 and Buying 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. 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 and Buying Policy shall continue to apply to the construction of the Project until the final certificate of occupancy for the Project has been issued by City.

8. Developer and its contractor(s) shall abide by all applicable State and local labor regulations.

Local Buying Program for Construction Related Materials and Supplies.

9. Local Supplier Requirements. Developer and its contractors shall use best faith efforts to ensure that construction related materials and supplies used during Active Construction of the project come from businesses based in the City of Gardena whenever possible. Construction related materials includes interior furnishings for the residential units.

    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.

10. Local Supplier Report. Developer shall prepare a biannual report for the City's Economic Development Manager which shall quantify in dollar amount the construction related materials and supplies procured from businesses based in the City of Gardena and the amount of construction related material and supplies procured elsewhere. The report shall include a description of efforts made to procure construction related materials and supplies from Gardena businesses. Developer responsibilities related to the Local Supplier Report required by this Section only apply during Active Construction.

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 16911 Normandie Associates, LLC , a Delaware legal entity authorized to do business in California ("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 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 _____, _____.

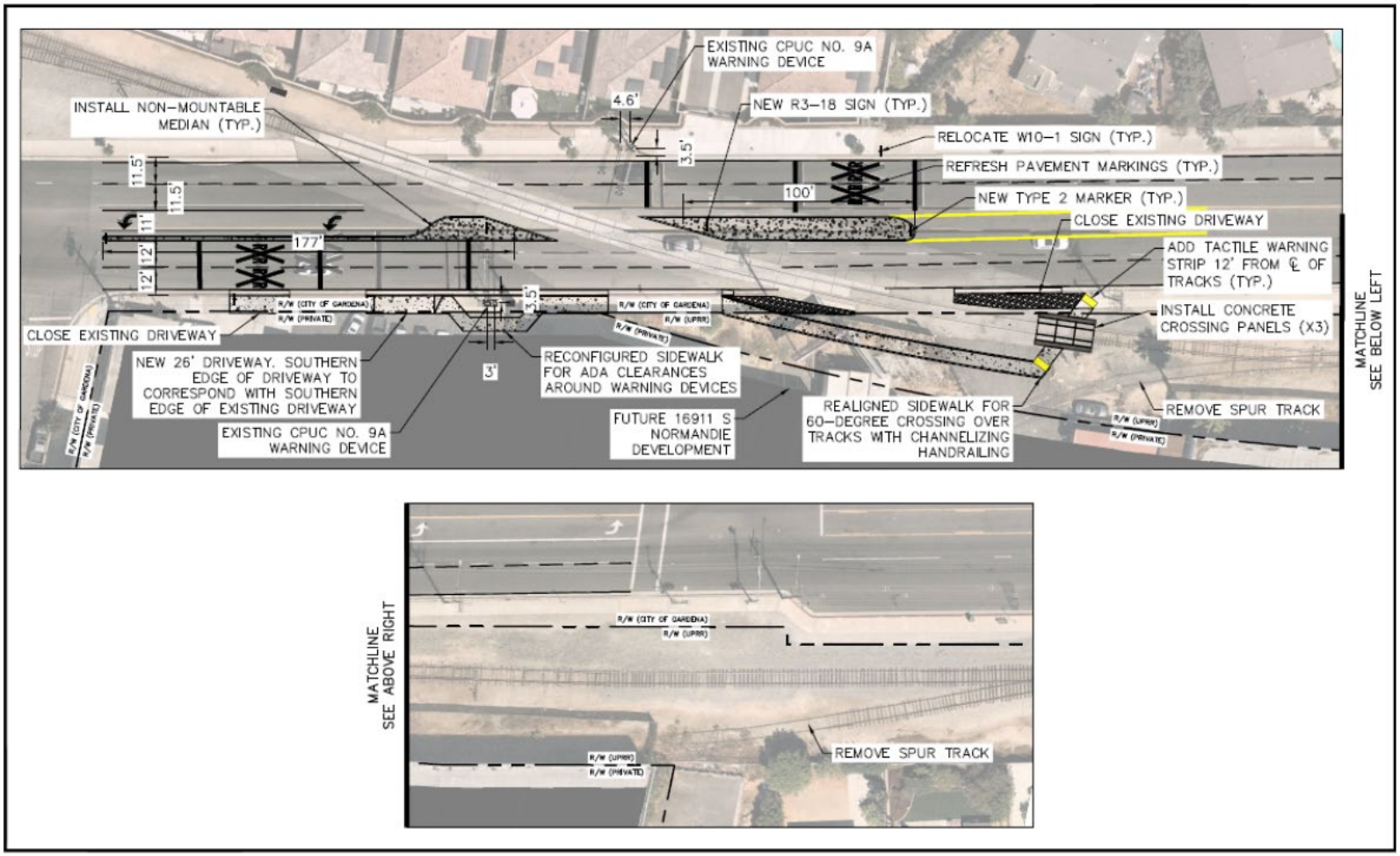
	CITY OF GARDENA By: _____ Planning and Community Development Director

EXHIBIT E

OFF-SITE IMPROVEMENT PLANS

169th Street Sidewalk Improvements – To be completed with Subarea B

Normandie Railroad Improvements– To be completed prior to expiration of GO 88-B or certificate of occupancy for Subarea A



Kimley»Horn

April 2023

NORMANDIE AVE GRADE CROSSING IMPROVEMENTS

Other Off-Site Improvements

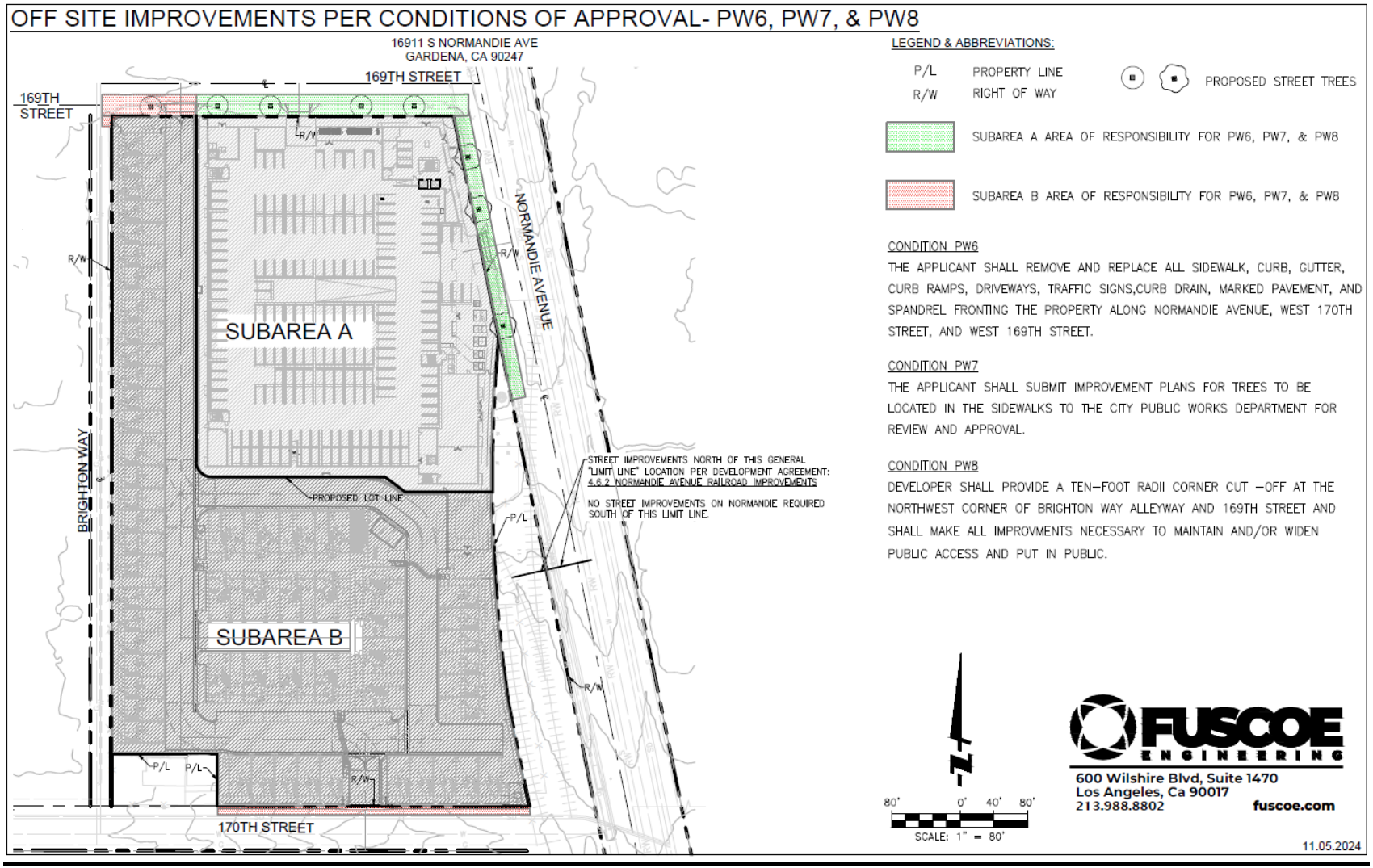


EXHIBIT F

Affordable Housing Agreement (Including Rental Restrictions)

Recording Requested By and When Recorded Mail To:	

RECORDING REQUESTED BY
AND WHEN RECORDED MAIL TO:

City of Gardena
1700 West 162nd Street,
Gardena, CA 90247
Attention: City Manager

No fee for recording pursuant to
Government Code Sections 27383 and 27388.1

(Space above for Recorder's Use)

AFFORDABLE HOUSING AGREEMENT
AND DECLARATION OF RESTRICTIVE COVENANTS
(Normandie Crossing Specific Plan)

This Affordable Housing Agreement and Declaration of Restrictive Covenants (the "Agreement") is dated as of _____ __, 2025, and is by and between the City of Gardena, a municipal corporation (the "City"), and 16911 Normandie Associates, LLC, a Delaware limited liability company, authorized to do business in California, (the "Developer"), with reference to the following facts:

A. Developer is the owner of certain real property consisting of approximately 5.23 acres which is located at property commonly known as 16907, 16835, and 16829 Normandie Avenue, in the City of Gardena, County of Los Angeles, California, as more particularly described in the attached Exhibit A, which is incorporated herein by this reference (the "Property").

B. The City has approved a residential development of 333 units consisting of a single five-story apartment building with 258 dwelling units (“Apartment Building”) and 75 three-story townhome style units (“Townhomes”) (collectively, the “Project”) which required the following Project Approvals: General Plan Amendment to the Land Use Plan (the “General Plan Amendment”), Specific Plan, Zone Change, Zoning Code Amendment, Development Agreement, Affordable Housing Agreement, and Site Plan Review;

C. As part of the Development Agreement, Developer has agreed to provide seven (7) units which will be affordable for Moderate Income Households in the Apartment Building for a 55 year period from the date that a certificate of occupancy is issued for the Affordable Units (the "Affordability Term").

D. The Development Agreement requires the City to ensure, and Developer to agree to, continued affordability of the Affordable Units for the Affordablility Term. To ensure their continued affordability for the Affordablility Term, this Agreement shall be

executed and recorded against the Property prior to the City's issuance of a Certificate of Occupancy for any portion of the Project.

E. Developer acknowledges and agrees that the Project Approvals, concessions and waivers provided adequate and proper notice pursuant to Government Code Section 66020 of Developer's right to protest any requirements for fees, dedications, reservations, and other exactions as may be included in this Agreement, that no protest in compliance with Section 66020 was made within ninety (90) days of the date that notice was given, and that the period has expired in which Developer may protest any and all fees, dedications, reservations, and other exactions as may be included in this Agreement.

WITH REFERENCE TO THE FACTS RECITED ABOVE, and for good and valuable consideration, the receipt of which is hereby acknowledged, the City and the Developer (collectively the "Parties") agree as follows:

AGREEMENT

The Parties agree and acknowledge that the above recitals are true and accurate and are incorporated into this Agreement by this reference.

ARTICLE 1.
DEFINITIONS AND EXHIBITS

Section 1.1. Definitions. When used in this Agreement, the following terms shall have the respective meanings assigned to them in this Article 1.

(a) "Actual Household Size" means the actual number of persons in the applicable household.

(b) “Adult” means a person 18 years of age or older.

(c) "Affordable Rent" means the maximum allowable Rent for an Affordable Unit as provided in Section 3.1(b) below.

(d) "Affordablility Term" is defined in Recital C.

(e) "Affordable Units" means the seven (7) units located in the Apartment Building restricted to Affordable Rents.

(f) "Agreement" is defined in the first paragraph on page 1.

(g) "Area Median Income" or "AMI" means the median gross yearly income in the County of Los Angeles, California (adjusted for Actual Household Size or Assumed Household Size as specified herein) as published from time to time by HCD. In the event that such income determinations are no longer published or are not updated for a period of at least eighteen (18) months, the City shall provide Borrower with other

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income determinations that are reasonably similar with respect to methods of calculation to those previously published by HCD.

(h) "Assumed Household Size" means the household size "adjusted for family size appropriate to the unit" as such term is defined in California Health & Safety Code Section 50052.5(h), used to calculate Rent.

(i) "City" is defined in the first paragraph on page 1 of this Agreement.

(j) "Developer" is defined in the first paragraph on page 1 of this Agreement.

(k) "Director" is the Community Development Director of the City.

(l) "Eligible Household" means a household which has been determined to be eligible to rent an Affordable Unit in compliance with this Agreement.

(m) "Floor Plan" means the depiction of layouts of the floors of the Apartment Building attached as Exhibit B specifying the initial location of the Affordable Units.

(n) "HCD" means the California Department of Housing and Community Development.

(o) "Household Income" means the combined gross, pre-tax income of all adult occupants of the applicant household. The applicable sources of income are defined in California Code of Regulations Title 25 Housing and Community Development section 6914.

(p) "Indemnitees" are defined in Section 5.5.

(q) “Moderate Income Household” means a household earning up to one hundred twenty percent (120%) of area median income adjusted for family size as defined in Health & Safety Code § 50093.

(r) “Other Units” means Units in the Apartment Building which are not Affordable Units.

(s) “Parties” means the City and the Developer.

(t) “Project” is defined in Recital B.

(u) “Project Approvals” are defined in Recital B.

(v) “Property” is defined in Recital B.

(w) “Rent” is the total of monthly payments by the Tenant of an Affordable Unit for all of the following: (1) use and occupancy of the Affordable Units and land and all facilities associated with the Affordable Unit; (2) any separately charged fees

or service charges assessed by Developer which are customarily charged in rental housing and required of all Tenants other than security deposits; (3) an allowance for the cost of an adequate level of service for utilities paid by the Tenant as established by the Los Angeles County Development Authority or its successor, including garbage collection, sewer, water, electricity, gas and other heating, cooking and refrigeration fuel, but not telephone service, electrical vehicle charging, or cable TV; and (4) any other interest, taxes, fees or charges for use of the land or associated facilities that are assessed by a public or private entity other than Developer and paid by the Tenant.

(x) "Tenant" is a household occupying one of the Affordable Units pursuant to a valid lease or rental agreement with Developer.

(y) "Tenant Lease" is defined in Section 3.2.

(z) "Units" means both the Affordable Units and Other Units.

Section 1.2. Exhibits. The following exhibits are attached to and incorporated into this Agreement:

Exhibit A. Legal Description of the Property.

Exhibit B. Floor Plan.

ARTICLE 2.
CONSTRUCTION OF APARTMENT BUILDING AND AFFORDABLE RENTAL UNITS

Section 2.1. Construction of Affordable Units. No building permit shall be issued for any Other Unit in the Apartment Building unless a building permit has been issued for the Affordable Units, and no certificates of occupancy or final inspections shall be issued for any Other Units in the Apartment Building unless a certificate of occupancy or final inspection has been issued for the Affordable Units.

Section 2.2. Affordable Units. To satisfy Developer's obligations under the Development Agreement, Developer shall rent the seven (7) Affordable Units to Moderate Income Households at an Affordable Rent for the Affordablility Term, as specified in Article 3 below.

Section 2.3. Appearance, Size and Bedroom Count of Affordable Units.

(a) Bedroom Count. The Affordable Units shall include: two (2) studio units; four (4) one-bedroom units; and one (1) two-bedroom unit; all located within in the Apartment Building.

(b) Appearance and Maintenance of Affordable Units. The design, square footage, appearance, and general quality of the Affordable Units shall be generally comparable with the Other Units. Developer shall allocate and assign bicycle storage, and other spaces reserved for use by individual Units to the Affordable Units on the same basis as for the Other Units, and Tenants of the Affordable Units shall have equal access

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to the common areas for the Apartment Building as is given to the residents of the Other Units, but any fee charged for use of common areas or for spaces reserved for individual Units shall be included in the Tenant's Rent. This does not apply to any fee to rent the common space for a private event. Developer shall make the parking spaces available to Affordable Units on the same terms as made to Other Units.

(c) Location and Characteristics of Affordable Units. Affordable Units shall be equitably distributed throughout the Apartment Building and shall not be distinguishable from Other Units. Developer shall initially provide Affordable Units in the Apartment Building at the location shown on the Floor Plan. These locations may be changed after the initial occupancy, provided that they are replaced with a similarly sized Unit and the change does not result in the Affordable Units being placed in inferior locations, segregated from the Other Units, or clustered together.

ARTICLE 3.
RENT REGULATORY PROVISIONS

Section 3.1. Affordability and Occupancy Covenants.

(a) Occupancy Requirements. Subject to the provisions of subsection (e) of this Section below, the Affordable Units shall be rented to and occupied by or, if vacant, available for occupancy by Moderate Income Households. The Affordable Units shall not be kept vacant or used for any purpose except for residential use and shall be offered for rent to Eligible Households at Affordable Rents.

(b) Allowable Rent. Subject to the provisions of subsection (e) of this Section below, for Moderate Income Households, the maximum Rent charged to Tenants of the Affordable Units shall not exceed the rent amounts as published by HCD and adjusted for the Assumed Household Size. The calculation of Rent shall be made pursuant to Health and Safety Code Section 50053, and the calcualtions above shall be adjusted based on any modifications made thereto. The initial Rent shall be determined based on the HCD Affordable Rents and Household Income limits in effect at the time Developer submits a marketing plan to City.

(c) City Approval of Rents. Initial Rents for all Affordable Units shall be approved by the City prior to occupancy at the time Developer submits to the City the marketing plan required by Section 3.3 below. The City shall review all proposed Rent increases to determine whether the proposed increases are consistent with the provisions of this Agreement. Developer shall certify to the City that Developer is not charging any fee other than Affordable Rent to Tenants of the Affordable Units for all of the components of Rent defined in Section 1.1(x) above.

(d) Schedule of Affordable Rents. The City shall provide Developer with a schedule of Affordable Rents for the Affordable Units at the time that Developer provides the marketing plan to City in accordance with section 3.3(b). The City annually determines Affordable Rents based on changes in Area Median Income, and Developer shall obtain a copy of the schedule from the Director.

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(e) Increased Income of Tenants. If, upon recertification in accordance with Section 3.3(d) below of a Tenant's Household Income, Developer determines that the Tenant's Household Income has increased and exceeds the qualifying income for a Moderate Income Household then the Tenant shall be given written notice that: (i) Tenant's Rent shall be increased sixty (60) days after the date in the notice to an amount to be determined by Developer but not to exceed Rent for a comparable Unit; and (ii) Tenant shall vacate the Affordable Unit six (6) months from the date of the notice or upon expiration of the Tenant's lease, whichever is earlier. If, prior to the date by which the Tenant must vacate the Affordable Unit, another Unit is vacated which is not designated as an Affordable Unit and is of the same bedroom size, the Developer may change the location of the Affordable Units; allow the over-income Tenant to remain in the original Unit; and designate the newly vacated Unit as an Affordable Unit.

(f) Agreement to Limitation on Rents. The Project has received benefits from the City under the Development Agreement, which is a form of assistance specified in Chapter 4.3 (commencing with Section 65915) of Division 1 of Title 7 of the Government Code. Civil Code Sections 1954.52(b) and 1954.53(a)(2) of the Costa-Hawkins Rental Housing Act, provide that, where a developer has received such assistance, certain provisions of the Costa-Hawkins Rental Housing Act do not apply if a developer has so agreed by contract. Developer hereby agrees to limit Rents as provided in this Agreement in consideration of Developer's receipt of the approval of the Normandie Crossing Specific Plan and further agrees that any limitations on Rents imposed on the Affordable Unit are in conformance with the Costa-Hawkins Rental Housing Act. Developer further covenants that the terms of this Agreement are fully enforceable.

Section 3.2. Lease Provisions. Developer shall use a form of Tenant lease (the "Tenant Lease") approved by the City for the Affordable Units. The Tenant Lease shall, among other matters:

(a) provide for termination of the lease for failure: (i) to provide any information required under this Agreement or reasonably requested by Developer to establish or recertify the Tenant's qualification, or the qualification of the Tenant's household, for occupancy in the Development in accordance with the standards set forth in this Agreement, or (ii) to qualify as an Eligible Household as a result of any material misrepresentation made by such Tenant with respect to the income computation or certification;

(b) provide that if the household's income increases above the applicable limits, such household's Rent will be subject to increase and Tenant will be required to vacate the Affordable Unit in accordance with the term of this Agreement, if no comparable alternate Unit is available to become an Affordable Unit;

(c) provide that the Rent may not be raised more often than once every twelve (12) months. Developer will provide each Tenant with at least ninety (90) days written notice of any increase in Rent applicable to such Tenant;

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(d) be for an initial term of not less than one (1) year. After the initial year of tenancy, the lease may be month to month by mutual agreement of Developer and the Tenant;

(e) require that the Affordable Unit be the principal residence of the Tenant and prohibit subleasing of the Affordable Unit or any portion of the Affordable Unit or any spaces reserved for the use of the Tenant, contain nondiscrimination provisions, and include the Tenant's obligation to inform Developer of any need for maintenance or repair;

(f) contain nondiscrimination provisions;

(g) include the Tenant's obligation to inform Developer of any need for maintenance or repair; and

(h) include reasonable rules of conduct consistent with California law.

Section 3.3. Marketing, Income Certification, and Reporting.

(a) Required City Approvals. At least ninety (90) days prior to the projected start date of accepting rental applications for the lease-up of the Affordable Unit, Developer shall notify City of the availability of the Affordable Units and provide to the City its proposed marketing plan for the Affordable Units as described below; its management policies as described in Section 3.4 below; the proposed form of Tenant Lease to confirm conformance with the provisions of Section 3.2 above; and proposed Affordable Rents for the Affordable Units, all for City review and approval.

(b) Marketing Plan. Developer's marketing plan shall be consistent with the provisions of this subsection (b). Upon receipt of the marketing plan, the City shall promptly review the marketing plan and shall approve or disapprove it within thirty (30) days after submission. If the marketing plan is not approved, Developer shall submit a revised marketing plan within thirty (30) days.

(i) Local Worker and Resident Preference. To the extent permitted by law and consistent with the program regulations for funding sources used for the development of the Affordable Unit, Developer shall give a preference in the rental of any Affordable Unit to eligible households in which at least one member lives or works in the City. The preference stated in this section applies to the rentals of Affordable Units throughout the Term.

(ii) Section 8 Vouchers and Certificate Holders. Developer will review applications from prospective tenants of Affordable Units, on the same basis as all other prospective tenants of Other Units, and of persons who are recipients of federal certificates for rent subsidies pursuant to the existing housing program under Section 8 of the United States Housing Act or any successor. Developer shall not apply selection criteria to Section 8 certificate or voucher holders that are more burdensome than criteria applied to all other prospective tenants for an Affordable Unit or Other Unit, nor shall Developer apply or permit the application of management policies or lease provisions with

respect to the Apartment Building which have the effect of precluding occupancy of an Affordable Unit by such prospective tenants. In no event may a Developer collect compensation from a Section 8 voucher payment and direct payment from a Tenant that collectively exceeds Affordable Rent.

(iii) Marketing Materials. The marketing plan submitted to the City shall include the following: means to be used to advertise Affordable Units to the public upon initial occupancy and as vacancies occur and maintenance of a waiting list; the amount of any application screening fee to be imposed by Developer, and information to be provided to applicants, including conditions and restrictions applicable to occupancy of the Affordable Unit, current Affordable Rent, permitted Rent increases, maximum qualifying income for Moderate Income Households, requirement for annual Household Income recertification, preferences, and requirement to vacate the Affordable Unit if the Tenant's Household Income exceeds the maximum qualifying income as permitted by project funding sources and regulatory requirements.

(c) Application. Developer may not charge more than the current industry standard per Adult Household member for application fees including credit check and screening background checks and in no event, more than the fee being charged for applicants of Other Units.

(d) Income Certification.

(i) Prior to Developer's entering into a lease with a prospective tenant of an Affordable Unit, the prospective tenant household shall be certified by Developer as a Moderate Income Household, in accordance with this Agreement. At City's request, Developer shall provide proof of prospective Tenant or Tenant's status as an Eligible Household.

(ii) Annually thereafter, Developer shall conduct recertifications and shall obtain, complete, and maintain on file Household Income recertifications for each Tenant renting any of the Affordable Units. To verify the information, two (2) or more of the following steps shall be taken: (A) obtain a pay stub for the most recent two (2) months of pay period for adults age eighteen (18) or older; (B) obtain an income tax return for the most recent tax year for all adults age eighteen (18) or older; (C) conduct a credit agency or similar search for all adults age eighteen (18) or older; (D) obtain an income verification form from the applicant's current employer verifying employment for the last two (2) months; (E) obtain an income verification form from the Social Security Administration and/or the California Department of Social Services if the applicant receives assistance from either of such agencies; or (F) if the applicant is unemployed and does not have a tax return, obtain another form of independent verification. Upon City's request, which request shall not be made more than once per year, Developer shall provide proof of a Tenant's status as an Eligible Household.

(iii) Copies of annual Tenant Household Income certifications shall be provided to the City upon request, and provide such additional information reasonably requested by the City in order to verify such certifications. A request by the

City to provide any of the items set forth in Subsection (c)(ii)(A) – (F) above will be considered a reasonable request.

(iv) Developer shall pay for all of City's costs relating to the certification and re-certification of households.

(e) Waiting List. Developer shall continuously maintain a waiting list of prospective tenants for the Affordable Units that may become available in the future.

(f) Annual Report to City. Developer shall submit to the City not later than the ninetieth (90) day after the close of each calendar year, or such other date as may be requested by the City, a statistical report, in a format acceptable to the City, which will include a cover sheet that details the following:

(i) For each Affordable Unit: tenant name, unit number, number of bedrooms, household size, last rent increase date, current rent paid by tenant including other charges, any additional rent paid by any entity other than tenant, any proposed rent increase, percentage of increase, resultant rent, rent increase effective date, gross household income of the residents upon commencing occupancy of the Affordable Unit and the source of such information, and the dates of vacancies.

(ii) Other Information: the waiting list for the Affordable Units and the number of current vacancies.

Section 3.4. Management of Property and Property Maintenance.

(a) Management Responsibilities. Developer is responsible for all management functions with respect to the Apartment Building, including, without limitation, the annual recertification of household size and Household Income (subject to review by the City or its assignee), selection of Tenants, maintenance of a waiting list for the Affordable Unit, evictions, collection of Developer's share of Rent and deposits, maintenance, landscaping, routine and extraordinary repairs, replacement of capital items, and security. The City shall have no responsibility over management of the Apartment Building.

(b) Approval of Management Policies. Prior to the issuance of a Certificate of Occupancy, Developer shall submit its written management policies with respect to the Apartment Building to the City for its review and shall amend such policies if necessary to ensure that such policies comply with the provisions of this Agreement. Developer shall also submit its updated written management policies to City upon any substantial modification thereto. Upon City's request, which request shall not be made more than once per year, Developer shall provide its written management policies to City.

(c) Property Maintenance. The City places prime importance on quality maintenance to ensure that all developments within the City which include affordable housing units are not allowed to deteriorate due to below-average maintenance. Developer shall provide the Affordable Units with the same level and quality of

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maintenance, including performance of repairs and periodic replacement of fixtures, as the Other Units. Developer agrees to maintain all interior and exterior improvements, including landscaping, on the Property in good condition and repair (and, as to landscaping, in a healthy condition) and in accordance with all applicable laws, rules, ordinances, orders and regulations of all federal, state, county, municipal, and other governmental agencies and bodies having or claiming jurisdiction and all their respective departments, bureaus, and officials.

(d) Remedies. In the event that Developer breaches any of the covenants contained in this Section 3.4 and such default continues for a period of five (5) business days after written notice from the City specifying the nature of the breach with respect to graffiti, debris, waste material, or a health or safety violation, or thirty (30) days after written notice from the City specifying the nature of the breach with respect to general maintenance, landscaping and building improvements, then the City, in addition to whatever other remedy it may have at law or in equity, has the right to enter upon the Property and perform or cause to be performed all such acts and work necessary to cure the violation. Pursuant to such right of entry, the City is permitted (but is not required) to enter upon the Property and to perform all acts and work necessary to protect, maintain, and preserve the improvements and landscaped areas on the Property, and to attach a lien on the Property, or to assess the Property, in the amount of the expenditures arising from such acts and work of protection, maintenance, and preservation by the City and/or costs of such cure, which amount Developer shall promptly pay to the City upon demand.

(e) Taxes and Assessments. Developer shall pay all real and personal property taxes, assessments, if any, and charges and all franchise, income, employment, old age benefit, withholding, sales, and other taxes assessed against it, or payable by it, at such times and in such manner as to prevent any penalty from accruing, or any lien or charge from attaching to the Property; provided, however, that Developer shall have the right to contest in good faith, any such taxes, assessments, or charges. In the event Developer exercises its right to contest any tax, assessment, or charge against it, Developer, on final determination of the proceeding or contest, shall immediately pay or discharge any decision or judgment rendered against it, together with all costs, charges and interest.

(f) Damage or Destruction of Apartment Building. If all of the Units on the Property are demolished and Developer elects not to rebuild the Apartment Building, the concessions and waivers granted to Developer under the Development Agreement shall terminate and the terms of this Agreement shall terminate and be of no further force and effect.

ARTICLE 4.
ENFORCEMENT

Section 4.1. Covenants Running with the Land. The City and Developer hereby declare their express intent that the covenants and restrictions set forth in this Agreement shall apply to and bind Developer and its heirs, executors, administrators, successors, transferees, and assignees having or acquiring any right, title or interest in or to any part

of the Property and shall run with and burden such portions of the Property until terminated in accordance with Section 4.2. Until all or portions of the Property are expressly released from the burdens of this Agreement, each and every contract, deed or other instrument hereafter executed covering or conveying the Property or any portion thereof shall be held conclusively to have been executed, delivered, and accepted subject to such covenants and restrictions, regardless of whether such covenants or restrictions are set forth in such contract, deed or other instrument. In the event of foreclosure or transfer by deed-in-lieu of all or any portion of the Property prior to completion of the Affordable Units, title to all or any portion of the Property shall be taken subject to this Agreement. Developer acknowledges that compliance with this Agreement is a requirement of the Project Approvals, and that no event of foreclosure or trustee's sale may remove these requirements from the Property. Any person who acquires title to all or any portion of the Property by foreclosure, trustee's sale, deed in lieu of foreclosure, or otherwise shall succeed to all of the rights and obligations of Developer under this Agreement.

Section 4.2. Monitoring. The City shall have the right, but not the obligation, to monitor and enforce the covenants contained in this Agreement. The Developer shall comply with any monitoring program set up by the City to enforce this Agreement. The Developer shall reimburse the City for all third-party costs incurred by the City pursuant to such monitoring program.

Section 4.3. Release of Property from Agreement.

(a) Prior to the expiration of the Affordablility Term, Developer shall provide all notifications required by Government Code Sections 65863.10 and 65863.11 or successor provisions or any other notification required by any state, federal, or local law.

(b) Upon the expiration of the Affordablility Term, the City shall execute and record a release of the Project, the Property, and each Unit in the Project from the burdens of this Agreement within thirty (30) days following written notice from Developer, if at the time Developer is in compliance with all terms of this Agreement.

Section 4.4. Default. Failure of Developer to satisfy any of Developer's obligations under the terms of this Agreement within thirty (30) days after the delivery of a notice of default from the City, will constitute a default under this Agreement and a failure to satisfy the Project Approvals. In addition to remedies for breach of this Agreement, the City may exercise any and all remedies available to it under the law, including but not limited to:

(a) withholding, conditioning, suspending or revoking any permit, license, subdivision approval or map, or other entitlement for the Project, including without limitation final inspections for occupancy and/or certificates of occupancy;

(b) instituting against Developer, or other parties, a civil action for declaratory relief, injunction or any other equitable relief, or relief at law, including without

limitation an action to rescind a transaction and/or to require repayment of any funds received in connection with such a violation; and

(c) any other means authorized under the City of Gardena Municipal Code, or any other federal or state statute.

Section 4.5. Remedies Cumulative. No right, power, or remedy given to the City by the terms of this Agreement is intended to be exclusive of any other right, power, or remedy; and each and every such right, power, or remedy shall be cumulative and in addition to every other right, power, or remedy given to the City by the terms of this Agreement, or by any statute or ordinance or otherwise against Developer and any other person. Neither the failure nor any delay on the part of the City to exercise any such rights and remedies shall operate as a waiver thereof, nor shall any single or partial exercise by the City of any such right or remedy preclude any other or further exercise of such right or remedy, or any other right or remedy. City is not required to comply with any provision of state or local law relating to exercising its remedies.

ARTICLE 5.
GENERAL PROVISIONS

Section 5.1. Appointment of Other Agencies. At its sole discretion, the City may designate, appoint, or contract with any other public agency, for-profit or non-profit organization to perform some or all of the City's obligations under this Agreement.

Section 5.2. Records. Developer shall retain all records related to compliance with obligations under this Agreement for a period not less than five (5) years from the date of origination of such records, and make them available to City employees or others designated by the City for inspection and copying on five (5) business days' written notice. The City shall be entitled to monitor compliance with this Agreement and Developer shall cooperate with City monitoring, including obtaining Tenant Rent and Household Income verification upon request of the City.

Section 5.3. Nondiscrimination. The Affordable Units shall be available for occupancy to members of the general public. Developer shall not give preference to any particular class or group of persons in renting the Affordable Units, except to the extent that the Affordable Units are required to be rented to Eligible Households and as required by this Agreement, including, without limitation, as set forth in Section 3.3(b) above; provided, however, there shall be no discrimination against or segregation of any person or group of persons, on account of race, color, creed, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, familial status, source of income (e.g., SSI), veteran or military status, ancestry, genetic information, or disability, in the leasing, transferring, use, occupancy, tenure, or enjoyment of any Unit nor shall Developer or any person claiming under or through Developer, establish or permit any such practice or practices of discrimination or segregation with reference to the selection, location, number, use, or occupancy of Tenants of any Unit or in connection with the employment of persons for the construction, operation and management of the Apartment Building.

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Section 5.4. Fair Housing Covenants. Developer covenants that it will comply with all applicable state and federal fair housing laws in the marketing and rental of the Affordable Units. Developer agrees to accept as tenants, on the same basis as all other prospective tenants, persons who are recipients of federal certificates or vouchers for rent subsidies under the Section 8 program or any successor program. The total amount of rent that may be charged and received by the Developer for an Affordable Unit is limited to the Affordable Rent.

Section 5.5. Hold Harmless. Developer will indemnify and hold harmless City and its elected officials, officers, employees and agents in their official capacity (hereinafter collectively referred to as "Indemnitees"), and any of them, from and against all loss, all risk of loss and all damage (including expense) sustained or incurred because of or by reason of any and all claims, demands, suits, actions, judgments and executions for damages of any and every kind and by whomever and whenever made or obtained, allegedly caused by, arising out of or relating in any manner to the Project, the Affordable Units, or Developer's performance or non-performance under this Agreement, and shall protect and defend Indemnitees, and any of them with respect thereto, except to the extent arising from the gross negligence or willful misconduct of the Indemnitees. The provisions of this Section shall survive expiration or other termination of this Agreement or any release of part or all of the Property from the burdens of this Agreement, and the provisions of this Section shall remain in full force and effect.

Section 5.6. Notices. All notices required pursuant to this Agreement shall be in writing and may be given by personal delivery or by registered or certified mail, return receipt requested, to the Party to receive such notice at the addressed set forth below:

TO THE CITY:

City of Gardena
1700 West 162nd Street
Gardena, CA 90247
Attention: City Manager
Phone: 310-217-9503
E-mail: cosorio@cityofgardena.org

WITH COPY TO:

City of Gardena
1700 West 162nd Street
Gardena, CA 90247
Attention: Community Development Director
Phone: 310-217-9546
E-mail: gtsujiuchi@cityofgardena.org

City Attorney's Office
1700 W. 162nd Street
Gardena, CA 90247

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Attention: Carmen Vasquez and Lisa Kranitz
Phone: 310-217-9503
E-mail: lkranitzlaw@gmail.com
cv@jones-mayer.com

TO DEVELOPER:

16911 Normandie Associates, LLC
134 Lomita Street
El Segundo, CA 90245
Attention: Fred Shaffer
Phone: 310-213-6560
Email: fshaffer@saikoinv.com

WITH COPY TO:

Rand|Paster|Nelson
633 W. Fifth Street, Ste. 5880
Los Angeles, CA 90071
Attention: Dave Rand
Phone: 213-557-7224
E-mail: dave@rpnllp.com

Any Party may change the address to which notices are to be sent by notifying the other Parties of the new address, in the manner set forth above.

Section 5.7. Integrated Agreement. This Agreement constitutes the entire Agreement between the Parties and no modification hereof shall be binding unless reduced to writing and signed by the Parties hereto.

Section 5.8. Each Party's Role in Drafting the Agreement. Each Party to this Agreement has had an opportunity to review the Agreement, confer with legal counsel regarding the meaning of the Agreement, and negotiate revisions to the Agreement. Accordingly, neither Party shall rely upon Civil Code Section 1654 in order to interpret any uncertainty in the meaning of the Agreement.

Section 5.9. Amendment of Agreement; Approvals and Consents.

(a) Amendments to this Agreement, including any proposal to change any condition of the Project Approvals, shall be subject to the review and approval of the decision-making body which approved the Project. No amendment may be approved that is inconsistent with State law, the Fremont Municipal Code, or any adopted affordable housing guidelines. Upon approval, a new Agreement or amendments to this Agreement, as appropriate, shall be executed and recorded.

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(b) The Mayor is authorized to execute this Agreement and has authorized the Director to deliver such approvals or consents as are required by this Agreement. Any consents or approvals required under this Agreement shall not be unreasonably withheld or made, unless it is specifically provided that a sole discretion standard applies.

Section 5.10. No Claims. Nothing contained in this Agreement shall create or justify any claim against the City by any person that Developer may have employed or with whom Developer may have contracted relative to the purchase of materials, supplies or equipment, or the furnishing or the performance of any work or services with respect to the Property or the construction of the Project or construction of the Affordable Unit.

Section 5.11. Applicable Law. This Agreement shall be governed by California law. Venue shall be the County of Alameda.

Section 5.12. Waivers. Any waiver by the City of any obligation or condition in this Agreement must be in writing. No waiver will be implied from any delay or failure by the City to take action on any breach or default of Developer or to pursue any remedy allowed under this Agreement or applicable law. Any extension of time granted to Developer to perform any obligation under this Agreement shall not operate as a waiver or release from any of its obligations under this Agreement. Consent by the City to any act or omission by Developer shall not be construed to be a consent to any other or subsequent act or omission or to waive the requirement for the City's written consent to future waivers.

Section 5.13. Title of Parts and Sections. Any titles of the sections, subsections, or subparagraphs of this Agreement are inserted for convenience of reference only and shall be disregarded in interpreting any part of the Agreement's provisions.

Section 5.14. Multiple Originals; Counterpart. This Agreement may be executed in multiple originals, each of which is deemed to be an original, and may be signed in counterparts.

Section 5.15. Recording of Agreement. Prior to the issuance of a certificate of occupancy, but no sooner than issuance of building permits for any part of the Project, this Agreement shall be recorded against the Property in the Official Records of the County of Los Angeles Recorder’s Office.

Section 5.16. Severability. In the event any limitation, condition, restriction, covenant, or provision contained in this Agreement is to be held invalid, void or unenforceable by any court of competent jurisdiction, the remaining portions of this Agreement shall nevertheless be and remain in full force and effect.

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IN WITNESS WHEREOF, the Parties hereto have caused this Agreement to be executed as of the day and year first above written.

DEVELOPER:

16911 Normandie Associates, LLC, a
limited liability company

By: _____

CITY:

APPROVED AS TO FORM

CITY OF GARDENA, a municipal corporation

By: _____
Carmen Vasquez, City Attorney

By:_____
Tasha Cerda, Mayor

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A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA)
)
COUNTY OF _____)

On _____, before me, _____, Notary Public, personally appeared _____, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify UNDER PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

_____
Name: _____
Notary Public

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A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA)
)
COUNTY OF _____)

On _____, before me, _____, Notary Public, personally appeared _____, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify UNDER PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

_____
Name: _____
Notary Public

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EXHIBIT A

LEGAL DESCRIPTION OF THE PROPERTY

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EXHIBIT B

FLOOR PLAN

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Docusign Envelope ID: A6BAF43B-4DAA-42CA-9685-7DDD20595F93

RESOLUTION NO. 6685

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF GARDENA, CALIFORNIA APPROVING VESTING TENTATIVE MAP NO. 83922 (VTM #4-21), TO MERGE FOUR LOTS INTO ONE WITH 75 CONDOMINIUMS FOR THE TOWNHOMES AND ONE PARCEL FOR THE APARTMENT BUILDING

16829, 16835, 16907, and 16911 S. Normandie Avenue (APNs: 6106-030-011, 015, 016, and 017)

WHEREAS, on December 22, 2021, 16911 Normandie Associates, LLC ("Developer"), filed an application for a General Plan Amendment to the Land Use Plan (the "General Plan Amendment"), Specific Plan, Zone Change, Zoning Code Amendment, Vesting Tentative Tract Map, and Site Plan Review to develop a 273 unit apartment building and 76 townhome style units on a total of 5.25 acres located at 16829, 16835, and 16907 South Normandie Avenue (APN ## 6106-030-011, 6106-030-015, 6106-030-016 - 6106-030-017) (the "Property); and

WHEREAS, on December 22, 2022, Developer amended its project to develop a 328 unit apartment building and 75 townhomes on the Property; and

WHEREAS, the City determined that in addition to the residential development and needed entitlements proposed by Developer, the project should also include revisions to the General Plan land use designations and zoning for two adjacent properties on the same block as the Project to match the actual uses of the properties. Specifically, for the property located at 16964 Brighton Avene (APN # 6106-030-008), change the General Plan Amendment from Industrial to Single Family Residential and change the zoning from General Industrial (M-2) to Single Family Residential (R-1); and for the property just to the east of the Project site owned by the Southern Pacific Railroad (APN # 6106-030-800), change the General Plan land use designation from Industrial to Public/Institutional and change the zoning from General Industrial (M-2) to Official (O); and

WHEREAS, the General Plan Amendments, Specific Plan, Zone Changes, Zoning Code Amendment, Development Agreement, Site Plan Review, and Vesting Tentative Tract Map are collectively referred to as the Project; and

WHEREAS, on March 19, 2024, 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 recommended that the City Council certify the Environmental Impact Report, but did not recommend approval of the project,; and

WHEREAS, after the Planning Commission's actions, Developer attended a community meeting where the project was discussed; and

Docusign Envelope ID: A6BAF43B-4DAA-42CA-9685-7DDD20595F93

WHEREAS, on September 30, 2024, Developer submitted revised plans to the City for a new alternative to be considered which consists of 70 fewer units in the apartment building and a reduction in height level from ground floor from seven stories to five stories, with one underground level of parking (hereafter the "Community Input Alternative;" and

WHEREAS, on December 3, 2024, the Planning Commission held a duly noticed public hearing on the Project, including the new Community Input Alternative submitted by the Developer at which time it considered all material submitted whether written or oral; and

WHEREAS, on December 3, 2024, after the close of the public hearing the Planning Commission adopted PC Resolution No. 18-24, recommending that the City Council certify the EIR, adopt a statement of overriding considerations, adopt a mitigation monitoring program and make CEQA findings;

WHEREAS, on December 3, 2024, the Planning Commission also adopted PC Resolution No. 19-24, recommending the City Council approve the requested General Plan amendment, zone change, zone text amendment, specific plan adoption, site plan review, development agreement, and affordable housing agreement for the Community Input Alternative; and

WHEREAS, on December 3, 2024, the Planning Commission also adopted PC Resolution No. 20-24, recommending the City Council approve Vesting Tentative Tract Map No. 83922 (VTM #4-21), to merge four lots into one with condominiums for the townhomes and one parcel for the apartment building; and

WHEREAS, on January 14, 2025, the City Council of the City of Gardena held a duly noticed hearing on the Project at which time it considered all evidence presented, both written and oral; and

WHEREAS, after the close of the public hearing and prior to adopting this Resolution, the City Council adopted Resolution No. 6683 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;

WHEREAS, after the close of the public hearing and prior to adopting this Resolution, the City Council also adopted Resolution No. 6684 approving the General Plan Amendment and introduced Ordinance No. 1878 establishing the Normandie Crossing Specific Plan in GMC Chapter 18.08, rezoning of the Property to Normandie Crossing Specific Plan, rezoning the 0.11 acre property located at 16964 Brighton Avenue to R-1, rezoning the 0.43 property located at the eastern edge of the specific plan area to official, approving the Normandie Crossing Specific Plan, including the Site Plan, approving the development agreement and the affordable housing agreement relating to the Project;

Docusign Envelope ID: A6BAF43B-4DAA-42CA-9685-7DDD20595F93

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

SECTION 1. VESTING TENTATIVE MAP NO. 83922 (VTM #4-21).

Vesting Tentative Map No. 83922 (VTM #4-21), as shown on Exhibit B, to merge four lots into one with condominiums for the townhomes and one parcel for the apartment building, is hereby approved, subject to the conditions of approval attached as Exhibit A based on the fact that none of the findings which would prohibit the approval of a map are present and the map satisfies all of the requirements of the Gardena Municipal Code Chapter 17.08 and Government Code Sections 66474, 66473.1, and 66473.5

A. *The map and design and improvement of the proposed subdivision is consistent with applicable general and specific plan (Government Code § 66474; § 66473.5).*

The City Council adopted Ordinance No. 1878 which established the Normandie Crossing Specific Plan and changed the zoning designation of the Property as such. State law requires that any specific plan be consistent with the City's General Plan. In accordance with the Normandie Crossing Specific Plan, the merging of four lots into one with condominiums for the townhomes and one parcel for the apartment building is consistent with the following goals and policies of the City's General Plan: Housing Element Goal 3, 4, 5 and Polices 5.2, 4.3, 4.4; and Land Use Plan Policies 1.4, 1.5, 1.6, and1.8.

B. *The site is physically suitable for the type or density of development (Government Code § 66474).*

The property is 5.25 acres in a highly urbanized area and is essentially flat. The site is large enough to accommodate the proposed development.

C. *The design of the subdivision and the proposed improvements will not cause serious public health problems, substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat (Government Code § 66474).*

D. The property is currently developed with six industrial buildings that were previously used for food production. An EIR was prepared for the Project and certified by the City Council. The only impact which remained significant was temporary noise during construction. This will not cause a serious public health problem, create substantial environmental damage or substantially injure fish and wildlife. *The design of the subdivision or type of improvements will not conflict with public access easements (Government Code § 66474).*

The subdivision was designed to not interfere with any public access easements as there are none which exist on the property.

Docusign Envelope ID: A6BAF43B-4DAA-42CA-9685-7DDD20595F93

E. *The design of the subdivision provides for, to the extent feasible, future passive or natural heating and cooling opportunities (Government Code § 66473.1).*

During winter, a north-south alignment of parcels provides for southern exposure to the winter path of the Sun. During the summer, the general direction of the prevailing winds can be expected to allow the development to benefit from natural and passive cooling opportunities.

Additionally, all buildings will comply with Title 24 requirements, including Cal Green standards, as adopted by the City, which will require each unit to provide a right-sized photovoltaic system.

There are no grounds upon which to deny the map. Therefore, with the conditions of approval, the subdivision and subdivision design will be consistent with the General Plan and State Subdivision Map Act as supplemented by Title 17 of the Gardena Municipal Code

SECTION 2. CEQA.

Under Resolution No. 6683, the City Council certified an environmental impact report which covered the Project in its entirety, adopting a mitigation monitoring and reporting program, adopted a statement of overriding considerations and made CEQA findings relating to the Normandie Crossing Specific Plan, and related entitlements, including Vesting Tentative Tract Map No. 83922 (VTM #4-21).

SECTION 3. 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 Greg Tsujiuchi, Community Development Director who can be reached at 310/217-9546 or gtsujiuchi@cityofgardena.org.

SECTION 4. 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.

Docusign Envelope ID: A6BAF43B-4DAA-42CA-9685-7DDD20595F93

SECTION 5. Certification. The City Clerk shall certify the passage of this resolution.

SECTION 6. Effective Date. This Resolution shall be effective upon the effective date or Ordinance No. 1878.

Passed, approved, and adopted this 14 day of January, 2025.

TASHA CERDA, Mayor

ATTEST:

MINA SEMENZA, City Clerk

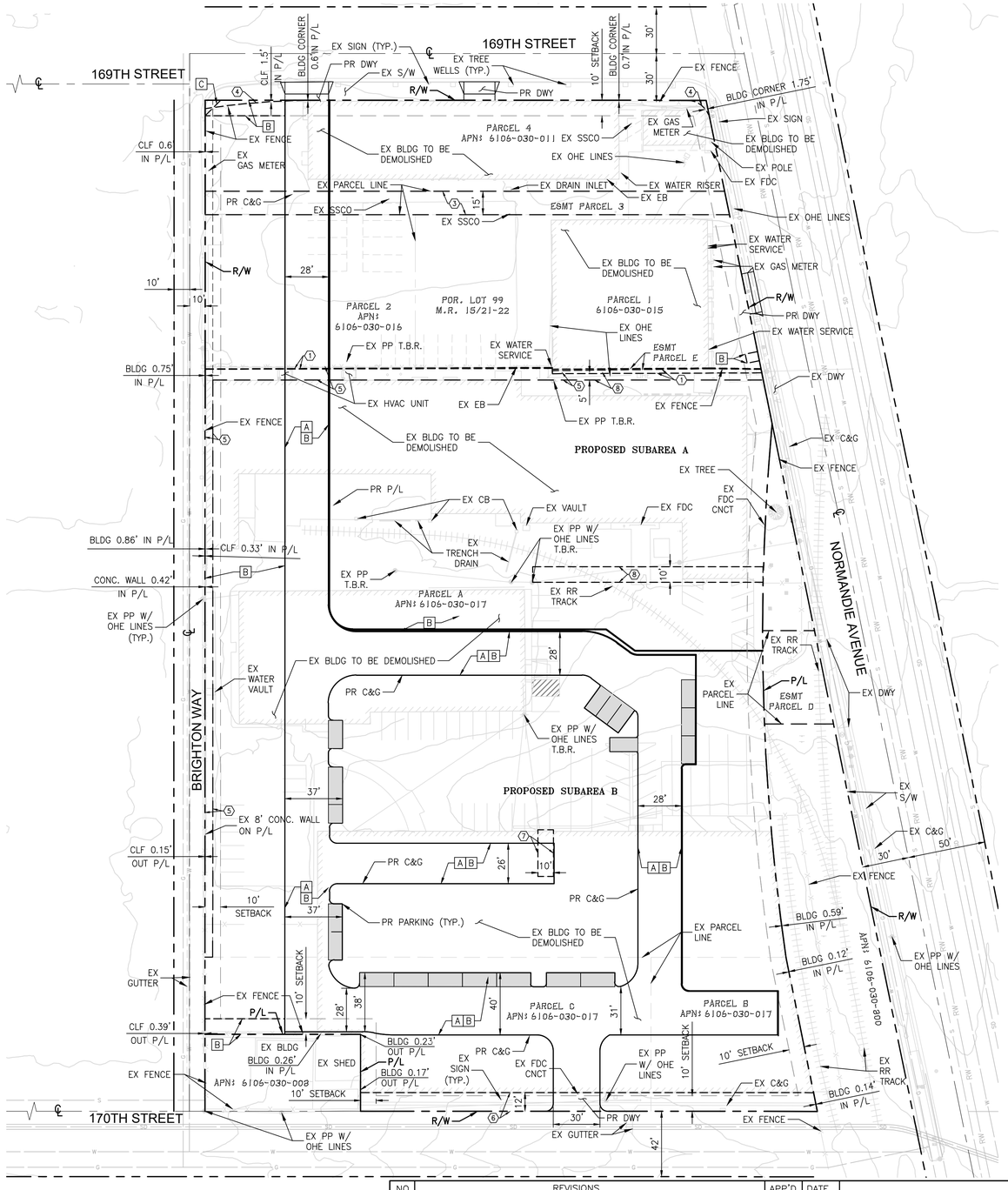
APPROVED AS TO FORM:

CARMEN VASQUEZ, City Attorney

Exhibit A – Vesting Tentative Tract Map No. 83922 (VTM #4-21)
Exhibit B – Conditions of Approval

VESTING TENTATIVE TRACT MAP NO. 83922

FOR LOT MERGER, AND CONDOMINIUM SUBDIVISION PURPOSES
CITY OF GARDENA, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA



OWNER

16911 NORMANDIE ASSOCIATES, LLC
COASTLINE REAL ESTATE ADVISORS, INC.
134 LOMITA STREET, EL SEGUNDO, CA 90245

CIVIL ENGINEER

FUSCOE ENGINEERING, INC.
600 WILSHIRE BLVD., SUITE 1470
LOS ANGELES, CA 90017
TEL: (213) 988-8802
FAX: (213) 988-8803
CONTACT: SAMSON KAWJAREE, PE #C83863

ARCHITECT

URBAN-ARCHITECTURE LAB
1657 ALVIRA ST. LOS ANGELES, CA 90035
TEL: (323)-954-9996

UTILITY COMPANIES

SEWER	
LOS ANGELES COUNTY SANITATION DISTRICT	714-647-3380
CITY OF GARDENA (OWNER/MAINTAINED)	310-217-9568
STORM DRAIN	
LOS ANGELES FLOOD CONTROL DISTRICT	626-458-4304
WATER	
GOLDEN STATE WATER COMPANY	800-999-4033
WEST BASIN MUNICIPAL WATER DISTRICT	310-217-2411
GAS	
SOUTHERN CALIFORNIA GAS CO.	800-427-2200
ELECTRICITY	
SOUTHERN CALIFORNIA EDISON	714-796-9932

BASIS OF BEARINGS

THE BASIS OF BEARINGS USED FOR THIS SURVEY IS THE CENTERLINE OF NORMANDIE AVE SHOWN AS BEARING S 11°33'06" E ON RECORD OF SURVEY, BOOK 85, PAGE 18, OF MAPS IN THE OFFICE OF THE COUNTY RECORDER OF LOS ANGELES.

BENCHMARK

BM NO.: 7Y1212O ELEV.: 42.096' (LOS ANGELES COUNTY PUBLIC WORKS SURVEY SECTION) NAVD 88 (2013)

DESCRIPTION: L&DPW TAG IN E CB 1FT N/O OF THE ECR @ NE COR CRENSHAW BL & 166TH ST

BM NO.: 7Y10879 ELEV.: 47.187' (LOS ANGELES COUNTY PUBLIC WORKS SURVEY SECTION) NAVD 88 (2013)

DESCRIPTION: DPW BM TAG IN E CB 4FT S/O BCR @ SE COR 170TH ST & CRENSHAW BLVD

FLOOD ZONE

CERIFICATION REGARDING FLOOD ZONE INFORMATION IS PER AVAILABLE MAP(S) OF THE FEDERAL EMERGENCY MANAGEMENT AGENCY, U.S. DEPARTMENT OF HOMELAND SECURITY, AS OF THE OBSERVABLE EVIDENCE DATA HEREON. THEREFORE MAKES NO REPRESENTATION AS TO THE ACCURACY OF THIS INFORMATION.

FEMA MAP NO.:	06037C1795F
COMMUNITY NAME/NO.:	CITY OF GARDENA 060119
MAP DATE:	09/26/2008
FLOOD ZONE:	X
DESCRIPTION:	AREA OF MINIMAL FLOOD HAZARD. THE SITE IS NOT LOCATED IN A SPECIAL FLOOD HAZARD AREA PER SAID FEMA MAP

SHEET PLAN INDEX

SHEET	NO.
VESTING TENTATIVE TRACT MAP	1
VESTING TENTATIVE TRACT MAP NOTES	2
CONCEPTUAL GRADING PLAN	3
PRELIMINARY UTILITY PLAN	4
FIRE ACCESS & HYDRANT LOCATION PLAN	5

ASSESSOR'S PARCEL NUMBERS

6106-030-017, 6106-030-016, 6106-030-015, 6106-030-011

SITE ADDRESSES

16831 S NORMANDIE AVE. PARCEL ALSO HAS ADDRESSES 16829 & 16835 S NORMANDIE AVE. GARDENA, CA 90247

16911 S NORMANDIE AVE. PARCEL ALSO HAS ADDRESSES 16907 & 16931 S NORMANDIE AVE. GARDENA, CA 90247

LAND AREA

228,559 S.F./ 5.25 ACRES

LAND USE

EXISTING: M1 = INDUSTRIAL ZONE
M2 = GENERAL INDUSTRIAL ZONE

PROPOSED: NORMANDIE SPECIFIC PLAN ZONE

PROPOSED LOTS

2 PROPOSED LOT SUBDIVISION

LOT SUMMARY TABLE		
SUBAREA	PROPOSED LOT AREA	
	SQUARE FEET	ACRES
A	93,032	2.14
B	135,527	3.11

PROJECT SUMMARY

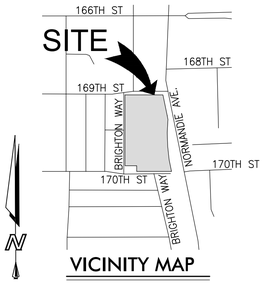
NORMANDIE APARTMENTS AND TOWNHOUSES
TOTAL: UNITS (403), PARKING (559)

DATA SUMMARY TABLE		
UNIT TYPE	PROPOSED QUANTITIES	
	UNIT	PARKING
APARTMENTS	328	399
TOWNHOMES	75	160

EASEMENT NOTE

(X) EXISTING EASEMENT NOTE, SEE SHEET 2 FOR: RECORDING NO., RECORDING DATE, AND PURPOSE

[X] PROPOSED EASEMENT NOTE, SEE SHEET 2



VICINITY MAP

THOMAS GUIDE PG. 734-A7 & 733-J7
NOT TO SCALE

LEGEND/ABBREVIATIONS

	RIGHT-OF-WAY LINE
	CENTERLINE
	PROPOSED EASEMENT LINE
	EXISTING PARCEL LINE
	CONTOUR
	PROPOSED LOT LINE
DW	PROPOSED DOMESTIC WATER LINE
FW	PROPOSED FIRE WATER LINE
SS	PROPOSED SEWER HOUSE CONNECTION
SS	EXISTING SANITARY SEWER LINE
DW	EXISTING DOMESTIC WATER LINE
SD	EXISTING STORM DRAIN LINE
RW	EXISTING RECYCLED WATER LINE
℄	CENTERLINE
AB	AGGREGATE BASE
AC	ASPHALT CONCRETE
BFP	BACKFLOW PREVENTER
BLDG	BUILDING
CAB	CABINET
CB	CATCH BASIN
C&G	CURB AND GUTTER
CLF	CHAIN LINK FENCE
CNCT	CONNECTION
CONC.	CONCRETE
DCDA	DOUBLE CHECK DETECTOR ASSEMBLY
DR	DRIVE
DW	DOMESTIC WATER
DWY	DRIVEWAY
EB	ELECTRIC BOX
ELEC.	ELECTRICAL
ESMT	EASMENT
EX/EXIST.	EXISTING
FDC	FIRE DEPARTMENT CONNECTION
FF	FINISHED FLOORS
FH	FIRE HYDRANT
FL	FLOW LINE
FS	FINISHED SURFACE
FW	FIRE WATER
HP	HIGH POINT
JC	JUNCTION
L/S	LANDSCAPE
MIN	MINIMUM
MH	MANHOLE
NTS	NOT TO SCALE
OHE	OVERHEAD ELECTRIC
PB	PULLBOX
PCL	PARCEL
P.I.P.	PROTECT IN PLACE
P/L	PROPERTY LINE
PP	POWER POLE
PR	PROPOSED
PUE	PUBLIC UTILITY EASEMENT
PVT	PRIVATE
RETW	RETAINING WALL
RR	RAILROAD
R/W	RIGHT-OF-WAY
SS	SANITARY SEWER
SSCO	SANITARY SEWER CLEAN OUT
SSMH	SANITARY SEWER MANHOLE
T.B.R	TO BE REMOVED
TYP.	TYPICAL
WTR	WATER

NO.	REVISIONS	APP'D.	DATE

FUSCOE ENGINEERING
600 Wilshire Blvd, Suite 1470
Los Angeles, Ca 90017
213.988.8802 fuscoe.com

REGISTERED PROFESSIONAL ENGINEER SAMSON ESPIRITU KAWJAREE No. C83863 11.5.2024 CIVIL STATE OF CALIFORNIA

VESTING TENTATIVE TRACT MAP
VTTM NO. 83922
16911 S NORMANDIE AVENUE
GARDENA, CA 90247
CITY OF GARDENA

DRAWN:	AN
DESIGN:	AN
CHECKED:	SK
SCALE:	AS SHOWN
JOB NO.:	4047-002
DATE:	11/05/24

SHEET 1 OF 5

K:\PROJECTS\4047-002\CAD\ENTITLEMENTS\ENGINEERING TRACT MAP\4047-002TM01.DWG [11-05-2024 7:56:46AM] Plotted by: Shaypree

LEGAL DESCRIPTION

ALL THAT CERTAIN REAL PROPERTY SITUATED IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

PARCEL 1:

THAT PORTION OF LOT 99 OF THE MCDONALD TRACT RANCHO PEDRO. IN THE CITY OF GARDENA, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGE 21 AND 22 OF MISCELLANEOUS RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

BEGINNING AT A POINT IN THE WESTERLY LINE OF NORMANDIE AVENUE, 60 FEET WIDE, SHOWN ON THE MAP OF SAID TRACT AS AN UNNAMED STREET ADJOINING SAID LOT 99 ON THE EAST, DISTANT SOUTH 673.50 FEET, MEASURED DIRECTLY SOUTH, FROM THE CENTER LINE OF THE 60 FOOT STREET ADJOINING SAID LOT ON THE NORTH, AS SHOWN ON SAID MAP; THENCE ALONG SAID WESTERLY LINE SOUTH 11° 33' 39" EAST 178.40 FEET; THENCE SOUTH 89° 59' 15" WEST 134.55 FEET; THENCE NORTH 0°00 45" WEST 4 FEET; THENCE SOUTH 89° 59' 15" WEST TO A POINT DISTANT 490 FEET EAST OF THE WEST LINE OF SAID LOT 99; THENCE NORTH PARALLEL WITH THE WEST LINE OF SAID LOT TO A LINE THAT IS PARALLEL WITH THE SOUTH LINE OF SAID LOT AND PASSES THROUGH THE POINT OF BEGINNING; THENCE EAST ALONG SAID LAST MENTIONED PARALLEL LINE TO THE POINT OF BEGINNING.

EXCEPT THE NORTH 75 FEET (MEASURED ALONG THE EAST LINE) OF SAID LAND.

ALSO EXCEPT THE WESTERLY 135 FEET, MEASURED ALONG A LINE PARALLEL WITH THE SOUTH LINE OF SAID LOT.

PARCEL 2:

THAT PORTION OF LOT 99 OF THE MCDONALD TRACT RANCHO PEDRO, IN THE CITY OF GARDENA, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15, PAGE 21 AND 22 OF MISCELLANEOUS RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT IN THE EAST LINE OF SAID LOT, DISTANT SOUTH 673.50 FEET MEASURED DIRECTLY SOUTH FROM THE CENTER LINE OF THE STREET NORTH OF SAID LOT; THENCE WEST PARALLEL WITH THE SOUTH LINE OF SAID LOT, A DISTANCE OF 19.63 RODS, MORE OR LESS, TO A POINT DISTANT 490 FEET EAST OF THE WEST LINE OF SAID LOT; THENCE PARALLEL WITH THE WEST LINE OF SAID LOT, A DISTANCE OF 171.27 FEET TO A POINT DISTANT 476.22 FEET NORTH OF THE SOUTH LINE OF SAID LOT; THENCE EAST PARALLEL WITH THE SOUTH LINE OF SAID LOT, TO THE EAST LINE THEREOF; THENCE NORTHERLY ALONG THE EAST LINE OF SAID LOT TO THE PLACE OF BEGINNING.

EXCEPT FROM THE ABOVE DESCRIBED LAND, THAT PORTION BOUNDED NORTHERLY BY THE NORTHERLY LINE OF THE SOUTHERLY 97.56 FEET OF SAID LAND, MEASURED ALONG THE WESTERLY LINE THEREOF; BOUNDED WESTERLY BY THE EASTERLY LINE OF THE WEST 135 FEET OF SAID LAND, MEASURED ALONG THE SOUTHERLY LINE THEREOF; AND BOUNDED EASTERLY AND SOUTHERLY BY THE EASTERLY AND SOUTHERLY LINES RESPECTIVELY OF SAID LAND.

ALSO EXCEPT THE NORTHERLY 75 FEET MEASURED ALONG THE EASTERLY LINE THEREOF.

ALSO EXCEPT THAT PORTION OF SAID LAND LYING SOUTHERLY OF THE FOLLOWING LINE:

COMMENCING AT A POINT IN THE WESTERLY LINE OF NORMANDIE AVENUE, 60 FEET WIDE, SHOWN ON THE MAP OF SAID TRACT AS AN UNNAMED STREET ADJOINING SAID LOT 99 ON THE EAST, DISTANT SOUTH 673.50 FEET, MEASURED DIRECTLY SOUTH, FROM THE CENTER LINE OF THE 60 FOOT STREET ADJOINING SAID LOT ON THE NORTH, AS SHOWN ON SAID MAP; THENCE ALONG SAID WESTERLY LINE SOUTH 11° 33' 39" EAST 176.40 FEET TO THE TRUE POINT OF BEGINNING; THENCE SOUTH 89 ° 59' 15" WEST 134.55 FEET; THENCE NORTH 0'00 '45" WEST 4 FEET; THENCE SOUTH 89° 59' 15" WEST TO A POINT DISTANT 490 FEET EAST OF THE WEST LINE OF SAID LOT 99.

PARCEL 3:

AN EASEMENT FOR INGRESS AND EGRESS OVER THE SOUTHERLY 15 FEET OF THE NORTHERLY 75 FEET MEASURED ALONG THE EASTERLY LINE OF THAT PORTION OF LOT 99 OF THE MCDONALD TRACT, RANCHO SAN PEDRO, IN THE CITY OF GARDENA, AS PER MAP RECORDED IN BOOK 15, PAGES 21 AND 22 OF MISCELLANEOUS RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT IN THE EAST LINE OF SAID LOT DISTANT SOUTH 673.50 FEET, MEASURED DIRECTLY SOUTH FROM THE CENTER LINE OF THE STREET NORTH OF SAID LOT; THENCE WEST PARALLEL WITH THE SOUTH LINE OF SAID LOT, 19.63 RODS, MORE OR LESS, TO A POINT DISTANT 476.22 FEET NORTH OF THE SOUTH LINE OF SAID LOT; THENCE EAST PARALLEL WITH THE SOUTH LINE OF SAID LOT TO THE EAST LINE THEREOF; THENCE NORTHERLY ALONG THE EAST LINE OF SAID LOT TO THE PLACE OF BEGINNING.

EXCEPT FROM THE ABOVE DESCRIBED LAND THAT PORTION BOUNDED NORTHERLY BY THE NORTHERLY FINE OF THE SOUTHERLY 97.56 FEET OF SAID LAND, MEASURED ALONG THE WESTERLY LINE THEREOF, BOUNDED WESTERLY BY THE EASTERLY LINE OF THE WEST 135 FEET OF SAID LAND, MEASURED ALONG THE SOUTHERLY LINE THEREOF AND BOUNDED EASTERLY AND SOUTHERLY BY THE EASTERLY LAND SOUTHERLY LINE RESPECTIVELY OF SAID LAND.

PARCEL 4:

THE NORTH 75 FEET, MEASURED ALONG THE EASTERLY LINE OF THAT PORTION OF LOT 99 OF THE MCDONALD TRACT, RANCHO SAN PEDRO, IN THE CITY OF GARDENA, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15 PAGES 21 AND 22 OF MISCELLANEOUS RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT IN THE EAST LINE OF SAID LOT, DISTANT SOUTH 673.50 FEET MEASURED DIRECTLY SOUTH FROM THE CENTER LINE OF THE STREET NORTH OF SAID LOT; THENCE WEST PARALLEL WITH THE SOUTH LINE OF SAID LOT, 19.63 RODS, MORE OR LESS, TO A POINT DISTANT 490 WEST EAST OF THE WEST LINE OF SAID LOT; THENCE SOUTH PARALLEL WITH THE WEST LINE OF SAID LOT, A DISTANCE OF 171.27 FEET TO A POINT DISTANT 476.22 FEET NORTH OF THE SOUTH LINE OF SAID LOT; THENCE EAST PARALLEL WITH THE SOUTH LINE OF SAID LOT TO THE EAST LINE THEREOF; THENCE NORTHERLY ALONG THE EAST LINE OF SAID LOT TO THE POINT OF BEGINNING.

ASSESSOR'S PARCEL NUMBER: 6106–030–011, 6106–030–015 AND 6106–030–016

THE LAND DESCRIBED BELOW IS PER THE LEGAL DESCRIPTION IN THE TITLE COMPANY, TITLE DOCUMENT REFERENCED IN THE LOWER RIGHT ON THIS SHEET. THE PLOT HEREON OF SAID DESCRIBED LAND IS DCA'S PROFESSIONAL INTERPRETATION AND OPINION OF SAME AND IS NOT A LEGAL DETERMINATION.

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF GARDENA, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORINA, AND IS DESCRIBED AS FOLLOWS:

PARCEL A (FEE):

THAT PORTION OF LOT 99 OF THE MCDONALD TRACT, IN THE CITY OF GARDENA, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS SHOWN ON MAP RECORDED IN BOOK 15, PAGES 21 AND 22 OF MISCELLANEOUS RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, BOUNDED BY THE FOLLOWING DESCRIBED LINES:

COMMENCING AT A POINT IN THE WESTERLY LINE OF NORMANDIE AVENUE, 60 FEET WIDE, SHOWN ON SAID MAP AS AN UNNAMED STREET ADJOINING SAID LOT ON THE EAST, DISTANT SOUTH 673.50 FEET, MEASURED DIRECTLY SOUTH FROM THE CENTER LINE OF THE 60 FOOT STREET ADJOINING SAID LOT ON THE NORTH, AS SHOWN ON SAID MAP; THENCE ALONG SAID WESTERLY LINE, SOUTH 11° 33' 59" EAST 178.40 FEET TO THE TRUE POINT OF BEGINNING; THENCE SOUTH 89°59' 15" WEST 134.55 FEET; THENCE NORTH 0° 00' 45" WEST 4 FEET; THENCE SOUTH 89° 59' 15" WEST 223.19 FEET TO THE EASTERLY LINE OF TRACT NO. 9547, AS SHOWN ON MAP RECORDED IN BOOK 150 PAGE 41 OF MAPS, RECORDS OF SAID COUNTY; THENCE ALONG SAID EASTERLY LINE SOUTH 0° 00' 18" WEST 379.95 FEET TO A POINT DISTANT NORTH 0° 00' 18" WEST THEREON, 99 FEET FROM THE SOUTHERLY LINE OF SAID LOT 99; THENCE PARALLEL WITH SAID SOUTHERLY LINE, NORTH 89° 59' 15" EAST 374.12 FEET TO THE WESTERLY LINE OF THE LAND DESCRIBED IN DEED TO THE PACIFIC ELECTRIC RAILWAY COMPANY, RECORDED DECEMBER 3, 1912 AS INSTRUMENT NO. 63 IN BOOK 5278 PAGE 170 OF DEEDS, RECORDS OF SAID COUNTY, BEING A POINT IN A CURVE CONCAVE TO THE EAST, HAVING A RADIUS OF 1462.47 FEET, A RADIAL LINE OF SAID CURVE BEARS NORTH 81° 38' 52" EAST FROM SAID LAST MENTIONED POINT; THENCE NORTHERLY ALONG SAID WESTERLY LINE ON SAID CURVE, 343.83 FEET TO SAID WESTERLY LINE OF NORMANDIE AVENUE; THENCE ALONG SAID NORMANDIE AVENUE, NORTH 11° 33' 59" WEST 33.62 FEET TO THE TRUE POINT OF BEGINNING.

PARCEL B (FEE):

THAT PORTION OF LOT 99 OF THE MCDONALD TRACT, RANCHO SAN PEDRO, IN THE CITY OF GARDENA, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15 PAGES 21 AND 22 OF MISCELLANEOUS RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT IN THE SOUTHERLY LINE OF SAID LOT 99 DISTANT WESTERLY THEREON 61.24 FEET FROM THE SOUTHEAST CORNER OF SAID LOT SAID POINT BEING THE SOUTHWESTERLY CORNER OF THE LAND CONVEYED TO THE PACIFIC ELECTRIC RAILWAY COMPANY BY DEED RECORDED IN BOOK 5480 PAGE 119 OF DEEDS, RECORDS OF SAID COUNTY; THENCE WESTERLY ALONG SAID SOUTHERLY LINE 107.36 FEET, MORE OR LESS TO A POINT IN SAID SOUTHERLY LINE DISTANT EASTERLY THEREON 776.67 FEET FROM THE SOUTHWEST CORNER OF SAID LOT; THENCE NORTHERLY PARALLEL WITH THE WESTERLY LINE OF SAID LOT, A DISTANCE OF 99.00 FEET TO A POINT IN THE SOUTHERLY LINE OF THE LAND DESCRIED IN DEED TO FRANCIS R. CARMICHAEL RECORDED IN BOOK 2605, PAGE 51 OF DEEDS, RECORDS OF SAID COUNTY; THENCE EASTERLY ALONG THE SOUTHERLY LINE OF SAID LAND OF CARMICHAEL, SAID LINE BEING PARALLEL WITH THE SOUTHERLY LINE OF SAID LOT, TO THE NORTHWEST CORNER OF THE LAND OF SAID PACIFIC ELECTRIC RAILWAY COMPANY FIRST ABOVE REFERRED TO; THENCE ALONG THE WESTERLY LINE OF THE LAND OF SAID PACIFIC ELECTRIC RAILWAY COMPANY, SOUTH 11° 06' EAST 100.89 FEET TO THE POINT OF BEGINNING.

PARCEL C (FEE):
THAT PORTION OF LOT 99 OF THE MCDONALD TRACT; IN THE CITY OF GARDENA, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 15 PAGE 21 OF MISCELLANEOUS RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF LOS ANGELES COUNTY. DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT ON THE SOUTH LINE OF SAID LOT 99, 490 FEET EAST OF THE SOUTHWEST CORNER; THENCE NORTH PARALLEL WITH THE WEST LINE OF SAID LOT, 99 FEET; THENCE EAST PARALLEL WITH THE SOUTH LINE OF SAID LOT, 286–2/3 FEET; THENCE SOUTH PARALLEL WITH THE WEST LINE OF SAID LOT 99 FEET THENCE WEST ALONG THE SOUTH LINE OF SAID LOT, 286–2/3 FEET TO THE POINT OF BEGINNING. EXCEPT THEREFROM THE WEST 100 FEET OF THE SOUTH ONE–HALF THEREOF.

PARCEL D (EASEMENT):
A PERPETUAL RIGHT OF WAY 60 FEET IN WIDTH AS SET FORTH IN THE DOCUMENT RECORDED IN BOOK 5278, PAGE 170 OF DEEDS.

PARCEL E (EASEMENT):
AN EASEMENT FOR ANY LAWFUL PURPOSE EXCEPT FOR THE STORAGE OR HANDLING OF ANY HAZARDOUS AND/OR TOXIC SUBSTANCES OR MATERIALS, AS SET FORTH AND SUBJECT TO THE TERMS AND PROVISIONS CONTAINED IN THAT CERTIAN RECIPROCAL EASEMENT AGREEMENT RECORDED NOVEMBER 6, 1990 AS INSTRUMENT NO. 90–1872982, OFFICIAL RECORDS.

EXISTING EASEMENTS

FUTURE CONDITIONS TO EXISTING SITE EASEMENTS
R = TO REMAIN
M = TO BE RELOCATED (TO BE MODIFIED)
A = TO BE ABANDONED (TO BE QUITCLAIMED/RELEASED)

EXISTING SITE EASEMENTS TO BE RELOCATED (MODIFIED) AND OR ABANDONED (QUITCLAIMED/RELEASED) WILL BE EXECUTED DURING THE FINAL MAP PROCESSING AND RECORDED PRIOR TO FINAL MAP RECORDATION.

A 1 — EASEMENT(S) FOR ANY LAWFUL PURPOSE AND RIGHTS INCIDENTAL THERETO, AS GRANTED IN A DOCUMENT TO JAMES G. BOWIE, TRUSTEE OF THE JAMES G. BOWIE THRUST U/T/D MARCH 15, 1982, RECORDED NOVEMBER 6, 1990, RECORDING NO. 90–1872982, OFFICIAL RECORDS. THIS ITEM AFFECTS THE SUBJECT PROPERTY AN IS PLOTTED HEREON.

A 2 — EASEMENT(S) FOR POLE LINES AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT RECORDED IN BOOK 5015 PAGE 136 OF DEEDS. THIS ITEM APPEARS TO AFFECT THE SUBJECT PROPERTY BUT IS NOT PLOTTED HEREON BECAUSE THE EXACT LOCATION OF SAID EASEMENT CAN NOT BE DETERMINED FROM RECORD. RECORD DOCUMENT IS ILLEGIBLE.

A 3 — EASEMENT(S) FOR INGRESS AND EGRESS AND RIGHTS INCIDENTAL THERETO AS RESERVED IN A DOCUMENT RECORDED SEPTEMBER 15, 1961, RECORDING NO. 2995 IN BOOK D1356, PAGE 500 OF OFFICIAL RECORDS. THIS ITEM AFFECTS THE SUBJECT PROPERTY AND IS PLOTTED HEREON.

R 4 — EASEMENT(S) FOR PUBLIC ROAD, STREET AND HIGHWAY, STORM DRAIN AND SURFACE DRAINAGE AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT RECORDED OCTOBER 7,1969, RECORDING NO.2330 OF OFFICAL RECORDS. THIS ITEM AFFECTS THE SUBJECT PROPERTY AND IS PLOTTED HEREON

M 5 — EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT:
PURPOSE: POLE LINES
RECORDING DATE: AUGUST 18, 1953
RECORDING NO: IN BOOK 42482, PAGE 215 OF OFFICIAL RECORDS

A 6 — EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT:
PURPOSE: PUBLIC ROAD STREET AND HIGHWAY
RECORDING DATE: AUGUST 16, 1967
RECORDING NO: AS INSTRUMENT NO. 2818 OF OFFICIAL RECORDS

A 7 — EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT:
PURPOSE: PUBLIC UTILITIES
RECORDING DATE: SEPTEMBER 25, 1967
RECORDING NO: AS INSTRUMENT NO. 2963 OF OFFICIAL RECORDS

A 8 — EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT:
PURPOSE: PUBLIC UTILITIES
RECORDING DATE: FEBRUARY 6, 1986
RECORDING NO: AS INSTRUMENT NO. 86–157344 OF OFFICIAL RECORDS

A 9 — EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT:
PURPOSE: POLE LINES
RECORDING NO: IN BOOK 5007, PAGE 204 OF DEEDS (LEGAL DESCRIPTION NOT PLOTTABLE)

A 10 — EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT:
PURPOSE: POLE LINES
RECORDING NO: IN BOOK 5015, PAGE 136 OF DEEDS (DOCUMENT ILLEGIBLE, NOT PLOTTABLE)

PROPOSED EASEMENTS

A — A PROPOSED EASEMENT TO THE CITY OF GARDENA FOR PUBLIC SERVICE VEHICULAR ACCESS AND EMERGENCY VEHICULAR ACCESS OVER THE PRIVATE STREETS

B — PROPOSED PUBLIC UTILITY EASEMENT (PUE)

C — A PROPOSED EASEMENT TO THE CITY OF GARDENA FOR A 10'x10' CORNER CUT OFF

NO.	REVISIONS	APP'D.	DATE

FUSCOE ENGINEERING
600 Wilshire Blvd, Suite 1470
Los Angeles, Ca 90017
213.988.8802 fuscoe.com

REGISTERED PROFESSIONAL ENGINEER — SHAWN ESPIRITU KEMPSKE — No. C83863 — 11.5.2024 — CIVIL — STATE OF CALIFORNIA

VTTM NOTES

VTTM NO. 83922

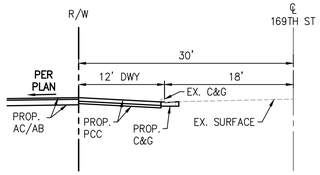
16911 S NORMANDIE AVENUE
GARDENA, CA 90247

CITY OF GARDENA

DRAWN:	AN
DESIGN:	AN
CHECKED:	SK
SCALE:	AS SHOWN
JOB NO.:	4047–002
DATE:	11/05/24

SHEET 2 OF 5

K:\PROJECTS\4047-002\PLANS\ENTITLEMENTS\ENTITLE TRACT MAP\4047-002TM01ENTLE.DWG (11-05-2024 7:57:17 AM) Plotted by: Shawpeee



SECTION A-A

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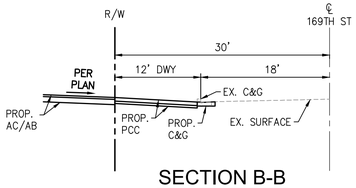

SECTION B-B

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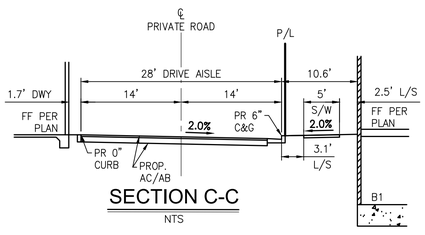

SECTION C-C

NTS

SECTION D-D

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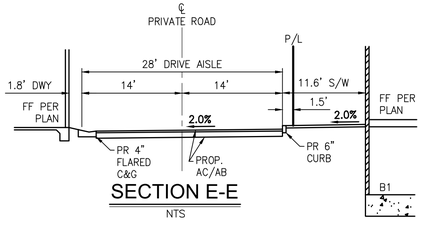

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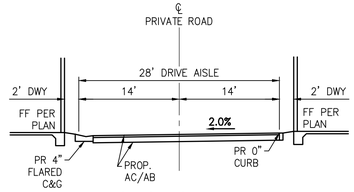

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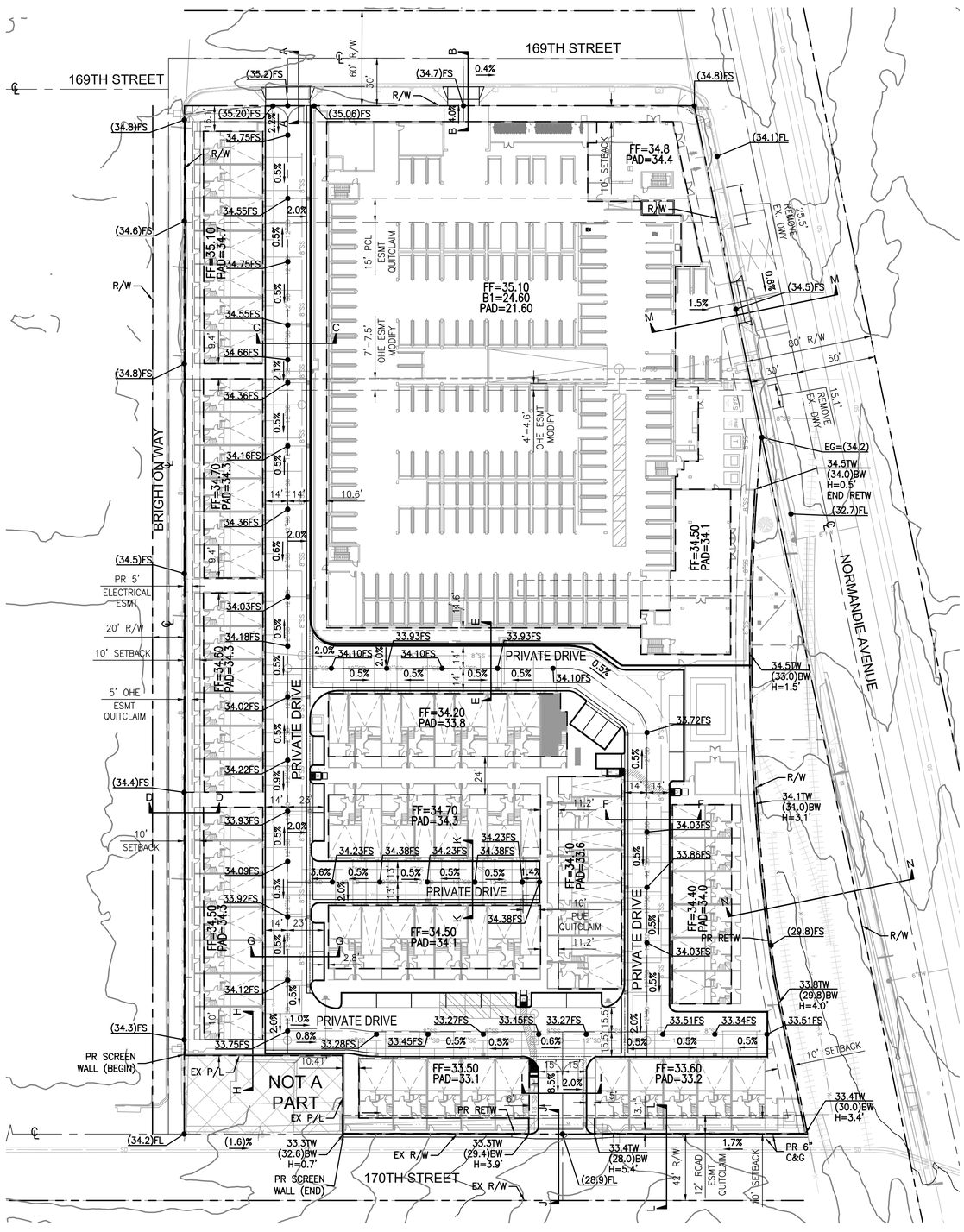

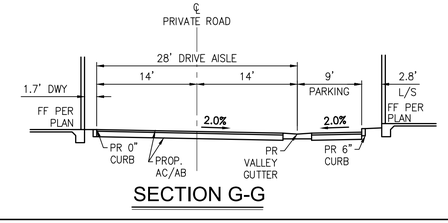

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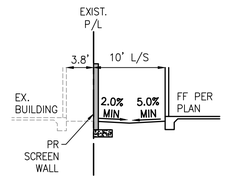

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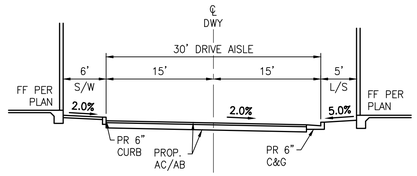
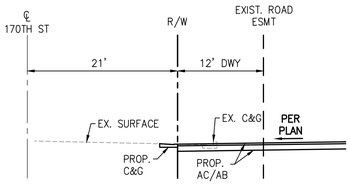


SECTION I-I

NTS



SECTION J-J

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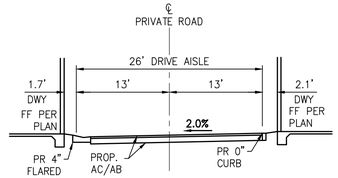

SECTION K-K

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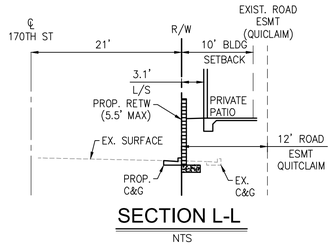

SECTION L-L

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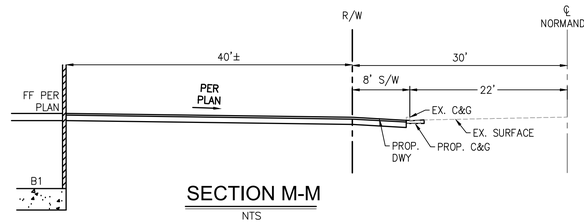
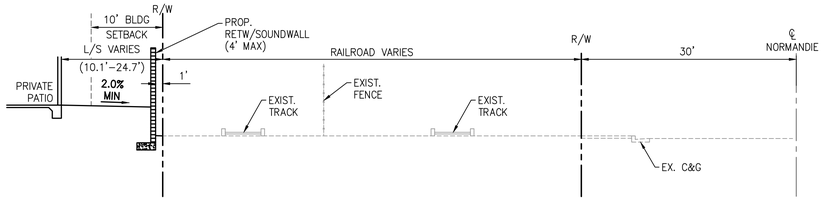


SECTION M-M

NTS

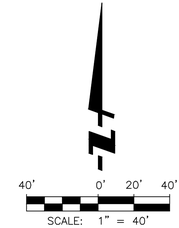


SECTION N-N

NTS

NOTES

1. SLAB THICKNESS ASSUMED TO BE 5-INCHES THICK PER PRELIMINARY GEOTECHNICAL INVESTIGATION DATED OCTOBER 25, 2021 PREPARED BY HAMILTON & ASSOCIATES.
2. SUBTERRANEAN GARAGE EXCAVATION ASSUMED TO BE 10'-6".



NO.	REVISIONS	APP'D.	DATE

FUSCOE ENGINEERING
600 Wilshire Blvd, Suite 1470
Los Angeles, Ca 90017
213.988.8802 fuscoe.com

REGISTERED PROFESSIONAL ENGINEER
JOSHUA ESPIRITU KAWAKAMI
No. C83863
CIVIL
STATE OF CALIFORNIA
11.5.2024

CONCEPTUAL GRADING PLAN

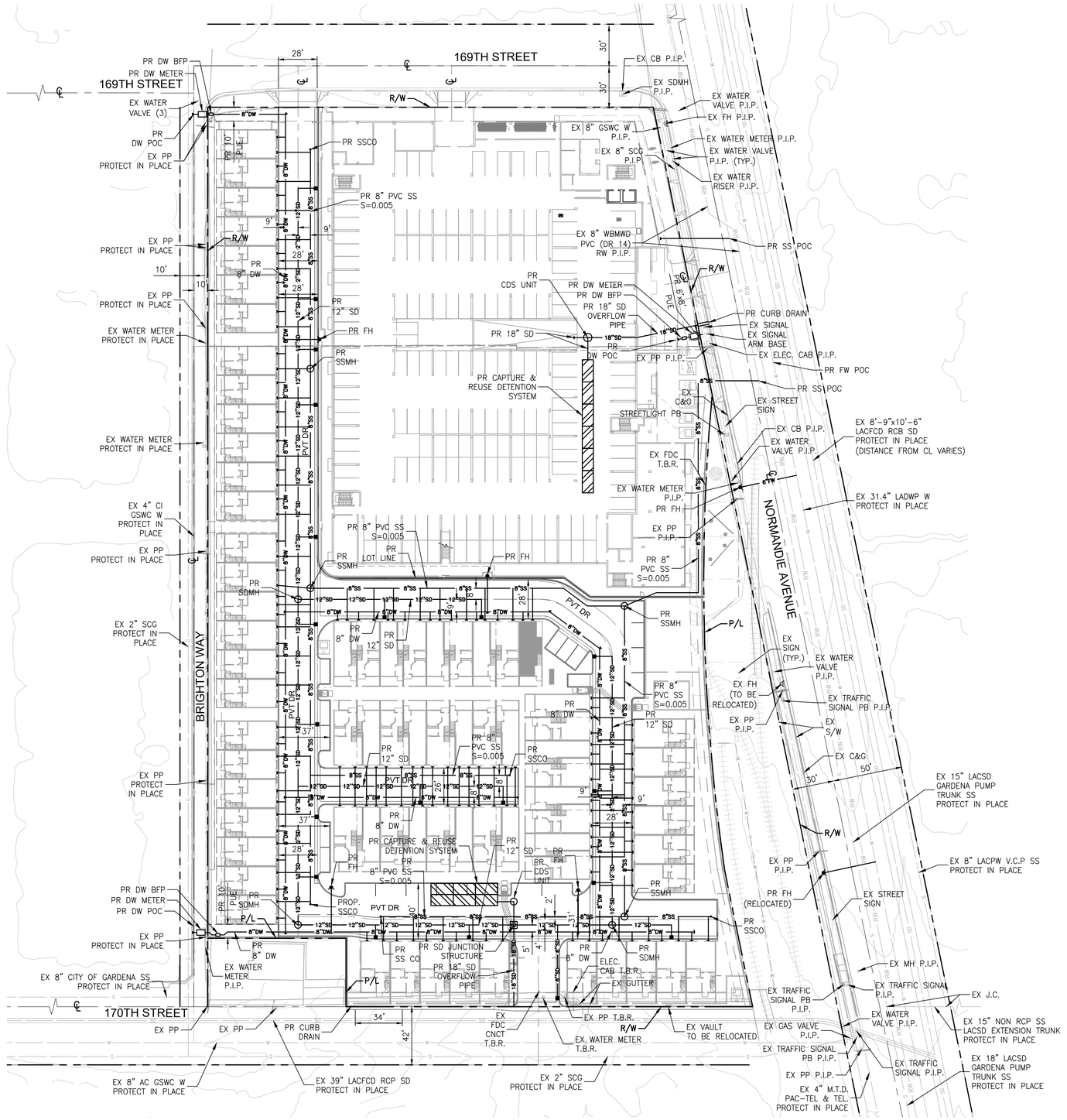
VTTM NO. 83922

16911 S NORMANDIE AVENUE
GARDENA, CA 90247

CITY OF GARDENA

DRAWN:	AN
DESIGN:	AN
CHECKED:	SK
SCALE:	AS SHOWN
JOB NO.:	4047-002
DATE:	11/05/24
SHEET	3 OF 5

P:\PROJECTS\4047.002\CAD\SHEETS\GRADING TRACT MAP\4047-002TMGRADING (11-05-2024 7:59:01 AM) Plotted by: Shawnee



NO.	REVISIONS	APP'D.	DATE

FUSCOE ENGINEERING
600 Wilshire Blvd, Suite 1470
Los Angeles, Ca 90017
213.988.8802 fuscoe.com

REGISTERED PROFESSIONAL ENGINEER
SAMSEN ESPIRITU KANJANEE
No. C83863
11.5.2024
CIVIL
STATE OF CALIFORNIA

PRELIMINARY UTILITY PLAN

VTTM NO. 83922

16911 S NORMANDIE AVENUE
GARDENA, CA 90247

CITY OF GARDENA

DRAWN:	AN
DESIGN:	AN
CHECKED:	SK
SCALE:	AS SHOWN
JOB NO.:	4047-002
DATE:	11/05/24

SHEET 4 OF 5

FIRE ACCESS & HYDRANT LOCATION PLAN
FOR VESTING TENTATIVE TRACT MAP NO. 83922

GENERAL NOTES

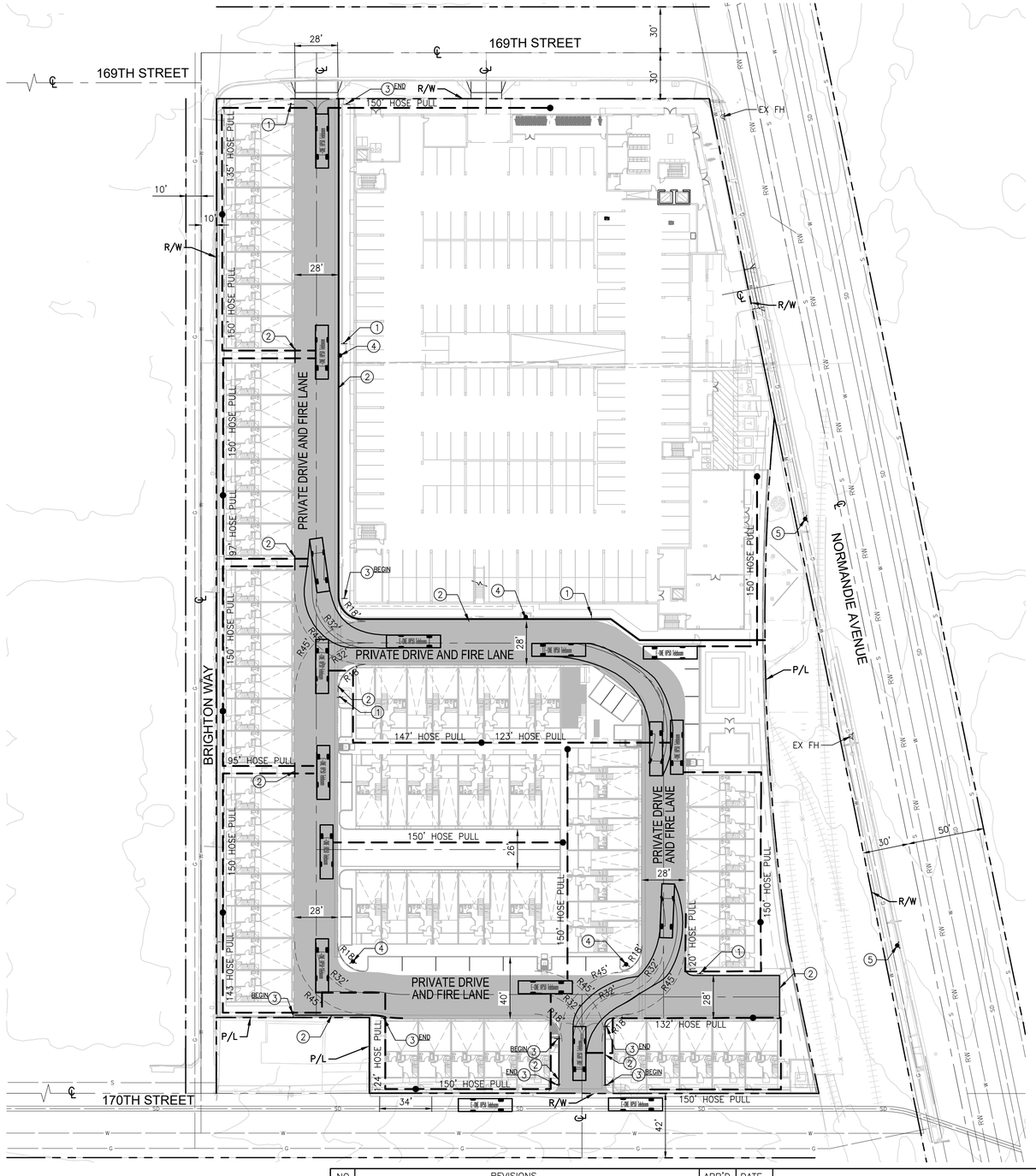
1. ALL FIRE ACCESS LANES MEET LA COUNTY FIRE DEPARTMENT MINIMUM REQUIREMENTS 19' & 45' RADII.
2. THIS PROJECT DOES NOT HAVE ANY FUEL MODIFICATION OR WILD LAND EXPOSURES AND IS NOT IN A VERY HIGH FIRE HAZARD ZONE.
3. THIS PROJECT IS DESIGNED IN CONFORMANCE WITH THE CBC, 2016 EDITION.
4. ALL FIRE ACCESS ROADS SHALL BE ALL WEATHER, MEET THE CRITERIA OF AN ALL DRIVING SURFACE AND COMPLY WITH LA COUNTY FIRE DEPARTMENT GUIDELINE FOR FIRE APPARATUS ROADS.
5. LARGEST BUILDING SQ. FOOTAGE = 70,531 SQFT
6. BUILDINGS ARE DESIGNATED TYPE-IA AND TYPE IIIA
7. BUILDING OCCUPANCIES ARE R-2 FOR ATTACHED MULTI-FAMILY UNITS
8. THE BUILDING HEIGHTS ARE APPROXIMATELY 40 FEET AND 88 FEET MAX OVERALL
9. ALL R-2 BUILDINGS ON SITE WILL BE SPRINKLERED PER NFPA-13
10. BUILDING ADDRESS NUMBER SHALL BE PROVIDED AND MAINTAINED SO AS TO BE PLAINLY VISIBLE AND LEGIBLE FROM THE STREET FRONTING THE PROPERTY. THE NUMBERS SHALL BE A MINIMUM OF 3 INCHES HIGH, 1 INCH WIDE WITH A 3/8 INCH STROKE. FOR BUILDINGS SET BACK MORE THAN 150 FEET FROM THE STREET, THE NUMBERS SHALL BE A MINIMUM 5 INCHES HIGH, 2 INCHES WIDE WITH A 1/2 INCH STROKE. FIRE CODE 908.4.4.
11. A KEY BOX SHALL BE PROVIDED AT THE MAIN ENTRANCE, IN ACCORDANCE WITH FIRE CODE 902.4, AND SET FORTH IN FIRE DEPARTMENT REGULATION 5.
12. THE REQUIRED FIRE FLOW FOR PUBLIC FIRE HYDRANT AT THIS LOCATION IS 3,000 GALLONS PER MINUTE (GPM), AT 20 PSI RESIDUAL PRESSURE, FOR A DURATION OF 3 HOURS FOR 1 FIRE HYDRANT.
13. THE REQUIRED FIRE FLOW FOR PRIVATE ON-SITE FIRE HYDRANTS AT THIS LOCATION IS 2,500 GALLONS PER MINUTE (GPM), AT 20 PSI RESIDUAL PRESSURE, FOR A DURATION OF 2 HOURS FOR 4 FIRE HYDRANTS.
14. ALL FIRE HYDRANTS SHALL MEASURE 6"X4"X2-1/12", BRASS OR BRONZE, CONFORMING TO AMERICAN WATER WORKS ASSOCIATION STANDARD C503, OR APPROVED EQUAL; AND SHALL BE INSTALLED IN COMPLIANCE WITH FIRE DEPARTMENT REGULATION 8 AND FIRE CODE 903.2.1.
15. ALL ON-SITE FIRE HYDRANTS SHALL BE INSTALLED, TESTED, AND APPROVED PRIOR TO BUILDING OCCUPANCY. FIRE CODE 1001.4.
16. THE INSPECTION, HYDROSTATIC TEST AND FLUSHING OF THE UNDERGROUND FIRE PROTE4CTION PIPING SHALL BE WITNESSED BY AN AUTHORIZED FIRE DEPARTMENT REPRESENTATIVE AND NO UNDERGROUND PIPING OR THRUST BLOCKS SHALL BE COVERED WITH EARTH OR HIDDEN FROM VIEW UNTIL THE FIRE DEPARTMENT REPRESENTATIVE HAS BEEN NOTIFIED AND GIVEN NOT LESS THAN 48 HOURS IN WHICH TO INSPECT SUCH INSTALLATIONS. FIRE CODE 1001.4.
17. 503.4.1 TRAFFIC CALMING DEVICES, INCLUDING BUT NOT LIMITED TO, SPEED BUMPS AND SPEED HUMPS, SHALL BE PROHIBITED UNLESS APPROVED BY THE FIRE CODE OFFICIAL.

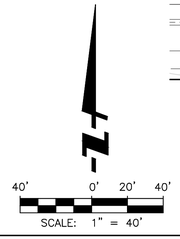
LEGEND/ABBREVIATIONS

- RIGHT-OF-WAY LINE
- CENTERLINE
- PROPOSED EASEMENT LINE
- CONTOUR
- PROPOSED FIRE HYDRANT
- EXISTING FIRE HYDRANT
- PROPOSED PRIVATE DRIVE AND FIRE LANE
- HOSE PULL
- RED CURB STRIPING
- EXISTING MANHOLE
- EXISTING SIGN
- EXISTING STREETLIGHT
- EXISTING STREETLIGHT PULLBOX
- EXISTING WATER METER
- ℄ CENTERLINE
- EX EXISTING
- FH FIRE HYDRANT
- P/L PROPERTY LINE
- PROP. PROPOSED
- R/W RIGHT-OF-WAY
- TYP. TYPICAL

CONSTRUCTION NOTES

1. INSTALL "FIRE LANE" SIGN PER DETAIL 1 HEREON.
2. FIRE LANE IDENTIFICATION-RED CURBS PER DETAIL 2 HEREON.
3. INSTALL "FIRE LANE" SIGN BEGIN OR END PER DETAIL 3 HEREON.
4. PROPOSED PRIVATE FIRE HYDRANT.
5. PROPOSED PUBLIC FIRE HYDRANT.

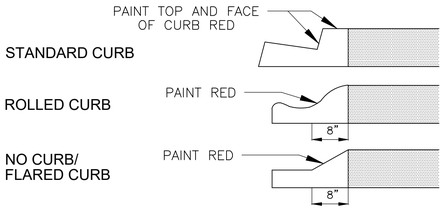




NOTES:

1. THE WORDS "FIRE LANE" SHALL BE BOLD, CONDENSED WHITE REFLECTIVE LETTERING ON RED BACKGROUND AND NO SMALLER THAN TWO (2) INCHES IN HEIGHT.
2. LETTERING SHALL BE BOLD, CONDENSED RED REFLECTIVE LETTERING ON WHITE REFLECTIVE BACKGROUND AND NO SMALLER THAN TWO (2) INCHES IN HEIGHT.
3. LETTERING SHALL BE RED ON WHITE REFLECTIVE BACKGROUND, NO SMALLER THAN ONE (1) INCH IN HEIGHT.
4. THE SIGN SHALL BE NO SMALLER THAN 12 INCHES WIDE BY 18 INCHES HIGH.
5. THE SIGN SHALL BE SECURELY MOUNTED FACING THE DIRECTION OF TRAVEL AND BE CLEARLY VISIBLE TO ONCOMING TRAFFIC ENTERING THE DESIGNATED AREA. SIGNS SHALL BE OF DURABLE MATERIAL AND INSTALLED PER ATTACHMENT 13 AND 14, OCFA GUIDELINE B-09, " FIRE LANE NO PARKING SIGN LOCATIONS" AND "MOUNTING SPECIFICATIONS FOR FIRE LANE ENTRANCE AND NO PARKING SIGNS.

NO PARKING SIGN (1) — NOT TO SCALE



1. FIRE LANE ENTRANCE SIGN(S) SHALL BE PROVIDED PER ATTACHMENT 9 FROM OCFA.
2. CURBS SHALL BE PAINTED OSHA RED.
3. "FIRE LANE – NO PARKING" SHALL BE PAINTED ON TOP OF THE CURB WITH WHITE THREE (3) INCH HIGH LETTERS SPACED THIRTY (30) FEET ON CENTER OR PORTION THEREOF.

RED CURB PAVEMENT MARKING (2) — NOT TO SCALE

NOTES:

1. THE WORDS "FIRE LANE" SHALL BE WHITE REFLECTIVE ON RED BACKGROUND AND NO SMALLER THAN TWO (2) INCHES IN HEIGHT.
2. LETTERING SHALL BE RED ON WHITE REFLECTIVE BACKGROUND, NO SMALLER THAN TWO (2) INCHES IN HEIGHT.
3. LETTERING SHALL BE RED ON WHITE REFLECTIVE BACKGROUND, NO SMALLER THAN ONE (1) INCH IN HEIGHT.
4. THE SIGN SHALL BE NO SMALLER THAN 12 INCHES WIDE BY 18 INCHES HIGH.
5. THE SIGN SHALL SECURELY MOUNTED FACING THE DIRECTION OF TRAVEL AND CLEARLY VISIBLE TO ONCOMING TRAFFIC ENTERING THE DESIGNATED AREA. SIGNS SHALL BE OF DURABLE MATERIAL AND INSTALLED PER SIGN MOUNTING DETAIL HEREON.

BEGIN & END NO PARKING SIGN OR BEGIN (PER PLAN) (3) — NOT TO SCALE

NO.	REVISIONS	APP'D.	DATE

FUSCOE ENGINEERING
600 Wilshire Blvd, Suite 1470
Los Angeles, Ca 90017
213.988.8802 fuscoe.com

REGISTERED PROFESSIONAL ENGINEER — JASON ESPIRITU NAVARRE — No. C83863 — 11.5.2024 — CIVIL — STATE OF CALIFORNIA

PRELIMINARY FIRE ACCESS

VTTM NO. 83922

16911 S NORMANDIE AVENUE
GARDENA, CA 90247

CITY OF GARDENA

DRAWN:	AN
DESIGN:	AN
CHECKED:	SK
SCALE:	AS SHOWN
JOB NO.:	4047-002
DATE:	11/05/24
SHEET	5 OF 5

C:\PROJECTS\4047\002\PLANS\ENTITLEMENTS\EXHIBIT FMAP\4047-002TMAP4.DWG (11-05-2024 8:07:24AM) Plotted by: SKnaylene

EXHIBIT B

CITY OF GARDENA
CONDITIONS OF APPROVAL FOR:

ENVIRONMENTAL ASSESSMENT #20-21; GENERAL PLAN AMENDMENT #3-21; ZONE CHANGE #2-22; ZONE TEXT AMENDMENT #4-21; SPECIFIC PLAN #1-21; VESTING TENTATIVE MAP #4-21; SITE PLAN REVIEW #11-21; DEVELOPMENT AGREEMENT #2-21; AND AFFORDABLE HOUSING AGREEMENT

16829, 16835, 16907, 16911 South Normandie Avenue
(APNs: 6106-030-011, 015, 016, 017)

CONDITIONS APPLICABLE TO EACH SUBAREA OF DEVELOPMENT – THE APARTMENT BUILDING AND TOWNHOME DEVELOPMENT

For each subarea of development, the following conditions shall apply, unless otherwise indicated.

GENERAL CONDITIONS

GC 1. The applicant accepts all of the conditions of approval set forth in this document and shall sign the acknowledgment. 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. The applicant shall comply with all written policies, resolutions, ordinances, and all applicable laws in effect at time of the effective date of the development agreement. The conditions of approval shall supersede all conflicting notations, specifications, and dimensions which may be shown on the project development plans. The conditions of approval include any requirements set forth in the Development Agreement, regardless of whether they are specifically set forth herein.

GC 4. The site plan layout shall be in accordance with the plans approved by the City Council as may be modified by these conditions of approval. The final completed project shall be in substantial compliance with the plans upon which the City Council based its decision, as modified by such decision.

GC 5. In accordance with GMC Section 8.20.130.A, 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 6. There shall be no outdoor lighting for construction beyond 6:00 pm any day.

GC 7. In accordance with GMC Section 18.42.140, any and all roof-mounted equipment, devices or materials shall be completely 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 defend, indemnify, and hold harmless the City, its agents, officers, and employees from any claims, actions or proceedings, damages, costs (including without limitation attorneys' fees), injuries, or liabilities against the City or its agents, officers, or employees arising out of the City's approval of Environmental Assessment #20-21; General Plan Amendment #3-21; Zone Change #2-22; Zone Text Amendment #4-21; Specific Plan #1-21; Vesting Tentative Map #4-21; Site Plan Review #11-21; Development Agreement #2-21; And Affordable Housing Agreement. The City shall promptly notify the applicant of any claim, action, or proceeding and the City shall cooperate fully in the defense. If the City fails to promptly notify the applicant of any claim, action, or proceeding, or if the City fails to cooperate fully in the defense, the applicant shall not thereafter be responsible to defend, indemnify, or hold harmless the City. Although the applicant is the real party in interest in 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 of any obligation under this condition, including the payment of attorneys' fees.

GC 9. The applicant shall comply with all mitigation measures set forth in the Mitigation Monitoring and Reporting Program adopted for the Project under Resolution No. 6683.

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, except for the tentative map. Utilization for the tentative tract map shall mean the final tract map to be recorded with the Los Angeles County Recorder's (TM 2).

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 shall submit for review and approval detailed landscape and irrigation plans prepared by a licensed landscape architect to the Director of Community Development or designee 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 five (5) gallon size. Metal cages, painted green, shall be used to protect irrigation check valves and controller, and consistent with the landscape plans approved by the City Council.,

PL4. The applicant shall submit a site lighting plan, with photometrics, for review and approval to the Community Development Department 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. All light fixtures shall further comply with the requirements of the specific plan.

PL5. Colors and materials as shown on the development plans under Exhibit C, are approved. Deviation from colors and materials shall be in accordance with the Design Standards of the Specific Plan (#1-21). Any minor modifications to the materials used shall be subject to the review and approval of the Community Development Director. If the Director deems the modifications to be major changes, then it shall go before the Planning Commission for review and approval.

PL6. A master sign program shall be submitted to the Community Development Director for administrative approval. The master sign program shall include identification and wayfinding signage throughout the Specific Plan Area.

PL7. 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.

PL8. Each subarea of development shall comply with all development standards of the specific plan.

PL9. Applicant shall pay fees in accordance with the Development Agreement which includes:

- A multiple-unit residential development impact fee of $1,000 per unit for market rate units prior to building permit issuance in accordance with Gardena Municipal Code section 15.48.040.

PL10. 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.

Off-site Improvements

PL11. The applicant shall submit Street Improvement plans for to the City's Public Works Department for the review and process for all offsite railroad improvements as shown in Exhibit C to the Normandie Crossing Specific Plan. The plans shall be in accordance with the California Public Utilities Commission (CPUC) standards and Union Pacific Railroad (UPRR) guidelines.

PL12. The applicant shall submit Street Improvement plans to the City's Public Works Department for review and approval for the installation of a sidewalk along the south side of 169th Street, west of the Property, between the Brighton Way alleyway and the alley west of Brighton Avenue. Such work shall be completed with the first phase of development.

PROJECT DESIGN FEATURES

DF 1. The Project would utilize off-road diesel-powered construction equipment which would meet, at a minimum, the Tier 4 emission standards for nonroad diesel engines promulgated by the USEPA for equipment greater than 50 horsepower.

DF 2. The Project would comply with the California Green Building Standards Code (CALGreen Code) (California Code of Regulations Title 24, Part 11) for electric vehicle (EV) charging design. Compliance would provide 10% of parking stalls to be EV capable, 25% of parking stalls to be EV ready with Level 2 EV charging receptacles, and 5% of parking stalls to be equipped with Level 2 EV chargers. The final design may vary from this in compliance with the CALGreen Code.

DF 3. There would be no natural gas use by any of the Project land uses.

DF 4. Prior to the start of construction, a Construction Traffic Management Plan would be prepared and submitted to City for review and approval. The Construction Traffic Management Plan would minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, the Construction Traffic Management Plan will include, but not be limited to, the following measures.

a. Identified routes for vehicular traffic, bicyclists, and pedestrians around traffic lane, parking lane and/or sidewalk closures as they are required;

b. Provisions to ensure that access remains unobstructed for land uses near the Project site during construction;

c. Provisions to accommodate parking for construction workers either on-site or at offsite, off-street locations. Parking would be prohibited on streets in the vicinity of the Project site; and

d. Prior to the start of construction, the Applicant would coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project site and neighboring businesses and residences.

BUILDING & SAFETY

BS1. The applicant shall comply with all applicable portions of the most current California Building Standards Code (Title 24, California Code of Regulations) in effect at the time of permit application.

BS2. The applicant shall obtain separate Building Division including permits for Demolition, Grading, Building, Electrical, Plumbing, Mechanical, and Fences and Walls if required.

BS3. The applicant shall comply with all conditions set forth by other departments and agencies, including but not limited to: Gardena Planning, Gardena Public Works, and Los Angeles County Fire Department.

BS4. The applicant shall comply with the latest adopted Los Angeles County Fire Code and Fire Department requirements, as applicable.

BS5. The applicant 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 Chief 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.

BS6. The applicant 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, evaporation, or bio-treat storm water runoff. Sheet flowing storm-water, without filtering, is no longer acceptable.

BS7. 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).

BS8. A grading plan shall be submitted by the applicant/developer to the Building Official for review and approval. Grading shall be in substantial conformance

with the proposed project plans.

BS9. The applicant shall provide a complete hydrology and hydraulic study prepared by a qualified engineer, and comply with the recommendations of the engineer, to the satisfaction of the Building Official.

BS10. The applicant shall submit a 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 will review construction plans to verify compliance with standard engineering practices, the GMC/CBSC, and the Geotechnical Investigation's recommendations.

BS11. The applicant shall prepare construction and demolition waste recycling plans for review and approval by the Building Division. The applicant shall enroll in the city's waste diversion program.

BS12. The applicant shall post procedures and phone numbers at the construction site for notifying the City, local Police Department, and construction contractor (during regular construction hours and off- hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.

BS13. The applicant shall notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.

BS14. The applicant shall designate an on-site construction complaint and enforcement manager for the project.

BS15. The applicant shall ensure that all construction equipment is properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.

PUBLIC WORKS – ENGINEERING DIVISION

PW1. All work in the public right of way shall be constructed in accordance with the Standard Plans and Standard Specifications for Public Works Construction, latest edition and the City and State Codes as applicable. This includes supplements thereto and City of Gardena Standard Drawings. All work shall be designed and signed by a registered Civil Engineer or other applicable professional license engineer(s).

PW2. Prior to the issuance of demolition or construction permits, the applicant shall prepare and implement a construction management plan that shall be reviewed and approved by the Public Works Director. Any approvals shall be revocable at the discretion of the Public Works Director if significant impacts develop. The plan shall include restriction on allowing the parking of construction vehicles on 169th Street only within parking lane where not prohibited by red curb or signage during working hours for the purpose of receiving materials. The street parking must be open for all during non-working hours. No vehicles may be stopped/parked on Normandie Avenue. No barriers shall be placed on the asphalt at any time. Parked vehicles must conform to all rules and regulations, such as distance from the curb. Pedestrian access must be always unimpeded. There shall be no staging of materials in any public right-of-way.

PW3. Before undertaking any Encroachment/Excavation within the public right of way, the applicant must first obtain the applicable permit from the Public Works Engineering Division.

PW4. Parking for construction workers shall be provided on-site or at off-site, off-street locations. Vehicles of construction workers shall be prohibited from parking within the residential areas.

PW5. Prior to issuance of permits, all public improvements shall be guaranteed to be installed by the execution of an Agreement for Public Improvements secured by sufficient bond sureties or cash, complete indemnification form, Certification of Insurance (General Liability, Auto & Workers Compensation) naming City of Gardena as additional insured, contractor State License and City Business License.

PW6. The applicant shall remove and replace all sidewalk, curb, gutter, curb ramps, driveways, traffic signs, curb drains, marked pavement, and spandrel fronting the property along Normandie Avenue, West 170th Street, and West 169th Street.

PW7. The applicant submit improvement plans for trees to be located in the sidewalks on 169th Street and Normandie Avenue to the City Public Works Department for review and approval

PW8. Developer shall provide a ten-foot radii corner cut-off at the northwest corner of Brighton Way alleyway and 169th Street and shall make all improvements necessary to maintain and/or widen public access and put in public improvements in accordance with engineering plans to be approved by the City Public Works Department.

PW9. The applicant shall provide traffic control plans per WATCH (Work Area Traffic Control Handbook) and/or California MUTCD (California Manual on Uniform

Traffic Control Devices) per the latest standard pending proposed controls (permanent-overnight or temporary). The temporary/permanent traffic control plans shall be prepared by, or under the direction of, a licensed civil engineer or other authorized to practice traffic engineering.

PW10. The applicant shall provide Street Improvement Plans showing all requirements and submit them to the Public Works Department for review and approval. The Street Improvement Plan shall be stamped and signed by a Civil Engineer Registered in the state of California. As-built plan signed and stamped by the Engineer of Record shall be submitted to the Public Works Department prior to finalizing and closing permit. Any deviations from the approved plan will require a submittal of plan revision for the City review and approval.

PW11. The applicant is responsible for all applicant permit, plan check, surety, and other incidental fees pertaining to the proposed project.

PW12. Pedestrian access to all surrounding public sidewalks shall be provided at all times, except during such times as improvements are being made to the sidewalks as required by these conditions.

STANDARD CONDITIONS TO REDUCE IMPACTS (Gardena Municipal Code Section 18.42.210. C, D, and E)

GMC1. 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.

GMC2. 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 and full-time paleontological monitoring shall occur for the remainder of ground disturbance for the project.

GMC3. If Native American or tribal cultural resources are found on the site, the applicant shall enter into a cultural resources treatment agreement with a local Native American tribe traditionally and culturally affiliated with Gardena that is acknowledged by the Native American Heritage Commission, which shall address the following:

a. Treatment and disposition of cultural resources;

b. Designation, responsibilities, and participation of professional tribal monitors during grading, excavation and ground disturbing activities;

c. Project grading and development scheduling;

d. Terms of compensation for the tribal monitors;

e. Treatment and final disposition of any cultural resources, sacred sites, and human remains discovered on site;

f. Tribal monitor's authority to stop and redirect grading in order to evaluate the significance of any potential resources discovered on the property, and to make recommendations as to treatment; and

g. The applicant's agreement to relinquish ownership of all cultural resources, including all archaeological artifacts that are found on the project area, to the tribe for proper treatment and disposition; and the applicant's agreement that all tribal sacred sites are to be avoided and preserved.

GMC4. In compliance with state law, if human remains are unearthed, the project developer, pursuant to State Health and Safety Code Section 7050.5, will contact the county coroner and ensure no further disturbance occurs until the county coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98.

GMC5. If the remains are determined to be of Native American descent, the Native American Heritage Commission (NAHC) must be notified within twenty-four hours.

GMC6. Construction, grubbing, brushing, or tree removal shall be conducted outside of the state identified nesting season for migratory birds (typically March 15th through September 1st) if possible. If construction is conducted during nesting season, a pre-construction nesting bird survey shall be conducted within and immediately adjacent to the project site by a qualified professional biologist no more than seven days prior to the beginning of any project-related physical activity that is likely to impact migratory birds. If active nests are found during the pre-construction nesting bird survey, a nesting bird plan (NBP) shall be prepared by a qualified biologist and implemented during construction. At a minimum, the NBP shall include guidelines for addressing active nests, establishing buffers, monitoring, and reporting. The size, location and duration of all buffer zones, if required, shall be based on the nesting species, nesting stage, nest location, its sensitivity to disturbance, and intensity and duration of the disturbance activity. The buffers shall be maintained until the breeding

season has ended or until a qualified professional biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

GOLDEN STATE WATER COMPANY

GS1. The applicant shall contact Golden State Water Company for review of the existing water main once Los Angeles County Fire Department has issued their fire protection requirements on the project to initiate application for new service installation.

LOS ANGELES COUNTY FIRE DEPARTMENT

FD1. The applicant shall submit plans and specifications to the County of Los Angeles Fire Department Fire Prevention Engineering Section Building Plan Check Unit for review prior to building permit issuance.

FD2. A digital copy of the Final Tract Map shall be submitted to the Fire Department's Land Development Unit for review and approval prior to recordation.

FD3. A digital copy of a water systems improvement plan from the local water purveyor to the County of Los Angeles Fire Department Fire Prevention Division Land Development Unit for the require public fire hydrant.

FD4. Install 1 public fire hydrant as noted on approved Tentative Map/Hydrants and Fire Access Plan. The required fire flow for the public fire hydrants for the proposed development is 3,000gpm at 20 psi residual pressure for 3 hours. All required public fire hydrants shall be installed, tested and accepted prior to beginning construction. All fire hydrants shall measure 6”x 4"x 2-1/2" brass or bronze, conforming to current AWWA standard C503 or approved equal, and shall be installed in accordance with the County of Los Angeles Fire Code. Fire Code 501.4.

FD5. Install 4 new on-site private fire hydrants as noted on the fire access plan mark up. The required fire flow from the private fire hydrants is 2,500gpm at 20 psi residual pressure for 2 hours. Each private fire hydrant shall be capable to supply of fire flow no less than 1250gpm at 20psi residual pressure for 2 hours duration. Fire Code 507.3 & Appendix C106.1. Submit underground piping plans for the private fire hydrant infrastructure for review and approval to the County of Los Angeles Fire Department Fire Prevention Division Engineering Section Sprinkler Plan Check Unit via EPIC-LA.

FD6. Traffic calming devices, including but not limited to, speed bumps and speed humps shall be prohibited unless approved by the fire code official. Provide a note on the site plan and resubmit for additional Fire Department review. Provide a note on the Fire Access Plan and resubmit for additional Fire Department review.

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.

CONDITIONS APPLICABLE ONLY TO APARTMENT BUILDING

Subarea A (Apartments)

PL13. 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 on private property shall be permitted to grow to their maximum height.

PL14. The apartment management shall ensure that when units become available for rent, new residents who commence a 12-month lease shall be offered a one-time free monthly Zone 1 EZ Transit pass.

PL15. The applicant shall be required to enter into an agreement for affordable housing in the form attached hereto as Exhibit F, as may be modified by the City Attorney.

PL16. Unbundled Parking. The apartment manager shall charge for residential vehicle parking spaces for Rental Units within Subarea A. The Developer shall unbundle automobile parking charges from the rents or other fees charged for leasing residential units. None of the parking spaces will be allowed to be leased to non-residents of the apartment building.

PL17. Pre-Leasing for Area Employees. Rental Units within Subarea A shall be marketed exclusively for a thirty-day period to residents who are employees working within a 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 and demonstrate compliance prior to issuance of a certificate of occupancy.

PL18. Transit Information. To ensure that residential tenants of Rental Units within Subarea A are aware of transit options and TDM programs available to them, an information board or kiosk shall be posted in a central location in Subarea A. Developer shall also provide transit information online, and the website will

be advertised on the information board or kiosk. This information shall also be included on the website for Rental Units within Subarea A.

PL19. The applicant shall fund and complete the railroad track and roadway improvements along South Normandie Avenue pursuant to current California Public Utilities Commission standards and Union Pacific Railroad guidelines as set forth in Development Agreement #2-21.

PL20. The applicant shall provide five parking spaces to the public for use on a first come, first serve basis along Normandie Avenue.

CONDITIONS APPLICABLE ONLY TO TOWNHOMES

The following conditions apply to the townhome style development regardless of whether applicant chooses to rent or sell the units.

Subarea B (Townhomes)

PL21. The applicant shall provide the City with a copy of the Covenants, Conditions and Restrictions (CC&Rs) for the townhome development within Subarea B, which shall apply to the townhomes for review and approval prior to approval of the final map or issuance of a certificate of occupancy, not including model homes. The CC&Rs shall include all items listed in these conditions which are required to be included in the CC&Rs or items for which the HOA is responsible. At a minimum, the following provisions shall be included, as may be further detailed by these conditions. The failure to include a condition on the list below does not relieve the responsibility to include it in the CC&Rs if otherwise provided herein:

a. Any revisions to the CC&Rs shall require prior city approval.

b. All landscaping to be kept in a healthy condition.

c. Maintenance and repair obligations of all private streets/driveways.

d. The re-slurring and re-striping of the driveway and parking areas shall happen every five years at a minimum. The Director of Community Development or designee may require more frequent slurry and re-striping if the parking area is not maintained in good condition.

e. The building shall be maintained in good condition at all times and shall be repainted every eight years at a minimum. The Director of Community Development or designee may require more frequent painting if the improvements are not maintained in good condition.

f. Maintenance and repair obligations of all open spaces and Common Areas.

g. Prohibition against outdoor storage.

h. Prohibition against alterations to architectural treatments.

i. Prohibition against parking in driveway areas and in front of garages.

j. A requirement that trash cans shall be kept in the garage or out of public view.

k. Residents' vehicles shall be stored in the garages at all times while on the site.

l. Residents shall not be allowed to use Guest Parking for their own vehicles.

m. The entire site, all walls and fencing, and all building walls shall be maintained at all times free and clear of litter, rubbish, debris, weeds, and graffiti. Graffiti shall be removed within 24 hours and if paint is used to cover the graffiti, it shall be of the same color and texture as the building wall.

When the draft is provided to the City for review, it shall be accompanied by a table specifying where all conditions required can be found.

PL22. The CC&Rs shall provide that the homeowner's association 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.

PL23. The CC&Rs shall contain a prohibition against modifying the exterior colors and materials of any unit without approval by the Community Development Director.

PL24. The applicant shall re-slurry and re-stripe the driveway and parking areas every five years at a minimum. The Director of Community Development or designee may require more frequent slurry and re-striping if the parking area is not maintained in good condition.

PL25. The applicant shall maintain the building in good condition at all times and shall repaint the approved buildings and accouterments every eight years at a minimum. The Director of Community Development or designee may require more frequent painting if the improvements are not maintained in good condition.

PL26. There shall be no outdoor storage permitted within the Common Areas.

PL27. The architecture of each building shall be in accordance with the plans under Exhibit C. A substantial deviation, as determined by the Community

Development Director, from the architecture approved shall be processed in accordance with the applicable provisions of state law provided in California Government Code sections 65450. Any minor modifications to the materials used shall be subject to the review and approval of the Community Development Director.

PL28. All trash cans shall be kept in the garage or out of public view.

PL29. All vehicles shall be prohibited from parking in driveway areas and in front of garages.

PL30. All residents' vehicles shall be stored in the garages at all times while on the site. Residents shall not be allowed to use Guest Parking for their own vehicles.

PL31. Any revisions to the CC&Rs shall require prior city approval.

TM 1. Applicant shall be required to record a final map to merge the four existing lots and subdivide the lots into two as well as provide for 75 condominium units, regardless of whether applicant desires to sell or rent the townhouse style condominium units. Nothing in this condition shall prohibit applicant from filing a lot line adjustment to separate Subareas A and B prior to the recording of the final map at applicant's discretion.

TM 2. The final tract map shall be recorded with the Los Angeles County Recorder's office within a period not to exceed the term of the Development Agreement or any extension thereof. If said map is not recorded within such time, the life of the map shall be deemed expired and said approval shall be considered null and void.

TM 3. In accordance with Section 17.08.170 of the Gardena Municipal Code, the applicant shall dedicate all necessary rights-of-way for public improvements and shall construct such improvements at no cost to the City. Such improvements may include, but not be limited to, site grading and drainage, new sidewalk, curb and gutter, driveways, street trees, roadway paving, street lights, traffic control devices, gas mains, electric power lines, telephone and cable lines, all of which shall be installed in accordance with the specifications of the Public Works Department. All utilities shall be underground.

TM 4. Pursuant to Government Code § 66495, at least one exterior boundary line of the land being subdivided must be adequately monumented or referenced before the map is recorded.

TM 5. In accordance with Government Code § 66473.1, the design of the subdivision shall provide, to the extent feasible, for future passive/natural heating or cooling opportunities.

TM 6. Private driveways shall be indicated on the final map as “Private Driveway and Fire lane” with the widths clearly depicted and shall be maintained in accordance with the Fire Code. All required fire hydrants shall be installed, tested, and accepted prior to construction.

TM 7. Prior to initial phase associated with building construction, all above ground and underground infrastructure shall be installed.

TM 8. The applicant shall pay in lieu park fees in accordance with Chapter 17.20 of the Gardena Municipal Code at the rate of $10,000 per unit prior to the recording of the final map.

TM 9. Model homes may be permitted prior to final map recordation provided that all Fire Department requirements for health and safety are satisfied prior to issuance of a building permit.

Saiko Investment Corporation, certifies that it has read, understood, and agrees to the Project Conditions listed herein.

_____

Saiko Investment Corporation, Representative

By_____

Dated_____

City of Gardena

Gardena City Council Meeting

AGENDA REPORT SUMMARY

Agenda Item No. 15.A
Section: DEPARTMENTAL ITEMS - POLICE
Meeting Date: January 14, 2025

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

AGENDA TITLE: Rejection of all Bids for Request for Proposals (RFP) for Police Incident Major Response Vehicle (MIRV)

COUNCIL ACTION REQUIRED:

Staff Recommendation: Reject all bids received for the Police Incident Major Response Vehicle (MIRV) project. Authorize Staff to re-issue a Request for Proposals (RFP)

RECOMMENDATION AND STAFF SUMMARY:

On October 24, 2024, the City of Gardena released a Request for Proposals (RFP) for a Police Incident Major Response Vehicle (MIRV). The current MIRV has been in operation for over 15 years and has reached its end of life. The MIRV is used by the Gardena Police Department's Special Weapons and Tactics Team (SWAT), which handles all tactical incidents within the City. It must be able to reach all cities within mutual-aid support agreements (South Bay area), as well as training destinations. The MIRV carries the equipment for the SWAT team, such as rifles, ballistic vests, and breaching equipment.

One of the requirements of the RFP was to attend a mandatory pre-bid meeting which was held on Zoom on November 14, 2024. Only one company participated in that Zoom meeting, Gerling & Associates, and is therefore the only eligible bidder. RFP submissions were due on December 3, 2024 and Gerling & Associates submitted a proposal. Unfortunately, the cost of the proposal exceeds the budget that Staff has allocated for the MIRV.

Staff is recommending that the bid be rejected and that the Police Department be authorized to advertise and re-bid the project. Should the Council approve the recommendation to re-bid, Staff will remove the requirement for mandatory attendance at a pre-bid meeting in an effort to encourage additional bidders.

FINANCIAL IMPACT/COST:

There is no financial impact to rejecting the bids and re-issuing a new RFP.

ATTACHMENTS:

MIRV RFP.pdf

GA Proposal Gardena MIRV Truck.pdf

APPROVED:

_____

Clint Osorio, City Manager

REQUEST FOR PROPOSALS FOR POLICE MAJOR INCIDENT RESPONSE VEHICLE (MIRV)

PROPOSALS DUE: DECEMBER 3, 2024 at 12:00PM PST

A) Notice of Request for Proposals

The City of Gardena is releasing this Request for Proposals (RFP) from qualified suppliers for the design, manufacture, and outfitting of a high-quality Police Major Incident Response Vehicle (MIRV). City requests your firm fixed price for a vehicle per the requirements and specifications listed herein.

A copy of the RFP may be obtained from Planet Bids and the City of Gardena website at www.cityofgardena.org.

The City reserves the right to reject any and all proposals. This RFP may be cancelled at any time prior to the execution of a written agreement if deemed in the best interests of the City. Proposer is not entitled to recover any costs related to the preparation of the proposal due to cancellation of the RFP or withdrawal of an award prior to the execution of a written agreement.

Any questions, interpretations, or clarifications, either administrative or technical, about this RFP must be requested in writing prior to the date indicated in RFP Section D. All pertinent questions will be answered in writing and conveyed to all proposers. All questions should be directed to:

Elizabeth Hernandez, Administrative Management Analyst
ehernandez@cityofgardena.org

B) Purpose and Description of Services

Qualified vendors are invited to submit proposals, based on the information provided in this RFP, to effectively and efficiently provide services to the City to design, manufacture, and outfit a Major Incident Response Vehicle (MIRV) that meets the needs of the Gardena Police Department.

It is not the intent of this RFP to completely describe every requirement and specification required in detail. Some of the requirements and specifications will be described in broad terms. The proposer is expected to meet the broad requirements by proposing something as good as or equal to.

If a proposer discovers any ambiguity, conflict, discrepancy, omissions or other error in the RFP or any of its attachments, he/she shall immediately notify the City of Gardena Contract Administrator of such error in writing and request modifications or clarification of the document. Modifications and clarifications will be made by addenda. Failure to acknowledge and incorporate addenda will not relieve the proposer of the responsibility to meet all terms and conditions of RFP and any subsequent addenda.

If a proposer fails to notify the City of Gardena prior to the date fixed for submission of proposals of an error in the RFP known to him/her, or an error that reasonably should have been known to him/her, proposer shall bid at his/her own risk, and if awarded the contract, shall not be entitled to additional compensation or time by reason of the error or its later correction.

C) Bidder Minimum Qualifications

In addition to meeting all other requirements of this RFP, all responding proposers shall furnish verifiable evidence that their firm and personnel, at a minimum, meet the following qualifications.

The proposer should have consistently evolved its products and prices as compared to their competitors, and demonstrate long-term viability, financial stability, etc. Proposers are to provide the following information and meet the City's minimum qualification standards in order to be considered for award. Proposers should respond to each point below in the proposal response, noting and referencing the section and item number.

C1. Proposer Information – Proposers are to provide the following information about their company:

- Address and contact information, including phone number(s), email, names of owner and company officers
- Number of years in business
- Company description, including a short history and services offered
- Prior experience providing, building, and designing law enforcement vehicles (please provide at least three references)

C2. Financial Stability – Proposers are required to demonstrate a record of past financial stability and positive indicators for future performance. As such, proposers must submit an audited annual report or audited financial statement for the past two (2) years.

C3. Capability – All proposers must be able to demonstrate the capability to provide the required services by possessing all necessary business and technological resources, including personnel, facilities, maintenance, support, systems, organizational structure, operational controls, and quality control. Specifically, a proposer should:

- Have a demonstrated record of designing and providing specialty law enforcement vehicles. Provide date, location, vehicle type(s), and customer name.
- Provide related copies of licenses and certifications to perform such work.
- Ability to provide an opportunity to City Staff to meet with the body company and see examples of the type of vehicle being requested prior to Contract Award.

C4. Insurance Requirements

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, with coverage at least as broad as Insurance Services Office Form CG 00 01, 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. 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.

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.

D) Bid Requirements and Information

There is a **mandatory** bid conference on **November 14, 2024 at 11:00AM**. The pre-bid conference will held online via Zoom. Meeting ID: 779 722 8262
Invite Link https://us06web.zoom.us/j/7797228262?omn=83478415615
https://us06web.zoom.us/j/7797228262?omn=83478415615

Any requests for information concerning this RFP must be submitted in writing, and any substantive replies will be issued as a written addendum and emailed to those who submit written questions or request a copy of the addendum. All questions must be submitted by **November 18, 2024 at 12:00PM**. Any written addendum to this RFP will be posted and emailed as prescribed above no later than **November 21, 2024 at 5:00PM**.

All questions shall be directed to Elizabeth Hernandez, Administrative Management Analyst at ehernandez@cityofgardena.org.

E) Contract Award

Based on bids received in response to this RFP, an array of factors may be used in selecting the CONTRACTOR. This RFP does not in any way limit the City of Gardena's right to solicit contracts for similar or identical services, if, in the City of Gardena's sole and absolute discretion, it determines bids received are inadequate to satisfy its needs.

F) Submission Requirements

1. Time and Place for Submission of Bids

Bids must be received by **12:00PM, PST, on December 3, 2024 via Planet Bids.**

Bids that are submitted by fax, email or hard copy will not be accepted. Late submissions will not be considered.

Proposals shall be prepared in such a way to provide straightforward, concise delineation of capabilities to satisfy the requirements of this RFP.

Costs for developing proposals are entirely the responsibility of the proposer and shall not be chargeable to the City of Gardena.

Proposals become the property of the City of Gardena and information contained therein shall become public property subject to disclosure laws after Notice of Intent to Award. City of Gardena reserves the right to make use of any information or ideas contained in proposal.

2. Proposal Format

Proposals shall adhere to the following format for organization and content. Proposals must be divided into the individual sections listed below.

1. Cover Letter
   The cover letter shall include a brief general statement of intent to perform the services and confirm that all elements of the RFP have been reviewed and understood. The letter should also include a brief summary of proposer's (and subcontractors) qualifications and the proposer's willingness to enter into a contract with the City of Gardena. The letter should be signed by an individual who can bring the proposer contractually.

   Proposer must notify City of Gardena in advance of any proprietary or confidential material contained in the proposal and provide justification for not making such material public. City of Gardena shall have sole discretion to disclose or not disclose such material subject to any protective order which proposer may obtain.

2. Table of Contents
   The table of contents shall identify the contents of the proposal in a format consistent with the proposal requirements and format set forth herein.

3. Exceptions
   Any and all exceptions to the RFP must be listed on an item-by-item basis and cross-referenced with the RFP document. If there are no exceptions, proposer must expressly state that no exceptions are taken.

4. Experience
   This section shall contain the responses to the minimum proposer qualifications included in Section C of the RFP, general overview of the proposer's qualifications, and shall include, but not be limited to the following information:

   - Proposer Company Name, Address, Telephone Number, Email, Authorized Representatives and Contact for the RFP

- Proposer shall identify the number of years experience in providing specialty vehicles for design and build, ideally for law enforcement and similar in scope, to this RFP.
- Identification of any subcontractors for the execution of this contract, contact information for that subcontractor, company's years in business, address, and experience in the areas that will be relevant to this RFP.
- Proposer References: Please provide three (3) client references for which the proposer has provided similar services. References shall include the date and description of services, organization's name, contact person, title, email and phone number.

5. Quality of Solution Proposed
   Proposer shall provide a detailed description of the approach or plan to be used in response to Attachment A: Scope of Work. The prepared plan should demonstrate an overall understanding of the work to be performed. Pictures, schematics, brochures are allowed.

6. Cost
   Proposer is expected to quote a firm fixed-price for the requirements in Attachment A: Scope of Work. All costs associated with the service of this contract must be identified, including warranty, delivery, etc.

Attachment A: Scope of Work

The Scope of Work that follows is to be used as a general guide and is not intended to be a complete list of all necessary aspects of the MIRV. The Gardena Police Department's Special Weapons and Tactics Team (SWAT) is tasked with handling all tactical incidents within the City. This MIRV will be utilized by the SWAT team and must be able to reach all cities within mutual-aid support agreements (South Bay area), as well as training destinations. Therefore, this vehicle must be able to function in compressed urban areas requiring capabilities such as tight turning radius.

1. **Project Goals**
   The City of Gardena seeks proposals from vendors to design and build a police vehicle in accordance with the requirements and specifications contained in this RFP. This contract will encompass the build, outfitting, delivery and training on the operation of the vehicle. Warranty options shall also be included in the firm fixed price proposal.

2. **Scope of Work**
   2.1 Coordination of Activities
   Proposer must coordinate all activities under a resultant contract award with City of Gardena Police Department Staff.
   2.2 Location of Work
   The vehicle design and build will be done at the Proposer's site. Training on the vehicle can be done at the Gardena Police Department. Training will be conducted on the operation of the delivered vehicle following build completion. Cost of training provided by the proposer should be included in the original cost breakdown.
   2.3 Delivery Process
   Proposer must be capable of delivering the vehicle to the Gardena Police Department, located at 1718 West 162nd Street, Gardena, California 90247. Cost for delivery should be included in the cost breakdown.
   2.4 Service and Warranty Technicians
   It is the expectation of the City that proposer will have available certified technicians capable of performing warranty work or service on the vehicle, as needed. Proposer must identify the process warranty work is to be scheduled and performed.
   2.5 Acceptance of Completed Work
   The City will determine if the completed build is satisfactory before taking delivery of the vehicle. If the completed build does not meet the requirements detailed in this RFP, proposer must take whatever remedial action is necessary to meet the requirements. All remedial work shall be done at proposer's expense.
   2.6 Warranty Requirements
   Proposer must provide a three (3) year bumper-to-bumper warranty on chassis, three (3) year manufacturer's parts warranty, and a minimum three (3) year warranty on the body. Such warranties shall be effective upon delivery and acceptance of the vehicle by City. Specifically,
      - All parts, equipment, and other materials and workmanship furnished by the proposer shall include the manufacturer's warranty for replacement.
      - Proposer agrees to guarantee all work performed.

- Proposer further agrees to replace all components which fail or do not perform according to the manufacturer's specifications during the warranty period.
- Proposer agrees to redo all work which fails or causes a failure or does not perform according to the City's specifications during the warranty period, at no cost to the City.
- Warranty repairs on the vehicle (and body) requiring the vehicle be returned to the Proposer or Parts Manufacturer may require transportation costs. Those costs shall be covered by the Proposer or Parts Manufacturer.

2.7 Costs

Proposer(s) shall specify cost of each vehicle option.

2.8 Vehicle Specifications and Requirements

Chassis Specifications:

- Model: Ford F650
- Model Year: New
- Engine Type: 7.3L Gas
- Transmission: Automatic
- Color: White

Body Specifications:

- Dry Freight Van Body 22 Ft
- Color: White
- Sliding glass window pass through to cab from rear slide door with window
- Skirt to dress bottom of vehicle
- Granny attic with two (2) 110V gang outlets for charging, plugging in equipment
- Minimum 8 feet headroom inside body
- Storage for 20 vests
- Weapon storage for twenty (20) AR platform rifles
- Storage for four (4) larger shields (4' x 4')
- Additional storage outside for additional tools and equipment, such as rams
- 7 kW generator to be mounted in a manufactured toolbox in or under the storage area of the vehicle
- Non-Slip Flooring
- HVAC systems, 13,500 BTU, with heat strips for the equipment area
- LED red/white lights in the equipment room
- Should be built to withstand a substantial amount of weight in the body

Vehicle Exterior

- White Exterior
- Emergency Lights
    - Red/Blue LEDs front, rear, and two (2) on each side (one (1) towards front center and one (1) towards rear)
    - Bright White Lights of the same size installed by the side lights, siren, and PA system

Optional Upfits

- Electrical wiring and outlets (Curbside) on the outside of the body. The purpose is to have power capability for CNT and Drone equipment.
- Mounts on outside of vehicle body (Curbside) for mounting monitors.

Attachment B: Sample Contract

AGREEMENT BETWEEN
THE CITY OF GARDENA
AND
_____

This contract, hereinafter referred to as Agreement is entered into this _____ day of _____, 202_, by and between THE CITY OF GARDENA ("City") and _____, a [state] [type of entity] ("Consultant"). Based on the mutual promises and covenants contained herein, the Parties hereto agree, as follows.

1. Recitals.

A. Whereas, City requires the services of a professional to provide design, manufacture, and outfit a Major Incidence Response Vehicle (MIRV); and

B. Whereas, Consultant has represented that it is qualified by virtue of experience, training, education and expertise to provide these services; and

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

D. WHEREAS, no official or employee of City has a financial interest, within the provisions of sections 1090-1092 of the California Government Code, in the subject matter of this Agreement.

2. Services.

A. Consultant agrees to provide the professional services described in the City's Request for Proposals (RFP) and any associated addendum, attached hereto as **Exhibit "A"** and Consultant's Response to City's RFP ("Consultant's Proposal"), attached hereto as **Exhibit "B",** both incorporated herein by this reference ("Services").

B. The Services shall be performed in accordance with the Project Schedule set forth in **Exhibit B**. Consultant shall not be liable for any failure or delay in furnishing proposed Services resulting from fire, explosion, flood, storm, Act of God, governmental acts, orders or regulations, hostilities, civil disturbances, strikes, labor difficulties, difficulty in obtaining parts, supplies, or shipping facilities, inability to obtain or delays in obtaining suitable material or facilities required for performance, temporary unavailability of qualified personnel, failure by City to provide appropriate access to equipment or personnel, or other causes beyond Consultant's reasonable control.

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

5. Timing of Performance. Time is of the essence with respect to Consultant's performance of the Services required by this Agreement. Consultant shall diligently and timely pursue and complete the performance of the Services required of it by this Agreement as set forth in **Exhibit A.** City, in its sole discretion, may extend the time for performance of any Service.

6. Compensation. Compensation for the Services shall be billed as set forth in **Exhibit B**, attached hereto. 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, unless otherwise noted.

7. Term of Agreement/Termination. This Agreement shall commence on the Effective Date and continue for a period of one (1) year, ending on _____, 20__, unless previously terminated as provided herein or as otherwise agreed to in writing by the parties.

A. This Agreement shall be effective as of the date of execution by the City and shall remain in effect until all Services are completed or until terminated as provided for herein.

B. City may terminate this Agreement without cause by providing written notice to Consultant not less than ten days prior to an effective termination date. City's only obligation in the event of termination will be payment of fees and allowed expenses incurred up to and including the effective date of termination.

C. Unless for cause, Consultant may not terminate this Agreement. If Consultant is terminating this Agreement for cause, it must provide the City with thirty (30) days written notice.

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.

8. Agreement Administrator. For purposes of this Agreement, City designates Chief Mike

Saffell or designee as the Agreement Administrator who shall monitor Consultant's performance under this Agreement. Consultant shall be notified in writing of any deficiency in the performance of this Agreement in a timely manner by Agreement Administrator Consultant shall have five (5) business days from receipt of the notification to cure any deficiency to the reasonable satisfaction of the Agreement Administrator. All costs for such corrections shall be borne by Consultant and shall not increase Consultant's fees due hereunder. Should the Agreement Administrator determine that Consultant has not performed its obligation as stated in this Agreement in a satisfactory manner, City may terminate this Agreement for cause as specified in Section- Term of Agreement/Termination. 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.

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. Performance By Consultant. Consultant shall maintain or exceed the level of competency presently maintained by other similar practitioners in the State of California, for professional and technical soundness, accuracy and adequacy of all work, advice and material furnished under this Agreement.

15. 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.

16. 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.

17. Ownership of Work Product. All documents or other information created, developed, or received by Consultant shall, for purposes of copyright law, be deemed works 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.

18. Confidentiality Clause. Consultant acknowledges that some of the material and information that may come into its possession or knowledge in connection with this Agreement or its performance may consist of information that is exempt from disclosure to the public or other unauthorized persons under either state or federal statutes ("Confidential Information"). Confidential Information includes, but is not limited to, names, addresses, Social Security numbers, e-mail addresses, telephone numbers, financial profiles, credit card information, driver's license numbers, medical data, law enforcement records, agency source code or object code, agency security data, or information identifiable to an individual that relates to any of these types of information. Consultant agrees to hold Confidential Information in strictest confidence and not to make use of Confidential Information for any purpose other than the performance of this Agreement, to release it only to authorized employees or Sub-consultants requiring such information for the purposes of carrying out this Agreement, and not to release, divulge, publish, transfer, sell, disclose, or otherwise make the information known to any other party without City's express written consent or as provided by law. Consultant agrees to release such information or material only to employees or Sub-consultants who have signed a nondisclosure agreement, the terms of which have been previously approved by City. Consultant agrees to implement physical, electronic, and managerial safeguards to prevent unauthorized access to Confidential Information.

"Personal information" including, but not limited to, "Protected Health Information" (PHI) under Health Insurance Portability And Accountability Act (HIPAA), individuals' names, addresses, phone numbers, birth dates, and social security numbers collected, used, or acquired in connection with this Agreement shall be protected against unauthorized use, disclosure, modification or loss.

HIPAA establishes national minimum standards for the use and disclosure of certain health information. The Consultant must comply with all HIPAA requirements and rules when determined applicable by the City. If City determines that (1) City is a "covered entity" under HIPAA, and that (2) Consultant will perform "business associate" services and activities covered under HIPAA, then at City's request, Consultant agrees to execute City's Agreement in compliance with HIPAA.

Consultant shall ensure its directors, officers, employees, Sub-consultants or agents use personal information solely for the purposes of accomplishing the services set forth herein. Consultant and its Sub-consultants agree not to release, divulge, publish, transfer, sell or

otherwise make known to unauthorized persons personal information without the express written consent of the City or as otherwise required by law.

Any breach of this provision may result in termination of the Agreement and demand for return of all personal information. Moreover, Consultant will indemnify and hold the City harmless from and against all losses and damages resulting from any unauthorized or improper disclosure, dissemination or use of the information as a result, in whole or in part, of Consultant's action or inaction.

19. 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 that it shall perform the Services required by this Agreement in compliance with all applicable Federal and California employment laws, including, but not limited to, those laws related to minimum hours and wages; occupational health and safety; fair employment and employment practices; workers' compensation insurance and safety in employment; and all other Federal, State and local laws and ordinances applicable to the services required under this Agreement. Consultant shall indemnify and hold harmless City from and against all claims, demands, payments, suits, actions, proceedings, and judgments of every nature and description including attorneys' fees and costs, presented, brought, or recovered against City for, or on account of any liability under any of the above-mentioned laws, which may be incurred by reason of Consultant's performance under this Agreement.

C. Consultant covenants that there 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.

20. 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.

21. 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.

22. 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, with coverage at least as broad as Insurance Services Office Form CG 00 01, 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 with coverage at least as broad as Insurance Services Office form CA 0001, 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 Consultant 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.

23. Indemnity.

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

B. Consultant agrees to defend, indemnify, hold free and harmless the City, its elected officials, officers, agents, employees and volunteers, at Consultant's sole expense, from and against any and all claims, actions, suits or other legal proceedings brought against the City, its elected officials, officers, agents, employees and volunteers arising out of the performance of the Consultant, its employees, and/or authorized subcontractors, of the work undertaken pursuant to this Agreement. The defense obligation provided for hereunder shall apply without any advance showing of negligence or wrongdoing by the Consultant, its employees, and/or authorized subcontractors, but shall be required whenever any claim, action, complaint, or suit asserts as its basis the negligence, errors, omissions or misconduct of the Consultant, its employees, and/or authorized subcontractors, and/or whenever any claim, action, complaint or suit asserts liability against the City, its elected officials, officers, agents, employees and volunteers based upon the work performed by the Consultant, its employees, and/or authorized subcontractors under this Agreement, whether or not the Consultant, its employees, and/or authorized subcontractors are specifically named or otherwise asserted to be liable. Notwithstanding the foregoing, the Consultant shall not be liable for the defense or indemnification of the City for claims, actions, complaints or suits arising out of the sole negligence or willful misconduct of the City. This provision shall supersede and replace all other indemnity provisions contained either in the City's specifications or Consultant's Proposal, which shall be of no force and effect.

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

24. 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.

25. PERS Eligibility Indemnification. In the event that Consultant or any employee, agent, or subcontractor of Consultant providing Services under this Agreement claims or is determined by a court of competent jurisdiction or the California Public Employees Retirement System (PERS) to be eligible for enrollment in PERS as an employee of the City, Consultant shall indemnify, defend, and hold harmless City for the payment of any employee and/or employer contributions for PERS benefits on behalf of Consultant or its employees, agents, or subcontractors, as well as for the payment of any penalties and interest on such contributions, which would otherwise be the responsibility of City.

Notwithstanding any other agency, state or federal policy, rule, regulation, law or ordinance to the contrary, Consultant and any of its employees, agents, and subcontractors providing service under this Agreement shall not qualify for or become entitled to, and hereby agree to waive any claims to, any compensation, benefit, or any incident of employment by City, including but not limited to eligibility to enroll in PERS as an employee of City and entitlement to any contribution to be paid by City for employer contribution and/or employee contributions for PERS benefits.

26. 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:
Title
Email: _____
Telephone: (___) _____

To Consultant: Name of Consultant
Street Address or P.O. Box
City, State Zip Code
Attn: _____
Email: _____
Telephone: (___) _____

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

27. 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.

28. 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.

29. 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.

30. Electronic Signatures. The parties hereby acknowledge and agree that electronic records and electronic signatures, as well as facsimile signatures, used in connection with the execution of this Agreement and electronic signatures, facsimile signatures or signatures transmitted by electronic mail in so-called pdf format shall be legal and binding and shall have the same full force and effect as if a paper original of this Agreement had been delivered and had been signed using a handwritten signature. City and Consultant (i) agree that an electronic signature, whether digital or encrypted, of a party to this Agreement is intended to authenticate

this writing and to have the same force and effect as a manual signature, (ii) intend to be bound by the signatures (whether original, faxed or electronic) on any document sent or delivered by facsimile or, electronic mail, or other electronic means, (iii) are aware that the other party will reply on such signatures, and (iv) hereby waive any defenses to the enforcement of the terms of this Agreement based on the foregoing forms of signature. If this Agreement has been executed by electronic signature, all parties executing this document are expressly consenting under the United States Federal Electronic Signatures in Global and National Commerce Act of 2000 ("E-SIGN") and California Uniform Electronic Transactions Act ("UETA")(Cal. Civ. Code § 1633.1, et seq.), that a signature by fax, email or other electronic means shall constitute an Electronic Signature to an Electronic Record under both E-SIGN and UETA with respect to this specific transaction.

31. Joint Drafting. Each party acknowledges that it has had an adequate opportunity to review each and every provision in this Agreement and to submit the same to counsel and other consultants for review and comment and that the parties jointly drafted this Agreement. No provision of this Agreement or any Assignment shall be construed more strictly against one party than the other party by reason that one or the other party proposed, drafted or modified such provision or any other existing or proposed provision.

32. Public Records Act Disclosure. Consultant has been advised and is aware that this Agreement and all reports, documents, information and data, including, but not limited to, computer tapes, discs or files furnished or prepared by Consultant, or any of its subcontractors, pursuant to this Agreement and provided to City may be subject to public disclosure as required by the California Public Records Act (California Government Code section 7920.000 *et seq*.). Exceptions to public disclosure may be those documents or information that qualify as trade secrets, as that term is defined in the California Government Code section 7924.510, and of which Consultant informs City of such trade secret. The City will endeavor to maintain as confidential all information obtained by it that is designated as a trade secret. The City shall not, in any way, be liable or responsible for the disclosure of any trade secret including, without limitation, those records so marked if disclosure is deemed to be required by law or by order of the Court.

33. Authority to Execute. The persons executing this Agreement on behalf of the parties warrant that they are duly authorized to execute this Agreement.

34. 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.

35. Section Headings. The Section headings used in this Agreement are for reference purposes only and shall have no binding effect.

36. Entire Agreement. This Agreement contains the entire understanding between City and Consultant. Any prior agreement, promises, negotiations or representations not expressly set forth herein are of no force or effect. Subsequent modifications to this Agreement shall be effective only if in writing and signed by both parties. This Agreement may be signed by the parties hereto in separate counterparts, including both counterparts that are executed on paper

and counterparts that are in the form of electronic signatures. Electronic signatures include facsimile or email electronic signatures. Each executed counterpart shall be deemed an original. All counterparts, taken together, constitute the executed Agreement.

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

"City"
City of Gardena

By: _____
Name and title of individual

Date: _____

"Consultant"
Name of Consultant or Consultant Company

By: _____
Name and title of individual

Date: _____

By: _____
Name and title of individual

Date: _____

ATTEST:

_____
Mina Semenza, City Clerk

APPROVED AS TO FORM:

_____
Carmen Vasquez, City Attorney

Example Vehicles

Gerling 22’ Stallion Class Emergency Response Vehicle

Configuration Prepared for City of Gardena POLICE MAJOR INCIDENT RESPONSE VEHICLE (MIRV)

Gardena Police Department
1718 West 162nd Street
Gardena, California 90247

COVER LETTER

200 Kintner Pkwy, Sunbury OH 43074
(740) 965-2888 - www.gerlinggroup.com

GSA Contract Holder

GSA Contract Number: GS-30F-0002V
TIN: 31-1389108 ▪ Small Business ▪ Primary NAICS 336211
CCR Cage Code: 1PAY3 ▪ DUNS: 802029157 ▪ UEI: J8MUD9KVY2L1

November 29, 2024

To whom it may concern,

Gerling and Associates is proud to provide this proposal for a Major Incident Response Vehicle. G&A is extremely versed in Emergency Response Vehicles, the associated capabilities and the difficult tasks they must perform. The scope of work below is for a product that meets or exceeds the requested specifications with our noted exceptions. We appreciate this opportunity and would be happy to answer any questions you may have regarding our proposed solution.

Best regards,

Scott Palazzola
Sales Product Specialist
614-301-3648
scottp@gerlinggroup.com

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EXCEPTIONS

Gerling and Associates does not have any exceptions to the RFP

EXPERIENCE

C1 Proposers Information

See contact information on page 2

Gerling & Associates, Inc. - Company Introduction

Gerling & Associates, Inc. is an Independent Corporation located in Sunbury, Ohio, USA. Established in 1986, Gerling & Associates, Inc. is the World's Leading Custom Manufacturer of Production Units and wide array of Specialty Vehicles for virtually any application. **Gerling & Associates is the only Specialty Vehicle Manufacturer that performs all aspects of design, fabrication, construction, integration, and installation under one roof!**

Facilities

Gerling & Associates utilizes its 150,000 square feet of floor space for the customized design, manufacture, and integration of Specialty Vehicles.

Gerling's facilities possess all the necessary tooling, engineering, materials, and personnel to accomplish this without the use of any outside contractors. All aspects of design and manufacture are completed at Gerling's Sunbury facilities.

Engineering

Gerling uses the most current version of AutoCAD and SolidWorks for all aspects of design and construction. **Because each vehicle is custom-built to meet the needs of each client**, every project is assigned a file containing all construction drawings and system schematics, which are then transferred to the appropriate personnel for actual construction. This also aids in dealing with any repair or warranty issues in the future. All

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construction drawings and vehicle system schematics are meticulously documented and are subsequently provided to each client.

Construction

Gerling's philosophy of customization and quality control requires that all phases of design, construction, and integration be performed "in- house"—with no subcontractors used for any purpose. Gerling is one of perhaps two or three companies worldwide that can legitimately make this claim. To accomplish this, Gerling & Associates utilizes state-of- the-art methods and materials in one of the most comprehensively tooled facilities in the industry.

At **Gerling & Associates**, our greatest asset is the quality people who make up the Gerling team. Among the most frequently asked questions at Gerling & Associates is how we are able to provide such high quality products at such reasonable costs and in such a timely fashion.

Invariably, the answer lies in the excellence of our personnel. At Gerling, the staff is not made up of employees who simply punch a time-clock. The Gerling Team is instead composed of a dedicated group of Associates—whose singular goal is not just to custom build your first vehicle, but to ensure that you return time and again to Gerling for your mobile needs.

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Our structure consist of:

Mr. Fred Gerling; President
Mrs. Jennifer Fenton; Company Manager
Mr. Trent Kelly; Manager over all Construction Teams, Body fabrication, Prep and Paint, Interior, Power Systems and Finish Crew
Mr. Dusty Fenton, Final Inspector
Mr. Brandon Robinson, Quality Control
Mr. Scott Palazzola, Primary Point of Contact

As the core business at Gerling and Associates is Broadcast Television, we believe Gerling and Associates is unequally positioned for this particular project.

The core business, Remote Television is extremely demanding. Broadcast Television, televising all sports events requires extreme diligence in all aspects of the mobile facility construction. Reliability is paramount as a failure in air conditioning or power can take an event like the Super Bowl off the air. In fact, 80% of the mobile systems used to produce the last six Super Bowls were manufactured at Gerling and Associates.

Television clientele are extremely demanding and have trained us well in preparation for our mobile command and medical mobile business. As an example, Gerling's mobile command custom solutions vehicle customers are very surprised with our attention to detail and expertise in creating interiors that are very efficient and of a fit and finish not seen in the mobile command industry and medical mobile business.

Our success speaks for itself in the following statistics:

G&A enjoys a 94% client return rate
G&A builds 9 of every 10 Network Television Production Trailers with expanding sides. G&A builds 1 of every 2 Satellite Uplink vehicles for Broadcast Television
G&A builds 1 of every 3 broadcast remote facilities used in the European market.
G&A builds 20% of all Television Station News Vans

After the 9/11 attacks on our country, our family business decided to serve the Government by putting all we have learned in remote television to work in the custom construction of mobile command centers. This expertise has blossomed to include:

G&A has delivered 60 Mobile Command Centers to the FBI
G&A has delivered over 60 mobile command centers to various law enforcement agencies in the USA
12 large expanding side units for the FBI
18 Mobile command units for the US Postal Service
10 Evidence ordnance disposal units for the US Government

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2 Mobile command units for The National Security Agency of the US Government 4 Mobile command units for California Department of Transportation
2 Mobile command units for The New York Metropolitan Transportation Authority
60 Miscellaneous Mobile Command Projects to Government Agencies across the USA 20 Mobile emergency units for the Department of Veterans Affairs

The G&A workforce consists of:

Management	5
Sales	4
Office support	3
Purchasing	2
Engineering	6
Floor management	4
Floor associates	75
Total as of this document	99

G&A Value Adds:

- **High quality construction built to last 10-15+ years**
- **Robust Power Systems**
- **Technology Integration**
- **Large underbody storage bays with sweep out design and integrated rub rail**
- **Service after the sale-** Here at Gerling and Associates we pride ourselves on our great "More hustle, Less hassle" service philosophy. We have our Issue Resolution Specialist on-call 24/7/365 to be there for any situation that may arise with your mobile facility.
- **Best warranty in the business-** G&A not only builds the best mobile facilities in the industry but we also back them with the best warranty as well. All Gerling products come with a 1 year comprehensive warranty, meaning anything that does not operate properly due to a manufacturers defect in workmanship or material will be repaired at no charge. We include a 3 year warranty on our paint and an incredible 4 year body and structural warranty as well to include any manufacturer's defects in workmanship and material.

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Recent Project Reference List

RTI International (for the CDC)
3040 Cornwallis Rd.
Research Triangle Park, NC 27709
Contact: Frank Mierzwa
fjm@rti.org
919-302-1036
21 Samaritan EXP Class Mobile Medical Units
Amount of Contract: $11,075,000.00
Project Completion: Under Construction. First batch of 3 units delivered August 2024

North Carolina Trucking Association Foundation (NCTA)
223 S. West Street
Raleigh, NC 27603
Contact: Ryan Chambers
rkchambers@chamberstransport.com
919-834-0387
53' Dual Expanding Side Mobile Teaching/Simulator Trailer
Amount of Contract: $813,700.00
Project Completion: July 2023
Virtual Tour: NCTA 1293 Dual EXP Simulator Trailer on Vimeo

California Department of Social Services
One (1) Mobile Command Center Trailer
Disaster Services Branch
744 P Street, MS 8-10-143
Sacramento CA 95814
Contact: Brian Lussier
Phone: 916-869-8890
brian.lussier@dss.ca.gov
Amount of Contract: $425,000.00
Project Completion: October 2022
Virtual Tour: CASDD 1234 Mobile Command Trailer on Vimeo

US Army Medical Center of Excellence
Learning Technology & Multimedia (LT&M) Division
One (1) Sprinter Mobile Television Unit Turn-Key
2105 11th Street
Bldg. 4191A DR 32
Fort Sam Houston, TX 78234
Contact: Franz Chenet
Chief, MEDVID Production Branch
Phone: 210-221-3111
franz.r.chenet.civ@army.mil
Project Completion: 2024

C2 Financial Stability

See provided financial statements

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C3 Capabilities

In addition to the references above, G&A has recently completed or is working on the following projects and has a history of providing Law Enforcements/Response vehicles for over 20 years.

U.S. Department of Homeland Security
Six (6) Stallion EXP Class Mobile Deployment Vehicles

Rocklin California Police Department
One (1) Mobile Crime Scene Van

City of Topeka Police Department
One (1) 36’ Gooseneck Mobile Crisis Negotiation and Command Trailer

Mine Safety Health Administration
One (1) 28’ Mine Emergency Unit Truck
One (1) 14’ Seismic Testing Truck
One (1) 20’ Communications Trailer

Santa Clara California Sherrif’s Office
One (1) 24’ Emergency Response Truck

US Department of Health and Human Services
One (1) Mobile Command Van

Department of Defense - Air Force
One (1) 20ft Mobile Command/Communications Trailer

US Veterans Administration
One (1) 40’ Mobile Command/Communications Trailer

Please see the attached business license.

We would welcome the opportunity to host City of Gardena representatives at our facility to show our capabilities and current projects.

C4 Insurance Requirements

Please see the attached Certificate of Insurance (COI). If awarded the contract, G&A can provide a specific copy noting City of Gardena as additionally insured.

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Gerling 22’ Emergency Response Vehicle

Scope of Work Summary

1.0 Overall Scale: Chassis and Operations Enclosure

1.1 Vehicle Dimensions

- Operations Enclosure overall height 12’6” High including AC units
- Operations Enclosure length 22’
- Operations Enclosure 102” Wide
- Overall length 32’

Chassis Specifications- Requested

- 2025 Ford F750 Chassis
- 7.3L 2V DEVCT NA PFI V8 Gas - 335 HP @ 3750 rpm
- Automatic transmission
- 50gal. left front fuel tank,
- 25,999 lbs. GVWR (NON-CDL)
- 10,000 lbs. front GAWR
- 19,000lbs. rear axle capacity
- 4-wheel ABS, hydraulic disc brakes
- Multi-leaf rear springs
- AM/FM/USB/Bluetooth stereo
- 120,000 frame yield strength (psi)
- Backup Alarm
- Mirrors, Dual Stainless Steel
- Air Conditioning, Manual

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2.0 Chassis Weight and Axle Loading

- Overall GVWR 25,900 LBS. **NON-CDL**
- GVWR Front Axle 10,000 LBS.
- GVWR Rear Axle 19,000 LBS.

Body and chassis shall be in compliance with legal weight limits and transportation regulations on all public highways. No special permits shall be required for travel on any public highway.

A Commercial Driver's License shall not be required

Vehicle body design and **axle placement** shall be developed according to Client specifications of all equipment, accessories, and all appointments through use of **Gerling's exclusive CAD-based Weight & Balance logarithmic software**. This software is the only weight and balance program in the industry to have the capacity to compute the distribution of weight, using weights of each piece of television production equipment. As this information (rack elevations) is made available to Gerling, final design and axle placement is determined using this software.

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3.0 Body Construction: Methods and Materials

General:

The mechanical design and construction of the production portion of the unit shall be such that the Client, with proper maintenance, can expect at least 15 years of use.

Shell strength exceeds Department of Transportation requirements of being able to sustain at least 1.5 times overall vehicle weight in the event of rollover or inversion.

All Gerling aluminum-to-steel joints are insulated with High Molecular Density Polymer to prevent corrosion due to galvanic electrolysis.

Aluminum skin shall be .090 at bulkheads and sides, continuous, seamless construction.

Fabrication and Construction practices shall utilize proprietary methods of MIG Welding and chemical bonding. Lord 500 Series Acrylic Adhesive shall provide extremely high impact rating and extreme resistance to thermal and chemical stress.

Body Filler products shall not be utilized in any weight or stress-bearing component of the aluminum body.

3.1 Floor Frame shall incorporate:

- Twin 4” aluminum I-beams, configured linearly to securely fasten Operations Enclosure to Chassis Frame Rails.
- 3” T-6061 Aluminum Alloy I-beams on 16” centers.
- .125 T-6061 Aluminum sheeting
- Additional Gerling proprietary methods and materials

3.2 Wall and Bulkhead Construction shall incorporate:

- .125”x2”x2” T-6061 Aluminum Alloy square tubing on 16” centers (lengths vary to accommodate roof 45 deg. dish reservoir, doorframes)
- .125”x2”x4” T-6061 Aluminum Alloy square tubing
- .090” T-6061 Aluminum Sheeting for exterior surface
- Cabover storage attic

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- Additional Gerling proprietary methods and materials

3.3 Corner Construction shall incorporate:

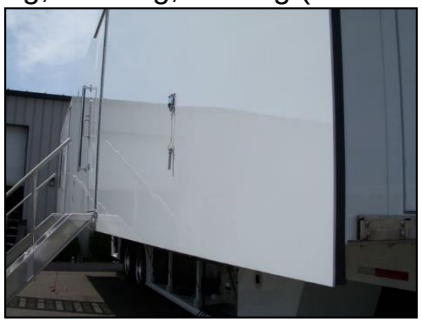
- .125”x2”x2”x3” beveled T6061-T6 Aluminum Alloy extrusions into which .090 sides and bulkheads shall be inserted, then welded and bonded
- Extrusions shall incorporate additional 2” x 2” tube aluminum for added support.
- .125” aluminum formed cap shall cover full height of body corner, providing additional strength and enhancing appearance.

3.4 Walk On Roof Construction shall incorporate:

- .125”x2”x4” T-6061 Aluminum Alloy square tubing on 12” centers
- .125”x2”x4” T-6061 Aluminum Alloy square tubing
- 5”x2”x ½” C-Channel for roof perimeter
- .040 Aluminum Sheeting for exterior roof surface
- Additional Gerling proprietary methods and materials

3.5 Exterior Finish:

- Full preparation to consist of all caulking, trimming, sanding, etching (zinc chromate chemical etching agent)
- 1 coat primer and 2 coats Aircraft-Grade Acrylic Polyurethane DuPont, white in color
- Coverage shall include inside bay doors
- Body to be undercoated with anti-corrosion agent



- **G&A Scepter Series, Smooth Seamless automotive look exterior**
- **Graphics Package (customer to provide artwork)**

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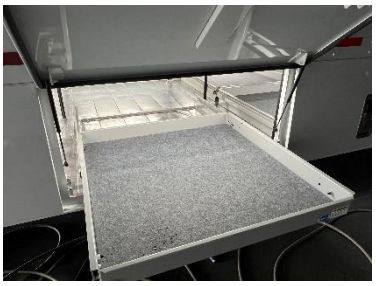
4.0 Undercarriage Storage Bays (Belly Bays)



General:
Shall be integrated into the skirting around the perimeter of the vehicle, beneath the chassis frame, such that the body is streamlined

Quantity three (3) Storage bays shall be provided per side

- **Ground Clearance shall be 12" between rub rail and ground**
- **Forward bay on each side of the vehicle is equipped with a slide out tray**

4.1 Special Design Features

- **Bay floors** shall be of "sweep-out" construction, with no raised edges to pool water or obstruct loading.
- **To include 3/8" x 4" "Rub Rail" guards that protrudes ½" laterally beyond the bay doors for protection in cornering situations**.
- **To include 3/8" x 3" x 4" Skid Rail for thorough protection in bottom-out situations.**

4.2 Material

- 10-gauge T-6061 Aluminum
- 2" x 4" aluminum c-channel construction

4.3 Weatherproofing/Security

- **FurgoCar integral locking handles** operating by a locking cam-style lever mechanism
- **Perimeter of each bay door shall seat on 90 degree exterior surface and trimmed in crushable gasket, rendering the bay waterproof**.
- Doors shall be held in the open position by means of **gas charged struts**; the geometrical positioning of which shall aid in both opening and closing.
- Hinges to be stainless steel, continuous piano hinges isolated with Mylar tape to prevent electrolysis between aluminum and stainless steel.

4.4 **Equipment to be permanently stored** in Storage Bays shall include:

- **Gerling Custom Designed Aluminum Power Frame**, which shall contain all power entry panels, analog meters and all other elements of Main Power Control Panel. Rear of frame shall be protected by means of an expanded metal screen painted safety yellow.
- Generator

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5.0 Exterior Doors

5.1 Personnel Doors:

- Provide and install one (1) 36” x 78” entry doors with stair and handrail set. Includes tinted window.

5.2 Personnel Doors, Entrance Stairs and Platform Construction shall incorporate:

- 2” x 2” x .125” T-6061 Aluminum Alloy square tubing
- .125 T-6061 Aluminum Alloy skin
- Reinforcement to prevent bowing shall be gained through use of 5” aluminum hat channel
- Shall be supplied with Yale panic-bar exit devices and LCN single-action track door closers (with no protruding “elbow” extending into operations interior).
- Stainless steel plates shall be mounted beneath (hand wear) exit device and at bottom of door (kick wear) to guard against wear upon repeated exits.
- Doors shall be provided with a separate “travel” latch that keeps the door closed by means of wedges that are driven into receiver holes at top and bottom of door frame; putting latch in travel position crushes gasket around door perimeter, rendering it waterproof for travel.
- Custom manufacture one (1) 10-gauge aluminum “Dimple Tread” safety grating expanded metal **stairs; Stairs shall be full width**
- One (1) Personnel Stairs shall be height adjustable by means of knurled knob which shall fix sliding feet. No spring mechanism, which is subject to corrosion, shall be employed.
- Two (2) handrails shall be custom manufactured and provided for each set of stairs; to be constructed of extruded T-6061 Brushed Aluminum Alloy round tubing, .125” wall thickness.
- All rails, stairs shall be inter-changeable with respect to mounting tabs utilized to fasten stairs to Vehicle.

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6.0 Exterior Functional

6.1 Scene & Emergency Lighting

- Provide and install one (1) Whelen 295SLSA6 controller with SA315P speaker
- Provide and install eight (8) Whelen red/blue flashing lights
- Provide and install eight (8) Whelen scene lights.

6.2 Backup camera

- Provide and install one (1) Provision rear back up camera system with 7” cab mounted monitor

6.3 Exterior Monitor

- Provide and install one (1) weatherproof exterior monitor enclosure with power/HDMI connections.

6.4 Roof Access Ladder

- Provide and install one (1) custom aluminum roof access ladder

6.5 Roof Storage Box

- Provide and install one (1) aluminum storage box with locking latch

6.6 Exterior Gun Storage Compartment

- Provide and install one (1) exterior storage compartment with roll up door and custom gun storage rack to accommodate up to (20) AR style rifles

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7.0 Interior Construction: Methods and Materials

Final layout and determination of operations area to be designed by Client and Gerling & Associates upon engineering meetings to ensure that Client specifications and needs are met

7.1 Fit and Finish

- 3/4” Decking
- Floor covering shall be Loncoin vinyl
- Walls shall be covered in 3/8” plywood with FRP or carpet
- Ceiling shall be covered in 3/8” plywood with FRP or carpet covering
- Colors TBD by client in engineering meeting

7.2 Interior Lighting

- Provide and install six (6) 2'X2' Flat panel LED- 45 watt-dimmable
- Provide and install eight (8) DC powered Red/White LED combo fixtures

7.3 Operations Area

- Provide and install two (2) aluminum storage cabinets with roll up access doors and shelves
- Provide one (1) aluminum storage cabinet with approximately four (4) drawers
- Provide and install one (1) custom cubby storage system on the streetside wall
- Provide and install one (1) combination smoke/CO detector
- Provide and install one (1) 5lb ABC fire extinguisher

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8.0 Environmental Control

8.1 Insulation

- Insulation factor on walls of R14 in concert with roof-air Air-Conditioning system shall provide environmentally secure environment

- Provide and install full thermal insulation on outer walls, floor, doors and ceiling
  - Insulation to be Blue Dow 2” Owen Corning Polystyrene
  - Includes continuous vapor seal
  - PolySeal foam to ensure vapor-tight insular seal
  - Spray foam insulation under the floor

- Insulation factors as follows: **R14 walls, R14 ceiling, R14 floors, R9 doors, and R2 door seals**

8.2 Air Conditioning

- **Provide and install one (1) 13,500 BTU roof-mounted HVAC units**
-

8.3 Heat

- Roof air-conditioners are equipped with electric heat strip options

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9.0 Electrical System

9.1 Power Source

Gerling Power System

9.1.1 Power Source

- The Vehicle shall have a **100A single phase power system** and shall be capable of being powered by means of:
  - Shore power
  - 7kw Generator

9.1.2 Power Entrance and Monitoring

- **Analog meters by Yokogawa shall be provided and installed on panel in vehicle interior, allowing monitoring during operations of:**
  - **Amperage and Voltage**

NOTE: Gerling provides and recommends analog meters, as digital meters may not function at extreme temperatures

- Supply and install one (1) 25’ shore power cable rated at 100 amps with shore power inlet
  - Provide and install one (1) 6’ pigtail adapters

9.1.3 Transmission and Termination

- **All Electrical wiring to utilize THHN insulated stranded copper wire**
  - **All Electrical wiring to be in strict accordance to “as-built” drawings which shall be provided to the Client**
  - **All Electrical wiring shall be dressed in accordance with highest industry standards**
  - **All wire runs shall be routed through EMT and flexible conduit. Full perimeter surface mounted raceway included**

- Provide and install up to twelve (12) 20-amp Hubbell **wall receptacles in trailer Interior**
- Provide and install two (2) Hubbell GFI protected exterior weatherproof duplex outlets, *location to be determined by the Client*.

9.2 Low Voltage System

9.2.1 12-Volt Power System

- A **12V DC system** shall be provided and integrated

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- Power Source for 12v DC shall be two (2) deep cycle batteries to be housed in a vented, anti-corrosive enclosure.
- Provide and integrate IntelliPower 9280 shall be provided and integrated, capable of providing 80A at 12V DC
  - Shall charge the batteries
  - Shall supply the DC loads while power is applied to the vehicle.
  - Interior lighting, activated by a mechanical timer located at personnel door such that interior DC powered devices will not be unintentionally left running

10.0 Generator

- Provide and install one (1) 7Kw Cummins Gasoline Generator
  - Belly Bay Mounted
  - Shall include Remote start/kill switch
  - Gerling Quiet-Pak Enclosure
  - Shall be equipped with manual transfer switch
  - Fuel pickup from the vehicle's tank

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22' Emergency Command Vehicle

G&A STANDARD TERMS	FOB	ESTIMATED COMPLETION
30% Upon Order 30% Upon Chassis Arrival Balance upon acceptance at G&A	Gardena, CA	270-360 Days

TOTAL PRICE **$398,959.00**

Includes:

- **All Systems Schematics**
- **Up to one (1) day of operations training on the vehicle**
- **Three (3) year manufacturer comprehensive warranty including defects in workmanship and material. See fully warranty details below**
- **Individual components will be covered by its own manufacturers limited warranty**
- **24/7 Telephone support access handled by our Service Manager, Brandon Robinson @ 614-296-1454.** Gerling and Associates Service Department (gerlinggroup.com)

This Confidential Quotation is effective for 60 days.

Proposed by:_____/___/2024
Fred Gerling
Gerling & Associates, Inc.

Accepted by:_____/___/2024

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GERLING AND ASSOCIATES STANDARD LIMITED WARRANTY

Your G&A Resolution Specialist: Brandon Robinson

Congratulations on your purchase of your new Mobile Facility manufactured by Gerling and Associates ("G&A"). Our service continues after the sale, as we are a company focused on your repeat business. Therefore, we present what we believe to be the best Limited Warranty in the Mobile Facility Industry: G&A's Repair/Replacement Warranty ("Warranty").

The Warranty includes parts and labor and is valid for one (1) year from date of vehicle acceptance, meaning the date you take possession of the Mobile Facility at G&A ("Acceptance Date"). (See Air Conditioner Warranty for Environmental Requirements)

The Warranty covers the trailer body, expanding section structure and box-body construction for four (4) years, parts and labor from the Acceptance Date. The Warranty also covers for four(4) years from Acceptance Date the kingpin, vertical support structures, horizontal support structures, and bay horizontal and vertical supports.

The Warranty covers the fixed body for four (4) years on the structure vertical and horizontal supports, frame, sidewall and bay structure.

Under the Warranty, G&A agrees to repair and/or replacement, including parts and labor during the applicable warranty period for the following systems:

Power

G&A will assume responsibility for the repair and/or replacement of Technical and Environmental Power System and elements thereof as installed by G&A, including parts and labor, for one (1) year from the Acceptance Date.

Production Truck & Trailer Power Exception

G&A provides a "green" Cam-Lock connector to provide a ground for your unit. Because altering the art of proven television production will on occasion require "floating" the ground, G&A does not recommend this practice. Equipment can be damaged through this practice and will not be the responsibility of G&A.

Air Conditioning

G&A will assume responsibility for arranging the repair and/or replacement of the Environmental Air Conditioning System and elements thereof, as installed by G&A. All roof top air conditioners are warranted for one (1) year, parts and labor solely by the manufacturer and are not covered by the G&A Warranty. Marv-Air provides a one (1) year parts only warranty and Marv-Air air conditioners are not covered by the G&A Warranty. Bard Systems provides NO warranty on air conditioners installed on mobile system. Northern Air provides one (1) year warranty on parts ONLY. Mitsubishi provides one (1) warranty on parts ONLY.

Please note that all air conditioner warranty work must be assigned to a designated G&A

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service facility or vendor by the G&A Issue Resolution Specialist Service by the End-User is not covered under and voids the Warranty.

Interior

G&A will assume responsibility for the repair and/or replacement of conversion interior and elements thereof, as installed by G&A, both parts and labor, for one (1) year from the Acceptance Date.

Please note: the folding floor warranty provided by this section is void if a folding floor is used to accommodate equipment over 50 pounds during system integration. All equipment over 50 pounds must be integrated with the folding floor in the up position.

Paint

G&A will assume responsibility for repair and/or replacement of all G&A paint and finish work for three (3) years labor and materials from the Acceptance Date. G&A is not, however responsible for any paint damage incurred by usage or damaged in any way after the Acceptance Date.

Scepter Series "smooth, seamless sides" paintwork is warranted for three (3) years labor and materials with the exception of minor thermal expansion discontinuity of negligible width (50-100 microns) in the outer paint surface. This expansion is limited to aluminum panel vertical splicing points only over the glue seam. This discontinuity is allowed for expansion and contraction of aluminum panels.

Bodywork Conversion-Exterior

G&A will assume responsibility for the repair and/or replacement of conversion of body exterior and installation of associated hardware, and elements thereof, as installed by G&A, including parts and labor, for one (1) year from the Acceptance Date. G&A will not be responsible for exterior body parts damaged by usage or damaged by accident.

Chassis

G&A will provide the Client with documentation of Manufacturer's Warranty, if applicable. Chassis by GMC, Ford Motor Company, Freightliner, Peterbilt, Great Dane, Trailmobile, and G&A are extended to the end-user through G&A and are part of this Warranty. As provided by the manufacturer of the chassis elected for the project.

Heat and Water Damage

Please note that the Warranty does not cover damage to items installed by you that are caused by heat or water. Remote Television Production, Mobile Command usage and Display requirements take place under all weather extremes. Some weather phenomena have the very limited possibility of intruding in or around the best G&A's designed systems of sealing and G&A shall not be responsible in any way for any damage to the Mobile Facility caused by any such weather phenomena.

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Warranty Repairs

By accepting this Warranty, you hereby agree and acknowledge that all warranty work shall be performed by G&A at the G&A facility located in Sunbury, Ohio, or by G&A's designated service centers and servicing agents; to not permit any other warranty work to be performed on the Mobile Facility except upon express written consent of G&A; and that you shall promptly communicate to the G&A Resolution Specialist all issues arising under this Warranty and to allow G&A to either perform the Warranty work itself or to arrange the performance of the Warranty work through an authorized vendor.

As the nature of the mobile facility industry may make returning the vehicle or trailer to G&A's Sunbury, Ohio facility difficult or impractical, the following will apply in the event that you cannot return the Mobile Facility to G&A's Sunbury, Ohio facility:

1.) **The Mobile Facility will be serviced by an authorized vendor to be determined by G&A at its sole and exclusive discretion.**
OR
2.) **You agree to be responsible for the costs of travel, room, responsible expenses and board for the required G&A Personnel to perform the needed warranty repairs at the location of the Mobile Facility. A travel authorization form must be completed by you before travel arrangements are made and a credit card shall be required to hold such reservations. Fuel surcharges may apply. Once G&A Personnel is onsite, G&A will be responsible for all needed tools, supplies and shop items to complete the warranty repairs**

All warranty issues shall be communicated by the Buyer to Gerling and Associates with all outside vendor warranty work to be arranged by Gerling and Associates.

DISCLAIMERS AND LIMITATIONS

Please note that the following disclaimers and limitations apply to the Warranty:

Disclaimer Of Express And Implied Warranties

THE G&A REPAIR/REPLACEMENT WARRANTY IS EXPRESSLY LIMITED TO THE TERMS AND CONDITIONS STATED HEREIN. THERE ARE NO OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING BUT NOT LIMITED TO WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH EXTEND BEYOND THOSE EXPRESSLY STATED IN THIS WARRANTY.

Limitation Of Remedies To Repair And/Or Replacement

The Warranty is expressly limited to the repair and/or replacement of construction defects only and the service required to repair or replace those construction defects. You hereby agree that the Warranty is your sole and exclusive remedy and is in substitution of any other remedy available at law or equity.

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Except as otherwise expressly stated herein, the Warranty is limited to covered parts only.

Customer accounts must be in good standing to be eligible to receive warranty related services.

Limitation of Liability to Repair and/or Replacement Costs

In the event an issue arises falling within the terms and conditions of the Warranty, you shall be entitled to the limited remedy of repair and/or replacement of the defect. Please note that G&A shall not be liable for any misuse or modification of the Mobile Facility or any parts thereof or damages caused from not adhering to the Warranty or owner's Instruction Manual, including G&A Maintenance Directives. Your failure to follow and adhere to the terms and conditions under the Warranty shall render the Warranty null and void.

IN THE EVENT OF A BREACH OR REPUDIATION OF THE WARRANTY, YOU AGREE AND ACKNOWLEDGE THAT YOU SHALL NOT BE ENTITLED TO RECOVER ANY LOSSES, COSTS, EXPENSES, LIABILITIES, OR INCIDENTAL OR CONSEQUENTIAL DAMAGES (INCLUDING, BUT WITHOUT LIMITATION, LOSS OF USE OR PROFITS, DAMAGES TO PROPERTY, ALL LIABILITIES YOU HAVE TO YOUR CUSTOMERS OR THIRD PERSONS, LOSS OF USE, COSTS, REVENUE OR PROFITS RELATED TO THE MOBILE FACILITY BEING OUT OF SERVICE FOR ANY REASON, AND ALL OTHER SPECIAL OR CONSEQUENTIAL DAMAGES), WHETHER DIRECT OR INDIRECT, HOWEVER CAUSED AND UNDER ANY THEORY OF LIABILITY, WHETHER OR NOT RESULTING FROM, OR CONTRIBUTED TO BY THE DEFAULT OR NEGLIGENCE OF G&A, AND NOTWITHSTANDING THE FAILURE OF ESSENTIAL PURPOSE OF ANY LIMITED REMEDY STATED IN THIS WARRANTY OR THE PURCHASE AGREEMENT.

G&A's liability under the Warranty shall in no event exceed its cost of correcting defects in the Mobile Facility or replacing the same with non-defective equipment.

Gerling and Associates thanks you for your business and wants your experience with your Mobile Facility to be a positive one. Therefore, all efforts will be made to ensure that any problem covered by the terms of this Warranty will be resolved under the above stated guidelines.

Gerling and Associates, Inc.

Financial Statements

For Years 2021 through 2023

Gerling and Associates, Inc.

Summary

Balance Sheet

For years 2021 through 2023

	December 31, 2023	December 31, 2022	December 31, 2021
ASSETS			
Current Assets	$ 14,536,090	$ 10,949,799	$ 10,749,886
Fixed Assets	$ 1,156,918	$ 961,240	$ 964,788
Other Assets	$ 406,110	$ 415,113	$ 424,116
TOTAL ASSETS	**$ 16,099,118**	**$ 12,326,152**	**$ 12,138,790**
LIABILITIES & EQUITY			
Liabilities			
Current Liabilities	$ 9,310,777	$ 5,628,142	$ 5,390,140
Long Term Liabilities	$ 2,356,579	$ 2,598,196	$ 2,875,860
Total Liabilities	**$ 11,667,356**	**$ 8,226,338**	**$ 8,266,000**
Equity	**$ 4,431,762**	**$ 4,099,814**	**$ 3,872,790**
TOTAL LIABILITIES & EQUITY	**$ 16,099,118**	**$ 12,326,152**	**$ 12,138,790**

Gerling and Associates, Inc.

Summary

Statement of Operations and Retained Earnings

For years 2021 through 2023

	Jan - Dec 2023	Jan - Dec 2022	Jan - Dec 2021
Ordinary Income and Expense			
Sales	$ 19,273,435	$ 16,240,410	$ 13,898,234
Cost of Sales	$ 15,817,486	$ 13,575,837	$ 11,684,021
Gross Profit	**$ 3,455,949**	**$ 2,664,573**	**$ 2,214,213**
General and administrative expenses	$ 2,652,932	$ 2,035,103	$ 1,805,712
Net Income from Operations	**$ 803,017**	**$ 629,470**	**$ 408,501**
Other Income and Expense	$ (471,069)	$ (402,446)	$ 178,856
Net income	**$ 331,948**	**$ 227,024**	**$ 587,357**

Client#: 2032075 GERLIASS

ACORD™ CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY) 01/31/2024

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer any rights to the certificate holder in lieu of such endorsement(s).

PRODUCER	CONTACT NAME:	
USI Insurance Services LLC 312 Elm Street, Suite 2400 Cincinnati, OH 45202 855 874-1390	PHONE (A/C, No, Ext):	FAX (A/C, No):
	E-MAIL ADDRESS:	

INSURER(S) AFFORDING COVERAGE	NAIC #
INSURER A : Travelers Indemnity Company	25658
INSURER B : Travelers Property Casualty Ins. Co	36161
INSURER C : Phoenix Insurance Company	25623
INSURER D :	
INSURER E :	
INSURER F :	

INSURED
Gerling and Associates, Inc.
200 Kintner Parkway
Sunbury, OH 43074

COVERAGES **CERTIFICATE NUMBER:** **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	X COMMERCIAL GENERAL LIABILITY			Y6304X876744IND24	01/17/2024	01/17/2025	EACH OCCURRENCE	$1,000,000
	CLAIMS-MADE X OCCUR						DAMAGE TO RENTED PREMISES (Ea occurrence)	$100,000
							MED EXP (Any one person)	$10,000
							PERSONAL & ADV INJURY	$1,000,000
	GEN'L AGGREGATE LIMIT APPLIES PER:						GENERAL AGGREGATE	$2,000,000
	X POLICY PRO-JECT LOC						PRODUCTS - COMP/OP AGG	$2,000,000
	OTHER:							$
C	AUTOMOBILE LIABILITY			BA4X8763632414G	01/17/2024	01/17/2025	COMBINED SINGLE LIMIT (Ea accident)	$1,000,000
	X ANY AUTO						BODILY INJURY (Per person)	$
	OWNED AUTOS ONLY / SCHEDULED AUTOS						BODILY INJURY (Per accident)	$
	X HIRED AUTOS ONLY / X NON-OWNED AUTOS ONLY						PROPERTY DAMAGE (Per accident)	$
								$
B	X UMBRELLA LIAB X OCCUR			CUP7X3976832414	01/17/2024	01/17/2025	EACH OCCURRENCE	$10,000,000
	EXCESS LIAB CLAIMS-MADE						AGGREGATE	$10,000,000
	DED X RETENTION $10,000							$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY Y / N						PER STATUTE / OTH-ER	
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED?	N / A					E.L. EACH ACCIDENT	$
	(Mandatory in NH)						E.L. DISEASE - EA EMPLOYEE	$
	If yes, describe under DESCRIPTION OF OPERATIONS below						E.L. DISEASE - POLICY LIMIT	$

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

CERTIFICATE HOLDER

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

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STATE OF OHIO
DEPARTMENT OF TAXATION

P. O. BOX 182215, COLUMBUS, OHIO 43218-2215

VENDOR'S LICENSE

PRESCRIBED
SALES TAX FORM
NO. ST -3 (REV. 09/29/00)

LICENSE NUMBER ASSIGNED
BY COUNTY AUDITOR
№ 21 030006

COUNTY OF **DELAWARE** DATE 10-10-01

THIS IS TO CERTIFY, that the vendor herein named, having complied with provisions of Sec. 5739.17 of the Revised Code of Ohio, is hereby, authorized to make taxable sales, at the location specified below. THIS LICENSE SHALL TERMINATE AND BE NULL AND VOID: IF THE BUSINESS IS MOVED TO A LOCATION OUTSIDE OF THE COUNTY OTHER THAN WHERE IT PRESENTLY CONDUCTS BUSINESS, IF THE BUSINESS IS SOLD, IF AN INDIVIDUAL OR PARTNERSHIP INCORPORATES HIS OR THEIR BUSINESS, IF A PARTNERSHIP IS DISSOLVED, IF A CORPORATION DISSOLVES; OR IS CANCELLED, FOR CAUSE, BY THE TAX COMMISSIONER.

Gerling and Associates Inc — NAME

— CORPORATION CHARTER

TR DE NAME OR DBA, IF OTHER THAN ABOVE

138 Stelzer Ct — BUSINESS ADDRESS

Sunbury — CITY

43074 — ZIP CODE

740-965-2898 — TELEPHONE NO.

Integrate Television Remote Facilities — KIND OF BUSINESS

443130 — CODE NUMBER

DAVID A. YOST, County Auditor By H. Disbennett Deputy

The Ohio Sales Tax Law provides that no vendor shall fail to collect the full and exact tax as required by Sections 5739.01 to 5739.31, inclusive, of the Revised Code, or fail to comply with such sections and the rules and regulations of the tax commissioner.

Whoever violates this provision shall be fined not less than twenty-five nor more than one hundred dollars for a first offense; for each subsequent offense such person shall, if a corporation, be fined not less than one hundred nor more than five hundred dollars, or if an individual or a member of a partnership, firm, or association, be fined not less than twenty-five nor more than one hundred dollars, or imprisoned not more than sixty days, or both.

Dayton Legal Blank, Inc., Form No. 24022

City of Gardena

Gardena City Council Meeting

AGENDA REPORT SUMMARY

Agenda Item No. 15.B
Section: DEPARTMENTAL ITEMS - POLICE
Meeting Date: January 14, 2025

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

AGENDA TITLE: Approve Three-Year Agreement with Peregrine Technologies, Inc. for Data Integration Services in the Amount Not to Exceed $273,000

COUNCIL ACTION REQUIRED:
Staff Recommendation: Approve Agreement

RECOMMENDATION AND STAFF SUMMARY:

The Gardena Police Department currently uses multiple data systems for its daily operations. The majority of these systems are not linked and require a significant amount of time, training, and effort to cross analyze case-related data and effectively investigate crime trends. None of these systems allow the Department to both proactively understand and respond to public safety concerns in real time.

In August 2024, the City of Alhambra released a Request for Proposals (RFP) to provide a real-time data visualization platform to serve as the key component of a real-time information center. The City of Alhambra's intent was to receive proposals for services to include pre-built connectors that allow for seamless integration with critical existing police department systems, as well as training, maintenance, and support of the software. On November 1, 2024, Peregrine Technologies, Inc. was awarded the contract as a result of that RFP, and Section 34 (Competitive Procurement Selection Process) of that contract allows other California agencies to leverage Alhambra's RFP for the same or similar services.

Peregrine Technologies, Inc. is an advanced analytic platform that provides a single point of access to view and analyze large-scale, real-time data from multiple data sources. The software performs several critical functionalities including data integration, search and information retrieval, advanced analytics, data management, collaboration, access control, and security. The Peregrine software would provide critical capabilities in furtherance of the Department's goals for its real time information center.

Peregrine provides a one-stop solution to data integration through their proprietary software

that allows all personnel to access multiple databases through one useful, actionable, portal. Peregrine will integrate data from the Computer Aided Dispatch (CAD) data, Records Management Systems (RMS) data, body camera footage, automated license plate reader system, video system, and the professional standards system. This will create a comprehensive view to easily gain immediate, real-time, access to virtually all of Gardena's critical Public Safety information, such as Tiburon CAD, Mark43 RMS, Axon Evidence.com and IA Pro, Vigilant ALPR, and Veritone.

Currently, the process of critically analyzing data and producing meaningful reports is primarily done manually. This is extremely inefficient and costly. Peregrine Technologies provides a powerful, unique solution that allows for intelligent analysis and reporting capabilities across all platforms and applications currently utilized by the Gardena Police Department. Peregrine does not create or bring any new data to the City, but rather utilizes data from systems the City owns and makes it quickly functional. In addition to significant improvements to police operations, the system will also act as a workforce multiplier by creating operational efficiencies, particularly regarding crime stat reporting and real-time information and investigative tools. This is now a cumbersome manual process involving many individuals in various roles.

Peregrine provides a powerful solution to address the demand for increased transparency by enabling staff to more easily respond to Public Records Act requests, subpoenas, and the public demand for meaningful fact-based information related to policing (i.e., informal and formal public contacts, community engagement, deployment of resources, crime trends, policies and procedures, use of force, etc.).

Peregrine is currently supporting other law enforcement agencies across thirteen states and more than 60 customers including Southern California agencies such as Los Angeles Police Department, Redondo Beach Police Department, Glendale Police Department, Anaheim Police Department, and Orange County Sheriffs.

FINANCIAL IMPACT/COST:

The cost for Peregrine Technologies' Inc. hosted system with data integration services is $91,000 per year for a three-year contract, for a total amount not to exceed $273,000.

Funding Source: Citizens Option for Public Safety Grant Award (COPS Grant)

ATTACHMENTS:

Contract & Exhibits A, B, C.pdf
Alhambra & Peregrine Contract.pdf

APPROVED:

_____

Clint Osorio, City Manager

Docusign Envelope ID: 023FFAC9-0701-4C00-95B2-27CD72F69619

AGREEMENT BETWEEN
THE CITY OF GARDENA
AND
Peregrine Technologies, Inc.

This contract, hereinafter referred to as Agreement is entered into this 14th day of January, 2025, by and between THE CITY OF GARDENA ("City") and Peregrine Technologies, Inc., a California corporation ("Consultant"). Based on the mutual promises and covenants contained herein, the Parties hereto agree, as follows.

1. Recitals.

A. Whereas, City requires the services of a professional to provide real-time data visualization platform services; and

B. Whereas, Consultant has represented that it is qualified by virtue of experience, training, education and expertise to provide these services; and

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

D. WHEREAS, no official or employee of City has a financial interest, within the provisions of sections 1090-1092 of the California Government Code, in the subject matter of this Agreement.

2. Services.

A. Consultant agrees to provide the professional services described in the City's Request for Proposals (RFP) and any associated addendum, attached hereto as **Exhibit "A"**, Consultant's Response to City's RFP ("Consultant's Proposal"), attached hereto as **Exhibit "B",** and Changes to Peregrine's Proposal for the City of Gardena ("Changes to the Proposal") attached hereto as **Exhibit "C"**, each incorporated herein by this reference ("Services").

B. The Services shall be performed in accordance with the Project Schedule set forth in **Exhibit B and Exhibit C**. Consultant shall not be liable for any failure or delay in furnishing proposed Services resulting from fire, explosion, flood, storm, Act of God, governmental acts, orders or regulations, hostilities, civil disturbances, strikes, labor difficulties, difficulty in obtaining parts, supplies, or shipping facilities, inability to obtain or delays in obtaining suitable material or facilities required for performance, temporary unavailability of qualified personnel, failure by City to provide appropriate access to equipment or personnel, or other causes beyond Consultant's reasonable control.

3. Additional Services. If City determines that additional Services are required to be

Docusign Envelope ID: 023FFAC9-0701-4C00-95B2-27CD72F69619

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. Consultant's Proposal. This Agreement shall include Consultant's proposal or bid which is incorporated herein as **Exhibit B** and Changes to the Proposal which is incorporated herein as **Exhibit C.**

5. Timing of Performance. Time is of the essence with respect to Consultant's performance of the Services required by this Agreement. Consultant shall diligently and timely pursue and complete the performance of the Services required of it by this Agreement as set forth in **Exhibit A.** City, in its sole discretion, may extend the time for performance of any Service.

6. Compensation. Compensation for the Services shall be billed as set forth in **Exhibit B**, attached hereto. 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, unless otherwise. In no event shall compensation under this Agreement exceed **TWO HUNDRED SEVENTY-THREE THOUSAND and 00/00 ($273,000)** without the prior written authorization of the City Council.

7. Term of Agreement/Termination. This Agreement shall commence on the Effective Date and continue for a period of three (3) years, ending on January 14, 2028, unless previously terminated as provided herein or as otherwise agreed to in writing by the parties.

A. This Agreement shall be effective as of the date of execution by the City and shall remain in effect until all Services are completed or until terminated as provided for herein.

B. City may terminate this Agreement without cause by providing written notice to Consultant not less than ten days prior to an effective termination date. City's only obligation in the event of termination will be payment of fees and allowed expenses incurred up to and including the effective date of termination.

C. Unless for cause, Consultant may not terminate this Agreement. If Consultant is terminating this Agreement for cause, it must provide the City with thirty (30) days written notice.

D. Upon receipt of a termination notice, Consultant shall: (1) promptly discontinue all Services, unless the notice directs otherwise; and (2) within ten (10)

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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.

8. Agreement Administrator. For purposes of this Agreement, City designates Chief Mike Saffell or designee as the Agreement Administrator who shall monitor Consultant's performance under this Agreement. Consultant shall be notified in writing of any deficiency in the performance of this Agreement in a timely manner by Agreement Administrator Consultant shall have five (5) business days from receipt of the notification to cure any deficiency to the reasonable satisfaction of the Agreement Administrator. All costs for such corrections shall be borne by Consultant and shall not increase Consultant's fees due hereunder. Should the Agreement Administrator determine that Consultant has not performed its obligation as stated in this Agreement in a satisfactory manner, City may terminate this Agreement for cause as specified in Section- Term of Agreement/Termination. 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.

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.

D. Consultant will invoice for the annual subscription at the outset of each year of the agreement.

10. Records/Audit.

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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. Performance By Consultant. Consultant shall maintain or exceed the level of competency presently maintained by other similar practitioners in the State of California,

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for professional and technical soundness, accuracy and adequacy of all work, advice and material furnished under this Agreement.

15. 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.

16. 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.

17. Ownership of Work Product. All documents or other information created, developed, or received by Consultant shall, for purposes of copyright law, be deemed works 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. The Peregrine platform is a commercial service. No custom code will be developed during the course of performance.

18. Confidentiality Clause. Consultant acknowledges that some of the material and information that may come into its possession or knowledge in connection with this Agreement or its performance may consist of information that is exempt from disclosure to the public or other unauthorized persons under either state or federal statutes ("Confidential Information"). Confidential Information includes, but is not limited to, names, addresses, Social Security numbers, e-mail addresses, telephone numbers, financial profiles, credit card information, driver's license numbers, medical data, law enforcement records, agency source code or object code, agency security data, or information identifiable to an individual that relates to any of these types of information. Consultant agrees to hold Confidential Information in strictest confidence and not to make use of Confidential Information for any purpose other than the performance of this

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Agreement, to release it only to authorized employees or Sub-consultants requiring such information for the purposes of carrying out this Agreement, and not to release, divulge, publish, transfer, sell, disclose, or otherwise make the information known to any other party without City's express written consent or as provided by law. Consultant agrees to release such information or material only to employees or Sub-consultants who have signed a nondisclosure agreement, the terms of which have been previously approved by City. Consultant agrees to implement physical, electronic, and managerial safeguards to prevent unauthorized access to Confidential Information.

"Personal information" including, but not limited to, "Protected Health Information" (PHI) under Health Insurance Portability And Accountability Act (HIPAA), individuals' names, addresses, phone numbers, birth dates, and social security numbers collected, used, or acquired in connection with this Agreement shall be protected against unauthorized use, disclosure, modification or loss.

HIPAA establishes national minimum standards for the use and disclosure of certain health information. The Consultant must comply with all HIPAA requirements and rules when determined applicable by the City. If City determines that (1) City is a "covered entity" under HIPAA, and that (2) Consultant will perform "business associate" services and activities covered under HIPAA, then at City's request, Consultant agrees to execute City's Agreement in compliance with HIPAA.

Consultant shall ensure its directors, officers, employees, Sub-consultants or agents use personal information solely for the purposes of accomplishing the services set forth herein. Consultant and its Sub-consultants agree not to release, divulge, publish, transfer, sell or otherwise make known to unauthorized persons personal information without the express written consent of the City or as otherwise required by law.

Any breach of this provision may result in termination of the Agreement and demand for return of all personal information. Moreover, Consultant will indemnify and hold the City harmless from and against all losses and damages resulting from any unauthorized or improper disclosure, dissemination or use of the information as a result, in whole or in part, of Consultant’s action or inaction.

19. 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 that it shall perform the Services required by this Agreement in compliance with all applicable Federal and California employment laws, including, but not limited to, those laws related to minimum hours and wages; occupational health and safety; fair employment and employment practices; workers’ compensation insurance and safety in employment; and all other Federal, State and local laws and ordinances applicable to the services required under this

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Agreement. Consultant shall indemnify and hold harmless City from and against all claims, demands, payments, suits, actions, proceedings, and judgments of every nature and description including attorneys' fees and costs, presented, brought, or recovered against City for, or on account of any liability under any of the above-mentioned laws, which may be incurred by reason of Consultant's performance under this Agreement.

C. Consultant covenants that there 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.

20. 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.

21. 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.

22. 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

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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, with coverage at least as broad as Insurance Services Office Form CG 00 01, 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 with coverage at least as broad as Insurance Services Office form CA 0001, 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 Consultant shall contain a clause that the policy may not be canceled until thirty (30) days written notice, return receipt requested, is mailed to City.

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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.

23. Indemnity.

A. Consultant hereby agrees to the following:

1. Indemnification for Professional Services. Consultant will save harmless and indemnify City and, at City's request, reimburse defense costs for City and all its officers, volunteers, employees and representatives from and against any and all suits, actions, or claims, of any character whatever, brought for, or on account of, any injuries, including death or damages sustained by any person or property resulting or arising from any negligent or wrongful act, error or omission by Consultant or any of Consultant's officers, agents, employees, or representatives, in the performance of this Agreement.

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2. Indemnification for other Damages. Consultant indemnifies and holds City harmless from and against any claim, action, damages, costs (including, without limitations, attorney's fees), injuries, or liability, arising out of this Agreement, or its performance. Should 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 this Agreement, or its performance, Consultant will defend City (at City's request and with counsel satisfactory to City) and will indemnify City for any judgement rendered against it or any sums paid out in settlement or otherwise provided that City (a) promptly gives written notice of the City's Claim to Consultant; (b) gives Consultant sole control of the defense and settlement of the City's Claim (provided that Consultant may not agree to any settlement that imposes any liability or obligation on City without Consultant's prior written consent, such consent not to be unreasonably withheld, conditioned , or delayed); and (c) provides to Consultant, at Consultant's cost, all reasonable assistance in the defense and settlement of the City's claim.

B. For purposes of this section, "City" includes City's officers, officials, employees, agents, and representatives.

C. It is expressly understood and agreed that the foregoing provisions will survive termination of this Agreement.

D. City does not, and shall not, waive any rights against Consultant which it may have by reason of the aforesaid hold-harmless Agreement because of the acceptance by City or the deposit with City by Consultant, of any of the insurance policies hereinafter described in this Agreement.

E. The aforesaid hold-harmless Agreement by Consultant shall apply to all damages and claims for damages of every kind suffered, or alleged to have been suffered, by reason of any of the aforesaid operations of Consultant, or any subcontractor of Consultant, regardless of whether such insurance policies shall have been determined to be applicable to any of such damages or claims for damages.

F. Notwithstanding any provision of this Agreement to the contrary, design professionals shall be required to defend and indemnify the City only to the extent allowed by Civil Code Section 2782.8, namely for claims that arise out of, pertain to, or relate to the negligence, recklessness, or willful misconduct of the design professional. The term "design professional" includes licensed architects, licensed landscape architects, registered professional engineers, professional land surveyors and the business entities which offer such services in accordance with the applicable provisions of the Business and Professions Code.

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G. The provisions of this section do not apply to Claims occurring as a result of the City's sole negligence or willful acts or omissions.

24. 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.

25. PERS Eligibility Indemnification. In the event that Consultant or any employee, agent, or subcontractor of Consultant providing Services under this Agreement claims or is determined by a court of competent jurisdiction or the California Public Employees Retirement System (PERS) to be eligible for enrollment in PERS as an employee of the City, Consultant shall indemnify, defend, and hold harmless City for the payment of any employee and/or employer contributions for PERS benefits on behalf of Consultant or its employees, agents, or subcontractors, as well as for the payment of any penalties and interest on such contributions, which would otherwise be the responsibility of City.

Notwithstanding any other agency, state or federal policy, rule, regulation, law or ordinance to the contrary, Consultant and any of its employees, agents, and subcontractors providing service under this Agreement shall not qualify for or become entitled to, and hereby agree to waive any claims to, any compensation, benefit, or any incident of employment by City, including but not limited to eligibility to enroll in PERS as an employee of City and entitlement to any contribution to be paid by City for employer contribution and/or employee contributions for PERS benefits.

26. 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: Mike Saffell
Title: Chief of Police
Email: chief@gardenapd.org
Telephone: (310) 217-9601

Consultant: Peregrine Technologies, Inc.
71 Stevenson Street, Suite 700
San Francisco, CA 94105
Attn: Nicholas Noone
Email: nick@peregrine.io
Telephone: (415) 287-2749

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

27. 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.

28. 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.

29. 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.

30. Electronic Signatures. The parties hereby acknowledge and agree that electronic records and electronic signatures, as well as facsimile signatures, used in connection with the execution of this Agreement and electronic signatures, facsimile signatures or signatures transmitted by electronic mail in so-called pdf format shall be legal and binding and shall have the same full force and effect as if a paper original of this Agreement had been delivered and had been signed using a handwritten signature. City and Consultant (i) agree that an electronic signature, whether digital or encrypted, of a party to this Agreement is intended to authenticate this writing and to have the same force and effect as a manual signature, (ii) intend to be bound by the signatures (whether original, faxed or electronic) on any document sent or delivered by facsimile or, electronic mail, or other electronic means, (iii) are aware that the other party will reply on such signatures, and (iv) hereby waive any defenses to the enforcement of the terms of this Agreement based on the foregoing forms of signature. If this Agreement has been executed by electronic signature, all parties executing this document are expressly consenting under the United States Federal Electronic Signatures in Global and National Commerce Act of 2000 ("E-SIGN") and California Uniform Electronic Transactions Act ("UETA")(Cal. Civ. Code § 1633.1, et seq.), that a signature by fax, email or other electronic means shall constitute an Electronic Signature to an Electronic Record under both E-SIGN and UETA with respect to this specific transaction.

31. Joint Drafting. Each party acknowledges that it has had an adequate opportunity to review each and every provision in this Agreement and to submit the same to counsel and other consultants for review and comment and that the parties jointly drafted this Agreement. No provision of this Agreement or any Assignment shall be construed more strictly against one party than the other party by reason that one or the other party proposed, drafted or modified such provision or any other existing or proposed

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provision.

32. Public Records Act Disclosure. Consultant has been advised and is aware that this Agreement and all reports, documents, information and data, including, but not limited to, computer tapes, discs or files furnished or prepared by Consultant, or any of its subcontractors, pursuant to this Agreement and provided to City may be subject to public disclosure as required by the California Public Records Act (California Government Code section 7920.000 *et seq*.). Exceptions to public disclosure may be those documents or information that qualify as trade secrets, as that term is defined in the California Government Code section 7924.510, and of which Consultant informs City of such trade secret. The City will endeavor to maintain as confidential all information obtained by it that is designated as a trade secret. The City shall not, in any way, be liable or responsible for the disclosure of any trade secret including, without limitation, those records so marked if disclosure is deemed to be required by law or by order of the Court.

33. Authority to Execute. The persons executing this Agreement on behalf of the parties warrant that they are duly authorized to execute this Agreement.

34. 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.

35. Section Headings. The Section headings used in this Agreement are for reference purposes only and shall have no binding effect.

36. Entire Agreement. This Agreement contains the entire understanding between City and Consultant. Any prior agreement, promises, negotiations or representations not expressly set forth herein are of no force or effect. Subsequent modifications to this Agreement shall be effective only if in writing and signed by both parties. This Agreement may be signed by the parties hereto in separate counterparts, including both counterparts that are executed on paper and counterparts that are in the form of electronic signatures. Electronic signatures include facsimile or email electronic signatures. Each executed counterpart shall be deemed an original. All counterparts, taken together, constitute the executed Agreement.

37. Order of Precedence. In the event of any conflict or inconsistency among the terms of the documents comprising this Agreement, the following order of precedence shall apply, whith the document listed first having the highest priority:

a. This Agreement (excluding Exhibits)
b. Exhibit C
c. Exhibit B
d. Exhibit A
e. Any other incorporated or referenced documents.

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The terms of the document with higher precedence shall prevail over the terms of any document with lower precedence.

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

"City" **City of Gardena**	**"Consultant"** **Peregrine Technologies, Inc.**
By: _____ **Tasha Cerda, Mayor**	By: _____ **Nicholas Noone, CEO**
Date: _____	Date: 12/12/2024

ATTEST:

_____
Mina Semenza, City Clerk

APPROVED AS TO FORM:

_____
Carmen Vasquez, City Attorney

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CITY OF ALHAMBRA
POLICE DEPARTMENT

Request for Proposals
No. RFP2M24-21

for

REAL-TIME DATA VISUALIZATION PLATFORM

City of Alhambra – Police Department
Lieutenant Debbie Gomez
211 South First Street
Alhambra, CA 91801

PROPOSALS DUE NO LATER THAN
10:00 AM ON MONDAY, SEPTEMBER 30, 2024

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REQUEST FOR PROPOSAL RFP NO. RFP2M24-21
REAL-TIME DATA VISUALIZATION PLATFORM

PUBLIC NOTICE IS HEREBY GIVEN that the City of Alhambra (hereinafter "City") will receive sealed proposals for qualified and experienced vendors to provide a comprehensive Real-Time Data Visualization Platform for the Alhambra Police Department. The City is also requesting software, data integration, and professional services for the implementation of the Real-Time Data Visualization Platform (hereinafter "PLATFORM"). Proposals should be submitted to the Police Department, 211 South First Street, Alhambra, California, **on or before the hour of 10:00 AM on September 30, 2024.**

The primary intent of this request for proposal (hereinafter "RFP") is to enter into an agreement with a vendor who has experience with law enforcement agencies, specifically California, Los Angeles County implementation, of the Real-Time Data Visual data integration, California Justice Information Services (CJIS) compliance standards and will meet the City's requirements as outlined in the RFP.

1. INTRODUCTION

The City of Alhambra is seeking proposals from qualified and experienced vendors to provide a Real-Time Data Visualization platform to serve as the key component in the Real-Time Information Center (RTIC). As a result of this RFP, the City expects to receive proposals for services to include pre-built connectors that allow for seamless integration with critical existing Alhambra Police Department systems: Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon Evidence.com and Laserfiche. All qualified Vendors are required to conduct a mandatory (on-site or virtual) demonstration of the platform. Once the evaluation committee has reviewed and scored the RFP responses, the City will select the Vendor most capable of providing a PLATFORM in its entirety and enter into a contract for the purchase and installation of the PLATFORM, as well as training, maintenance, and support of software. This RFP provides a list of required services, general information, instructions for submitting responses, and vendor selection procedures.

2. RFP SCHEDULE AND PROCESS

The City anticipates the project schedule to be as follows:

Activity	Dates
Release of Request for Proposals (RFP)	August 27, 2024
Deadline for Questions	September 17, 2024 – 5:00 PM
Responses to questions posted on the City's website	September 19, 2024
Proposal submittal Deadline	**September 30, 2024 – 10:00 AM**
Mandatory On-Site or Virtual Demonstration	Week of October 1st
Contract Award by the City Council:	October 28, 2024

*These dates may be changed at the discretion of the City of Alhambra. Changes to the due date for questions or due date for proposal submittal will be made by written addendum.

Questions may be asked via email to Lieutenant Debbie Gomez at dgomez@alhambrapd.org. All questions are due September 17, 2024, no later than 5:00 pm. A unified response will be provided on September 19, 2024, to all parties making email inquiries. All questions are to be asked via email, and phone inquiries will not receive a response.

Request for Proposal shall include all applicable State and Local sales taxes.

Request for Proposals may be withdrawn up and until the deadline date and time for final submission as noted in the Request for Proposal.

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Request for Proposals shall be couriered, hand-delivered or mailed. Request for Proposals will not be accepted by facsimile transmission or other telecommunication or electronic means. Proposers assume the risk of the method of dispatch chosen and any costs associated with delivery. Request for Proposals arriving after the deadline will be returned unopened to the senders.

A team has been selected by the Chief of Police to evaluate the proposals submitted. Proposals will be evaluated by the designated evaluation team, and a Vendor will be selected based on the final evaluation scores.

Any contract awarded hereunder shall become effective or enforceable against the City of Alhambra only when a formal written contract has been duly executed by the appropriate officers of the City of Alhambra.

Each vendor shall specify whether such contractor is a corporation, a partnership, or an individual. If a corporation, designate the name of the state of incorporation; if a partnership, the vendor shall state the names and addresses of all partners.

The City of Alhambra reserves the right to accept or reject any or all bids, to waive any informality, to negotiate separately with competing Vendors and to accept the proposal deemed to be in the best interest of the City of Alhambra.

The proposals shall be submitted in a sealed envelope bearing the name and address of the vendor and clearly marked:

SEALED PROPOSAL FOR
REAL-TIME DATA VISUALIZATION PLATFORM
RFP NO. 2M24-21
DO NOT OPEN WITH REGULAR MAIL

BY ORDER OF:
LAUREN MYLES, CMC
ALHAMBRA CITY CLERK

Docusign Envelope ID: 023FFAC9-0701-4C00-95B2-27CD72F69619

3. SCOPE OF SERVICES

3.1 General Provisions

The purpose of this Request for Proposal (RFP) is to solicit and select Vendor to provide pre-built connectors that allow for seamless integration with critical existing Alhambra Police Department systems such as Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon Evidence.com and Laserfiche. The PLATFORM needs to offer a full integrated set of use-facing applications for search, map-based analysis, link analysis, reporting, and dashboarding that allow for seamless movement of data between those applications without the need to export and import data manually.

The PLATFORM shall offer proprietary algorithms that will enable automatic and auditable deduplication and merging of data. In addition, the PLATFORM should offer seamless integration with Alhambra Police Department's existing single-sign-on and multi-factor authentication services.

The successful Vendor will be required to furnish all labor, equipment, and materials to furnish and install the PLATFORM. The successful Vendor will also be required to provide a training plan for the administrator role and user training for identified City Staff and to include the cost of the training plan in their proposal.

The successful proposer will be expected to sign a contract in substantially the form attached to the RFP. Any issues with/concerns regarding any provision of the contract must be included in the proposal.

Under the contract awarded from this RFP, the successful Vendor will be the single point of contact for all installation, maintenance, and support of all software acquired in the solicitation and will be required to have the capability to support all components of this system in an integrated manner.

3.2 Equipment Warranty

Vendor shall include a copy of each manufacturer's written warranty statement for each piece of equipment furnished and installed into the PLATFORM with their proposal. Vendors shall also provide the details of all warranties that are applicable to the services and equipment provided to the City.

3.3 Project Manager/Key Personnel

Vendor shall provide a full-time Project Manager and key personnel who will be responsible for project oversight and delivery of the PLATFORM. The Project Manager shall be the single point of contact for the City and will be responsible for the management, implementation, and on-going troubleshooting of the PLATFORM during its installation. The Project Manager shall coordinate efforts with the City designee. The Project Manager shall be available to the City at all times by telephone during the course of the project and on-site within seventy-two hours of notification if necessary and requested, to respond to City needs, questions and/or issues. Project Manager will develop in consultation with the City a detailed implementation and project plan for the PLATFORM.

3.4 Subcontractors

The Vendor shall provide a list of names, addresses, and telephone numbers for subcontractor(s) the Vendor intends to employ in the installation, training and ongoing maintenance and support of

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the PLATFORM with the proposal. A criminal background check will be performed for all subcontractors and their employees before they are allowed to perform any services for the City.

The City reserves the right to reject any subcontractor and/or subcontractor employee. Should a subcontractor be rejected, the Vendor will be required to provide an acceptable alternate subcontractor.

Should a subcontractor under the direction of the Contractor fail to provide the agreed-upon level of service and response, the Vendor will be required to replace the subcontract with another organization. Such an action shall be completed so as not to cause unnecessary delays to the project schedule. Any additional costs associated with securing a competent replacement subcontractor shall be the responsibility of the Vendor.

3.5 Condition of Facilities

The Contractor shall be responsible for ensuring that all City work areas remain clean and orderly at the end of each day.

3.6 Vendor Coordination Responsibilities

The Vendor shall be responsible for coordinating the design and installation of the PLATFORM with the City and the vendor's subcontractors and suppliers involved in this project.

3.7 Delivery Schedule

Vendor shall provide an integrated project timeline and implementation plan for the PLATFORM. The project timeline and implementation plan shall include details for all phases of activity for the project, including all deliverables and major milestones. The project goals and deadlines deemed the responsibility of the City are to be identified in the project timeline. This proposed project timeline and implementation plan shall be finalized during the negotiation phase.

3.8 Project Implementation Status Reports

The Vendor shall provide weekly updates on the project timeline and implementation plan update to the City's point of contact, Lieutenant Debbie Gomez.

3.9 Training

The Vendor must provide a plan for in-depth technical training for administrators, end users, and IT staff on PLATFORM components, which shall include the use and management of the Alhambra Police Department's system such as Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon Evidence.com, and Laserfiche. All required instruction manuals, on-site qualified instructor costs, travel and lodging costs, and class materials shall be furnished by the Vendor, and included in the Fee Proposal.

3.10 Cost

Vendors shall identify all costs for PLATFORM software, installation, project management, training, maintenance, etc. Maintenance costs shall be provided for a term of five (5) years from the date of PLATFORM acceptance. The proposal should itemize each PLATFORM component, which shall include the data integrations specifically for systems used by the Alhambra Police Department, so the City can determine the projection of each phase based on cost and budget.

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4. TECHNICAL SPECIFICATIONS

4.1 General Requirements

The successful Vendor will be required to provide a PLATFORM with the following capabilities and demonstrate them as part of this evaluation:

- PLATFORM shall be CJIS compliant and vendor must identify location PLATFORM will be hosted at.
- PLATFORM must be a web-based interface that automatically establishes connections and relationships between data elements within and across disparate systems.
- PLATFORM should be fully integrated with user-facing applications for search, map-based analysis, link analysis, reporting, and dashboarding that allow for seamless movement of data between applications without the need to export and import data manually.
- PLATFORM should offer pre-built connectors that allow for seamless integration with critical existing systems including: Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon Evidence.com, and Laserfiche. These pre-built connectors should ensure data available in the PLATFORM is complete, accurate, and always up to date.
- PLATFORM should have the ability for users to log into a single solution for access to data from those high priority systems.
- PLATFORM should offer seamless integration with Alhambra Police Department's existing single-sign-on and multi-factor authentication services.
- PLATFORM should have reliable algorithms that will enable automatic and auditable deduplication and merging of data. Additionally, the PLATFORM must provide the ability to easily view any individual records that have been merged and offer the ability to un-do merges when desired.
- PLATFORM should have the flexibility to change desired data model over time without needing to build and maintain additional interfaces or make any changes to underlying source systems and the way it stores or represents information.
- PLATFORM must have a clean and reliable information upon data searches.
- PLATFORM should offer desktop, laptop, tablet, and mobile device-accessible versions of those integrated applications so that they can be accessed by authorized users wherever and whenever they are needed.
- PLATFORM should have the ability to securely collaborate and share data and visualization in real-time with agencies in the San Gabriel Valley, Los Angeles County, and Orange County.
- PLATFORM should have the ability to accommodate future software applications that City may acquire.
- City retains full and total rights to its data within the PLATFORM at all times and has the ability to access and export that data in open, standard data formats at any time.
- Vendor shall provide cybersecurity insurance.

4.2 System Architecture

Vendors shall provide a detailed description of the PLATFORM, including a discussion of the PLATFORM's architecture and its ability to provide the services required by the City. Proposal should address how to accommodate additions of future software applications.

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5. PROPOSAL REQUIREMENTS

Although the City requires no specific format, this section is intended to provide guidelines to the Vendor regarding features that the City will look for and expect to be included in the proposal.

5.1 Content & Format

The City requests that proposals submitted be in 12-point font, organized and presented in a neat and logical format, and are relevant to these services. Vendor's proposals shall be clear, accurate, and comprehensive. Excessive or irrelevant material will not be favorably received.

The proposal should include the following:

1. Transmittal/offer letter
2. Page numbering
3. Index/Table of Contents
4. Approach
5. Team Organization, including an organization diagram and time commitment of key staff
6. Statement of Qualifications, including descriptions of similar projects by key staff to be assigned during the term of the contract
7. Fee Proposal

5.2 Approach

A description of the vendor's approach and work program to meet the city's objectives shall be included. It should explain the technical approach, methodology, and specific tasks and activities that will be performed to address the specific issues and work items.

5.3 Team Organization

The purpose of this section is to describe the organization of the project team including subcontractors and key staff. A project manager and an alternate project manager shall be named, who shall be the prime contact and be responsible for coordinating all activities with the City. An organization diagram shall be submitted, showing all key team members and illustrating the relationship between the City, the project manager, key staff, and subcontractors. There also should be a brief description of the role and responsibilities of all key staff and subcontractors identified in the team organization.

5.4 Statement of Qualifications

The information provided in this section should describe the qualifications of the vendor and key staff in performing projects within the past five (5) years that are similar in scope and size to demonstrate competence to perform these services. The projects listed should be those that the key staff named for this project were responsible for performing. Information shall include:

1. Names of key staff that participated in named projects and their specific responsibilities.
2. The client's name, contact person, address, e-mail address, and telephone numbers.
3. A brief description of the type and extent of services provided.
4. Completion dates (estimated, if not yet completed).
5. Total costs of the projects.

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5.5 Fee Proposal

Compensation for services provided shall be based upon the Vendor's detailed Fee Proposal to furnish the services and equipment detailed in their proposal.

The Fee Proposal shall identify all costs associated with the comprehensive PLATFORM, including software, installation, project management, training, support, and maintenance. Maintenance costs shall be provided for a term of five (5) years, priced annually, from date of PLATFORM acceptance. Price breaks should be included for each phase so the City can budget for the next fiscal year. This information will be used by the City staff to evaluate the reasonableness of the fee proposal and may be used in negotiating the final fee amounts for the contract agreement.

Reimbursable expenses shall not be allowed unless negotiated prior to a contract.

Price escalations during the contract term are disfavored and will not be allowed unless negotiated prior to execution of contract.

5.6 Statement of Offer & Signature

The Proposal shall contain a statement that the proposals are a firm offer for a 90-day period and signed by an individual authorized to act on behalf of the Vendor.

6. TERMS AND CONDITIONS

6.1 Insurance Requirements

1. **Types of Required Coverages**

The successful Vendor shall procure and maintain in full force and effect during the term of the contract, the following policies of insurance. If the existing policies do not meet the Insurance Requirements set forth herein, the Vendor agrees to amend, supplement, or endorse the policies to do so.

a. **Commercial General Liability:** Commercial General Liability Insurance which affords coverage at least as broad as Insurance Services Office "occurrence" form CG 00 01, with minimum limits of at least $5,000,000 each occurrence, and if written with aggregate, the aggregate shall be double each occurrence limit.

b. **Products-Completed Operations:** Contractor shall procure and submit to City evidence of insurance for a period of at least three (3) years from the time that all work under this Contract is completed.

c. **Automobile Liability Insurance:** Automobile Liability Insurance with coverage at least as broad as Insurance Services Office Form CA 0001 covering "Any Auto" (Codel 1) with minimum limits of $1,000,000 each accident.

d. **Professional Liability:** Professional Liability insurance with minimum limits of $3,000,000 each claim. Covered Professional Services shall specifically include all work to be performed under the contract and delete any exclusion that may potentially affect the work to be performed.

e. **Workers' Compensation:** Workers' Compensation Insurance, as required by the State of California and Employer's Liability Insurance with a limit of not less than

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$1,000,000 each accident for bodily injury and $1,000,000 each employee for bodily injury by disease.

2. **Endorsements**

Insurance policies shall not be in compliance if they include any limiting provision or endorsement that has not been submitted to the City for approval.

a. The insurance coverages required by Section 1.a. Commercial General Liability; and 1.c. Automobile Liability Insurance shall contain the following provisions or be endorsed to provide the following:

(1) **Additional Insured:** The City, its elected officials, officers, employees, volunteers, boards, agents, and representatives shall be additional insureds with regard to liability and defense of suits or claims arising out of the performance of the Contract.
Additional Insured Endorsements shall not:

1. Exclude "Contractual Liability"
2. Restrict coverage to the "Sole" liability of the contractor
3. Exclude "Third-Party-Over Actions"
4. Contain any other exclusion contrary to the Contract

(2) **Primary Insurance:** This insurance shall be primary, and any other insurance, whether primary, excess, umbrella, or contingent insurance, including deductible or self-insurance available to the insureds added by endorsement, shall be in excess of and shall not contribute to this insurance.

(3) The policy or policies of insurance required by Section 1.e. Workers' Compensation shall be endorsed, as follows:

1. **Waiver of Subrogation:** A waiver of subrogation stating that the insurer waives all rights of subrogation against the indemnified parties.

3. **Notice of Cancellation**

Required insurance policies shall not be cancelled, or the coverage reduced until a thirty (30) day written notice of cancellation has been served upon the City except ten (10) days shall be allowed for non-payment of premium.

4. **Evidence of Insurance**

The Contractor concurrently with the execution of the contract, and as a condition precedent to the effectiveness thereof, shall deliver either certified copies of the required policies or original certificates and endorsements on forms approved by the City. The certificates and endorsements for each insurance policy shall be signed by a person authorized by that insurer to bind coverage on its behalf. At least fifteen (15) days prior to the expiration of any such policy, evidence of insurance showing that such insurance coverage has been renewed or extended shall be filed with the City. If such coverage is canceled or reduced, Contractor shall, within ten (10) days after receipt of written notice of such cancellation or reduction of coverage, file with the City evidence of insurance showing that the required insurance has been reinstated or has been provided through another insurance company or companies.

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5. **Deductible or Self-Insured Retention**

Any deductible or self-insured retention must be approved in writing by the City and shall protect the indemnified parties in the same manner and to the same extent as they would have been protected had the policy or policies not contained a deductible or self-insured retention.

6. **Contractual Liability**

The coverage provided shall apply to the obligations assumed by the Contractor under the indemnity provisions of this contract.

7. **Failure to Maintain Coverage**

Contractor agrees to suspend and cease all operations hereunder during such period of time as the required insurance coverage is not in effect and evidence of insurance has not been furnished to the City. The City shall have the right to withhold any payment due Contractor until Contractor has fully complied with the insurance provisions of this Contract.

In the event that the Contractor's operations are suspended for failure to maintain required insurance coverage, the Contractor shall not be entitled to an extension of time for completion of the Work because of production lost during the suspension.

8. **Acceptability of Insurers**

Each such policy shall be from a company or companies with a current A.M. Best's rating of no less than A:VII and authorized to do business in the State of California, or otherwise allowed to place insurance through surplus line brokers under applicable provisions of the California Insurance Code or any federal law. Any other rating must be approved in writing in accordance with the City.

9. **Claims Made Policies**

If coverage is written on a claims-made basis, the retroactive date on such insurance and all subsequent insurance shall coincide or precede the effective date of the initial Contractor's Contract with the City and continuous coverage shall be maintained or an extended reporting period shall be exercised for a period of at least three (3) years from termination or expiration of this Contract.

Upon expiration or termination of coverage of required insurance, Contractor shall procure and submit to City evidence of "tail" coverage or an extended reporting coverage period endorsement for the period of at least three (3) years from the time that all work under this contract is completed.

10. **Insurance for Subcontractors**

Contractor shall be responsible for causing Subcontractors to purchase the same types and limits of insurance in compliance with the terms of this Contract/Agreement, including adding the City as an Additional Insured to the Subcontractor's policies.

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6.2 Standard Form of Agreement

The contractor will enter into an agreement with the City based upon the contents of the RFP and the contractor's proposal.

6.3 Disclaimer

This RFP does not commit the City to award a contract, or to pay any costs incurred in the preparation of the proposal. The City reserves the right to extend the due date for the proposal, to accept or reject any or all proposals received as a result of this request, to negotiate with any qualified contractor, or to cancel this RFP in part or user-definable entirety. The City may require the selected contractor to participate in negotiations and to submit such technical, fee, or other revisions of their proposals as may result from negotiations.

6.4 Assigned Representatives

The City will assign a responsible representative to administer the contract and to assist the contractor in obtaining information. The contractor also shall assign a responsible representative (project manager) and an alternate, who shall be identified in the proposal. The contractor's representative will remain in responsible charge of the contractor's duties from the notice-to-proceed through project completion. If the contractor's primary representative should be unable to continue with the project, then the alternate representative identified in the proposal shall become the project manager. The City's representative shall first approve any substitution of representatives or subcontractors identified in the proposal in writing. The City reserves the right to review and approve/disapprove all key staff and subcontractor substitution or removal and may consider such changes not approved to be a breach of contract.

6.5 City Business License

A city business license will be required of the contractor and any subcontractors for services performed in connection with any agreement entered into through this RFP process.

7. EVALUATION & SELECTION PROCESS

The City's selection of qualified Vendor will be based on the following:

- Quality and completeness of submitted proposal (**10 points**);
- Understanding of project objectives and PLATFORM requirements (**20 points**);
- Project approach, timeline, implementation and training plan (**20 points**);
- Fee Proposal/Proposed Cost (**30 points**); and
- Qualifications and experience with similar types of efforts (**20 points**).

Vendors will be notified of any additional required information and/or demonstrations and product testing after the written proposals have been evaluated.

Additional information related to the vendor selection process will be made available in the future once the City has executed this contract. Please refrain from making any verbal inquiries or requests for a formal debriefing related to the subject RFP until the City of Alhambra completes the ongoing contract process.

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8. ADMINISTRATION SPECIFICATIONS

8.1 The City of Alhambra's Rights to Proposals

All proposals, upon submission to the City of Alhambra, shall become its property for use as deemed appropriate. By submitting a proposal, the Contractor covenants not to make any claim for or have any right to damages because of any misinterpretation or misunderstanding of the specification or because of any misinformation or lack of information. The City of Alhambra reserves the right to take one or more of the following actions as determined in the best interest of the organization:

1. to accept or reject in whole or in part any or all proposals;
2. to cancel this RFP in whole or in part without prior notice. Thereafter, City may issue a solicitation for new proposals;
3. The City makes no guarantee as to the usage of the services by City;
4. to waive, at its discretion, any minor errors, informalities or irregularities, which the City deems correctable or otherwise not warranting rejection of the RFP;
5. to correct any arithmetic errors in any or all proposals submitted;
6. to negotiate with any Vendor as necessary to serve the best interest of the City and to negotiate the final contract(s) with the most responsive, responsible Vendor
7. to investigate the qualifications of any Vendor under consideration;
8. to disqualify a proposal upon evidence of collusion with the intent to defraud or other illegal practices on the part of the Vendor;
9. to require confirmation of information furnished by the Vendor;
10. to award one contract for the total PLATFORM, or make multiple awards for separate PLATFORM components if it is deemed to be in the best interest of the City.
11. to utilize any or all the ideas from proposals submitted;
12. to change the proposal's due date upon appropriate notification;
13. to adopt any or all of a vendor's proposal; and
14. to negotiate modifications to the scope and fee with selected Vendor(s) prior to contract award.

8.2 Interviews/Demonstrations/Equipment Testing

City reserves the right to conduct interviews, and/or to require demonstrations and/or product testing with some or all of the Vendors at any point during the evaluation process. However, the City may determine that interviews/ demonstrations/equipment testing are not necessary. In the event interviews/ demonstrations/equipment testing are conducted, information provided during the interview/ demonstrations/ equipment testing shall be taken into consideration when evaluating the stated criteria. The city shall not reimburse the Vendor for the costs associated with the interview/ demonstrations/equipment testing process. Equipment testing will be held at a time and place specified by the City. The Vendor's key project team members will be invited to attend the interview and/or demonstrations and/or equipment testing. The Vendors should be prepared to discuss at the interview, their specific experience providing services and equipment similar to those described in this RFP, project approach, estimated work effort, available resources, and other pertinent things distinguishing the Vendor from others.

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8.3 Proposal Instructions

Deadline for submitting proposals is 10:00 a.m., Monday, September 30, 2024. Mail or deliver to:

City of Alhambra, Police Department
Attn: Lieutenant Debbie Gomez
211 South First Street
Alhambra, CA 91801

Please submit one (1) original and four (4) color copies of the proposal and in addition to the hard copies, an electronic copy shall be included with the proposal submitted. If no document can be identified as original bearing original signatures, Vendor's proposal may be rejected at the discretion of the City. Proposals received after the deadline will be returned, unopened, to the Vendor.

All submissions must be sealed in an envelope/package marked on the outside with:

SEALED PROPOSAL FOR
REAL-TIME DATA VISUALIZATION PLATFORM
RFP NO. 2M24-21
DO NOT OPEN WITH REGULAR MAIL

8.4 Addendum and Supplements to the RFP

If it becomes necessary to revise any part of this RFP, an addendum or revision will be transmitted to all prospective vendors by email and will be posted on the City's website. Questions concerning the RFP document must be submitted in writing to City of Alhambra, Attn: Lieutenant Debbie Gomez, 211 South First Street, Alhambra, CA 91801, or email at dgomez@alhambrapd.org. Questions will be received through September 17, 2024, at 5:00 p.m. Responses to all questions will be distributed in writing via email to all known vendors and will be posted on the City of Alhambra's website (www.cityofalhambra.org) as an addendum on September 19, 2024. Vendors are cautioned that any statements made by the contact person that materially change any portion of the RFP shall not be relied upon unless subsequently ratified by a formal written amendment to this RFP.

8.5 Award of Contract

The City reserves the right to reject any and all Proposals. A formal contract award is anticipated for the best overall vendor as determined by the Evaluation Committee and approved by City Council as a result of this RFP. The City reserves the right, in its sole discretion, to waive minor irregularities in proposals. A minor irregularity is a variation of the RFP, which does not affect the funding request, or gives one party advantage or benefit not enjoyed by the other parties, or adversely impacts the interest of the City. Waivers, when granted, shall in no way modify the RFP requirements or excuse the party from full compliance with the RFP specifications and other contract requirements if the party is awarded the contract.

8.6 False or Misleading Statements

Any submittals containing, in the opinion of the City, false or misleading statements will be rejected.

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8.7 Prospective Contractor Costs

Costs for developing submittals are entirely the responsibility of the vendor and shall not be chargeable in any manner to the City.

8.8 Evaluation Process

The City will form an Evaluation Committee to review all submittals received by the deadline. Any submittal failing to meet any of the qualifications documented in this RFP may be rejected. The purpose of the Evaluation Committee is to recommend which vendor is best able to provide, install, maintain, and support the PLATFORM to the City's requirements and within the City's budget. Submission in response to this RFP indicates your acceptance of the City's evaluation criteria.

8.9 Clarification of Proposals

The City reserves the right to obtain clarification on any item in any vendor's submittal or to obtain additional related information necessary to properly evaluate the submittal. Failure of a vendor to respond to a request for more information may result in the proposal being rejected.

8.10 Confidential Information

All responses to this RFP become the property of City and will be kept confidential until such time as a recommendation for award of contract has been announced. Thereafter, proposals are subject to public inspection and disclosure under the California Public Records Act (Cal. Government Code Section 6250, et seq.). If a contractor believes that any portion of its proposal is exempt from public disclosure, such portion may be marked "confidential." The City will use reasonable means to ensure that such confidential information is safeguarded but will not be held liable for inadvertent disclosure of such materials, data, and information. Proposals marked "confidential" in their entirety will not be honored, and City will not deny public disclosure of all or any portion of proposals so marked. By submitting information with portions marked "confidential", the Contractor represents it has a good faith belief that such material is exempt from disclosure under the California Public Records Act and agrees to reimburse the City for, and to indemnify, defend and hold harmless City, its officials, officers, employees and agents from and against: (a) any and all claims, damages, losses, liabilities, suits, judgments, fines, penalties, costs and expenses including, (collectively, "Claims") arising from or relating to OCFA's non-disclosure of any such designated portions of a proposal if disclosure is deemed required by law or court order. Additionally, City may request that the Vendor directly defend any action for disclosure of any information marked confidential.

8.11 City Use of RFP Ideas

The City reserves the right to use any and all service and product ideas presented from prospective contractors. Selection or rejection of a contractor does not affect this right.

8.12 Copyrights and Patents

The vendor shall hold the City of Alhambra and its officers, agents, servants, and employees harmless from liability of any nature or kind because of any copyrighted information, secret or proprietary process, patented or unpatented invention, disclosed or used in response to this RFP, and agrees to defend, at its own expense, any and all actions brought against the City of Alhambra or its officers, agents, servants, or employees or the Vendor alleging or arising from unauthorized use of such information, process or invention.

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8.13 Reliance on Information

VENDORS MAY RELY ONLY UPON WRITTEN INFORMATION AND/OR INSTRUCTIONS FROM THE CITY GIVEN HEREIN OR SUBSEQUENT TO THE ISSUANCE OF THIS RFP. CONTRACTOR MAY NOT RELY ON ANY ORAL INFORMATION AND/OR INSTRUCTIONS GIVEN WITH REGARD TO THIS RFP.

Any City response to a question or request for clarification by a contractor will be made in the form of an addendum to the RFP, which will be sent via email to all parties to whom the RFP has been issued not later than five (5) business days prior to the due date for receipt of the Proposal and will become part of the RFP.

8.14 Replacement of Incompatible Staff

The City reserves the right to request and receive a replacement for any vendor staff member whom the City, in its sole and absolute discretion, determines is not working effectively with the City's staff assigned to this project, or who is inadequately qualified to perform the services to be provided, or who is unsuitable to be performing services in secure areas.

8.15 Security Check

All vendor personnel and subcontractors are required to pass an extensive security background check before they will be allowed to perform any services for the City. The vendor or individual employees of the vendor may be excluded from providing services based on the results of the background checks, in the sole and absolute discretion of the City. All proposals should acknowledge this fact, and project timelines should reflect this fact.

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AGREEMENT FOR PROFESSIONAL SERVICES
Contract No. _____

This AGREEMENT FOR PROFESSIONAL SERVICES ("AGREEMENT") is made and entered into effective as of the _____ day of _____, 20__, by and between the CITY OF ALHAMBRA, a charter law city, located at 111 South First Street, Alhambra, CA 91801, ("CITY") and _____ [inset corporation, LLC, partnership etc.], located at _____ ("CONSULTANT").

W I T N E S S E T H:

For and in consideration of the promises and of the mutual covenants and agreements herein contained, said parties hereby agree as follows:

1. RECITALS. This AGREEMENT is made and entered into with respect to the following facts:

a. CITY requires professional _____ services ("SERVICES"); and

b. On _____, 20__, CITY issued a Request for Proposals #_____ ("RFP") to obtain professional _____ services for the CITY's and based on review and rating of RFPs received CONSULTANT was selected; and

c. CONSULTANT is qualified to provide those certain services to the CITY necessary for said SERVICES; and, therefore, the Alhambra City Council has elected to engage the services of CONSULTANT upon the terms and conditions hereinafter set forth.

2. SCOPE OF SERVICES.

a. CONSULTANT shall furnish to the City all labor, materials, tools, equipment, services, and incidental customary work necessary to fully and adequately perform those services described in CONSULTANT's Proposal for Services dated _____, ("PROPOSAL") consistent with the CITY's Request for Proposals dated _____ ("RFP") attached hereto as Exhibits "A" and "B" respectively and hereby incorporated by reference.

b. Performance of the SERVICES specified herein is made an obligation of CONSULTANT under this AGREEMENT, subject to any changes made subsequently upon the mutual written agreement of the parties.

c. The scope of services to be performed by CONSULTANT under this AGREEMENT shall include, but not be limited to, those services specified in Paragraph 2A hereof.

3. PERFORMANCE STANDARDS. While performing this AGREEMENT CONSULTANT will use the appropriate generally accepted professional standards of practice existing at the time of performance utilized by persons engaged in providing similar services. CONSULTANT shall cooperate with CITY if CITY opts to monitor CONSULTANT's services. CITY will notify CONSULTANT of any deficiencies and CONSULTANT will have fifteen (15) days after such notification to cure any shortcomings to CITY's satisfaction. Costs associated with curing the deficiencies will be borne by CONSULTANT.

4. FAMILIARITY WITH WORK.

a. By executing this AGREEMENT, CONSULTANT agrees that, to the best of CONSULTANT's knowledge and belief, CONSULTANT has

i. Carefully investigated and considered the scope of services to be performed;

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ii. Carefully considered how the services should be performed; and

iii. Understands the facilities, difficulties, and restrictions attending performance of the services under this Agreement.

b. If services involve work upon any site, CONSULTANT agrees that CONSULTANT has or will investigate the site and is or will be fully acquainted with the conditions there existing, before commencing the services hereunder. Should CONSULTANT discover any latent or unknown conditions that may materially affect the performance of the services, CONSULTANT will immediately inform CITY of such fact and will not proceed except at CONSULTANT's own risk until written instructions are received from CITY.

5. CITY SUPERVISION. The Director of the Department of _____ of CITY, or the Director's designee, shall have the right of general supervision of all work performed by CONSULTANT and shall be the CITY's agent with respect to obtaining CONSULTANT's compliance hereunder. No payment for any services rendered under this AGREEMENT shall be made without the prior approval of the Director of _____ or the Director's designee.

6. FEE. Compensation to CONSULTANT for the total services to be rendered pursuant to this AGREEMENT shall be in an amount not to exceed $_____ to be billed in a manner described in CONSULTANT's PROPOSAL, consistent with the CITY's RFP. If any discrepancies exist between the RFP and the CONSULTANT's PROPOSAL exist, then the terms of the RFP shall control.

7. EXTRA SERVICES. Notwithstanding any other provision herein, no extra services shall be rendered by CONSULTANT under this AGREEMENT unless such extra services first shall have been authorized in writing by the CITY. Any such services so authorized shall be paid by the CITY at rates approved of by the CITY.

8. PAYMENT BY CITY. CONSULTANT shall send invoices to the City on a monthly basis, based upon the services already rendered at the time of the submission. City shall pay all proper costs within thirty (30) days of receipt of such invoice(s).

9. TERM. The term of this AGREEMENT shall be as provided for in the RFP from after the date on which the CITY issues CONSULTANT a Notice to Commence Work. CONSULTANT shall complete all those services set forth in its PROPOSAL by that certain date set forth in said Notice to Commence Work or until such time as the services have been completed by the CONSULTANT and accepted by the CITY, whichever occurs first. The CITY may extend said time of completion for delays caused by circumstances beyond the control of either party to this AGREEMENT. Should the consulting contract extend beyond the estimated time for completion of said services, CITY hereby reserves the right to continue CONSULTANT's services hereunder with any and all fees for such additional services to be compensated by the CITY at rates approved by the CITY.

10. DISPUTES AND REMEDIES.

a. Claims, disputes, and other matters in question between the Parties arising out of or relating to this AGREEMENT or the breach thereof, must be resolved by the following procedure:

i. CITY and CONSULTANT will exercise their best efforts to resolve disputes through the development of a consensus. A meeting may be requested by CITY or CONSULTANT at any time for the purpose of resolving a dispute. A determination by CITY'S Director of the Department of _____ will be made within two (2) weeks after a meeting to resolve the dispute;

ii. If unresolved within thirty (30) days, then City Manager, or his designee, will make a final determination;

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iii. Following the City Manager's final determination, the Parties may submit any unresolved matters to non-binding mediation. The parties may, but are not required to be, represented by counsel in mediation;

iv. If the Parties do not agree to mediation, or if mediation does not resolve the Parties' dispute, the matter may be pursued in Los Angeles County Superior Court, or the United States District Court, Central District of California, if federal jurisdiction exists.

b. The Parties' rights and remedies under this Agreement are in addition to any other rights and remedies provided by law.

11. PREVAILING WAGE. CONSULTANT is aware of the requirements of California Labor Code Section 1720, *et seq*., and 1770, *et seq*., as well as California Code of Regulations, Title 8, Section 1600, et seq., ("Prevailing Wage Laws"), which require the payment of prevailing wage rates and the performance of other requirements on "public works" and "maintenance" projects. If the SERVICES are being performed as part of an applicable "public works" or "maintenance" project, as defined by the Prevailing Wage Laws, and if the total compensation is $1,000 or more, CONSULTANT agrees to fully comply with such Prevailing Wage Laws. The CITY shall provide CONSULTANT with a copy of the prevailing rates of per diem wages in effect at the commencement of this Agreement. CONSULTANT shall make copies of the prevailing rates of per diem wages for each craft, classification or type of worker needed to execute the SERVICES available to interested parties upon request, and shall post copies at the Consultant's principal place of business and at the project site. CONSULTANT shall defend, indemnify and hold the City, its elected officials, officers, employees and agents free and harmless from any claim or liability arising out of any failure or alleged failure to comply with the Prevailing Wage Laws.

12. TERMINATION OF AGREEMENT. The CITY may terminate this AGREEMENT upon giving a ten (10) day advance written notice of such termination to CONSULTANT. In that event, the City Manager, or his designee, based upon work accomplished by CONSULTANT prior to notice of such termination, shall determine the amount of fees to be paid to CONSULTANT for such services based upon accepted accounting practices. This finding by the City Manager, or his designee, shall be considered by the Alhambra City Council and the Council's determination shall be final and conclusive as to the amount of such fee.

13. INDEPENDENT CONTRACTOR. CONSULTANT shall act as an independent contractor in the performance of the services provided for in this AGREEMENT and shall furnish such services in CONSULTANT's own manner and method and in no respect shall CONSULTANT be considered an agent or employee of the CITY.

14. OWNERSHIP OF DOCUMENTS. All financial documents, data, studies, and reports prepared by CONSULTANT under this AGREEMENT are CITY's property. CONSULTANT may retain copies of said documents and materials as desired, but will deliver all original materials to CITY upon CITY's written notice. CITY agrees that use of CONSULTANT's completed work product, for purposes other than identified in this AGREEMENT, or use of incomplete work product, is at CITY's own risk. CITY will indemnify and hold CONSULTANT harmless for any use of the work product other than as contemplated by this AGREEMENT.

15. PUBLICATION OF DOCUMENTS. Except as necessary for performance of service under this AGREEMENT, no copies, sketches, or graphs of materials, including graphic art work, prepared pursuant to this Agreement, will be released by CONSULTANT to any other person or City without CITY's prior written approval. All press releases, including graphic display information to be published in newspapers or magazines, will be approved and distributed solely by CITY, unless otherwise provided by written agreement between the parties.

16. NONASSIGNMENT. This AGREEMENT is not assignable either in whole or in part by CONSULTANT without the written consent of CITY.

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17. TAXPAYER IDENTIFICATION NUMBER. CONSULTANT will provide CITY with a valid Taxpayer Identification Number.

18. PERMITS AND LICENSES. CONSULTANT, at its sole expense, will obtain and maintain during the term of this AGREEMENT, all necessary permits, licenses, and certificates that may be required in connection with the performance of services under this Agreement.

19. INDEMNIFICATION.

a. CONSULTANT hereby agrees to the following:

i. Indemnification for Professional Services. CONSULTANT will save harmless and indemnify CITY and, at CITY's request, reimburse defense costs for CITY and all its officers, volunteers, employees and representatives from and against any and all suits, actions, or claims, of any character whatever, brought for, or on account of, any injuries, including death or damages sustained by any person or property resulting or arising from any negligent or wrongful act, error or omission by CONSULTANT or any of CONSULTANT's officers, agents, employees, or representatives, in the performance of this Agreement.

ii. Indemnification for other Damages. CONSULTANT indemnifies and holds CITY harmless from and against any claim, action, damages, costs (including, without limitation, attorney's fees), injuries, or liability, arising out of this Agreement, or its performance. Should 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 this Agreement, or its performance, CONSULTANT will defend CITY (at CITY's request and with counsel satisfactory to CITY) and will indemnify CITY for any judgment rendered against it or any sums paid out in settlement or otherwise.

b. For purposes of this section "CITY" includes CITY's officers, officials, employees, agents, and representatives.

c. It is expressly understood and agreed that the foregoing provisions will survive termination of this Agreement.

d. CITY does not, and shall not, waive any rights against CONSULTANT which it may have by reason of the aforesaid hold-harmless AGREEMENT because of the acceptance by CITY or the deposit with CITY by CONSULTANT, of any of the insurance policies hereinafter described in this AGREEMENT.

e. The aforesaid hold-harmless AGREEMENT by CONSULTANT shall apply to all damages and claims for damages of every kind suffered, or alleged to have been suffered, by reason of any of the aforesaid operations of CONSULTANT, or any subcontractor of CONSULTANT, regardless of whether such insurance policies shall have been determined to be applicable to any of such damages or claims for damages.

f. Notwithstanding any provision of this Agreement to the contrary, design professionals shall be required to defend and indemnify the City only to the extent allowed by Civil Code Section 2782.8, namely for claims that arise out of, pertain to, or relate to the negligence, recklessness, or willful misconduct of the design professional. The term "design professional" includes licensed architects, licensed landscape architects, registered professional engineers, professional land surveyors and the business entities which offer such services in accordance with the applicable provisions of the Business and Professions Code.

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g. The provisions of this section do not apply to Claims occurring as a result of the City's sole negligence or willful acts or omissions.

20. INSURANCE. CONSULTANT shall not commence work under this contract until CONSULTANT shall have obtained all insurance required by this AGREEMENT and such insurance shall have been approved by CITY as to form, amount and carrier, nor shall CONSULTANT allow any subcontractor of CONSULTANT to commence work on any subcontract until all similar insurance required of the subcontractor of CONSULTANT shall have been so obtained and approved.

a. COMPENSATION INSURANCE. CONSULTANT shall take out and maintain, during the life of this contract, Worker's Compensation Insurance for all of CONSULTANT'S employees employed to perform the SERVICES as described section 2 of the AGREEMENT; and, if any work is sublet, CONSULTANT shall require the subcontractor of CONSULTANT similarly to provide Worker's Compensation Insurance for all of the latter's employees, unless such employees are covered by the protection afforded by CONSULTANT. If any class of employees engaged in work under this AGREEMENT is not protected under any Workers' Compensation law, CONSULTANT shall provide and shall cause each subcontractor of CONSULTANT to provide adequate insurance for the protection of employees not otherwise protected. CONSULTANT shall indemnify CITY for any damage resulting to it from failure of either CONSULTANT or any subcontractor of CONSULTANT to take out or maintain such insurance.

b. COMPREHENSIVE GENERAL LIABILITY, PROFESSIONAL LIABILITY, COMPREHENSIVE AUTOMOBILE LIABILITY AND CONTRACTUAL GENERAL LIABILITY INSURANCE. CONSULTANT shall take out and maintain during the life of this contract comprehensive general liability, products/completed operations hazard, comprehensive automobile liability and contractual general liability insurance and shall protect CITY, its elective and appointive boards, officers, agents and employees, CONSULTANT, and any subcontractor of CONSULTANT performing work covered by this contract, from claims for damage for personal injury, including death, as well as from claims for property damage which may arise from CONSULTANT'S or any subcontractor of CONSULTANT'S operations under this contract, whether such operations be by CONSULTANT or by any subcontractor of CONSULTANT, or by anyone directly or indirectly employed by either CONSULTANT or any subcontractor of CONSULTANT, and the amounts of such insurance shall be as follows:

i. Commercial General Liability Insurance in an amount of not less than ONE MILLION DOLLARS ($1,000,000);

ii. Professional Liability Insurance in an amount of not less than ONE MILLION DOLLARS ($1,000,000);

iii. Comprehensive Automobile Liability Insurance in an amount of not less amount of not less than ONE MILLION DOLLARS ($1,000,000).

A combined single limit policy with aggregate limits in an amount of not less than TWO MILLION DOLLARS ($2,000,000) shall be considered equivalent to the said required minimum limits set forth in subsections (i),(ii), and (iii) above.

c. PROOF OF INSURANCE. The insurance required by this Agreement shall be with insurers which are Best A+ rated, and California-Admitted, or better. The CITY of Alhambra shall be named as "additional insured" on all policies required hereunder, except for Professional Liability Insurance, and CONSULTANT shall furnish the CITY Clerk, concurrently with the execution hereof, with satisfactory proof of carriage of the insurance required, and adequate legal assurance that each carrier will give CITY at least thirty (30) days' prior notice of the cancellation of any policy during the effective period of the contract.

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d. NOTICE TO COMMENCE WORK. The CITY will not issue any notice authorizing CONSULTANT or any subcontractor to commence work under this AGREEMENT until CONSULTANT has provided to the CITY Clerk the proof of insurance as required by subparagraph (C) of this article.

21. NON-DISCRIMINATION. CONSULTANT shall not discriminate in its recruiting, hiring, promotion, demotion or termination practices on the basis of race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, marital status, sex, age, or sexual orientation in the performance of this AGREEMENT and shall comply with the provisions of the California Fair Employment and Housing Act as set forth in Part 2.8 of Division 3, Title 2 of the California Government Code; the Federal Civil Rights Act of 1964, as set forth in Public Law 88-352, and all amendments thereto; Executive Order 11246; and all administrative rules and regulations issued pursuant to such acts and order.

22. UNAUTHORIZED ALIENS. CONSULTANT hereby promises and agrees to comply with all of the provisions of the Federal Immigration and Nationality Act (8 USCA 1101, *et seq.*), as amended; and, in connection therewith, shall not employ unauthorized aliens as defined therein. Should CONSULTANT so employ such unauthorized aliens for the performance of work and/or services covered by this AGREEMENT, and should the Federal Government impose sanctions against the CITY for such use of unauthorized aliens, CONSULTANT hereby agrees to, and shall, reimburse CITY for the cost of all such sanctions imposed, together with any and all costs, including attorney's fees, incurred by the CITY in connection therewith.

23. CONFLICT OF INTEREST. CONSULTANT will comply with all conflict of interest laws and regulations including, without limitation, CITY's conflict of interest regulations.

24. WAIVER. Waiver by any party hereto of any term, condition, or covenant of this AGREEMENT shall not constitute the waiver of any other term, condition or covenant hereof.

25. ATTORNEY'S FEES. If litigation is reasonably required to enforce or interpret the provisions of this AGREEMENT, the prevailing party in such litigation shall be entitled to an award of reasonable attorney's fees, in addition to any other relief to which it may be entitled.

26. BINDING EFFECT. This AGREEMENT shall be binding upon the heirs, executors, administrators, successors and assigns of the parties hereto.

27. PROVISIONS, CUMULATIVE. The provisions of this AGREEMENT are cumulative and in addition to and not in limitation of any rights or remedies available to CITY.

28. NO PRESUMPTION RE: DRAFTER. The parties acknowledge and agree that the terms and provisions of this AGREEMENT have been negotiated and discussed between the parties and their attorneys, and this AGREEMENT reflects their mutual AGREEMENT regarding the same. Because of the nature of such negotiations and discussions it would be inappropriate to deem any party to be the drafter of this AGREEMENT; and, therefore, no presumption for or against validity or as to any interpretation hereof, based upon the identity of the drafter, shall be applicable in interpreting or enforcing this AGREEMENT.

29. ASSISTANCE OF COUNSEL. Each party to this AGREEMENT warrants to each other party as follows:

a. That each party either had the assistance of counsel or had counsel available to it, in the negotiation for, and execution of, this AGREEMENT, and all related documents; and,

b. That each party has lawfully authorized the execution of this AGREEMENT.

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30. MODIFICATION. This AGREEMENT shall not be modified except by written agreement of the parties.

31. GOVERNING LAW. This AGREEMENT shall be interpreted and construed according to the laws of the State of California.

32. NOTICE. Whenever it shall be necessary for either party to serve notice on the other regarding this AGREEMENT, such notice may be furnished in writing by either party to the other and shall be served by personal service as required in judicial proceedings or by certified mail, postage prepaid, return receipt requested, addressed to the parties as follows:

CITY: _____
_____
City of Alhambra
111 South First Street
Alhambra, CA 91801

CONSULTANT: _____
_____
_____
Tel: _____
Fax: _____

33. FORCE MAJEURE. Neither party shall be responsible for delays or failures in performance resulting from acts beyond the control of the offending party. Such acts shall include, but not be limited to, acts of God, fire, flood, earthquake, or other natural disaster, nuclear accident, strike, lockout, riot, freight embargo, public regulated utility, or government statutes or regulations superimposed after the fact.

34. ELECTRONIC TRANSMISSION OF CONTRACT AND SIGNATURE. The Parties agree that this Agreement may be transmitted and signed by electronic mail by either/any or both/all Parties, and that such signatures shall have the same force and effect as original signatures, in accordance with California Government Code section 16.5 and Civil Code section 1633.7.

IN WITNESS WHEREOF, the parties hereto have caused this AGREEMENT to be executed on its effective date by their respective officers duly authorized on their behalf.

"CITY"
CITY OF ALHAMBRA, a Charter Law City

ATTEST:

By _____
_____, Mayor

_____
Lauren Myles, City Clerk

APPROVED AS TO FORM:
JOSEPH M. MONTES, CITY ATTORNEY

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By _____

"CONSULTANT"

(FULL NAME OF CONSULTANT)

TAXPAYER ID # _____

By _____
Print Name: _____
Title: _____

By _____
Print Name: _____
Title: _____

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Peregrine

REQUEST FOR PROPOSAL

No. RFP2M24-21 — Alhambra Police Department

REAL-TIME DATA VISUALIZATION PLATFORM

RESPONSE FOR PEREGRINE TECHNOLOGIES, INC.

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1. Executive Summary

1.1 Letter of Transmittal

September 24th, 2024

To the Attention of:
Lieutenant Debbie Gomez
211 South First Street
Alhambra, CA 91801

Proposal Package:
No. RFP2M24-21

Proposing Firm:
Peregrine Technologies, Inc.
71 Stevenson St. Suite 700
San Francisco, California, 94105

Role	Name	Title	Phone	Email
Authorized person to contractually obligate Peregrine	Nick Noone	CEO / Co-founder	415-287-2749	nick@peregrine.io
Authorized person to negotiate a contract for Peregrine	Robert Wheeler	COO	617-869-7964	robert.wheeler@peregrine.io
RFP Contact	Jordan Karasik	Business Development	310-597-5914	jordan.karasik@peregrine.io

Peregrine Technologies, Inc, a corporation headquartered in San Francisco, CA, offers this proposal in response to No. RFP2M24-21 – Real-Time Data Visualization Platform. No other business entities take part in this proposal or comprise the Proponent.

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1.2 Offer Letter

Dear City of Alhambra Police Department:

Peregrine Technologies, Inc. ("Peregrine") is pleased to provide the following proposal to the City of Alhambra Police Department (“APD”) in response to No. RFP2M24-21 – Real-Time Data Visualization Platform.

Peregrine was founded in 2017 with the goal of empowering law enforcement agencies to make data-driven decisions in real time. Today, Peregrine is a rapidly growing technology company is committed to advancing public safety and providing a solution that helps law enforcement solve their most difficult problems.

Peregrine’s capabilities are uniquely suited for APD’s requirements. Peregrine began in and continues to be focused on the law enforcement and public safety sector. Our platform has been tailored to serve the diverse needs of a department like APD, allowing civilian and sworn users across department functions to utilize the agency’s valuable data to maximum effect.

Peregrine is currently supporting diverse law enforcement agencies across the country – from police departments to Sheriff’s offices, to state law enforcement agencies – in fulfilling on these same objectives, and is deployed in RTIC’s across the country. Peregrine operates across 13 states, with more than 60 customers including southern California agencies such as LAPD, Redondo Beach PD, Glendale PD, Menifee PD, Orange County SO, Anaheim PD, Huntington Beach PD, Costa Mesa PD, Fullerton PD, Escondido PD and San Diego SO.

The Alhambra Police Department seeks a single point of access to integrate, discover, view, and analyze data specifically from Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon Evidence.om and Laserfiche to serve as a key component in the Real Time Information Center (RTIC). Staff in the RTIC, such as investigators and analysts, need the ability to search multiple data sources simultaneously for subjects or objects of interest and quickly navigate through vast amounts of data. Next, they need to interpret and visualize findings as well as represent connections between data, such as persons of interest and vehicles. RTIC Staff and Patrol operations needs the ability to ensure universal awareness of key locations, assets, threats, and services, and then drive real-time collaboration, both for unplanned mutual aid events and planned major events. And finally, executive leadership needs real-time crime trend data and internal departmental data at their fingertips to inform resource deployment, operational decision making, and long-term strategy.

Peregrine has proven experience integrating with Spillman products, Flock ALPR, Vigilant ALPR, Axon, Evidence.com and Laserfiche at other with other Law Enforcement customers across the country that will enable all the aforementioned workflows.

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Peregrine provides a secure and CJIS-compliant, cloud-based, data integration and analytics platform that is purpose-built for law enforcement and public safety agencies and has been approved to safely handle CJI by the CA DOJ. Peregrine is a technically mature, operationally proven software as a service (SaaS) company with the only platform that enables seamless sharing of mission-critical information with fine-grained permissions between public safety agencies. Peregrine's configurable data analytics platform enables agencies to easily integrate, interact with, and visually represent their data in real-time on any device.

In addition to the technical capabilities of our software, our professional support team has extensive experience working directly with officers, analysts, investigators, administrative personnel, executive staff, and senior leaders. Our team is ready to meet the needs of APD with the agility and flexibility that is required to support the rapid changes in law enforcement technology and mission landscape.

Thank you for your time and consideration. We look forward to partnering with APD on your upcoming RTIC and other pressing data challenges. My contact information and the contact information of our primary contact for this RFP are listed above. Please do not hesitate to reach out with any questions.

Sincerely,

Nicholas Noone

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2. Technical Specifications

2.1 General Requirements

REQUIREMENT	YES/NO	RESPONSE
PLATFORM shall be CJIS- compliant and vendor must identify location PLATFORM will be hosted at:	YES	Peregrine is a fully CJIS compliant platform hosted in the AWS Government Cloud, West Region.
PLATFORM must be a web-based interface that automatically establishes connections and relationships between data elements within and across disparate systems:	YES	Peregrine is a web-based platform includes powerful knowledge graphs — automated ways to connect and visualize the relationships between people, places, events, vehicles, and other data elements. Peregrine's platform also automatically extracts links from both structured and unstructured data, including handwritten documents, to illuminate connections between people, places, events, documents, and media data without requiring manual processing.
PLATFORM should be fully integrated with user-facing applications for search, map-based analysis, link analysis, reporting, and dashboarding that allow for seamless movement of data between applications without the need to export and import data manually.	YES	The Peregrine platform is a fully integrated solution that offers applications for search, map-based analysis, link/relationship analysis, reporting, and dashboards. Data can be seamlessly moved between any/all applications. Users do not need to download, export, and upload data in order to move it between applications.
PLATFORM should offer pre-built connectors that allow for seamless integration with critical existing systems including: Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon, Evidence.com, and Laserfiche. These pre-built connectors should ensure data available in the PLATFORM is complete, accurate, and always up to date.	YES	Peregrine offers pre-built connectors that will allow for a seamless integration of critical APD systems including: Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon Evidence.com, and Laserfiche. These pre-built connectors will ensure all data in the platform is complete, accurate and always up to date. Additionally, these pre-built connectors remove any need for APD IT to build and maintain any interfaces that translate data from source system schema to the Peregrine schema.

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REQUIREMENT	YES/NO	RESPONSE
PLATFORM should have the ability for users to log into a single solution for access to data from those high priority systems.	YES	Peregrine provides the ability for all users to log in once to Peregrine and access all the data from all the integrated underlying systems.
PLATFORM should offer seamless integration with Alhambra Police Department's existing single-sign-on and multi-factor authentication services.	YES	Peregrine seamlessly integrates with any existing single sign-on provider, providing users a familiar, secure sign-on experience, and administrators single-source control over access to multiple applications within your network
PLATFORM should have reliable algorithms that will enable automatic and auditable deduplication and merging of data. Additionally, the PLATFORM must provide the ability to easily view any individual records that have been merged and offer the ability to un-do merges when desired.	YES	Peregrine's entity resolution system identifies similar records from different source systems and merges them into a single, unified record. This unified record retains full auditability and allows for the review of the original source system records. Additionally, the system offers fine-grained configurability and permission controls to manage user access to resolved records. Peregrine uses advanced techniques to enable record resolution and allows agencies to define resolution criteria tailored to their specific needs. Peregrine also offers the ability to un-do merges when desired or manually merge records that were not automatically merged.
PLATFORM should have the flexibility to change desired data model over time without needing to build and maintain additional interfaces or make any changes to underlying source systems and the way it stores or represents information.	YES	The Peregrine platform features a dynamic data model layer that allows customers to customize and change their desired data model to agency needs, which may change over time. Changes in the peregrine data model layer do not require making any chances to the data model/schema of underlying source systems from which Peregrine integrates data.

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REQUIREMENT	YES/NO	RESPONSE
PLATFORM must have a clean and reliable information upon data searches.	YES	The Peregrine platform presents clean, clear search results that have been cleaned, de-duplicated, and prioritized to ensure users always get the most relevant and reliable information from their searches.
PLATFORM should offer desktop, laptop, tablet, and mobile device-accessible versions of those integrated applications so that they can be accessed by authorized users wherever and whenever they are needed.	YES	The Peregrine platform is available via all common web browsers on both MAC and PC operating systems on Desktop, Laptop and Tablets. Peregrine also offers a dedicated iOS and Android mobile application for mobile devices and tablets. This ensures the application can be accesses by authorized users wherever and whenever they need to.
PLATFORM should have the ability to securely collaborate and share data and visualization in real-time with agencies in the San Gabriel Valley, Los Angeles County, and Orange County	YES	The Peregrine platform provides features for secure collaboration and sharing that will enable APD to build deeper, trusting partnerships with local and regional stakeholders. The platform's granular access and usage control capabilities prevent unauthorized or inappropriate use or sharing of sensitive data while allowing agencies and departments to share information with their partners in a deliberate, precise, and auditable manner. With appropriate Memorandums of Understanding (MOUs) in place, the Peregrine platform includes the ability to search and share data with other current and future Peregrine customers in the San Gabriel Valley, LA + Orange Counties regardless of what underlying data sources/systems they have that may differ from APD's. This includes but is not limited to LAPD, Glendale PD, Redondo Beach PD, Orange County SO, Anaheim PD, Costa Mesa PD, Fullerton PD and Huntington Beach PD.

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REQUIREMENT	YES/NO	RESPONSE
PLATFORM should have the ability to securely collaborate and share data and visualization in real-time with agencies in the San Gabriel Valley, Los Angeles County, and Orange County	YES	Collaboration in the Peregrine platform extends beyond simple data sharing; it also allows for multiple users to work within the same application at the same time across multiple devices and locations. The platform's collaboration features compound the value of users' work by dynamically connecting them in real time with other users who are working with or interested in the same data. In this way, the Peregrine platform generates opportunities for users to improve the quality and speed of their answers by connecting them to users who are asking the same question. Sharing can be conducted at the individual user level (e.g., sharing a case with one additional user), at the group level (e.g., sharing a case with an Analysts group or Investigators group), or at the organization level (e.g., sharing an analysis product or dashboard in a public setting for the whole organization to view). Sharing can be configured with various permission settings including View, Edit, and Discover (discover allows users to see that a file exists, but not to open it). Expiration timelines can also be set (e.g., a user can choose to share a file with another user for 48 hours, after which the file is no longer accessible). The platform also includes collaborative chat, @mention, and commenting capabilities within an investigation or analysis.
PLATFORM should have the ability to accommodate future software applications that City may acquire	YES	Further data sources can and integrated into Peregrine as they are identified. Many of our customers identify new data sources after implementation has begun or after it has finished as they discover ways to make all their data actionable.

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REQUIREMENT	YES/NO	RESPONSE
City retains full and total rights to its data within the PLATFORM at all times and has the ability to access and export that data in open, standard data formats at any time.	YES	The City of Alhambra and Alhambra PD will retain full and total rights to all of its data within the Peregrine platform at all time. Data can be exported to machine readable formats for import into on-premise or cloud- based databases. Additionally, Peregrine provides an open, free API for agency personnel and 3rd parties to query.
Vendor shall provide cybersecurity insurance.	YES	Peregrine carries cyber insurance from reputable carriers and is able to provide documented coverage commensurate with the City's requirements.

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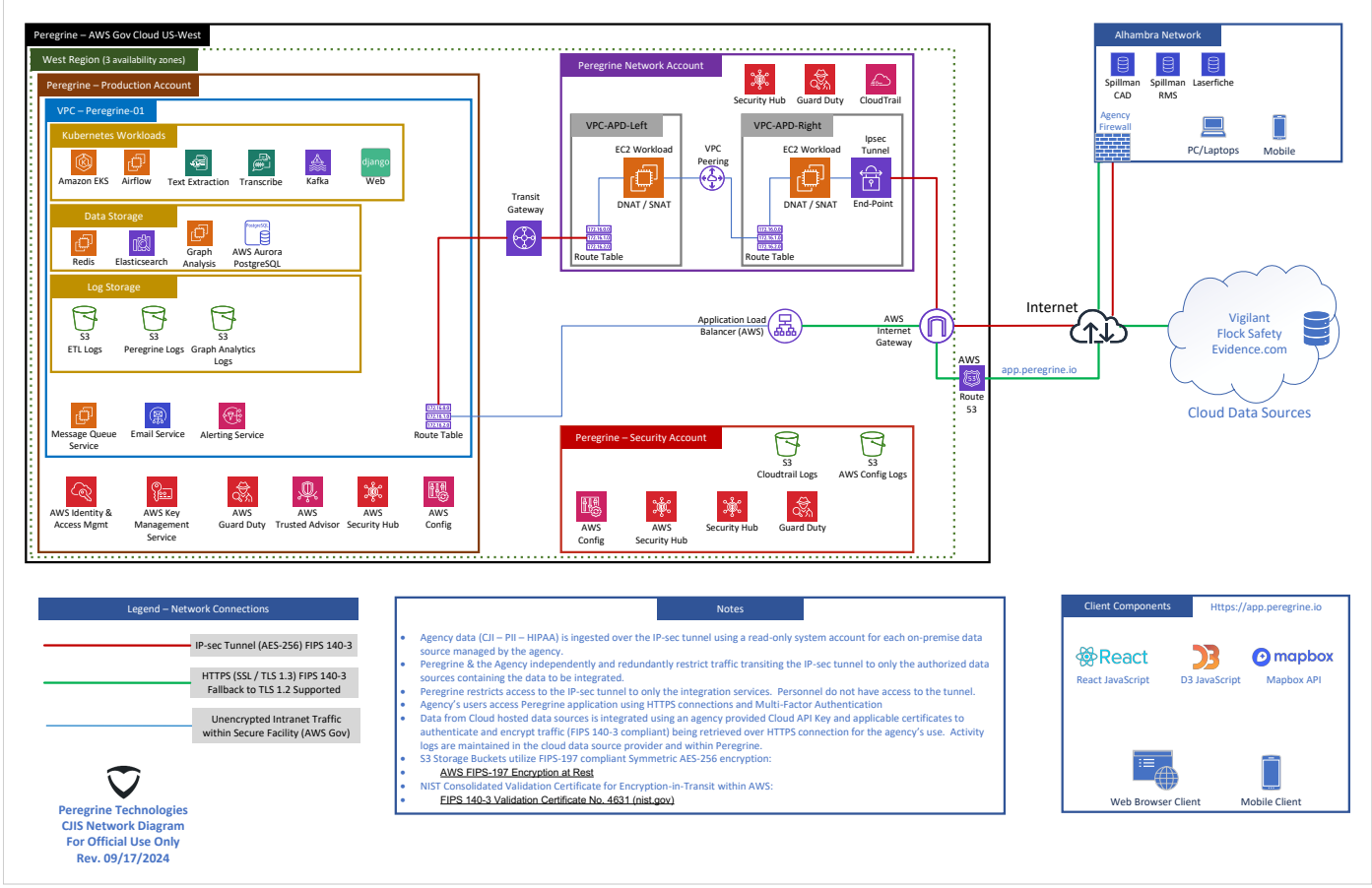
2.2 System Architecture

Data integration is the foundational capability that underlies the scope of services requested in this RFP. To have a single point of access for all of APD's major data sources for the RTIC, as well as investigations, patrol, crime analysis and command staff, a proponent must specialize in the complex process of data integration in such a way that serves the specific needs of law enforcement. Peregrine has developed public-safety focused data integration and operations platform.

To integrate data, Peregrine's software does three things: connect, ingest, and model. Below is an architecture diagram of Peregrine, which outlines the Platform and the way in which it connects to customer networks and data sources.



Connect

The Peregrine platform includes a wide range of pre-built and highly configurable connectors that allow for seamless connection to any type of underlying database or data store, including ones for all of the specific data systems that APD has identified, and future systems should APD identify more you want to integrate. These connectors range from mechanisms to interact with simple SQL stores, more modern application programming interfaces (APIs), and more complex source types, such as information sent to email inboxes and exchange servers.

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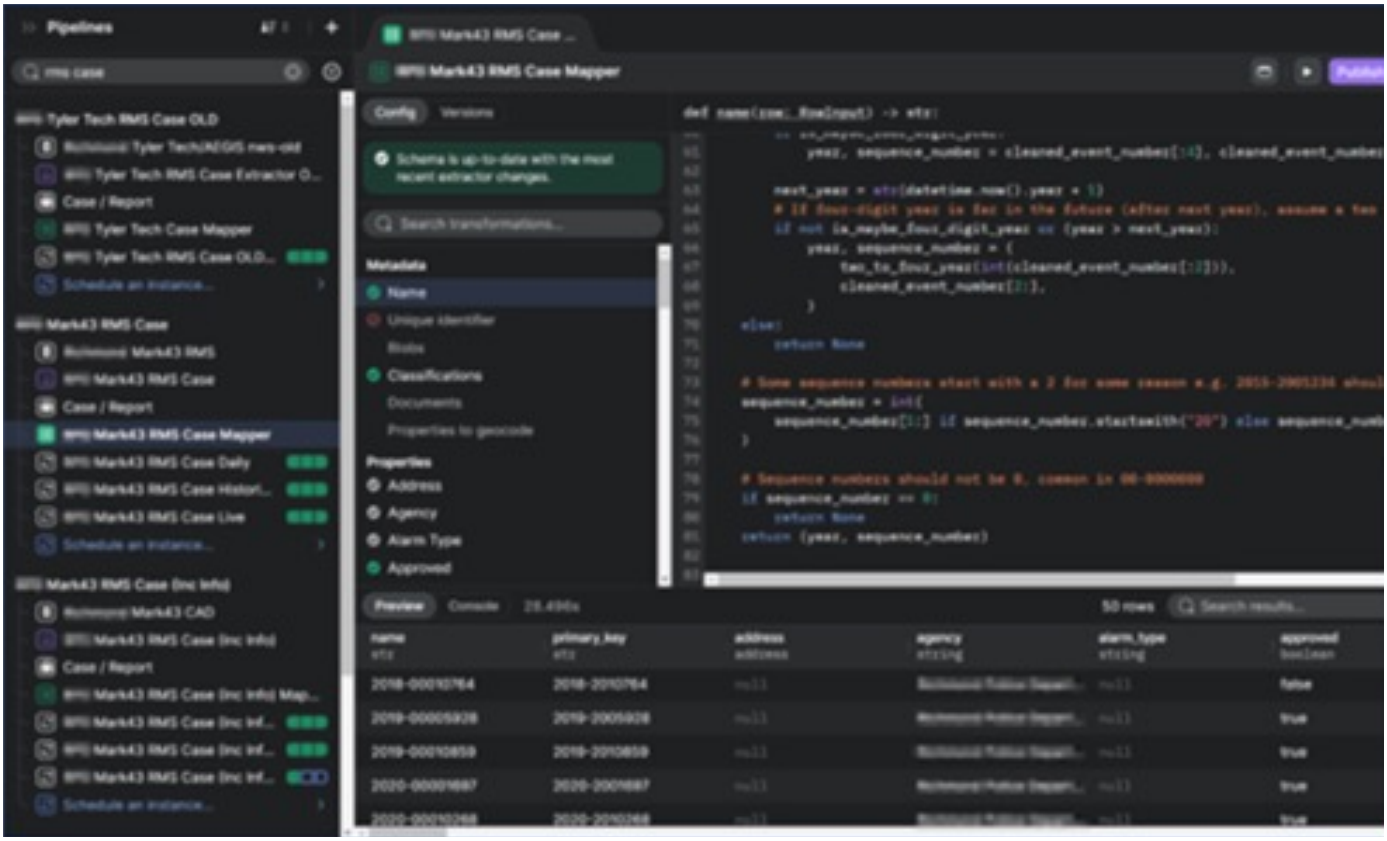
Ingest

Once connectivity with an external system is established, the Peregrine platform provides built-in capabilities to ensure data ingested from those systems are:

1. current and up to date,
2. complete and include all expected data, and
3. correct such that data appears as expected by end users.



The Peregrine platform utilizes proprietary strategies that ensure successful ingestion of structured, unstructured, and semi-structured data. This allows for tailoring the data ingestion process in a manner that is most appropriate to the data source and use case – whether that entails ingesting all data at once, ingesting only new data, or ingesting incremental slices of the data. Additionally, the Peregrine platform features automated data health checks and notifications of any ingestion failures to ensure the fidelity of data currency, completeness, and correctness.

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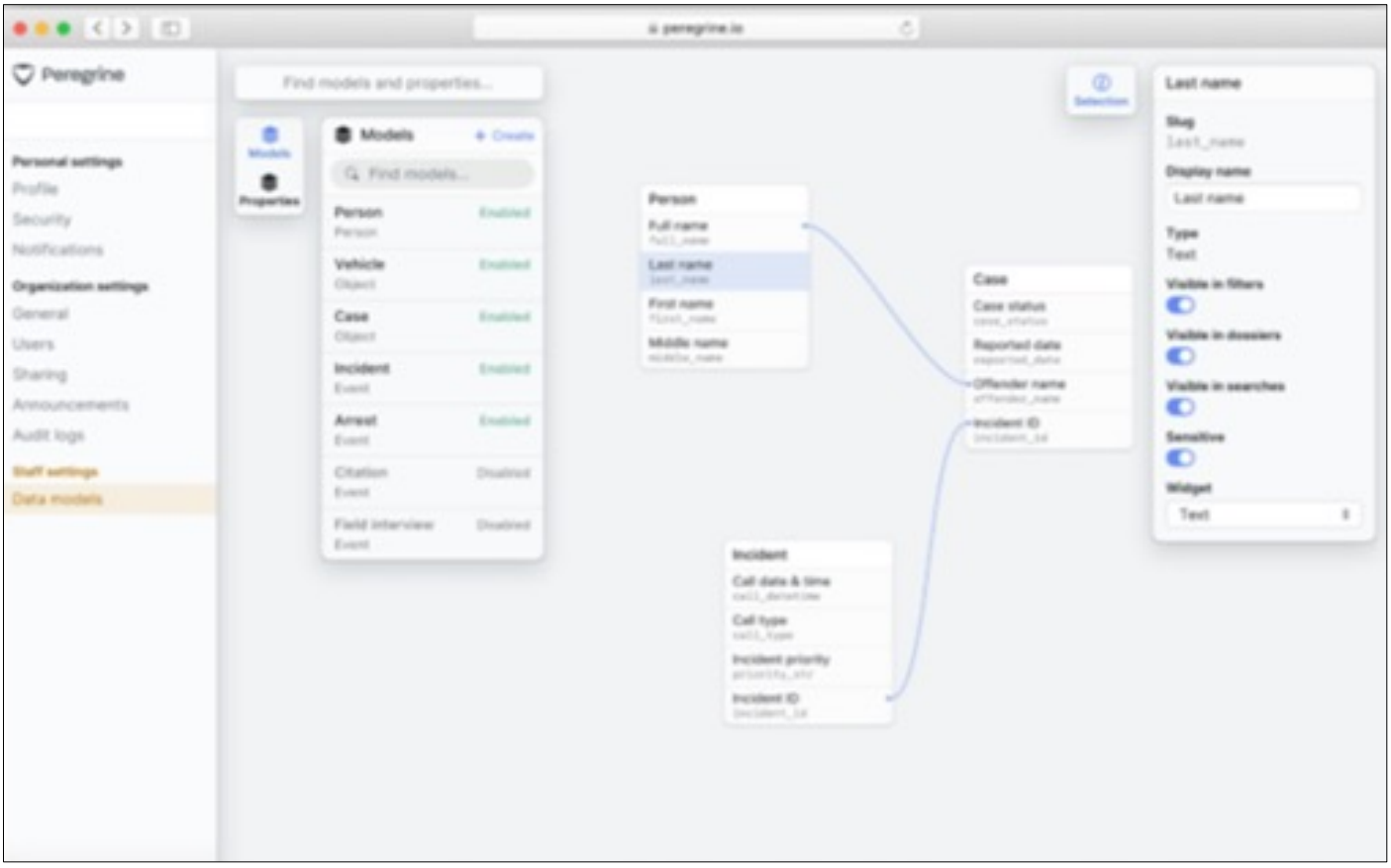

Model

The Peregrine platform models ingested data into a dynamic “ontology” or data model, a configurable schema that can transform source system data to be maximally useful to end users. This method allows users to search, retrieve, and view data in easy-to-understand concepts (e.g., persons, vehicles, cases, etc.) and automatically links information across different data sources (e.g., persons reflected in an RMS and a traffic system).

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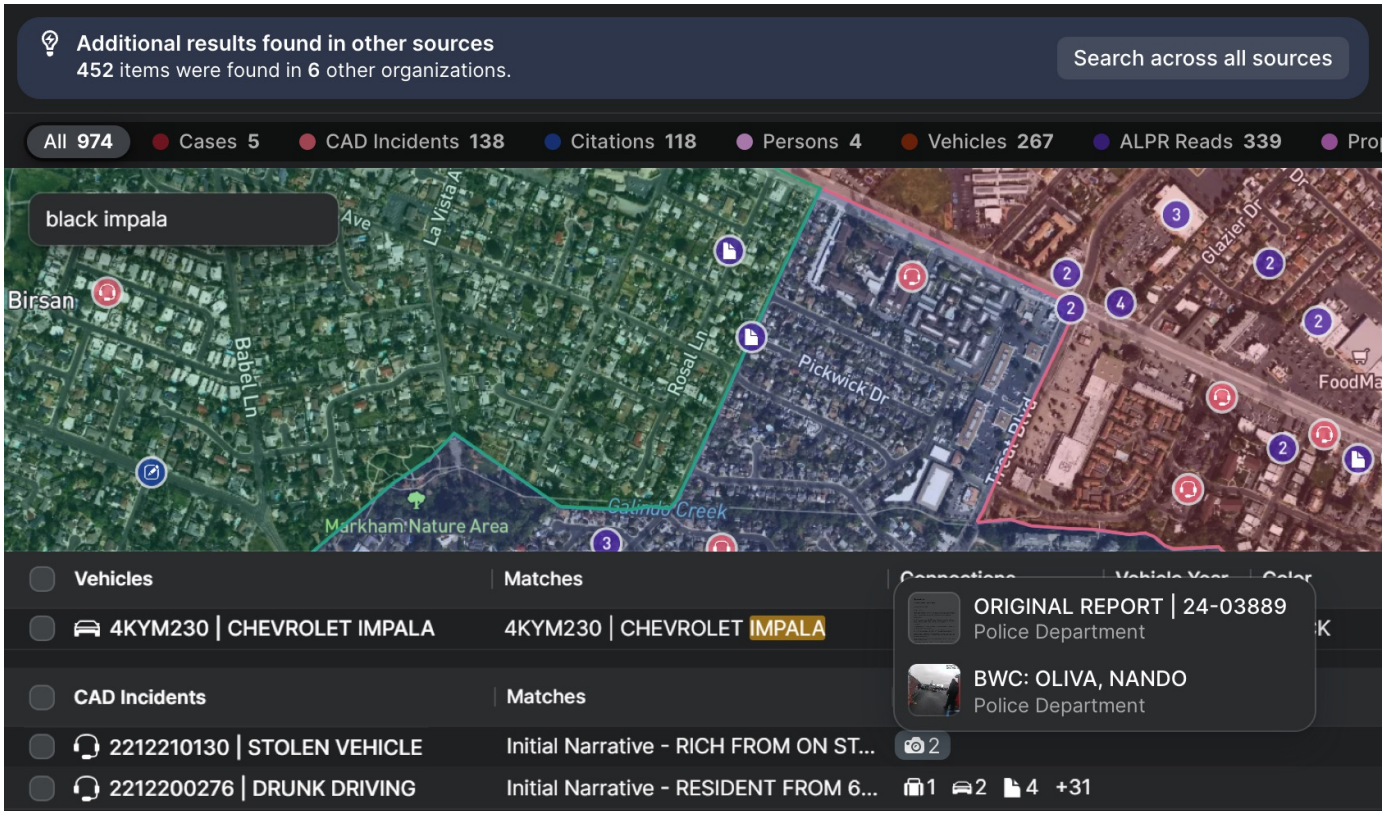
2.3 Examples of user facing applications

2.31 Search and Discovery

Peregrine's search and information discovery capabilities make all relevant information immediately accessible. Officers and civilians can quickly navigate through vast amounts of data, then interpret and visualize findings through several front-end applications. With "universal search", APD users are empowered to ask questions and find answers that were previously unattainable. Peregrine search is intuitive to use, allowing personnel of varying technical abilities, skillsets, and functions to surface information that is relevant to them and streamline their unique search workflows. Any search within Peregrine can be saved and then further refined for a derived search result, either at the time of the original query and to be returned to and searched again later.



The platform is designed to be walk-up usable; new users of the platform can immediately surface, analyze, and action data by navigating the platform's intuitive user interface and applications. These users have multiple ways to surface and view relevant information, allowing them flexibility to approach questions and decisions in ways that best suit them. These features mean that users arrive at answers more quickly and with greater accuracy, saving time and effort. Users can search based on extensive criteria, including but not limited to, name, date-of-birth, SSN, address, moniker, driver's license number, registered vehicles and guns, and much more.

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Within the platform, databases from multiple contributing agencies are integrated, modeled, cleaned (linked, deduplicated, etc.) in real-time, near-real-time, or on periodic cadences via a web-based, configurable data integration pipeline management console. All data extraction, transformation, and modeling are performed via a modern, fully interactive web-browser interface that includes an extensive set of modern, open Application Programming Interfaces (APIs) made available to APD at no additional cost. These APIs feed all agency data into Peregrine's off-the-shelf front-end search and analytical applications, or an unlimited number of third-party systems as required or desired, enabling users to access the information they need in the format they need it without constraint.

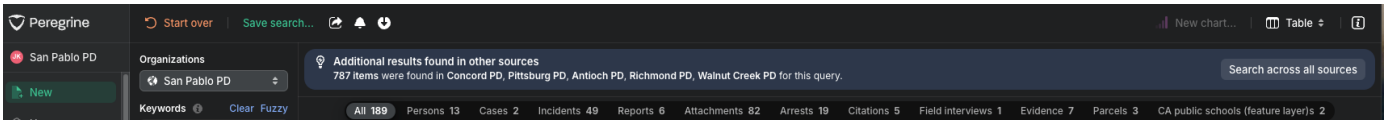
In addition, Peregrine's off-the-shelf search applications can be configured to display in multiple formats or interaction styles for individual users, teams/groups, or the entire agency. Peregrine's search functions are backed by granular security and permission control rules that are configured down to the individual record or field value, to ensure end users across a variety of agencies or job functions can access all available data in near-real-time in accordance with their permission level.

The platform enables geo-temporal "search around" as well as network-based "search around" capabilities that offer a wide range of exploratory capabilities to the user. If a user inputs or selects an entity, they can search around for other entities or activities that have occurred in the same area, around the same timeframe, or using a detailed variety of filtering criterion including keyword searches or matches on specific field values.

2.32 Interagency Searching

Law enforcement agencies know that crime doesn't stop at jurisdictional boundaries. To adequately address crime that crosses jurisdictional boundaries, local police departments, county Sheriff's offices, and even federal agencies must coordinate to solve and prevent crimes. Today, when an agency wants to collaborate or share information with its partners, often based on an exigent need in an investigation, it must endure a long, drawn-out process that's time consuming, cumbersome and inefficient.

In addition to searching and visualizing APD's own data, Peregrine also provides the ability to search and share data across other current and future Peregrine customers in the San Gabriel Valley, Los Angeles County, Orange County even if they are all on different underlying technologies. These include but are not limited to Los Angeles PD, Glendale PD, Redondo Beach PD, Orange County SO, Anaheim PD, Fullerton PD, Costa Mesa PD and Huntington Beach PD. This kind of data sharing is contingent upon an MOU between the respective agency head which will also govern exactly which data is shared.



An example search of a keyword in just one agencies data returned 189 results

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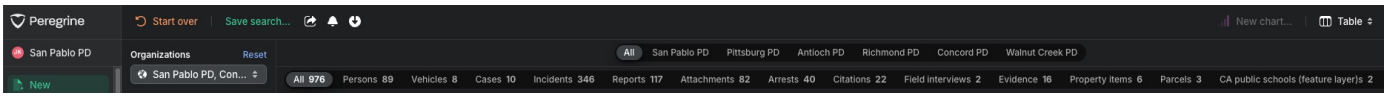


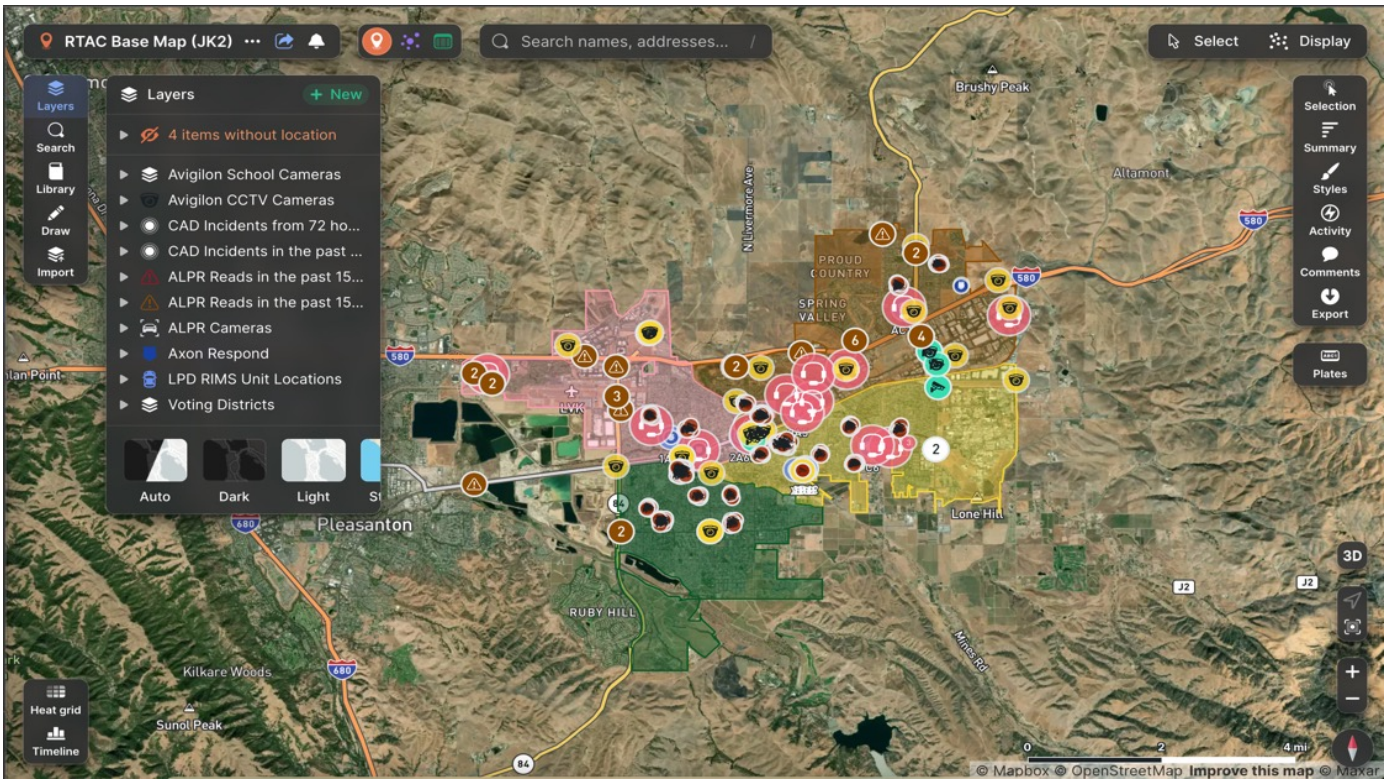
An example search of the same keyword expanded across multiple agencies data returned 976 results

2.33 Real Time Information Center (RTIC)

Peregrine was developed to provide a common operations and intelligence picture to facilitate real-time operational decision-making, enhance investigatory capabilities, streamline criminal analysis, and generate intelligence products for Law Enforcement. The software creates an extremely efficient method for turning large amounts of raw data into useful decision-support and analysis products, quickly and with significant reduction in manual manpower processing needs.

The Peregrine platform offers a complete operational picture of data points and video feeds across any data that is integrated into the platform. Data and video feeds can be displayed and explored through configurable maps, dashboards, reports, tables, link charts, and several search mediums.

The Peregrine platform can combine multiple data/video feeds for display on a video wall. Live data and video feeds can be displayed side-by-side in one or multiple views, and/or layered onto the same interface view. Peregrine can also stream real-time video feeds without duplicating or increasing media storage costs.



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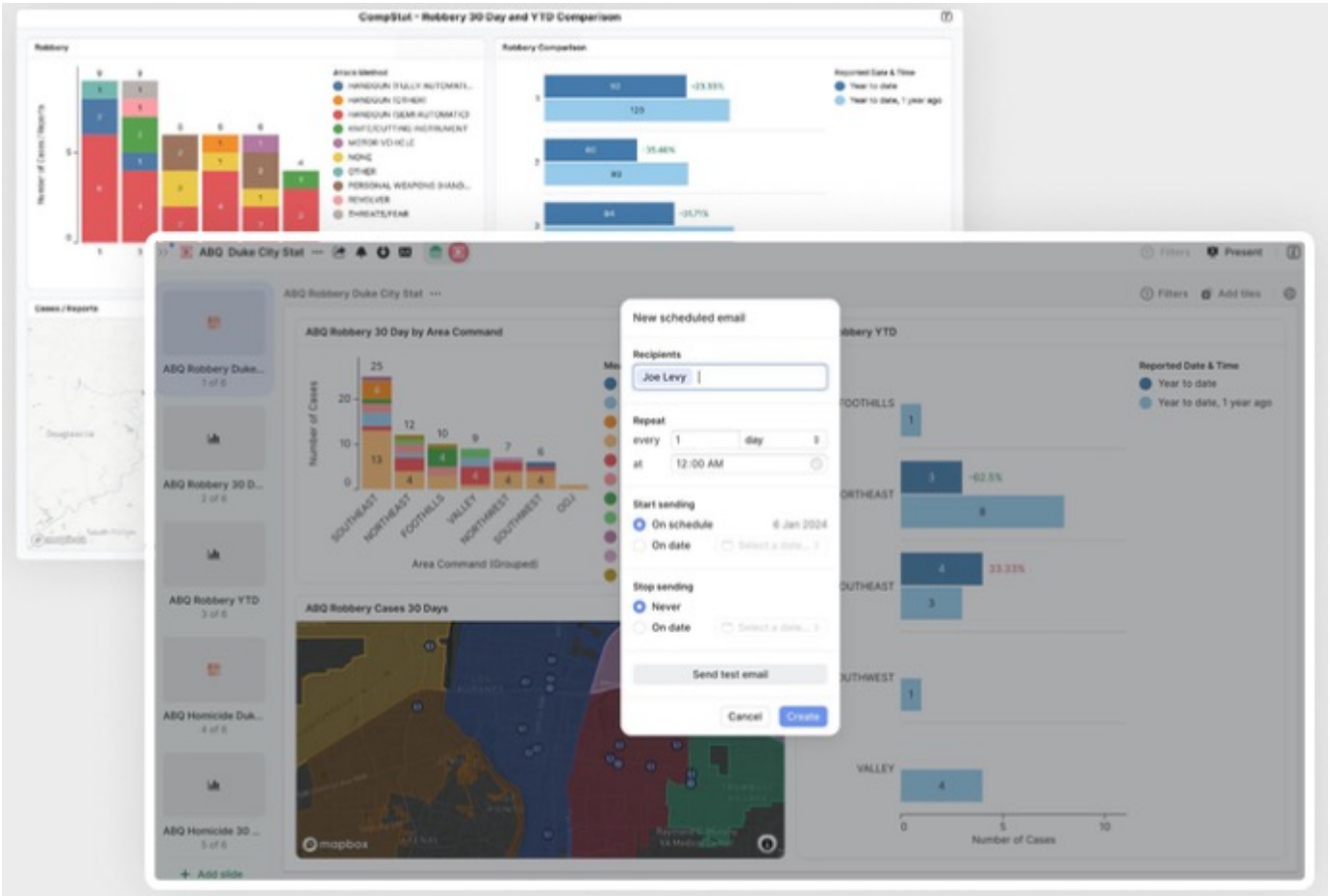
2.34 Visualizations and Reporting

The Peregrine platform provides a powerful suite of tools for the exploration, visualization, and reporting of data. These tools allow users to create dynamic data products and reports — such as interactive maps, network graphs, and dashboards — that automatically update as new data flows into the platform. APD users can smoothly move data across a single platform, viewing the same data in on a map, in a network, or on a dashboard without having to log into different systems or applications.

Peregrine's platform generates various styles of printable reports typical for LE agencies including subject profiles, vehicle reports, spotting reports, intel reports, printable dossiers for any record type, printable dashboards, charts, maps, and user-generated analytical products such as slide-based presentations.

Peregrine's Dashboarding and Charts applications enable users to build advanced visualizations including time-series comparisons, diagrams, and tabular summaries, backed by multiple underlying information sources that are accessible in one place. Dashboards can be configured to update in real-time or can be distributed as scheduled reports on a periodic cadence. Chart and dashboard visualizations are directly connected to all underlying data in the platform, empowering users to perform drill-down analysis from high-level statistics to the most granular information within the same interface.



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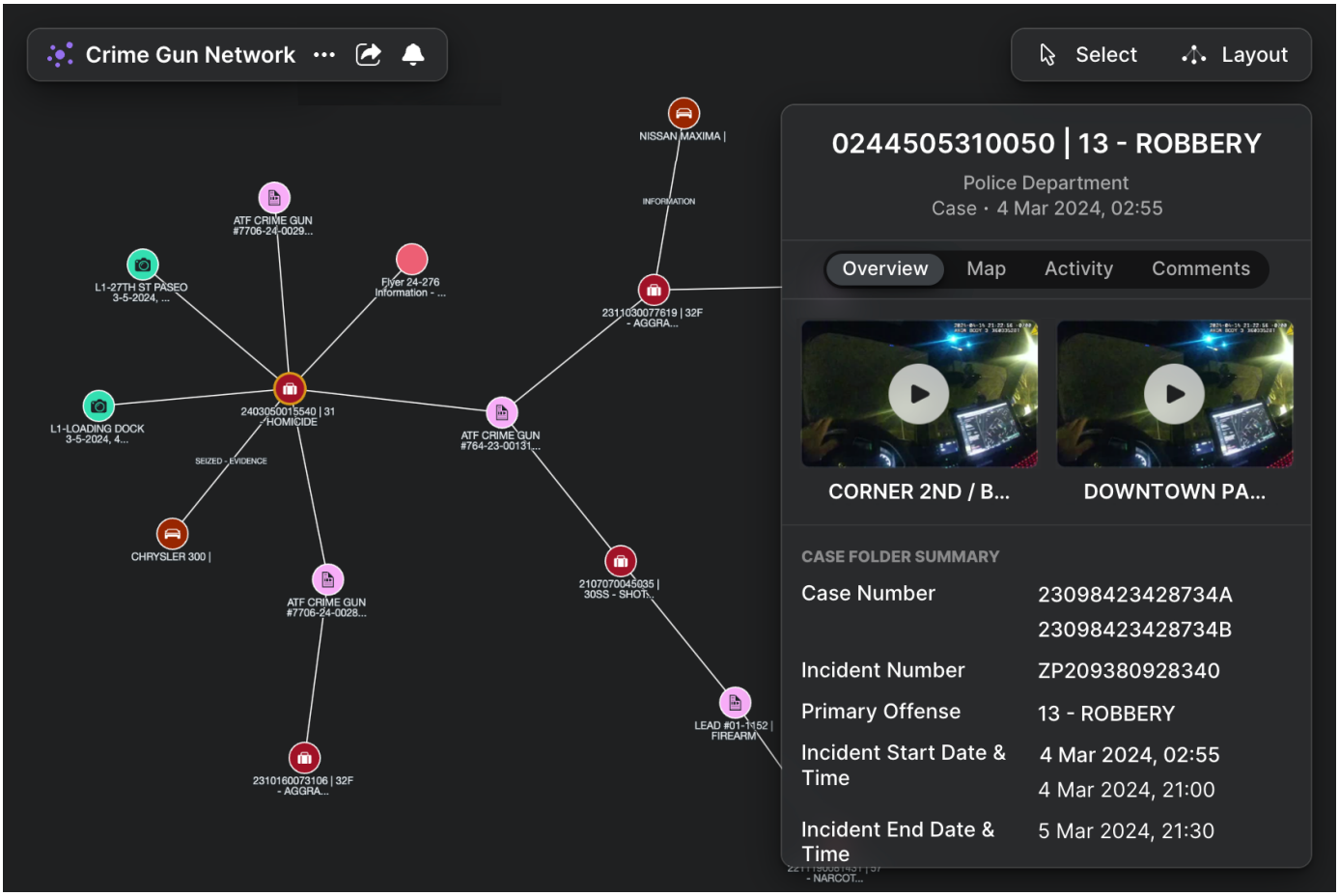
Peregrine's platform has a full investigative workspace that can be deployed for a variety of purposes. Data can be integrated from any application (dashboard, chart, map, network, or table) within a workspace. A workspace can be comprised of one or multiple interoperable applications organized as tabs in a single web browser window. A workspace can also be opened and manipulated in multiple browser windows at the same time.

Templated workspaces can be created by administrative users with a set of "out of the box" workspace tabs such as a blank map, a blank network graph, and a blank browser. Templated workspaces can be leveraged by other users to quickly create investigative workspaces or workspaces for any variety of operational purposes.

All applications within a workspace are backed by search functions that can retrieve entities from the entire corpus of data that is integrated into the platform across all LE agencies. Users can create an unlimited number of workspaces for their investigations, analyses, operations, or projects. Users can invite collaborators within and across multiple agencies to join a workspace and co-work in a real-time, web-based setting. Multiple collaborators can work in the same workspace at the same time while maintaining security controls such that each user can only see and access information in accordance with their permission settings.

2.35 Network and Link Analysis



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Peregrine's platform includes powerful knowledge graphs — a visual representation of connections between data like persons of interest and vehicles. That data can then be seamlessly represented geospatially as well, with all the fine-grained permissions to ensure appropriate access and usage while ensuring all legal, ethical, and regulatory boundaries are maintained. The platform's knowledge graph aids in the discovery and visualization of connections between otherwise disconnected data. Peregrine's platform also automatically extracts links from both structured and unstructured data, including handwritten documents, to illuminate connections between people, places, events, documents, and media data without requiring manual processing. For example, an address written in narrative form within a scanned document can be automatically linked to a person living at that address or to a vehicle registered there.

2.36 Entity Resolution / Merging Records

Fragmented records make it hard to find what you're looking for. When an investigator opens a search, searches for a person, and sees 40 records, it's hard to know which one will have the data they need so they have to open all of them to be sure. Similarly, the fragmentation makes it harder to find all records related to a single Person. Without entity resolution, there's no way to see all "John Doe's" cases if there's dozens of "Jon Doe's," each with their own cases. Both problems are solved by Peregrine's entity resolution system, which identifies similar records from different source systems and merges them into a single, unified record. This unified record retains full auditability and allows for the review of the original source system records. Additionally, the system offers fine-grained configurability and permission controls to manage user access to resolved records. Peregrine uses advanced techniques to enable record resolution and allows agencies to define resolution criteria tailored to their specific needs.

Records can be merged by the system as part of the data integration pipelining process where multiple databases are integrated and transformed into a single set of modeled records. Advanced techniques including deployment of machine learning models identify matched records can be leveraged to detect duplicates and merge them together when there is assurance of a match, eliminating significant manual labor. Entity resolution can also be conducted in user-driven manners by selecting and merging two or more entities into a single record within Peregrine's front-end applications. For example, a user can select two person records in a network graph and choose to resolve them. Upon resolution, all field values from the separate records are collated into one master record, and all links from the separate records are linked to the newly resolved record.

2.37 Real-time Alerting

With all data centrally located, users can receive real-time notifications when events occur, evolve, or when new entities enter the system. Alerting is configurable in geographical contexts (e.g., example, a user can draw a polygon around a neighborhood and set an alert if particular types of activity occur within the defined area) or using links (e.g., a user can set an alert when persons meet a threshold for frequent offender status). Peregrine's alerting technology can notify users or user groups via email, text, or push notification on a mobile device.

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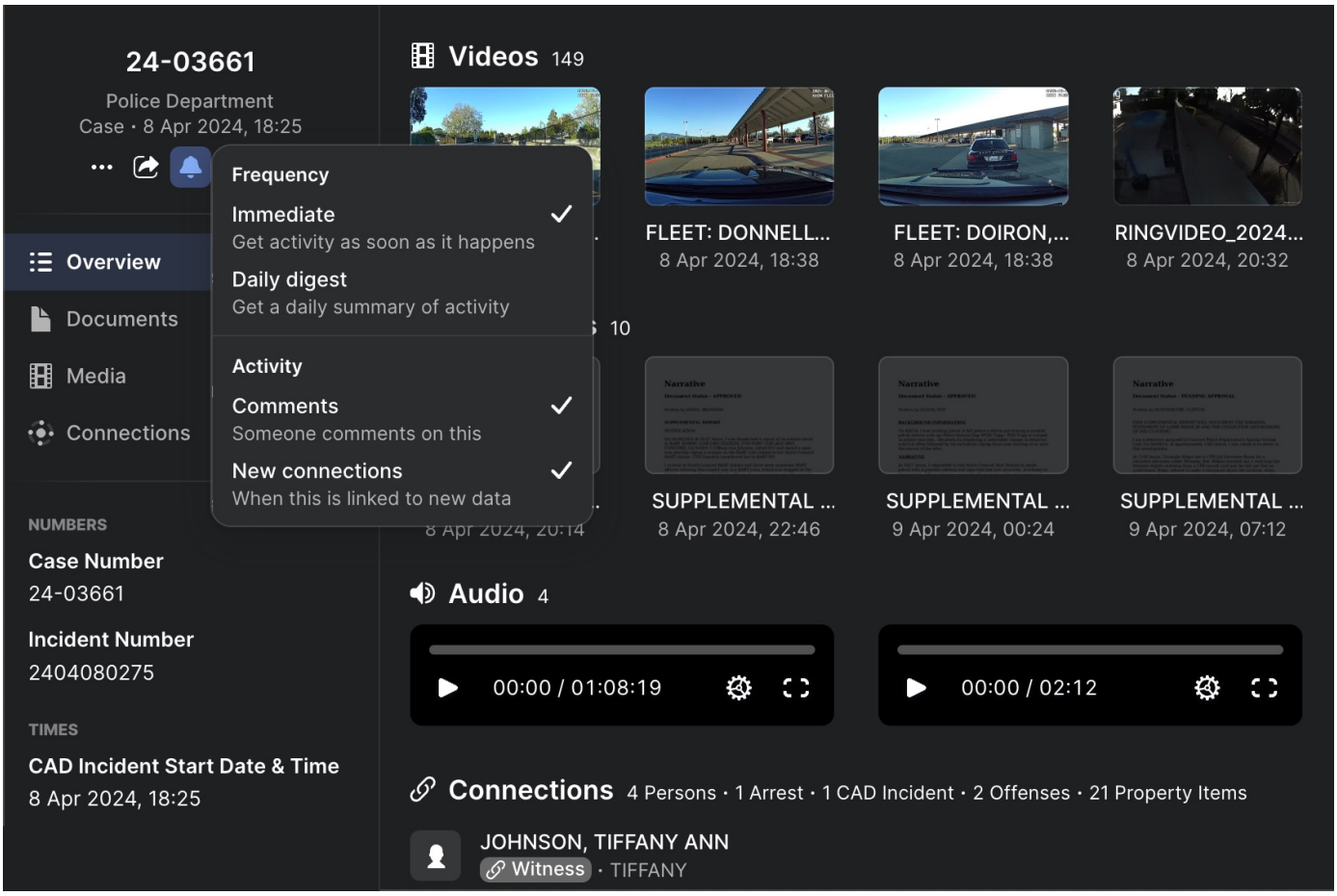
Peregrine's platform notifies authorized users when new information is added to the system in a variety of manners. At the database level, authorized users can trace every integration of every record, and the insertion or expungement of records within the platform in real-time.



Within the platform's user-facing applications, users can click on any Entity to review the entire timeline of additions, deletions, or modifications. Authorized users can set alerts on specific entities to be notified when new information is added to the entity, or when a new entity is linked to the entity. Authorized users are also able to configure advanced search criterion to be notified any time new information is added to the system that matches their criterion.

2.38 Trend Analysis

By centralizing data — and all associated metadata — from data systems, users can understand and surface trends over time. Through an intuitive interface, users can analyze how, e.g., calls for service or types of incidents vary by day of week and time of day. Peregrine supports robust search and query capabilities at the day of week and hour of day level, enabling users to conduct analysis over specific units, in specific shifts, at specific locations. As a result, organization can make more informed, data-backed resourcing decisions to meet mission outcomes more effectively.

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3. Approach

3.1 Understanding of APD's goals and objectives

The Alhambra Police Department (APD) seeks a single point of access to integrate, discover, view, and analyze data specifically from Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon Evidence.om and Laserfiche to serve as a key component in the Real Time Information Center (RTIC). Staff in the RTIC, such as investigators and analysts, need the ability to search multiple data sources simultaneously for subjects or objects of interest and quickly navigate through vast amounts of data. Next, they need to interpret and visualize findings as well as represent connections between data, such as persons of interest and vehicles. RTIC Staff and Patrol operations needs the ability to ensure universal awareness of key locations, assets, threats, and services, and then drive real-time collaboration, both for unplanned mutual aid events and planned major events. And finally, executive leadership needs real-time crime trend data and internal departmental data at their fingertips to inform resource deployment, operational decision making, and long-term strategy.

Peregrine's capabilities are uniquely suited for APD's requirements, as we have proven experience with integrating Spillman products, Flock ALPR, Vigilant ALPR, Axon Evidence.com and Laserfiche with other law enforcement customers across the country, supporting all the aforementioned workflows above.

Peregrine is currently supporting diverse law enforcement agencies across the country—from police departments to Sheriff's offices, to state law enforcement agencies—in fulfilling on these same objectives and is deployed in RTIC's across the country. Peregrine operates across 13 states, with more than 60 customers including southern California agencies such as LAPD, Redondo Beach PD, Glendale PD, Menifee PD, Orange County SO, Anaheim PD, Huntington Beach PD, Costa Mesa PD, Fullerton PD, Escondido PD and San Diego SO.

3.2 Approach for meeting APD's goals

Peregrine will leverage pre-built connectors that will be leveraged to seamlessly and quickly integrate with Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon Evidence.com and Laserfiche to ensure this process is smooth and efficient.

Once integrated, the platform provides an intuitive user interface that will enable personnel to efficiently leverage data across a variety of use cases, including but not limited to:

- Agency-wide search and information retrieval
- Real-time situational awareness, alerting, and analysis
- Crime and heat mapping
- Network analysis

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- Investigations
- Resource planning and optimization
- Customized and automated reporting, dashboarding, and requests for information
- Form and template creation
- Transparency and community engagement
- Secure collaboration, information sharing, and messaging

The Peregrine team has decades of experience building enterprise software alongside government and non-government entities. We have partnered closely with law enforcement agencies across the country to bring cutting-edge technologies to vital public servants while recognizing and respecting the critical security, privacy, and transparency principles that communities require from government agencies. Our team is primarily composed of world-class, Silicon Valley-based engineers (>50% of headcount) and is quickly expanding as we near 100 employees. Additionally, our professional implementation, training, and support teams have extensive experience working directly with officers, analysts, investigators, administrative personnel, executive staff, and senior leaders.

3.3 Delivery Schedule

Each Peregrine platform implementation consists of four steps to maximize success and impact at the outset of our partnership. These steps typically enable implementation and use within 90 days.*

MILESTONES	DELIVERY	DELIVERABLE
1. Kickoff and Scoping	Week 2	1. Determine priority order of data integrations and user groups 2. Facilitate Peregrine team access to data sources and initial users 3. Set up project team and steering committee
2. Data Integration, Data Modeling, and User Discovery	Month 1	1. Deploy the Peregrine platform 2. Ingest, integrate, transform, model, and validate data sources 3. Configure permission controls 4. Introduce platform to the first set of users 5. Conduct 45-day steering committee review
3. Real-time Workflows and Analytics	Month 2	1. Initiate user training 2. Develop and implement user-specific workflows
4. Operationalization and Next Steps	Month 3	1. Continue collecting feedback and improve user workflows 2. Validate work based on actionable results 3. Identify next steps 4. Conduct 90-day steering committee review (quarterly thereafter)

** Integration timelines provided are from date of access to relevant networks and data sources.*

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Peregrine will be the only firm engaged as part of this proposal.

Within Peregrine, there will be two key staff members who will coordinate work and communication between Peregrine and APD.

Peregrine's Deployment Strategist (DS) assigned to APD will be the initial point of contact and source of communication. The DS will communicate and coordinate with IT stakeholders and operational stakeholders, assuring successful progress on the implementation plan including gaining data access, building data pipelines, designing data models, conducting Quality Assurance, scheduling training, and configuring the platform to meet the Success Criteria and the other needs of APD that arise.

After initial data is integrated, modeled, and configured, the Deployment Strategist with bring in Peregrine's Training team to conduct in-person trainings as well as provide access to the on-demand learning management system.

After implementation is complete, Peregrine's Customer Advocate (CA) will step in to the role as the primary source of communication and point of contact. The CA will be responsible for the continued pursuit of Success Criteria, coordinating further training, gathering and responding to feedback, and assuring the long-term success of the partnership.

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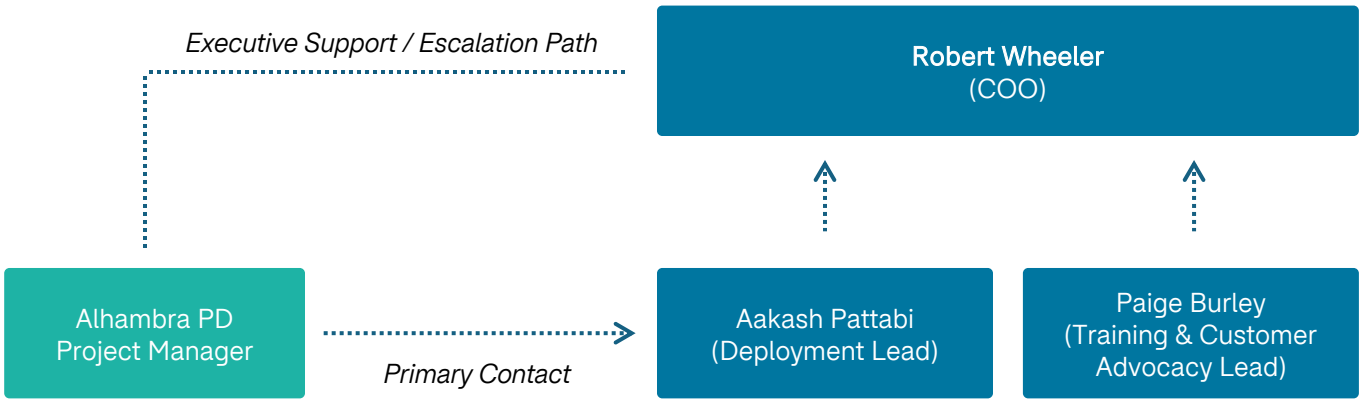
4. Team Organization

4.1 Organization Chart

Organization chart of proposed team indicating the role each primary team member will fulfill;



Peregrine's implementation and training teams consist of software engineering, product development, human-centered design, user engagement, and training experts. While a deployment strategist or a customer advocate may be the lead of our work with Alhambra at any given time, there is a team of people behind them that will have the skills and context to step in to support the implementation and ongoing support should need be. The Peregrine implementation team will be ready provide continuous support and collaborate closely with APD to provide use case development, data modeling, data integration, training curriculums, use case/workflow development, and continuous support. This team is committed to ensure that the Peregrine platform is quickly deployed, securely configured, and adopted for its intended purpose and generates outsized value for APD personnel and stakeholders.

Peregrine will not be using any subcontractors for any and all work.

4.2 Training Model

At Peregrine, we deliver a unique approach to training and user adoption that ensures everyone in the agency achieves maximum value from the platform. We begin every partnership with a crisp articulation of each customer's goals, priorities, and outcomes they hope to achieve using Peregrine. We call these goals Success Criteria (SC).

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All Success Criteria must:

- Be measurable;
- Articulate what value we'll provide to our customers through tangible outcomes; and
- Explain, tactically, how we will provide that value through our platform's myriad capabilities.

Success criteria allow us to concentrate on the customer's top priorities and deliver customized training to meet the customer's needs. Our various training programs include on-site classes, remote classes, on-site deskside sessions for individual users, scheduled webinars, in-field training, and various video and written content made available through a fully featured Learning Management System.

4.3 Statement of Qualifications

Aakash Pattabi

Deployment Lead

Aakash Pattabi is the Head of Implementation at Peregrine Technologies, where he leads a team of deployment strategists to implement the Peregrine Platform, build data integrations, configure software, and develop workflows side-by-side with end users for Law Enforcement and State & Local Government clients. Prior to joining Peregrine, Aakash was a consultant at the Boston Consulting Group where he supported Fortune 500 companies in building and launching software startups. He holds an MS in Computer Science specializing in Artificial Intelligence and a BA in Economics from Stanford University.

Relevant projects

Fremont PD (CA) deployment

- Launched Peregrine's deployment with Fremont PD starting in April of 2021. Went live over the summer of 2021, integrating data from CAD, RMS, CCTV Cameras, ALPR, and other enterprise data sources
- Developed patrol planning, Organized Retail Theft reporting, Intelligence Led Policing, and Real Time Information Center workflows with FPD
- Contact: Crime & Intelligence Analysis Manager Johanna Canaday (jcanaday@fremont.gov)

Orange County SD (CA) deployment

- Launched Peregrine's deployment with the Orange County Sheriff's Department in May of 2023. Went live in the fall of 2023, integrating data from CAD, RMS, ALPR, Evidence, Warrants, BOLOs, JMS, Personnel Records, and other enterprise data sources
- Developed litany of operational workflows across Real Time Operations Center, SAFE Bureau, Custody Command, and Field Operations Command, including novel way of normalizing and forecasting NIBRS offense trends for executive leadership
- Contact: Technology Asst. Deputy Director Joe Giese (jgiese@ocsheriff.gov)

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Paige Burley

Head of Training & Customer Advocacy

Paige Burley is the Head of Training & Customer Advocacy at Peregrine Technologies where she creates training across all roles at law enforcement agencies, ensuring virtual or in-person options are available & focuses on specific law enforcement workflows. Before joining Peregrine, Paige was the Director of Training for Vigilant Technologies at Motorola Solutions, developing certified training for over 1,000 agencies across the country on ALPR. She came into police technologies after working as a regional crime analyst in Northern California, as well as real-time crime center analyst at Houston Police Department & Harris County Sheriff's Office.

Relevant projects

Huntington Beach PD (CA) Deployment

- Onboarding training completed in March 2024, continued support.
- Trained 181 sworn/non-sworn over 15 sessions. Included Power User Training, Patrol Mobile App
- Training, Investigator, & Command Staff training to ensure content was appliable & designed for each specific group.
- Aided in connecting HBPD to technical teams to usher in additional data sources, as well as help connect & integrate regional data from neighboring agencies.
- Contact: Captain Oscar Garcia (ogarcia@hbpd.org)

Albuquerque PD (NM) Deployment

- Onboarding training completed in December 2022, continued support.
- Trained 177 sworn/non-sworn over six sessions. Worked with ABQ PD to ensure their specific workflows (their version of Compstat, investigative uses, train the trainer) were brought through in Peregrine sessions, listening to their specific needs of the platform.
- Usage is up 180% year over year, as well having weekly users consistently rising in 2024.
- Contact: DC. Jon Griego, (jjgriego@cabq.gov)

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5. Cost Proposal

APPENDIX	COST PROPOSAL

City of Alhambra **Real Time Data Visualization Platform** Pricing Estimates	
Pricing Estimates, Hosted / Software-as-a-Service	
1. Software Licensing Other than or in addition to annual subscription.	Not applicable
2. Third-Party Licensing (if applicable) Discuss pricing for any recommended third-party solutions.	Third Party API or data fees may apply*
3. Implementation Training, user adoption, travel expenses, initial installation, scoped data, conversion, scoped integration, etc.	*$0*
4. Annual Subscription, 5 Years Includes operating and maintenance, support, data conversion, data integrations to meet project objectives	
Year One	$93,000*
Year Two	$93,000*
Year Three	$93,000*
Year Four	$93,000*
Year Five	$93,000*
6. Total Five Years	$465,000

**The annual fee per year, $93,000/yr, is subject to modification such that the total five year amount is no less than $465,000*

This proposed fee schedule constitutes a firm offer for a 90-day period from the RFP due date.

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Based upon the scope outlined in RFP No. RFP2M24-21for a real time data visualization platform for Alhambra Police Department, Peregrine proposes a firm-fixed price software license fee of $93,000 per year. The initial implementation fee will be waived with a multi-year commitment. This license includes all ongoing support, data integration maintenance, workflow development, and user training to support the scope of this work. Peregrine will not charge for travel or other miscellaneous expenses. The total for years one through five shall not exceed $465,000 due to Peregrine for the scope of this project.

The contract shall run for a period of five years with payments due annually upon the contract anniversary. The initial payment shall be due next 30 days from receipt of invoice.

ATTEST:

Peregrine

DocuSigned by:
William R. Wheeler
37C7CCD7DE7344F...

Name: Rob Wheeler
Title: Chief Operating Officer

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Changes to Peregrine's Proposal for the City of Gardena

Background: The City of Gardena, CA seeks to piggyback on the contract between the City of Alhambra, CA and Peregrine Technologies. The contract incorporates a Proposal, including statement of work, integrations, and pricing, that is not aligned to requirements for the City of Gardena. In order to align the proposal to the City of Gardena's needs, the following changes are made:

1. **Identification**. All references to the City of Alhambra, Alhambra Police Department, and APD are changed to City of Gardena, Gardena Police Department, and GPD, respectively.
2. **Integrations**. All systems referenced for integration purposes are replaced with the following: Tiburon CAD, Mark43 RMS, Axon Evidence.com and IA Pro, Vigilant ALPR, and Veritone.
3. **Pricing**. Prices and price related information in the proposal are not relevant to the City of Gardena. The subscription price for the Peregrine platform for the City of Gardena, including and limited to the aforementioned integrations, is $91,000 annually. This price includes a one-time allowance of $3,000 for 3rd party API and/or data access fees.

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AGREEMENT FOR PROFESSIONAL SERVICES
Contract No. C2M24-64

This AGREEMENT FOR PROFESSIONAL SERVICES ("AGREEMENT") is made and entered into effective as of the 1st day of November 2024, by and between the CITY OF ALHAMBRA, a charter law city, located at 111 South First Street, Alhambra, CA 91801, ("CITY") and Peregrine Technologies, Inc., located at 71 Stevenson St. Suite 700, San Francisco, CA 94105 ("CONSULTANT").

W I T N E S S E T H:

For and in consideration of the promises and of the mutual covenants and agreements herein contained, said parties hereby agree as follows:

1. RECITALS. This AGREEMENT is made and entered into with respect to the following facts:

A. CITY requires professional real-time data visualization platform services ("SERVICES"); and

B. On August 27, 2024, CITY issued a Request for Proposals #2M24-21 ("RFP") to obtain professional data visualization platform services for the CITY's and based on review and rating of RFPs received, CONSULTANT was selected; and

C. CONSULTANT is qualified to provide those certain services to the CITY necessary for said SERVICES; and, therefore, the Alhambra City Council has elected to engage the services of CONSULTANT upon the terms and conditions hereinafter set forth.

2. SCOPE OF SERVICES.

A. CONSULTANT shall furnish to the City all labor, materials, tools, equipment, services, and incidental customary work necessary to fully and adequately perform those services described in CONSULTANT's Proposal for Services dated September 24, 2024 ("PROPOSAL") consistent with the CITY's Request for Proposals dated August 27, 2024 ("RFP") attached hereto as Exhibits "A" and "B" respectively and hereby incorporated by reference.

B. Performance of the SERVICES specified herein is made an obligation of CONSULTANT under this AGREEMENT, subject to any changes made subsequently upon the mutual written agreement of the parties.

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C. The scope of services to be performed by CONSULTANT under this AGREEMENT shall include, but not be limited to, those services specified in Paragraph 2A hereof.

3. PERFORMANCE STANDARDS. While performing this AGREEMENT CONSULTANT will use the appropriate generally accepted professional standards of practice existing at the time of performance utilized by persons engaged in providing similar services. CONSULTANT shall cooperate with CITY if CITY opts to monitor CONSULTANT's services. CITY will notify CONSULTANT of any deficiencies, and CONSULTANT will have fifteen (15) days after such notification to cure any shortcomings to CITY's satisfaction. Costs associated with curing the deficiencies will be borne by CONSULTANT.

4. FAMILIARITY WITH WORK.

A. By executing this AGREEMENT, CONSULTANT agrees that, to the best of CONSULTANT's knowledge and belief, CONSULTANT has

(i) Carefully investigated and considered the scope of services to be performed;

(ii) Carefully considered how the services should be performed; and

(iii) Understands the facilities, difficulties, and restrictions attending performance of the services under this Agreement.

B. If services involve work upon any site, CONSULTANT agrees that CONSULTANT has or will investigate the site and is or will be fully acquainted with the conditions there existing, before commencing the services hereunder. Should CONSULTANT discover any latent or unknown conditions that may materially affect the performance of the services, CONSULTANT will immediately inform CITY of such fact and will not proceed except at CONSULTANT's own risk until written instructions are received from CITY.

5. CITY SUPERVISION. The Chief of Police of CITY, or the Chief's designee, shall have the right of general supervision of all work performed by CONSULTANT and shall be the CITY's agent with respect to obtaining CONSULTANT's compliance hereunder. No payment for any services rendered under this AGREEMENT shall be made without the prior approval of the Chief of Police or the Chief's designee.

6. FEE. Compensation to CONSULTANT for the total services to be rendered pursuant to this AGREEMENT shall be in an amount not to exceed $465,000 (Four Hundred Sixty-Five Thousand Dollars) to be billed in a manner described in CONSULTANT's PROPOSAL, consistent with the CITY's RFP. If any discrepancies exist between the RFP and the CONSULTANT's PROPOSAL exist, then the terms of the RFP shall control.

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7. EXTRA SERVICES. Notwithstanding any other provision herein, no extra services shall be rendered by CONSULTANT under this AGREEMENT unless such extra services first shall have been authorized in writing by the CITY. Any such services so authorized shall be paid by the CITY at rates approved of by the CITY.

8. PAYMENT BY CITY. CONSULTANT shall send invoices to the City on a monthly basis, based upon the services already rendered at the time of the submission. City shall pay all proper costs within thirty (30) days of receipt of such invoice(s).

9. TERM. The term of this AGREEMENT shall be as provided for in the RFP from after the date on which the CITY issues CONSULTANT a Notice to Commence Work. CONSULTANT shall complete all those services set forth in its PROPOSAL by that certain date set forth in said Notice to Commence Work or until such time as the services have been completed by the CONSULTANT and accepted by the CITY, whichever occurs first. The CITY may extend said time of completion for delays caused by circumstances beyond the control of either party to this AGREEMENT. Should the consulting contract extend beyond the estimated time for completion of said services, CITY hereby reserves the right to continue CONSULTANT's services hereunder with any and all fees for such additional services to be compensated by the CITY at rates approved by the CITY.

10. DISPUTES AND REMEDIES.

A. Claims, disputes, and other matters in question between the Parties arising out of or relating to this AGREEMENT or the breach thereof, must be resolved by the following procedure:

(i) CITY and CONSULTANT will exercise their best efforts to resolve disputes through the development of a consensus. A meeting may be requested by CITY or CONSULTANT at any time for the purpose of resolving a dispute. A determination by Chief of Police will be made within two (2) weeks after a meeting to resolve the dispute;

(ii) If unresolved within thirty (30) days, then City Manager, or his designee, will make a final determination;

(iii) Following the City Manager's final determination, the Parties may submit any unresolved matters to non-binding mediation. The parties may, but are not required to be, represented by counsel in mediation;

(iv) If the Parties do not agree to mediation, or if mediation does not resolve the Parties' dispute, the matter may be pursued in Los Angeles County Superior Court, or the United States District Court, Central District of California, if federal jurisdiction exists.

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B. The Parties' rights and remedies under this Agreement are in addition to any other rights and remedies provided by law.

11. TERMINATION OF AGREEMENT. The CITY may terminate this AGREEMENT upon giving a ten (10) day advance written notice of such termination to CONSULTANT. In that event, the City Manager, or his designee, based upon work accomplished by CONSULTANT prior to notice of such termination, shall determine the amount of fees to be paid to CONSULTANT for such services based upon accepted accounting practices. This finding by the City Manager, or his designee, shall be considered by the Alhambra City Council and the Council's determination shall be final and conclusive as to the amount of such fee.

12. INDEPENDENT CONTRACTOR. CONSULTANT shall act as an independent contractor in the performance of the services provided for in this AGREEMENT and shall furnish such services in CONSULTANT's own manner and method and in no respect shall CONSULTANT be considered an agent or employee of the CITY.

13. OWNERSHIP OF DOCUMENTS. All financial documents, data, studies, and reports prepared by CONSULTANT under this AGREEMENT are CITY's property. CONSULTANT may retain copies of said documents and materials as desired, but will deliver all original materials to CITY upon CITY's written notice. CITY agrees that use of CONSULTANT's completed work product, for purposes other than identified in this AGREEMENT, or use of incomplete work product, is at CITY's own risk. CITY will indemnify and hold CONSULTANT harmless for any use of the work product other than as contemplated by this AGREEMENT.

14. PUBLICATION OF DOCUMENTS. Except as necessary for performance of service under this AGREEMENT, no copies, sketches, or graphs of materials, including graphic art work, prepared pursuant to this Agreement, will be released by CONSULTANT to any other person or City without CITY's prior written approval. All press releases, including graphic display information to be published in newspapers or magazines, will be approved and distributed solely by CITY, unless otherwise provided by written agreement between the parties.

15. NONASSIGNMENT. This AGREEMENT is not assignable either in whole or in part by CONSULTANT without the written consent of CITY.

16. TAXPAYER IDENTIFICATION NUMBER. CONSULTANT will provide CITY with a valid Taxpayer Identification Number.

17. PERMITS AND LICENSES. CONSULTANT, at its sole expense, will obtain and maintain during the term of this AGREEMENT, all necessary permits, licenses, and certificates that may be required in connection with the performance of services under this Agreement.

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18. INDEMNIFICATION.

A. CONSULTANT hereby agrees to the following:

(i) Indemnification for Professional Services. CONSULTANT will save harmless and indemnify CITY and, at CITY's request, reimburse defense costs for CITY and all its officers, volunteers, employees and representatives from and against any and all suits, actions, or claims, of any character whatever, brought for, or on account of, any injuries, including death or damages sustained by any person or property resulting or arising from any negligent or wrongful act, error or omission by CONSULTANT or any of CONSULTANT's officers, agents, employees, or representatives, in the performance of this Agreement.

(ii) Indemnification for other Damages. CONSULTANT indemnifies and holds CITY harmless from and against any claim, action, damages, costs (including, without limitation, attorney's fees), injuries, or liability, arising out of this Agreement, or its performance. Should 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 this Agreement, or its performance, CONSULTANT will defend CITY (at CITY's request and with counsel satisfactory to CITY) and will indemnify CITY for any judgment rendered against it or any sums paid out in settlement or otherwise provided that CITY (a) promptly gives written notice of the CITY's Claim to CONSULTANT; (b) gives CONSULTANT sole control of the defense and settlement of the CITY's Claim (provided that CONSULTANT may not agree to any settlement that imposes any liability or obligation on CITY without CONSULTANT'S prior written consent, such consent not to be unreasonably withheld, conditioned, or delayed); and (c) provides to CONSULTANT, at CONSULTANT'S cost, all reasonable assistance in the defense and settlement of the CITY's Claim.

B. For purposes of this section "CITY" includes CITY's officers, officials, employees, agents, and representatives.

C. It is expressly understood and agreed that the foregoing provisions will survive termination of this Agreement.

D. CITY does not, and shall not, waive any rights against CONSULTANT which it may have by reason of the aforesaid hold-harmless AGREEMENT because of the acceptance by CITY or the deposit with CITY by CONSULTANT, of any of the insurance policies hereinafter described in this AGREEMENT.

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E. The aforesaid hold-harmless AGREEMENT by CONSULTANT shall apply to all damages and claims for damages of every kind suffered, or alleged to have been suffered, by reason of any of the aforesaid operations of CONSULTANT, or any subcontractor of CONSULTANT, regardless of whether such insurance policies shall have been determined to be applicable to any of such damages or claims for damages.

F. Notwithstanding any provision of this Agreement to the contrary, design professionals shall be required to defend and indemnify the City only to the extent allowed by Civil Code Section 2782.8, namely for claims that arise out of, pertain to, or relate to the negligence, recklessness, or willful misconduct of the design professional. The term "design professional" includes licensed architects, licensed landscape architects, registered professional engineers, professional land surveyors and the business entities which offer such services in accordance with the applicable provisions of the Business and Professions Code.

G. The provisions of this section do not apply to Claims occurring as a result of the City's sole negligence or willful acts or omissions.

19. INSURANCE. CONSULTANT shall not commence work under this contract until CONSULTANT shall have obtained all insurance required by this AGREEMENT and such insurance shall have been approved by CITY as to form, amount and carrier, nor shall CONSULTANT allow any subcontractor of CONSULTANT to commence work on any subcontract until all similar insurance required of the subcontractor of CONSULTANT shall have been so obtained and approved.

A. COMPENSATION INSURANCE. CONSULTANT shall take out and maintain, during the life of this contract, Worker's Compensation Insurance for all of CONSULTANT'S employees employed to perform the SERVICES as described section 2 of the AGREEMENT; and, if any work is sublet, CONSULTANT shall require the subcontractor of CONSULTANT similarly to provide Worker's Compensation Insurance for all of the latter's employees, unless such employees are covered by the protection afforded by CONSULTANT. If any class of employees engaged in work under this AGREEMENT is not protected under any Workers' Compensation law, CONSULTANT shall provide and shall cause each subcontractor of CONSULTANT to provide adequate insurance for the protection of employees not otherwise protected. CONSULTANT shall indemnify CITY for any damage resulting to it from failure of either CONSULTANT or any subcontractor of CONSULTANT to take out or maintain such insurance.

B. COMPREHENSIVE GENERAL LIABILITY, PROFESSIONAL LIABILITY, COMPREHENSIVE AUTOMOBILE LIABILITY AND CONTRACTUAL GENERAL LIABILITY INSURANCE. CONSULTANT shall take out and maintain during the life of this contract comprehensive general liability, products/completed operations hazard, comprehensive automobile liability

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and contractual general liability insurance and shall protect CITY, its elective and appointive boards, officers, agents and employees, CONSULTANT, and any subcontractor of CONSULTANT performing work covered by this contract, from claims for damage for personal injury, including death, as well as from claims for property damage which may arise from CONSULTANT'S or any subcontractor of CONSULTANT'S operations under this contract, whether such operations be by CONSULTANT or by any subcontractor of CONSULTANT, or by anyone directly or indirectly employed by either CONSULTANT or any subcontractor of CONSULTANT, and the amounts of such insurance shall be as follows:

(i) Commercial General Liability Insurance in an amount of not less than TWO MILLION DOLLARS ($2,000,000); per occurrence and FOUR MILLION DOLLARS ($4,000,000) aggregate.

(ii) Professional Liability Insurance in an amount of not less than TWO MILLION DOLLARS ($2,000,000) per occurrence and FOUR MILLION ($4,000,000) aggregate.

(iii) Comprehensive Automobile Liability Insurance in an amount of not less amount of not less than TWO MILLION DOLLARS ($2,000,000).

(iv) Workers' Compensation in an amount of $1,000,000 each accident by bodily injury and $1,000,000 each employee for bodily injury by disease.

(v) Cyber Liability Insurance in an amount of not less than TWO MILLION ($2,000,000) per occurrence and TWO MILLION ($2,000,000) aggregate.

(vi) Umbrella Liability: in the amount not less than THREE MILLION ($3,000,000).

C. PROOF OF INSURANCE. The insurance required by this Agreement shall be with insurers which are Best A+ rated, and California-Admitted, or better. The CITY of Alhambra shall be named as "additional insured" on all policies required hereunder, except for Professional Liability Insurance, and CONSULTANT shall furnish the CITY Clerk, concurrently with the execution hereof, with satisfactory proof of carriage of the insurance required, and adequate legal assurance that each carrier will give CITY at least thirty (30) days' prior notice of the cancellation of any policy during the effective period of the contract.

D. NOTICE TO COMMENCE WORK. The CITY will not issue any notice authorizing CONSULTANT or any subcontractor to commence work under

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this AGREEMENT until CONSULTANT has provided to the CITY Clerk the proof of insurance as required by subparagraph (C) of this article.

20. NON-DISCRIMINATION. CONSULTANT shall not discriminate in its recruiting, hiring, promotion, demotion or termination practices on the basis of race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, martial status, sex, age, or sexual orientation in the performance of this AGREEMENT and shall comply with the provisions of the California Fair Employment and Housing Act as set forth in Part 2.8 of Division 3, Title 2 of the California Government Code; the Federal Civil Rights Act of 1964, as set forth in Public Law 88-352, and all amendments thereto; Executive Order 11246; and all administrative rules and regulations issued pursuant to such acts and order.

21. UNAUTHORIZED ALIENS. CONSULTANT hereby promises and agrees to comply with all of the provisions of the Federal Immigration and Nationality Act (8 USCA 1101, *et seq.*), as amended; and, in connection therewith, shall not employ unauthorized aliens as defined therein. Should CONSULTANT so employ such unauthorized aliens for the performance of work and/or services covered by this AGREEMENT, and should the Federal Government impose sanctions against the CITY for such use of unauthorized aliens, CONSULTANT hereby agrees to, and shall, reimburse CITY for the cost of all such sanctions imposed, together with any and all costs, including attorney's fees, incurred by the CITY in connection therewith.

22. CONFLICT OF INTEREST. CONSULTANT will comply with all conflict of interest laws and regulations including, without limitation, CITY's conflict of interest regulations.

23. WAIVER. Waiver by any party hereto of any term, condition, or covenant of this AGREEMENT shall not constitute the waiver of any other term, condition or covenant hereof.

24. ATTORNEY'S FEES. If litigation is reasonably required to enforce or interpret the provisions of this AGREEMENT, the prevailing party in such litigation shall be entitled to an award of reasonable attorney's fees, in addition to any other relief to which it may be entitled.

25. BINDING EFFECT. This AGREEMENT shall be binding upon the heirs, executors, administrators, successors and assigns of the parties hereto.

26. PROVISIONS, CUMULATIVE. The provisions of this AGREEMENT are cumulative and in addition to and not in limitation of any rights or remedies available to CITY.

27. NO PRESUMPTION RE: DRAFTER. The parties acknowledge and agree that the terms and provisions of this AGREEMENT have been negotiated and discussed between the parties and their attorneys, and this AGREEMENT reflects their mutual AGREEMENT regarding the same. Because of the nature of such negotiations and

discussions it would be inappropriate to deem any party to be the drafter of this AGREEMENT; and, therefore, no presumption for or against validity or as to any interpretation hereof, based upon the identity of the drafter, shall be applicable in interpreting or enforcing this AGREEMENT.

28. ASSISTANCE OF COUNSEL. Each party to this AGREEMENT warrants to each other party as follows:

A. That each party either had the assistance of counsel or had counsel available to it, in the negotiation for, and execution of, this AGREEMENT, and all related documents; and,

B. That each party has lawfully authorized the execution of this AGREEMENT.

29. MODIFICATION. This AGREEMENT shall not be modified except by written agreement of the parties.

30. GOVERNING LAW. This AGREEMENT shall be interpreted and construed according to the laws of the State of California.

31. NOTICE. Whenever it shall be necessary for either party to serve notice on the other regarding this AGREEMENT, such notice may be furnished in writing by either party to the other and shall be served by personal service as required in judicial proceedings or by certified mail, postage prepaid, return receipt requested, addressed to the parties as follows:

CITY: City of Alhambra – Chief of Police
211 South First Street
Alhambra, CA 91801

CONSULTANT: Peregrine Technologies, Inc.
Nicholas Noone
71 Stevenson Street, Suite 700, San Francisco, CA 94105
Tel: 650-619-0046
Fax: N/A

32. FORCE MAJEURE. Neither party shall be responsible for delays or failures in performance resulting from acts beyond the control of the offending party. Such acts shall include, but not be limited to, acts of God, fire, flood, earthquake, or other natural disaster, nuclear accident, strike, lockout, riot, freight embargo, public regulated utility, or government statutes or regulations superimposed after the fact.

33. ELECTRONIC TRANSMISSION OF CONTRACT AND SIGNATURE. The Parties agree that this Agreement may be transmitted and signed by electronic mail by either/any or both/all Parties, and that such signatures shall have the same force and

effect as original signatures, in accordance with California Government Code section 16.5 and Civil Code section 1633.7.

34. COMPETITIVE PROCUREMENT SELECTION PROCESS. The competitive procurement selection process by which CITY contracts with CONSULTANT may be acknowledged and used by other California government entities to replace their respective competitive procurement selection process for RFP purposes such that other government entities may contract with CONSULTANT for the same or substantially similar product(s) or service(s) without undergoing a separate competitive procurement selection process. Accordingly, the terms, and conditions of this contract executed between CITY and CONSULTANT may be used by other government entities to contract with CONSULTANT for the same or substantially similar product(s) and service(s) under either the same or a separate contract; provided for clarity that the pricing applicable to other government entities may differ depending on the nature of CONSULTANT engagement with such government entity.

IN WITNESS WHEREOF, the parties hereto have caused this AGREEMENT to be executed on its effective date by their respective officers duly authorized on their behalf.

"CITY"

CITY OF ALHAMBRA, a Charter Law City

ATTEST:

By _____
Garrett Kennedy, Chief of Police

_____
Lauren Myles, City Clerk

APPROVED AS TO FORM:
JOSEPH M. MONTES, CITY ATTORNEY

By _____

"CONSULTANT"

PEREGRINE TECHNOLOGIES, INC.

TAXPAYER ID # 38-4083465

Signed by:
By Nick Noone
C23E48B6A32B478...
Print Name: Nick Noone 10/29/2024
Title: President & CEO

By _____
Print Name: _____
Title: _____

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Peregrine

REQUEST FOR PROPOSAL

No. RFP2M24-21 – Alhambra Police Department

REAL-TIME DATA VISUALIZATION PLATFORM

RESPONSE FOR PEREGRINE TECHNOLOGIES, INC.

EXHIBIT A

Docusign Envelope ID: 686C6055-E61D-4D5B-BBC3-09D6D6EA7F93

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1. Executive Summary

1.1 Letter of Transmittal

September 24th, 2024

To the Attention of:
Lieutenant Debbie Gomez
211 South First Street
Alhambra, CA 91801

Proposal Package:
No. RFP2M24-21

Proposing Firm:
Peregrine Technologies, Inc.
71 Stevenson St. Suite 700
San Francisco, California, 94105

Role	Name	Title	Phone	Email
Authorized person to contractually obligate Peregrine	Nick Noone	CEO / Co-founder	415-287-2749	nick@peregrine.io
Authorized person to negotiate a contract for Peregrine	Robert Wheeler	COO	617-869-7964	robert.wheeler@peregrine.io
RFP Contact	Jordan Karasik	Business Development	310-597-5914	jordan.karasik@peregrine.io

Peregrine Technologies, Inc, a corporation headquartered in San Francisco, CA, offers this proposal in response to No. RFP2M24-21 – Real-Time Data Visualization Platform. No other business entities take part in this proposal or comprise the Proponent.

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1.2 Offer Letter

Dear City of Alhambra Police Department:

Peregrine Technologies, Inc. ("Peregrine") is pleased to provide the following proposal to the City of Alhambra Police Department ("APD") in response to No. RFP2M24-21 – Real-Time Data Visualization Platform.

Peregrine was founded in 2017 with the goal of empowering law enforcement agencies to make data-driven decisions in real time. Today, Peregrine is a rapidly growing technology company is committed to advancing public safety and providing a solution that helps law enforcement solve their most difficult problems.

Peregrine's capabilities are uniquely suited for APD's requirements. Peregrine began in and continues to be focused on the law enforcement and public safety sector. Our platform has been tailored to serve the diverse needs of a department like APD, allowing civilian and sworn users across department functions to utilize the agency's valuable data to maximum effect.

Peregrine is currently supporting diverse law enforcement agencies across the country – from police departments to Sheriff's offices, to state law enforcement agencies – in fulfilling on these same objectives, and is deployed in RTIC's across the country. Peregrine operates across 13 states, with more than 60 customers including southern California agencies such as LAPD, Redondo Beach PD, Glendale PD, Menifee PD, Orange County SO, Anaheim PD, Huntington Beach PD, Costa Mesa PD, Fullerton PD, Escondido PD and San Diego SO.

The Alhambra Police Department seeks a single point of access to integrate, discover, view, and analyze data specifically from Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon Evidence.om and Laserfiche to serve as a key component in the Real Time Information Center (RTIC). Staff in the RTIC, such as investigators and analysts, need the ability to search multiple data sources simultaneously for subjects or objects of interest and quickly navigate through vast amounts of data. Next, they need to interpret and visualize findings as well as represent connections between data, such as persons of interest and vehicles. RTIC Staff and Patrol operations needs the ability to ensure universal awareness of key locations, assets, threats, and services, and then drive real-time collaboration, both for unplanned mutual aid events and planned major events. And finally, executive leadership needs real-time crime trend data and internal departmental data at their fingertips to inform resource deployment, operational decision making, and long-term strategy.

Peregrine has proven experience integrating with Spillman products, Flock ALPR, Vigilant ALPR, Axon, Evidence.com and Laserfiche at other with other Law Enforcement customers across the country that will enable all the aforementioned workflows.

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Peregrine provides a secure and CJIS-compliant, cloud-based, data integration and analytics platform that is purpose-built for law enforcement and public safety agencies and has been approved to safely handle CJI by the CA DOJ. Peregrine is a technically mature, operationally proven software as a service (SaaS) company with the only platform that enables seamless sharing of mission-critical information with fine-grained permissions between public safety agencies. Peregrine's configurable data analytics platform enables agencies to easily integrate, interact with, and visually represent their data in real-time on any device.

In addition to the technical capabilities of our software, our professional support team has extensive experience working directly with officers, analysts, investigators, administrative personnel, executive staff, and senior leaders. Our team is ready to meet the needs of APD with the agility and flexibility that is required to support the rapid changes in law enforcement technology and mission landscape.

Thank you for your time and consideration. We look forward to partnering with APD on your upcoming RTIC and other pressing data challenges. My contact information and the contact information of our primary contact for this RFP are listed above. Please do not hesitate to reach out with any questions.

Sincerely,

Nicholas Moore

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2. Technical Specifications

2.1 General Requirements

REQUIREMENT	YES/NO	RESPONSE
PLATFORM shall be CJIS- compliant and vendor must identify location PLATFORM will be hosted at:	YES	Peregrine is a fully CJIS compliant platform hosted in the AWS Government Cloud, West Region.
PLATFORM must be a web-based interface that automatically establishes connections and relationships between data elements within and across disparate systems:	YES	Peregrine is a web-based platform includes powerful knowledge graphs — automated ways to connect and visualize the relationships between people, places, events, vehicles, and other data elements. Peregrine's platform also automatically extracts links from both structured and unstructured data, including handwritten documents, to illuminate connections between people, places, events, documents, and media data without requiring manual processing.
PLATFORM should be fully integrated with user-facing applications for search, map-based analysis, link analysis, reporting, and dashboarding that allow for seamless movement of data between applications without the need to export and import data manually.	YES	The Peregrine platform is a fully integrated solution that offers applications for search, map-based analysis, link/relationship analysis, reporting, and dashboards. Data can be seamlessly moved between any/all applications. Users do not need to download, export, and upload data in order to move it between applications.
PLATFORM should offer pre-built connectors that allow for seamless integration with critical existing systems including: Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon, Evidence.com, and Laserfiche. These pre-built connectors should ensure data available in the PLATFORM is complete, accurate, and always up to date.	YES	Peregrine offers pre-built connectors that will allow for a seamless integration of critical APD systems including: Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon Evidence.com, and Laserfiche. These pre-built connectors will ensure all data in the platform is complete, accurate and always up to date. Additionally, these pre-built connectors remove any need for APD IT to build and maintain any interfaces that translate data from source system schema to the Peregrine schema.

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REQUIREMENT	YES/NO	RESPONSE
PLATFORM should have the ability for users to log into a single solution for access to data from those high priority systems.	YES	Peregrine provides the ability for all users to log in once to Peregrine and access all the data from all the integrated underlying systems.
PLATFORM should offer seamless integration with Alhambra Police Department's existing single-sign-on and multi-factor authentication services.	YES	Peregrine seamlessly integrates with any existing single sign-on provider, providing users a familiar, secure sign-on experience, and administrators single-source control over access to multiple applications within your network
PLATFORM should have reliable algorithms that will enable automatic and auditable deduplication and merging of data. Additionally, the PLATFORM must provide the ability to easily view any individual records that have been merged and offer the ability to un-do merges when desired.	YES	Peregrine's entity resolution system identifies similar records from different source systems and merges them into a single, unified record. This unified record retains full auditability and allows for the review of the original source system records. Additionally, the system offers fine-grained configurability and permission controls to manage user access to resolved records. Peregrine uses advanced techniques to enable record resolution and allows agencies to define resolution criteria tailored to their specific needs. Peregrine also offers the ability to un-do merges when desired or manually merge records that were not automatically merged.
PLATFORM should have the flexibility to change desired data model over time without needing to build and maintain additional interfaces or make any changes to underlying source systems and the way it stores or represents information.	YES	The Peregrine platform features a dynamic data model layer that allows customers to customize and change their desired data model to agency needs, which may change over time. Changes in the peregrine data model layer do not require making any chances to the data model/schema of underlying source systems from which Peregrine integrates data.

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REQUIREMENT	YES/NO	RESPONSE
PLATFORM must have a clean and reliable information upon data searches.	YES	The Peregrine platform presents clean, clear search results that have been cleaned, de-duplicated, and prioritized to ensure users always get the most relevant and reliable information from their searches.
PLATFORM should offer desktop, laptop, tablet, and mobile device-accessible versions of those integrated applications so that they can be accessed by authorized users wherever and whenever they are needed.	YES	The Peregrine platform is available via all common web browsers on both MAC and PC operating systems on Desktop, Laptop and Tablets. Peregrine also offers a dedicated iOS and Android mobile application for mobile devices and tablets. This ensures the application can be accesses by authorized users wherever and whenever they need to.
PLATFORM should have the ability to securely collaborate and share data and visualization in real-time with agencies in the San Gabriel Valley, Los Angeles County, and Orange County	YES	The Peregrine platform provides features for secure collaboration and sharing that will enable APD to build deeper, trusting partnerships with local and regional stakeholders. The platform's granular access and usage control capabilities prevent unauthorized or inappropriate use or sharing of sensitive data while allowing agencies and departments to share information with their partners in a deliberate, precise, and auditable manner. With appropriate Memorandums of Understanding (MOUs) in place, the Peregrine platform includes the ability to search and share data with other current and future Peregrine customers in the San Gabriel Valley, LA + Orange Counties regardless of what underlying data sources/systems they have that may differ from APD's. This includes but is not limited to LAPD, Glendale PD, Redondo Beach PD, Orange County SO, Anaheim PD, Costa Mesa PD, Fullerton PD and Huntington Beach PD.

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REQUIREMENT	YES/NO	RESPONSE
PLATFORM should have the ability to securely collaborate and share data and visualization in real-time with agencies in the San Gabriel Valley, Los Angeles County, and Orange County	YES	Collaboration in the Peregrine platform extends beyond simple data sharing; it also allows for multiple users to work within the same application at the same time across multiple devices and locations. The platform's collaboration features compound the value of users' work by dynamically connecting them in real time with other users who are working with or interested in the same data. In this way, the Peregrine platform generates opportunities for users to improve the quality and speed of their answers by connecting them to users who are asking the same question. Sharing can be conducted at the individual user level (e.g., sharing a case with one additional user), at the group level (e.g., sharing a case with an Analysts group or Investigators group), or at the organization level (e.g., sharing an analysis product or dashboard in a public setting for the whole organization to view). Sharing can be configured with various permission settings including View, Edit, and Discover (discover allows users to see that a file exists, but not to open it). Expiration timelines can also be set (e.g., a user can choose to share a file with another user for 48 hours, after which the file is no longer accessible). The platform also includes collaborative chat, @mention, and commenting capabilities within an investigation or analysis.
PLATFORM should have the ability to accommodate future software applications that City may acquire	YES	Further data sources can and integrated into Peregrine as they are identified. Many of our customers identify new data sources after implementation has begun or after it has finished as they discover ways to make all their data actionable.

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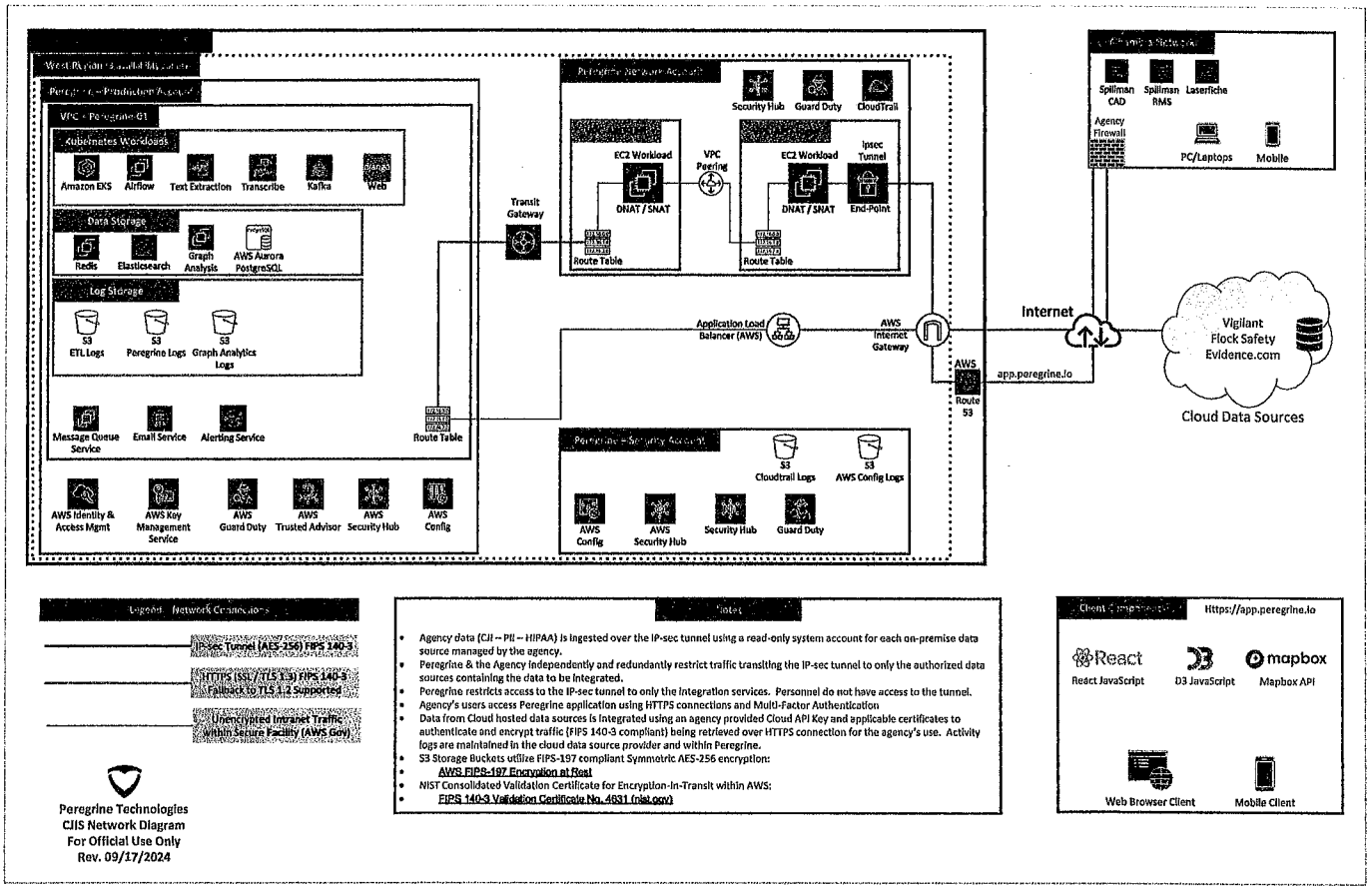
REQUIREMENT	YES/NO	RESPONSE
City retains full and total rights to its data within the PLATFORM at all times and has the ability to access and export that data in open, standard data formats at any time.	YES	The City of Alhambra and Alhambra PD will retain full and total rights to all of its data within the Peregrine platform at all time. Data can be exported to machine readable formats for import into on-premise or cloud- based databases. Additionally, Peregrine provides an open, free API for agency personnel and 3rd parties to query.
Vendor shall provide cybersecurity insurance.	YES	Peregrine carries cyber insurance from reputable carriers and is able to provide documented coverage commensurate with the City's requirements.

2.2 System Architecture

Data integration is the foundational capability that underlies the scope of services requested in this RFP. To have a single point of access for all of APD's major data sources for the RTIC, as well as investigations, patrol, crime analysis and command staff, a proponent must specialize in the complex process of data integration in such a way that serves the specific needs of law enforcement. Peregrine has developed public-safety focused data integration and operations platform.

To integrate data, Peregrine's software does three things: connect, ingest, and model. Below is an architecture diagram of Peregrine, which outlines the Platform and the way in which it connects to customer networks and data sources.



Connect

The Peregrine platform includes a wide range of pre-built and highly configurable connectors that allow for seamless connection to any type of underlying database or data store, including ones for all of the specific data systems that APD has identified, and future systems should APD identify more you want to integrate. These connectors range from mechanisms to interact with simple SQL stores, more modern application programming interfaces (APIs), and more complex source types, such as information sent to email inboxes and exchange servers.

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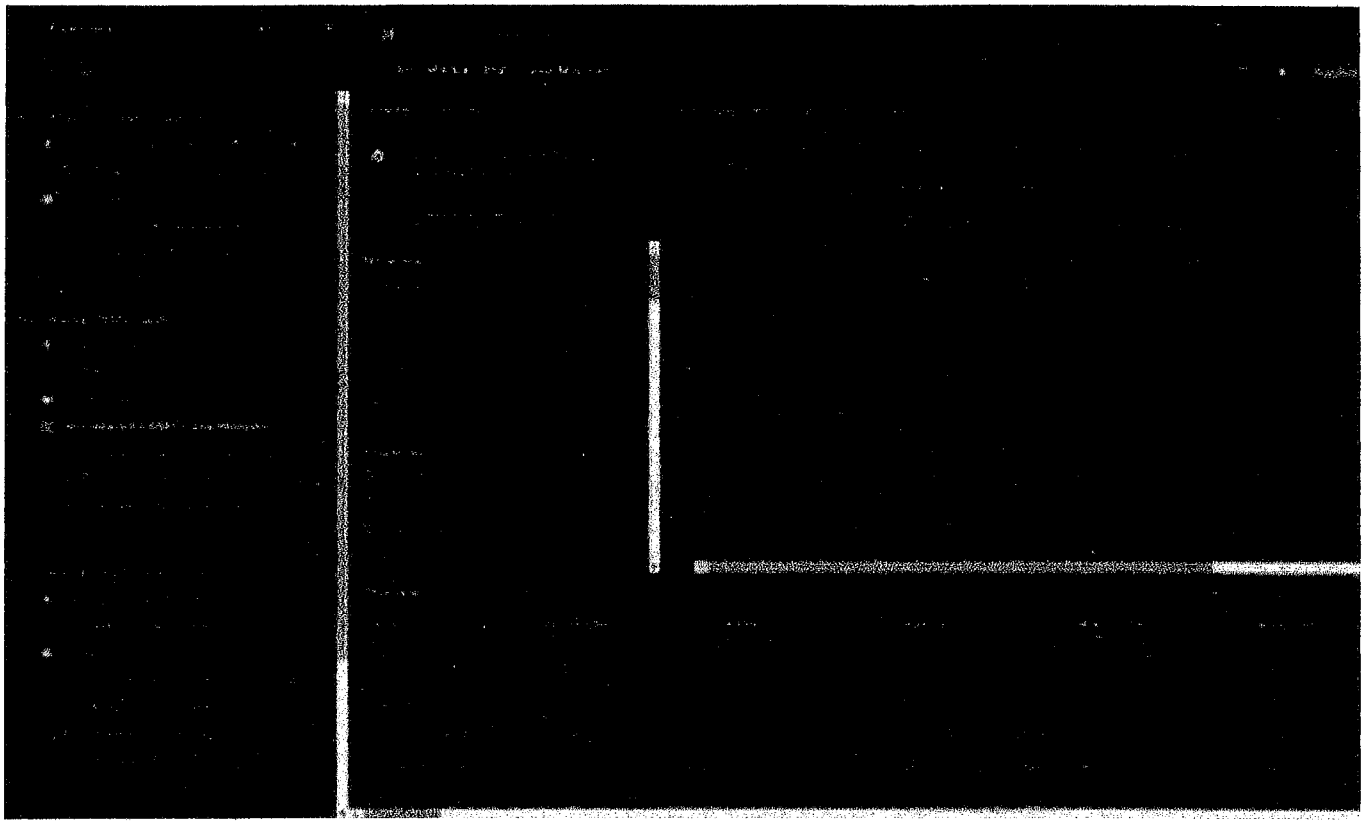
Ingest

Once connectivity with an external system is established, the Peregrine platform provides built-in capabilities to ensure data ingested from those systems are:

1. current and up to date,
2. complete and include all expected data, and
3. correct such that data appears as expected by end users.



The Peregrine platform utilizes proprietary strategies that ensure successful ingestion of structured, unstructured, and semi-structured data. This allows for tailoring the data ingestion process in a manner that is most appropriate to the data source and use case – whether that entails ingesting all data at once, ingesting only new data, or ingesting incremental slices of the data. Additionally, the Peregrine platform features automated data health checks and notifications of any ingestion failures to ensure the fidelity of data currency, completeness, and correctness.

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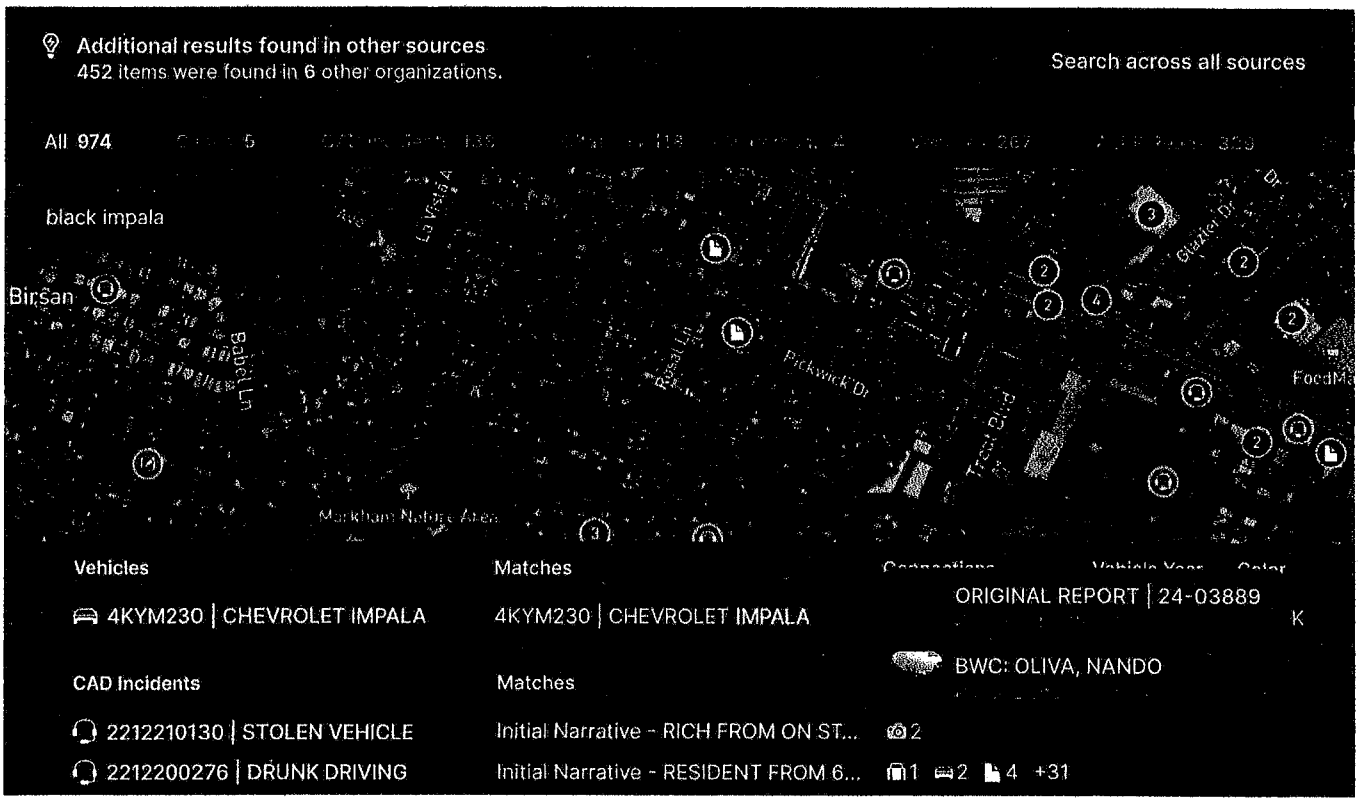
2.3 Examples of user facing applications

2.31 Search and Discovery

Peregrine's search and information discovery capabilities make all relevant information immediately accessible. Officers and civilians can quickly navigate through vast amounts of data, then interpret and visualize findings through several front-end applications. With "universal search", APD users are empowered to ask questions and find answers that were previously unattainable. Peregrine search is intuitive to use, allowing personnel of varying technical abilities, skillsets, and functions to surface information that is relevant to them and streamline their unique search workflows. Any search within Peregrine can be saved and then further refined for a derived search result, either at the time of the original query and to be returned to and searched again later.



The platform is designed to be walk-up usable; new users of the platform can immediately surface, analyze, and action data by navigating the platform's intuitive user interface and applications. These users have multiple ways to surface and view relevant information, allowing them flexibility to approach questions and decisions in ways that best suit them. These features mean that users arrive at answers more quickly and with greater accuracy, saving time and effort. Users can search based on extensive criteria, including but not limited to, name, date-of-birth, SSN, address, moniker, driver's license number, registered vehicles and guns, and much more.

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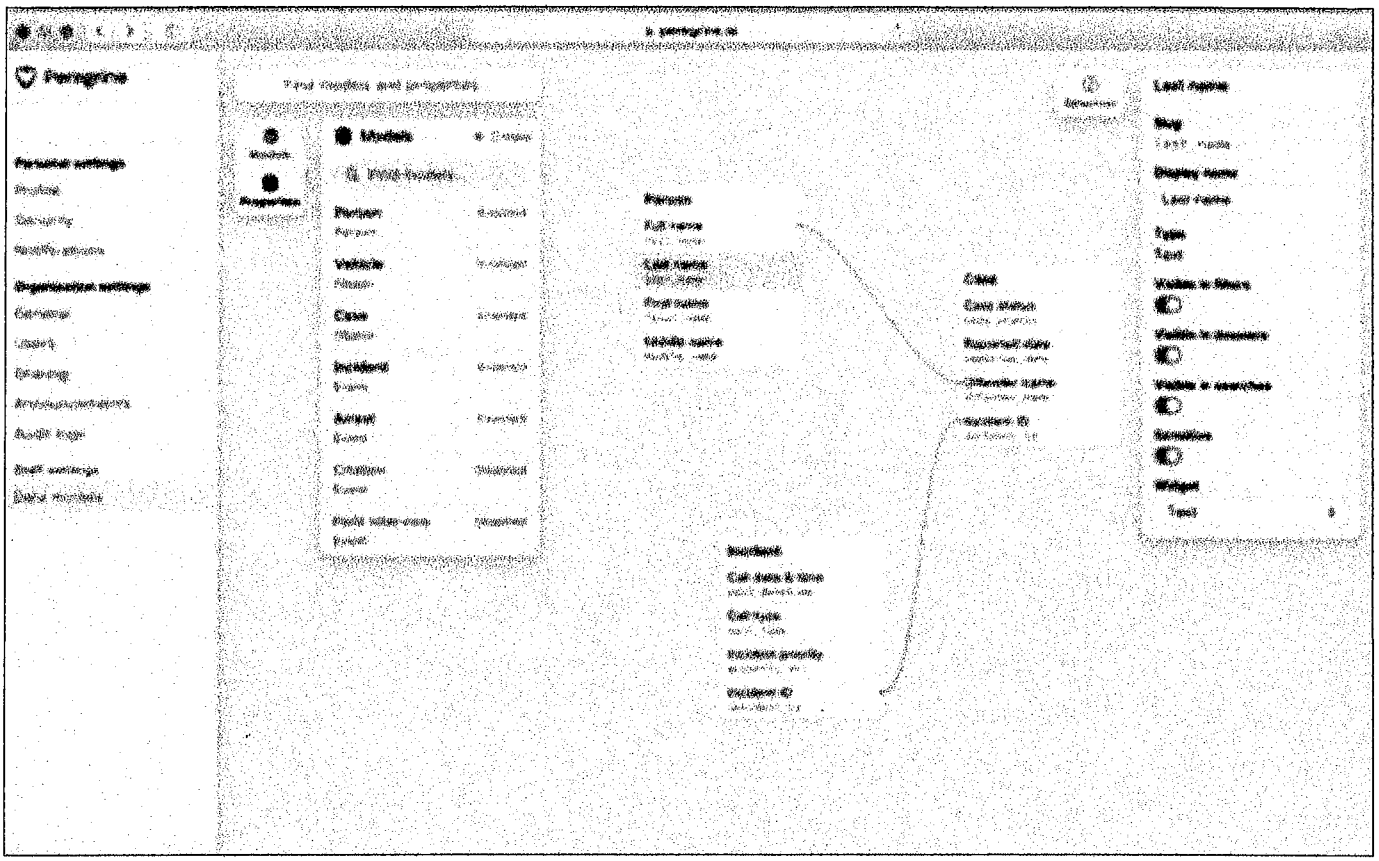

Model

The Peregrine platform models ingested data into a dynamic "ontology" or data model, a configurable schema that can transform source system data to be maximally useful to end users. This method allows users to search, retrieve, and view data in easy-to-understand concepts (e.g., persons, vehicles, cases, etc.) and automatically links information across different data sources (e.g., persons reflected in an RMS and a traffic system).

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Within the platform, databases from multiple contributing agencies are integrated, modeled, cleaned (linked, deduplicated, etc.) in real-time, near-real-time, or on periodic cadences via a web-based, configurable data integration pipeline management console. All data extraction, transformation, and modeling are performed via a modern, fully interactive web-browser interface that includes an extensive set of modern, open Application Programming Interfaces (APIs) made available to APD at no additional cost. These APIs feed all agency data into Peregrine's off-the-shelf front-end search and analytical applications, or an unlimited number of third-party systems as required or desired, enabling users to access the information they need in the format they need it without constraint.

In addition, Peregrine's off-the-shelf search applications can be configured to display in multiple formats or interaction styles for individual users, teams/groups, or the entire agency. Peregrine's search functions are backed by granular security and permission control rules that are configured down to the individual record or field value, to ensure end users across a variety of agencies or job functions can access all available data in near-real-time in accordance with their permission level.

The platform enables geo-temporal "search around" as well as network-based "search around" capabilities that offer a wide range of exploratory capabilities to the user. If a user inputs or selects an entity, they can search around for other entities or activities that have occurred in the same area, around the same timeframe, or using a detailed variety of filtering criterion including keyword searches or matches on specific field values.

2.32 Interagency Searching

Law enforcement agencies know that crime doesn't stop at jurisdictional boundaries. To adequately address crime that crosses jurisdictional boundaries, local police departments, county Sheriff's offices, and even federal agencies must coordinate to solve and prevent crimes. Today, when an agency wants to collaborate or share information with its partners, often based on an exigent need in an investigation, it must endure a long, drawn-out process that's time consuming, cumbersome and inefficient.

In addition to searching and visualizing APD's own data, Peregrine also provides the ability to search and share data across other current and future Peregrine customers in the San Gabriel Valley, Los Angeles County, Orange County even if they are all on different underlying technologies. These include but are not limited to Los Angeles PD, Glendale PD, Redondo Beach PD, Orange County SO, Anaheim PD, Fullerton PD, Costa Mesa PD and Huntington Beach PD. This kind of data sharing is contingent upon an MOU between the respective agency head which will also govern exactly which data is shared.

An example search of a keyword in just one agencies data returned 189 results

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An example search of the same keyword expanded across multiple agencies data returned 976 results

2.33 Real Time Information Center (RTIC)

Peregrine was developed to provide a common operations and intelligence picture to facilitate real-time operational decision-making, enhance investigatory capabilities, streamline criminal analysis, and generate intelligence products for Law Enforcement. The software creates an extremely efficient method for turning large amounts of raw data into useful decision-support and analysis products, quickly and with significant reduction in manual manpower processing needs.

The Peregrine platform offers a complete operational picture of data points and video feeds across any data that is integrated into the platform. Data and video feeds can be displayed and explored through configurable maps, dashboards, reports, tables, link charts, and several search mediums.

The Peregrine platform can combine multiple data/video feeds for display on a video wall. Live data and video feeds can be displayed side-by-side in one or multiple views, and/or layered onto the same interface view. Peregrine can also stream real-time video feeds without duplicating or increasing media storage costs.

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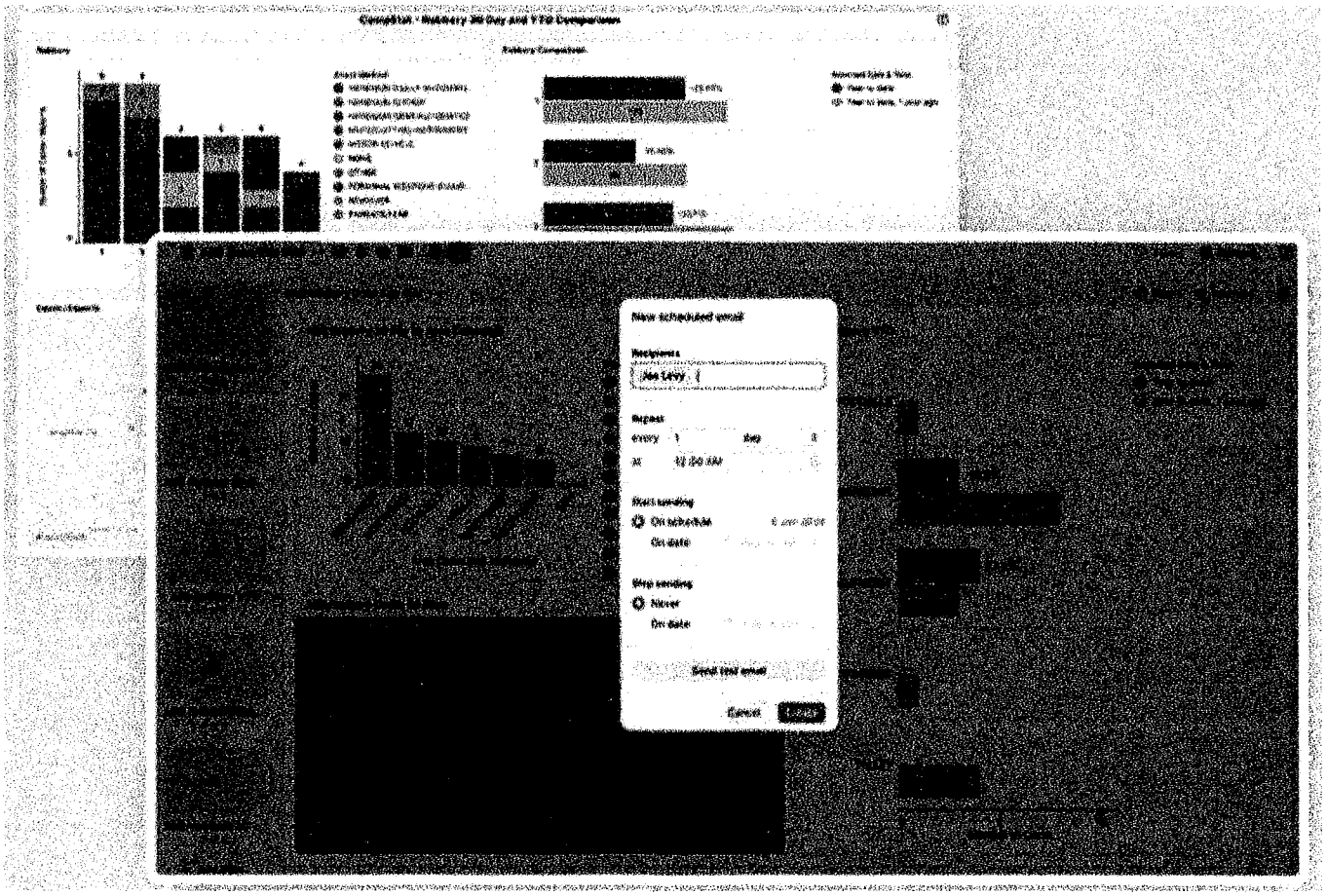
2.34 Visualizations and Reporting

The Peregrine platform provides a powerful suite of tools for the exploration, visualization, and reporting of data. These tools allow users to create dynamic data products and reports — such as interactive maps, network graphs, and dashboards — that automatically update as new data flows into the platform. APD users can smoothly move data across a single platform, viewing the same data in on a map, in a network, or on a dashboard without having to log into different systems or applications.

Peregrine's platform generates various styles of printable reports typical for LE agencies including subject profiles, vehicle reports, spotting reports, intel reports, printable dossiers for any record type, printable dashboards, charts, maps, and user-generated analytical products such as slide-based presentations.

Peregrine's Dashboarding and Charts applications enable users to build advanced visualizations including time-series comparisons, diagrams, and tabular summaries, backed by multiple underlying information sources that are accessible in one place. Dashboards can be configured to update in real-time or can be distributed as scheduled reports on a periodic cadence. Chart and dashboard visualizations are directly connected to all underlying data in the platform, empowering users to perform drill-down analysis from high-level statistics to the most granular information within the same interface.



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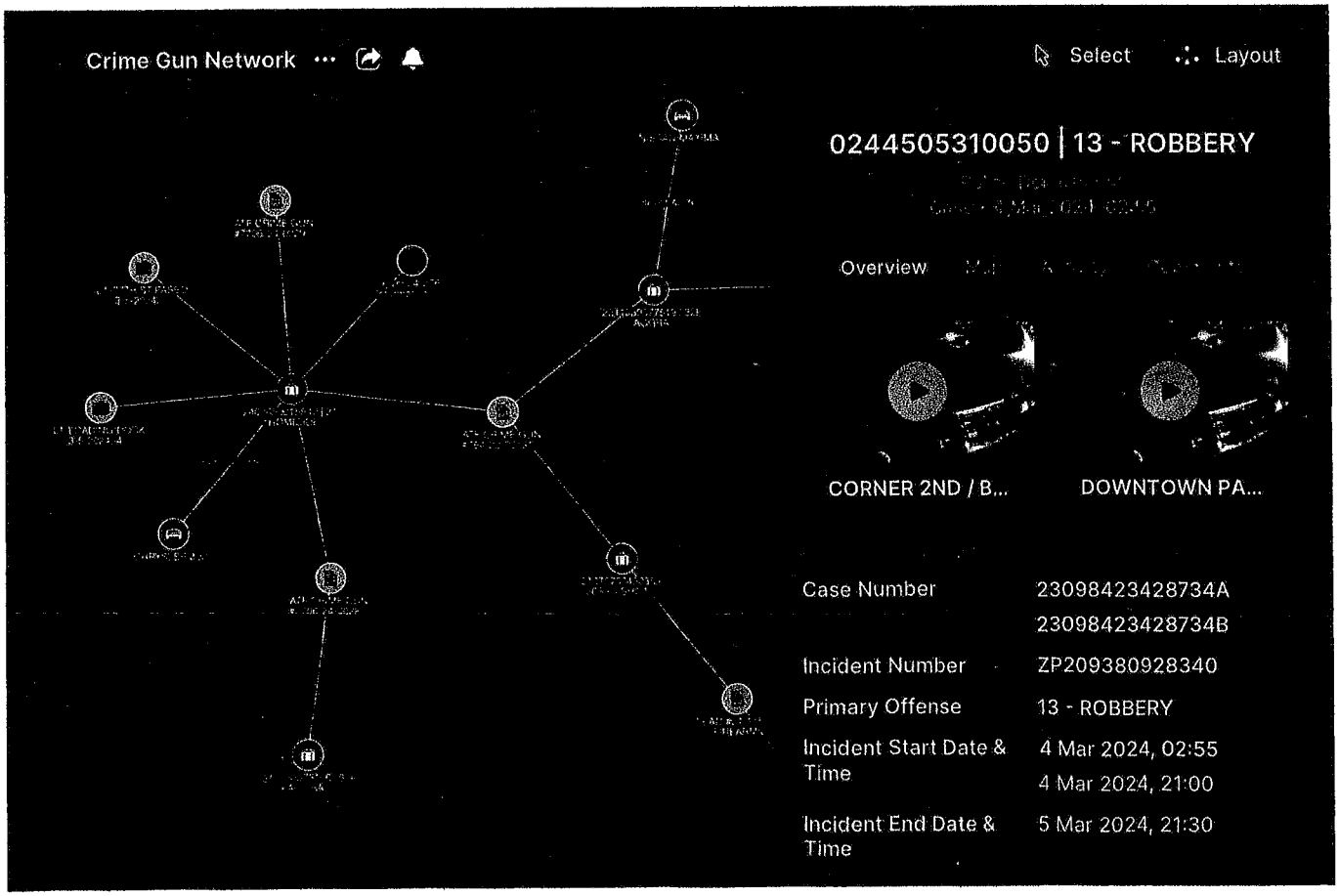
Peregrine's platform has a full investigative workspace that can be deployed for a variety of purposes. Data can be integrated from any application (dashboard, chart, map, network, or table) within a workspace. A workspace can be comprised of one or multiple interoperable applications organized as tabs in a single web browser window. A workspace can also be opened and manipulated in multiple browser windows at the same time.

Templated workspaces can be created by administrative users with a set of "out of the box" workspace tabs such as a blank map, a blank network graph, and a blank browser. Templated workspaces can be leveraged by other users to quickly create investigative workspaces or workspaces for any variety of operational purposes.

All applications within a workspace are backed by search functions that can retrieve entities from the entire corpus of data that is integrated into the platform across all LE agencies. Users can create an unlimited number of workspaces for their investigations, analyses, operations, or projects. Users can invite collaborators within and across multiple agencies to join a workspace and co-work in a real-time, web-based setting. Multiple collaborators can work in the same workspace at the same time while maintaining security controls such that each user can only see and access information in accordance with their permission settings.

2.35 Network and Link Analysis



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Peregrine's platform includes powerful knowledge graphs — a visual representation of connections between data like persons of interest and vehicles. That data can then be seamlessly represented geospatially as well, with all the fine-grained permissions to ensure appropriate access and usage while ensuring all legal, ethical, and regulatory boundaries are maintained. The platform's knowledge graph aids in the discovery and visualization of connections between otherwise disconnected data. Peregrine's platform also automatically extracts links from both structured and unstructured data, including handwritten documents, to illuminate connections between people, places, events, documents, and media data without requiring manual processing. For example, an address written in narrative form within a scanned document can be automatically linked to a person living at that address or to a vehicle registered there.

2.36 Entity Resolution / Merging Records

Fragmented records make it hard to find what you're looking for. When an investigator opens a search, searches for a person, and sees 40 records, it's hard to know which one will have the data they need so they have to open all of them to be sure. Similarly, the fragmentation makes it harder to find all records related to a single Person. Without entity resolution, there's no way to see all "John Doe's" cases if there's dozens of "Jon Doe's," each with their own cases. Both problems are solved by Peregrine's entity resolution system, which identifies similar records from different source systems and merges them into a single, unified record. This unified record retains full auditability and allows for the review of the original source system records. Additionally, the system offers fine-grained configurability and permission controls to manage user access to resolved records. Peregrine uses advanced techniques to enable record resolution and allows agencies to define resolution criteria tailored to their specific needs.

Records can be merged by the system as part of the data integration pipelining process where multiple databases are integrated and transformed into a single set of modeled records. Advanced techniques including deployment of machine learning models identify matched records can be leveraged to detect duplicates and merge them together when there is assurance of a match, eliminating significant manual labor. Entity resolution can also be conducted in user-driven manners by selecting and merging two or more entities into a single record within Peregrine's front-end applications. For example, a user can select two person records in a network graph and choose to resolve them. Upon resolution, all field values from the separate records are collated into one master record, and all links from the separate records are linked to the newly resolved record.

2.37 Real-time Alerting

With all data centrally located, users can receive real-time notifications when events occur, evolve, or when new entities enter the system. Alerting is configurable in geographical contexts (e.g., example, a user can draw a polygon around a neighborhood and set an alert if particular types of activity occur within the defined area) or using links (e.g., a user can set an alert when persons meet a threshold for frequent offender status). Peregrine's alerting technology can notify users or user groups via email, text, or push notification on a mobile device.

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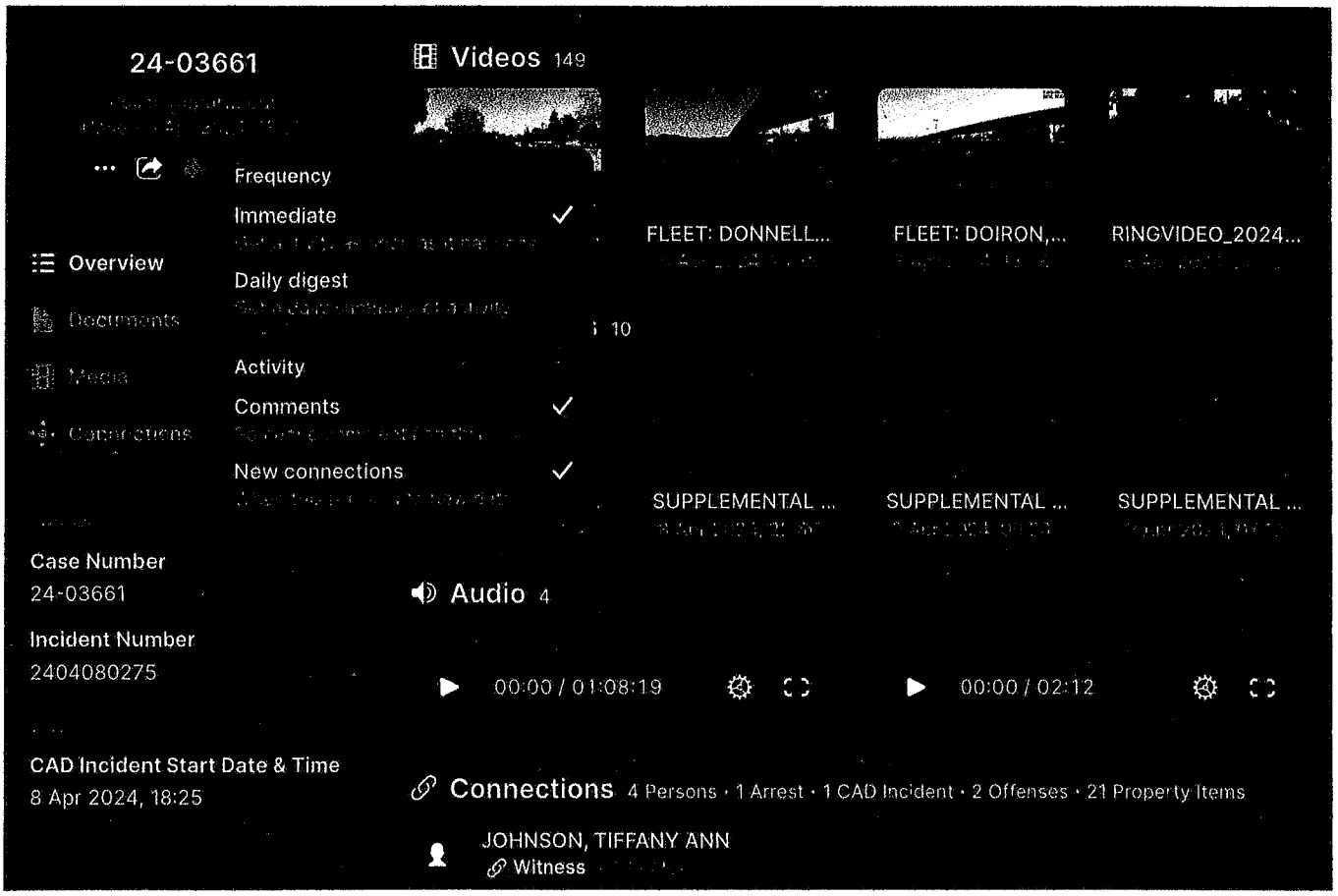
Peregrine's platform notifies authorized users when new information is added to the system in a variety of manners. At the database level, authorized users can trace every integration of every record, and the insertion or expungement of records within the platform in real-time.



Within the platform's user-facing applications, users can click on any Entity to review the entire timeline of additions, deletions, or modifications. Authorized users can set alerts on specific entities to be notified when new information is added to the entity, or when a new entity is linked to the entity. Authorized users are also able to configure advanced search criterion to be notified any time new information is added to the system that matches their criterion.

2.38 Trend Analysis

By centralizing data — and all associated metadata — from data systems, users can understand and surface trends over time. Through an intuitive interface, users can analyze how, e.g., calls for service or types of incidents vary by day of week and time of day. Peregrine supports robust search and query capabilities at the day of week and hour of day level, enabling users to conduct analysis over specific units, in specific shifts, at specific locations. As a result, organization can make more informed, data-backed resourcing decisions to meet mission outcomes more effectively.

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3. Approach

3.1 Understanding of APD's goals and objectives

The Alhambra Police Department (APD) seeks a single point of access to integrate, discover, view, and analyze data specifically from Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon Evidence.om and Laserfiche to serve as a key component in the Real Time Information Center (RTIC). Staff in the RTIC, such as investigators and analysts, need the ability to search multiple data sources simultaneously for subjects or objects of interest and quickly navigate through vast amounts of data. Next, they need to interpret and visualize findings as well as represent connections between data, such as persons of interest and vehicles. RTIC Staff and Patrol operations needs the ability to ensure universal awareness of key locations, assets, threats, and services, and then drive real-time collaboration, both for unplanned mutual aid events and planned major events. And finally, executive leadership needs real-time crime trend data and internal departmental data at their fingertips to inform resource deployment, operational decision making, and long-term strategy.

Peregrine's capabilities are uniquely suited for APD's requirements, as we have proven experience with integrating Spillman products, Flock ALPR, Vigilant ALPR, Axon Evidence.com and Laserfiche with other law enforcement customers across the country, supporting all the aforementioned workflows above.

Peregrine is currently supporting diverse law enforcement agencies across the country—from police departments to Sheriff's offices, to state law enforcement agencies—in fulfilling on these same objectives and is deployed in RTIC's across the country. Peregrine operates across 13 states, with more than 60 customers including southern California agencies such as LAPD, Redondo Beach PD, Glendale PD, Menifee PD, Orange County SO, Anaheim PD, Huntington Beach PD, Costa Mesa PD, Fullerton PD, Escondido PD and San Diego SO.

3.2 Approach for meeting APD's goals

Peregrine will leverage pre-built connectors that will be leveraged to seamlessly and quickly integrate with Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon Evidence.com and Laserfiche to ensure this process is smooth and efficient.

Once integrated, the platform provides an intuitive user interface that will enable personnel to efficiently leverage data across a variety of use cases, including but not limited to:

- Agency-wide search and information retrieval
- Real-time situational awareness, alerting, and analysis
- Crime and heat mapping
- Network analysis

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- Investigations
- Resource planning and optimization
- Customized and automated reporting, dashboarding, and requests for information
- Form and template creation
- Transparency and community engagement
- Secure collaboration, information sharing, and messaging

The Peregrine team has decades of experience building enterprise software alongside government and non-government entities. We have partnered closely with law enforcement agencies across the country to bring cutting-edge technologies to vital public servants while recognizing and respecting the critical security, privacy, and transparency principles that communities require from government agencies. Our team is primarily composed of world-class, Silicon Valley-based engineers (>50% of headcount) and is quickly expanding as we near 100 employees. Additionally, our professional implementation, training, and support teams have extensive experience working directly with officers, analysts, investigators, administrative personnel, executive staff, and senior leaders.

3.3 Delivery Schedule

Each Peregrine platform implementation consists of four steps to maximize success and impact at the outset of our partnership. These steps typically enable implementation and use within 90 days.*

MILESTONES	DELIVERY	DELIVERABLE
1. Kickoff and Scoping	Week 2	1. Determine priority order of data integrations and user groups 2. Facilitate Peregrine team access to data sources and initial users 3. Set up project team and steering committee
2. Data Integration, Data Modeling, and User Discovery	Month 1	1. Deploy the Peregrine platform 2. Ingest, integrate, transform, model, and validate data sources 3. Configure permission controls 4. Introduce platform to the first set of users 5. Conduct 45-day steering committee review
3. Real-time Workflows and Analytics	Month 2	1. Initiate user training 2. Develop and implement user-specific workflows
4. Operationalization and Next Steps	Month 3	1. Continue collecting feedback and improve user workflows 2. Validate work based on actionable results 3. Identify next steps 4. Conduct 90-day steering committee review (quarterly thereafter)

** Integration timelines provided are from date of access to relevant networks and data sources.*

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Peregrine will be the only firm engaged as part of this proposal.

Within Peregrine, there will be two key staff members who will coordinate work and communication between Peregrine and APD.

Peregrine's Deployment Strategist (DS) assigned to APD will be the initial point of contact and source of communication. The DS will communicate and coordinate with IT stakeholders and operational stakeholders, assuring successful progress on the implementation plan including gaining data access, building data pipelines, designing data models, conducting Quality Assurance, scheduling training, and configuring the platform to meet the Success Criteria and the other needs of APD that arise.

After initial data is integrated, modeled, and configured, the Deployment Strategist with bring in Peregrine's Training team to conduct in-person trainings as well as provide access to the on-demand learning management system.

After implementation is complete, Peregrine's Customer Advocate (CA) will step in to the role as the primary source of communication and point of contact. The CA will be responsible for the continued pursuit of Success Criteria, coordinating further training, gathering and responding to feedback, and assuring the long-term success of the partnership.

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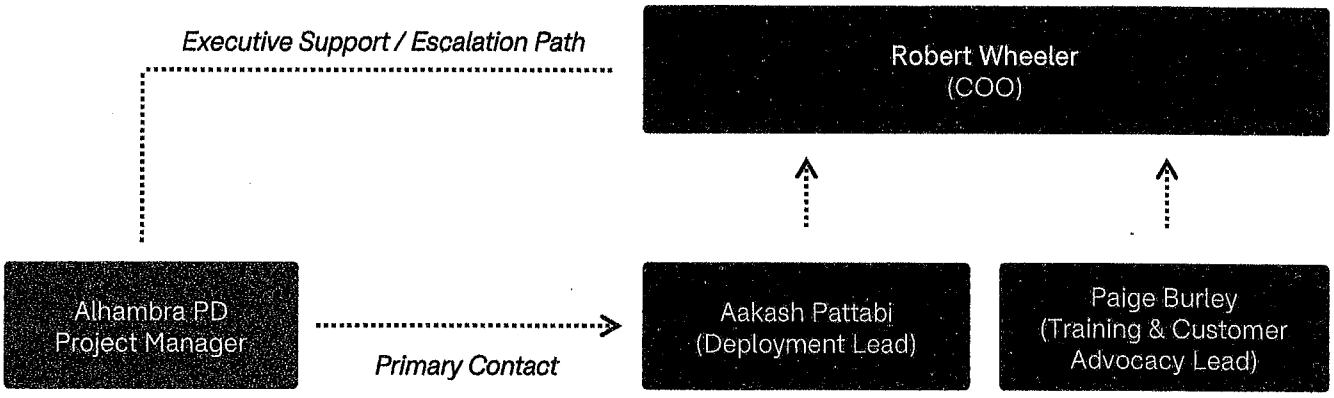
4. Team Organization

4.1 Organization Chart

Organization chart of proposed team indicating the role each primary team member will fulfill;



Peregrine's implementation and training teams consist of software engineering, product development, human-centered design, user engagement, and training experts. While a deployment strategist or a customer advocate may be the lead of our work with Alhambra at any given time, there is a team of people behind them that will have the skills and context to step in to support the implementation and ongoing support should need be. The Peregrine implementation team will be ready provide continuous support and collaborate closely with APD to provide use case development, data modeling, data integration, training curriculums, use case/workflow development, and continuous support. This team is committed to ensure that the Peregrine platform is quickly deployed, securely configured, and adopted for its intended purpose and generates outsized value for APD personnel and stakeholders.

Peregrine will not be using any subcontractors for any and all work.

4.2 Training Model

At Peregrine, we deliver a unique approach to training and user adoption that ensures everyone in the agency achieves maximum value from the platform. We begin every partnership with a crisp articulation of each customer's goals, priorities, and outcomes they hope to achieve using Peregrine. We call these goals Success Criteria (SC).

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All Success Criteria must:

- Be measurable;
- Articulate what value we'll provide to our customers through tangible outcomes; and
- Explain, tactically, how we will provide that value through our platform's myriad capabilities.

Success criteria allow us to concentrate on the customer's top priorities and deliver customized training to meet the customer's needs. Our various training programs include on-site classes, remote classes, on-site deskside sessions for individual users, scheduled webinars, in-field training, and various video and written content made available through a fully featured Learning Management System.

4.3 Statement of Qualifications

Aakash Pattabi

Deployment Lead

Aakash Pattabi is the Head of Implementation at Peregrine Technologies, where he leads a team of deployment strategists to implement the Peregrine Platform, build data integrations, configure software, and develop workflows side-by-side with end users for Law Enforcement and State & Local Government clients. Prior to joining Peregrine, Aakash was a consultant at the Boston Consulting Group where he supported Fortune 500 companies in building and launching software startups. He holds an MS in Computer Science specializing in Artificial Intelligence and a BA in Economics from Stanford University.

Relevant projects

Fremont PD (CA) deployment

- Launched Peregrine's deployment with Fremont PD starting in April of 2021. Went live over the summer of 2021, integrating data from CAD, RMS, CCTV Cameras, ALPR, and other enterprise data sources
- Developed patrol planning, Organized Retail Theft reporting, Intelligence Led Policing, and Real Time Information Center workflows with FPD
- Contact: Crime & Intelligence Analysis Manager Johanna Canaday (jcanaday@fremont.gov)

Orange County SD (CA) deployment

- Launched Peregrine's deployment with the Orange County Sheriff's Department in May of 2023. Went live in the fall of 2023, integrating data from CAD, RMS, ALPR, Evidence, Warrants, BOLOs, JMS, Personnel Records, and other enterprise data sources
- Developed litany of operational workflows across Real Time Operations Center, SAFE Bureau, Custody Command, and Field Operations Command, including novel way of normalizing and forecasting NIBRS offense trends for executive leadership
- Contact: Technology Asst. Deputy Director Joe Giese (jgiese@ocsheriff.gov)

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Paige Burley

Head of Training & Customer Advocacy

Paige Burley is the Head of Training & Customer Advocacy at Peregrine Technologies where she creates training across all roles at law enforcement agencies, ensuring virtual or in-person options are available & focuses on specific law enforcement workflows. Before joining Peregrine, Paige was the Director of Training for Vigilant Technologies at Motorola Solutions, developing certified training for over 1,000 agencies across the country on ALPR. She came into police technologies after working as a regional crime analyst in Northern California, as well as real-time crime center analyst at Houston Police Department & Harris County Sheriff's Office.

Relevant projects

Huntington Beach PD (CA) Deployment

- Onboarding training completed in March 2024, continued support.
- Trained 181 sworn/non-sworn over 15 sessions. Included Power User Training, Patrol Mobile App
- Training, Investigator, & Command Staff training to ensure content was appliable & designed for each specific group.
- Aided in connecting HBPD to technical teams to usher in additional data sources, as well as help connect & integrate regional data from neighboring agencies.
- Contact: Captain Oscar Garcia (ogarcia@hbpd.org)

Albuquerque PD (NM) Deployment

- Onboarding training completed in December 2022, continued support.
- Trained 177 sworn/non-sworn over six sessions. Worked with ABQ PD to ensure their specific workflows (their version of Compstat, investigative uses, train the trainer) were brought through in Peregrine sessions, listening to their specific needs of the platform.
- Usage is up 180% year over year, as well having weekly users consistently rising in 2024.
- Contact: DC. Jon Griego, (jjgriego@cabq.gov)

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5. Cost Proposal

APPENDIX	COST PROPOSAL

City of Alhambra Real Time Data Visualization Platform Pricing Estimates	
Pricing Estimates, Hosted / Software-as-a-Service	
1. Software Licensing Other than or in addition to annual subscription.	Not applicable
2. Third-Party Licensing (if applicable) Discuss pricing for any recommended third-party solutions.	Third Party API or data fees may apply*
3. Implementation Training, user adoption, travel expenses, initial installation, scoped data, conversion, scoped integration, etc.	*$0*
4. Annual Subscription, 5 Years Includes operating and maintenance, support, data conversion, data integrations to meet project objectives	
Year One	$93,000*
Year Two	$93,000*
Year Three	$93,000*
Year Four	$93,000*
Year Five	$93,000*
6. Total Five Years	$465,000

**The annual fee per year, $93,000/yr, is subject to modification such that the total five year amount is no less than $465,000*

This proposed fee schedule constitutes a firm offer for a 90-day period from the RFP due date.

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Based upon the scope outlined in RFP No. RFP2M24-21for a real time data visualization platform for Alhambra Police Department, Peregrine proposes a firm-fixed price software license fee of $93,000 per year. The initial implementation fee will be waived with a multi-year commitment. This license includes all ongoing support, data integration maintenance, workflow development, and user training to support the scope of this work. Peregrine will not charge for travel or other miscellaneous expenses. The total for years one through five shall not exceed $465,000 due to Peregrine for the scope of this project.

The contract shall run for a period of five years with payments due annually upon the contract anniversary. The initial payment shall be due next 30 days from receipt of invoice.

ATTEST:

Peregrine

DocuSigned by:

William R. Wheeler

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Name: Rob Wheeler
Title: Chief Operating Officer

EXHIBIT A

Peregrine

Pricing [Annual]

Package	Scope Definitions & Deliverables	Year 1	Year 2	Year 3	Year 4	Year 5	
5 Year Package	Alhambra Police Department source system integrations: - Spillman CAD - Spillman RMS - Evidence.com - Flock ALPR - Vigilant ALPR - Laserfiche	**$117,849**	**$111,118**	**$78,677.67**	**$78,677.67**	**$78,677.66**	**$465,000***

Platform Features

The following platform features are available at no cost to all Peregrine customers:

Core Platform Features

- Web & Mobile application access for unlimited agency users
- Rapid search across all in-scope data sources
- Map, Graph, Tables, Network & Charting functionalities
- CJIS Compliant secure file storage & sharing

Pre-built User Import Capabilities

- APBNet imports
- Imagery Uploads / GIS Imagery
- Call Detail Records (CDR) imports
- DNA / Print Imports
- NIBIN Imports
- Mobile Pings
- Social Media Warrant (SMW) imports
- N-Dex
- Census Data
- Weather Data

Pricing Notes:

- Pricing is based on 85 sworn count
- Pricing is based on 50,000,000 Annual Detections across all in-scope sensors. Deviations of +/- 50% will necessitate refreshed pricing.
- Peregrine can support up to $5,000 in API / data access fees imposed by in-scope vendors to access their data within Peregrine.
- The price covers all aspects of data integration, modeling, cleansing, pipelining, workflow development, and continuous access within the Peregrine platform for the duration of the agency contract.
- Pricing expires on 10/31/24*

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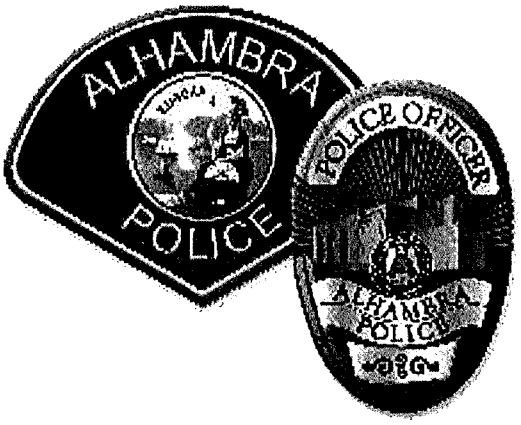

CITY OF ALHAMBRA
POLICE DEPARTMENT

Request for Proposals
No. RFP2M24-21

for

REAL-TIME DATA VISUALIZATION PLATFORM

City of Alhambra – Police Department
Lieutenant Debbie Gomez
211 South First Street
Alhambra, CA 91801

PROPOSALS DUE NO LATER THAN
10:00 AM ON MONDAY, SEPTEMBER 30, 2024

EXHIBIT B

REQUEST FOR PROPOSAL RFP NO. RFP2M24-21
REAL-TIME DATA VISUALIZATION PLATFORM

PUBLIC NOTICE IS HEREBY GIVEN that the City of Alhambra (hereinafter "City") will receive sealed proposals for qualified and experienced vendors to provide a comprehensive Real-Time Data Visualization Platform for the Alhambra Police Department. The City is also requesting software, data integration, and professional services for the implementation of the Real-Time Data Visualization Platform (hereinafter "PLATFORM"). Proposals should be submitted to the Police Department, 211 South First Street, Alhambra, California, **on or before the hour of 10:00 AM on September 30, 2024.**

The primary intent of this request for proposal (hereinafter "RFP") is to enter into an agreement with a vendor who has experience with law enforcement agencies, specifically California, Los Angeles County implementation, of the Real-Time Data Visual data integration, California Justice Information Services (CJIS) compliance standards and will meet the City's requirements as outlined in the RFP.

1. INTRODUCTION

The City of Alhambra is seeking proposals from qualified and experienced vendors to provide a Real-Time Data Visualization platform to serve as the key component in the Real-Time Information Center (RTIC). As a result of this RFP, the City expects to receive proposals for services to include pre-built connectors that allow for seamless integration with critical existing Alhambra Police Department systems: Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon Evidence.com and Laserfiche. All qualified Vendors are required to conduct a mandatory (on-site or virtual) demonstration of the platform. Once the evaluation committee has reviewed and scored the RFP responses, the City will select the Vendor most capable of providing a PLATFORM in its entirety and enter into a contract for the purchase and installation of the PLATFORM, as well as training, maintenance, and support of software. This RFP provides a list of required services, general information, instructions for submitting responses, and vendor selection procedures.

2. RFP SCHEDULE AND PROCESS

The City anticipates the project schedule to be as follows:

Activity	Dates
Release of Request for Proposals (RFP)	August 27, 2024
Deadline for Questions	September 17, 2024 – 5:00 PM
Responses to questions posted on the City's website	September 19, 2024
Proposal submittal Deadline	**September 30, 2024 – 10:00 AM**
Mandatory On-Site or Virtual Demonstration	Week of October 1st
Contract Award by the City Council:	October 28, 2024

*These dates may be changed at the discretion of the City of Alhambra. Changes to the due date for questions or due date for proposal submittal will be made by written addendum.

Questions may be asked via email to Lieutenant Debbie Gomez at dgomez@alhambrapd.org. All questions are due September 17, 2024, no later than 5:00 pm. A unified response will be provided on September 19, 2024, to all parties making email inquiries. All questions are to be asked via email, and phone inquiries will not receive a response.

Request for Proposal shall include all applicable State and Local sales taxes.

Request for Proposals may be withdrawn up and until the deadline date and time for final submission as noted in the Request for Proposal.

Request for Proposals shall be couriered, hand-delivered or mailed. Request for Proposals will not be accepted by facsimile transmission or other telecommunication or electronic means. Proposers assume the risk of the method of dispatch chosen and any costs associated with delivery. Request for Proposals arriving after the deadline will be returned unopened to the senders.

A team has been selected by the Chief of Police to evaluate the proposals submitted. Proposals will be evaluated by the designated evaluation team, and a Vendor will be selected based on the final evaluation scores.

Any contract awarded hereunder shall become effective or enforceable against the City of Alhambra only when a formal written contract has been duly executed by the appropriate officers of the City of Alhambra.

Each vendor shall specify whether such contractor is a corporation, a partnership, or an individual. If a corporation, designate the name of the state of incorporation; if a partnership, the vendor shall state the names and addresses of all partners.

The City of Alhambra reserves the right to accept or reject any or all bids, to waive any informality, to negotiate separately with competing Vendors and to accept the proposal deemed to be in the best interest of the City of Alhambra.

The proposals shall be submitted in a sealed envelope bearing the name and address of the vendor and clearly marked:

SEALED PROPOSAL FOR
REAL-TIME DATA VISUALIZATION PLATFORM
RFP NO. 2M24-21
DO NOT OPEN WITH REGULAR MAIL

BY ORDER OF:
LAUREN MYLES, CMC
ALHAMBRA CITY CLERK

3. SCOPE OF SERVICES

3.1 General Provisions

The purpose of this Request for Proposal (RFP) is to solicit and select Vendor to provide pre-built connectors that allow for seamless integration with critical existing Alhambra Police Department systems such as Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon Evidence.com and Laserfiche. The PLATFORM needs to offer a full integrated set of use-facing applications for search, map-based analysis, link analysis, reporting, and dashboarding that allow for seamless movement of data between those applications without the need to export and import data manually.

The PLATFORM shall offer proprietary algorithms that will enable automatic and auditable deduplication and merging of data. In addition, the PLATFORM should offer seamless integration with Alhambra Police Department's existing single-sign-on and multi-factor authentication services.

The successful Vendor will be required to furnish all labor, equipment, and materials to furnish and install the PLATFORM. The successful Vendor will also be required to provide a training plan for the administrator role and user training for identified City Staff and to include the cost of the training plan in their proposal.

The successful proposer will be expected to sign a contract in substantially the form attached to the RFP. Any issues with/concerns regarding any provision of the contract must be included in the proposal.

Under the contract awarded from this RFP, the successful Vendor will be the single point of contact for all installation, maintenance, and support of all software acquired in the solicitation and will be required to have the capability to support all components of this system in an integrated manner.

3.2 Equipment Warranty

Vendor shall include a copy of each manufacturer's written warranty statement for each piece of equipment furnished and installed into the PLATFORM with their proposal. Vendors shall also provide the details of all warranties that are applicable to the services and equipment provided to the City.

3.3 Project Manager/Key Personnel

Vendor shall provide a full-time Project Manager and key personnel who will be responsible for project oversight and delivery of the PLATFORM. The Project Manager shall be the single point of contact for the City and will be responsible for the management, implementation, and on-going troubleshooting of the PLATFORM during its installation. The Project Manager shall coordinate efforts with the City designee. The Project Manager shall be available to the City at all times by telephone during the course of the project and on-site within seventy-two hours of notification if necessary and requested, to respond to City needs, questions and/or issues. Project Manager will develop in consultation with the City a detailed implementation and project plan for the PLATFORM.

3.4 Subcontractors

The Vendor shall provide a list of names, addresses, and telephone numbers for subcontractor(s) the Vendor intends to employ in the installation, training and ongoing maintenance and support of

the PLATFORM with the proposal. A criminal background check will be performed for all subcontractors and their employees before they are allowed to perform any services for the City.

The City reserves the right to reject any subcontractor and/or subcontractor employee. Should a subcontractor be rejected, the Vendor will be required to provide an acceptable alternate subcontractor.

Should a subcontractor under the direction of the Contractor fail to provide the agreed-upon level of service and response, the Vendor will be required to replace the subcontract with another organization. Such an action shall be completed so as not to cause unnecessary delays to the project schedule. Any additional costs associated with securing a competent replacement subcontractor shall be the responsibility of the Vendor.

3.5 Condition of Facilities

The Contractor shall be responsible for ensuring that all City work areas remain clean and orderly at the end of each day.

3.6 Vendor Coordination Responsibilities

The Vendor shall be responsible for coordinating the design and installation of the PLATFORM with the City and the vendor's subcontractors and suppliers involved in this project.

3.7 Delivery Schedule

Vendor shall provide an integrated project timeline and implementation plan for the PLATFORM. The project timeline and implementation plan shall include details for all phases of activity for the project, including all deliverables and major milestones. The project goals and deadlines deemed the responsibility of the City are to be identified in the project timeline. This proposed project timeline and implementation plan shall be finalized during the negotiation phase.

3.8 Project Implementation Status Reports

The Vendor shall provide weekly updates on the project timeline and implementation plan update to the City's point of contact, Lieutenant Debbie Gomez.

3.9 Training

The Vendor must provide a plan for in-depth technical training for administrators, end users, and IT staff on PLATFORM components, which shall include the use and management of the Alhambra Police Department's system such as Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon Evidence.com, and Laserfiche. All required instruction manuals, on-site qualified instructor costs, travel and lodging costs, and class materials shall be furnished by the Vendor, and included in the Fee Proposal.

3.10 Cost

Vendors shall identify all costs for PLATFORM software, installation, project management, training, maintenance, etc. Maintenance costs shall be provided for a term of five (5) years from the date of PLATFORM acceptance. The proposal should itemize each PLATFORM component, which shall include the data integrations specifically for systems used by the Alhambra Police Department, so the City can determine the projection of each phase based on cost and budget.

4. TECHNICAL SPECIFICATIONS

4.1 General Requirements

The successful Vendor will be required to provide a PLATFORM with the following capabilities and demonstrate them as part of this evaluation:

- PLATFORM shall be CJIS compliant and vendor must identify location PLATFORM will be hosted at.
- PLATFORM must be a web-based interface that automatically establishes connections and relationships between data elements within and across disparate systems.
- PLATFORM should be fully integrated with user-facing applications for search, map-based analysis, link analysis, reporting, and dashboarding that allow for seamless movement of data between applications without the need to export and import data manually.
- PLATFORM should offer pre-built connectors that allow for seamless integration with critical existing systems including: Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon Evidence.com, and Laserfiche. These pre-built connectors should ensure data available in the PLATFORM is complete, accurate, and always up to date.
- PLATFORM should have the ability for users to log into a single solution for access to data from those high priority systems.
- PLATFORM should offer seamless integration with Alhambra Police Department's existing single-sign-on and multi-factor authentication services.
- PLATFORM should have reliable algorithms that will enable automatic and auditable deduplication and merging of data. Additionally, the PLATFORM must provide the ability to easily view any individual records that have been merged and offer the ability to un-do merges when desired.
- PLATFORM should have the flexibility to change desired data model over time without needing to build and maintain additional interfaces or make any changes to underlying source systems and the way it stores or represents information.
- PLATFORM must have a clean and reliable information upon data searches.
- PLATFORM should offer desktop, laptop, tablet, and mobile device-accessible versions of those integrated applications so that they can be accessed by authorized users wherever and whenever they are needed.
- PLATFORM should have the ability to securely collaborate and share data and visualization in real-time with agencies in the San Gabriel Valley, Los Angeles County, and Orange County.
- PLATFORM should have the ability to accommodate future software applications that City may acquire.
- City retains full and total rights to its data within the PLATFORM at all times and has the ability to access and export that data in open, standard data formats at any time.
- Vendor shall provide cybersecurity insurance.

4.2 System Architecture

Vendors shall provide a detailed description of the PLATFORM, including a discussion of the PLATFORM's architecture and its ability to provide the services required by the City. Proposal should address how to accommodate additions of future software applications.

5. PROPOSAL REQUIREMENTS

Although the City requires no specific format, this section is intended to provide guidelines to the Vendor regarding features that the City will look for and expect to be included in the proposal.

5.1 Content & Format

The City requests that proposals submitted be in 12-point font, organized and presented in a neat and logical format, and are relevant to these services. Vendor's proposals shall be clear, accurate, and comprehensive. Excessive or irrelevant material will not be favorably received.

The proposal should include the following:

1. Transmittal/offer letter
2. Page numbering
3. Index/Table of Contents
4. Approach
5. Team Organization, including an organization diagram and time commitment of key staff
6. Statement of Qualifications, including descriptions of similar projects by key staff to be assigned during the term of the contract
7. Fee Proposal

5.2 Approach

A description of the vendor's approach and work program to meet the city's objectives shall be included. It should explain the technical approach, methodology, and specific tasks and activities that will be performed to address the specific issues and work items.

5.3 Team Organization

The purpose of this section is to describe the organization of the project team including subcontractors and key staff. A project manager and an alternate project manager shall be named, who shall be the prime contact and be responsible for coordinating all activities with the City. An organization diagram shall be submitted, showing all key team members and illustrating the relationship between the City, the project manager, key staff, and subcontractors. There also should be a brief description of the role and responsibilities of all key staff and subcontractors identified in the team organization.

5.4 Statement of Qualifications

The information provided in this section should describe the qualifications of the vendor and key staff in performing projects within the past five (5) years that are similar in scope and size to demonstrate competence to perform these services. The projects listed should be those that the key staff named for this project were responsible for performing. Information shall include:

1. Names of key staff that participated in named projects and their specific responsibilities.
2. The client's name, contact person, address, e-mail address, and telephone numbers.
3. A brief description of the type and extent of services provided.
4. Completion dates (estimated, if not yet completed).
5. Total costs of the projects.

5.5 Fee Proposal

Compensation for services provided shall be based upon the Vendor's detailed Fee Proposal to furnish the services and equipment detailed in their proposal.

The Fee Proposal shall identify all costs associated with the comprehensive PLATFORM, including software, installation, project management, training, support, and maintenance. Maintenance costs shall be provided for a term of five (5) years, priced annually, from date of PLATFORM acceptance. Price breaks should be included for each phase so the City can budget for the next fiscal year. This information will be used by the City staff to evaluate the reasonableness of the fee proposal and may be used in negotiating the final fee amounts for the contract agreement.

Reimbursable expenses shall not be allowed unless negotiated prior to a contract.

Price escalations during the contract term are disfavored and will not be allowed unless negotiated prior to execution of contract.

5.6 Statement of Offer & Signature

The Proposal shall contain a statement that the proposals are a firm offer for a 90-day period and signed by an individual authorized to act on behalf of the Vendor.

6. TERMS AND CONDITIONS

6.1 Insurance Requirements

1. Types of Required Coverages

The successful Vendor shall procure and maintain in full force and effect during the term of the contract, the following policies of insurance. If the existing policies do not meet the Insurance Requirements set forth herein, the Vendor agrees to amend, supplement, or endorse the policies to do so.

a. **Commercial General Liability:** Commercial General Liability Insurance which affords coverage at least as broad as Insurance Services Office "occurrence" form CG 00 01, with minimum limits of at least $5,000,000 each occurrence, and if written with aggregate, the aggregate shall be double each occurrence limit.

b. **Products-Completed Operations:** Contractor shall procure and submit to City evidence of insurance for a period of at least three (3) years from the time that all work under this Contract is completed.

c. **Automobile Liability Insurance:** Automobile Liability Insurance with coverage at least as broad as Insurance Services Office Form CA 0001 covering "Any Auto" (Codel 1) with minimum limits of $1,000,000 each accident.

d. **Professional Liability:** Professional Liability insurance with minimum limits of $3,000,000 each claim. Covered Professional Services shall specifically include all work to be performed under the contract and delete any exclusion that may potentially affect the work to be performed.

e. **Workers' Compensation:** Workers' Compensation Insurance, as required by the State of California and Employer's Liability Insurance with a limit of not less than

$1,000,000 each accident for bodily injury and $1,000,000 each employee for bodily injury by disease.

2. **Endorsements**

Insurance policies shall not be in compliance if they include any limiting provision or endorsement that has not been submitted to the City for approval.

a. The insurance coverages required by Section 1.a. Commercial General Liability; and 1.c. Automobile Liability Insurance shall contain the following provisions or be endorsed to provide the following:

(1) **Additional Insured:** The City, its elected officials, officers, employees, volunteers, boards, agents, and representatives shall be additional insureds with regard to liability and defense of suits or claims arising out of the performance of the Contract.
Additional Insured Endorsements shall not:

1. Exclude "Contractual Liability"
2. Restrict coverage to the "Sole" liability of the contractor
3. Exclude "Third-Party-Over Actions"
4. Contain any other exclusion contrary to the Contract

(2) **Primary Insurance:** This insurance shall be primary, and any other insurance, whether primary, excess, umbrella, or contingent insurance, including deductible or self-insurance available to the insureds added by endorsement, shall be in excess of and shall not contribute to this insurance.

(3) The policy or policies of insurance required by Section 1.e. Workers' Compensation shall be endorsed, as follows:

1. **Waiver of Subrogation:** A waiver of subrogation stating that the insurer waives all rights of subrogation against the indemnified parties.

3. **Notice of Cancellation**

Required insurance policies shall not be cancelled, or the coverage reduced until a thirty (30) day written notice of cancellation has been served upon the City except ten (10) days shall be allowed for non-payment of premium.

4. **Evidence of Insurance**

The Contractor concurrently with the execution of the contract, and as a condition precedent to the effectiveness thereof, shall deliver either certified copies of the required policies or original certificates and endorsements on forms approved by the City. The certificates and endorsements for each insurance policy shall be signed by a person authorized by that insurer to bind coverage on its behalf. At least fifteen (15) days prior to the expiration of any such policy, evidence of insurance showing that such insurance coverage has been renewed or extended shall be filed with the City. If such coverage is canceled or reduced, Contractor shall, within ten (10) days after receipt of written notice of such cancellation or reduction of coverage, file with the City evidence of insurance showing that the required insurance has been reinstated or has been provided through another insurance company or companies.

5. **Deductible or Self-Insured Retention**

Any deductible or self-insured retention must be approved in writing by the City and shall protect the indemnified parties in the same manner and to the same extent as they would have been protected had the policy or policies not contained a deductible or self-insured retention.

6. **Contractual Liability**

The coverage provided shall apply to the obligations assumed by the Contractor under the indemnity provisions of this contract.

7. **Failure to Maintain Coverage**

Contractor agrees to suspend and cease all operations hereunder during such period of time as the required insurance coverage is not in effect and evidence of insurance has not been furnished to the City. The City shall have the right to withhold any payment due Contractor until Contractor has fully complied with the insurance provisions of this Contract.

In the event that the Contractor's operations are suspended for failure to maintain required insurance coverage, the Contractor shall not be entitled to an extension of time for completion of the Work because of production lost during the suspension.

8. **Acceptability of Insurers**

Each such policy shall be from a company or companies with a current A.M. Best's rating of no less than A:VII and authorized to do business in the State of California, or otherwise allowed to place insurance through surplus line brokers under applicable provisions of the California Insurance Code or any federal law. Any other rating must be approved in writing in accordance with the City.

9. **Claims Made Policies**

If coverage is written on a claims-made basis, the retroactive date on such insurance and all subsequent insurance shall coincide or precede the effective date of the initial Contractor's Contract with the City and continuous coverage shall be maintained or an extended reporting period shall be exercised for a period of at least three (3) years from termination or expiration of this Contract.

Upon expiration or termination of coverage of required insurance, Contractor shall procure and submit to City evidence of "tail" coverage or an extended reporting coverage period endorsement for the period of at least three (3) years from the time that all work under this contract is completed.

10. **Insurance for Subcontractors**

Contractor shall be responsible for causing Subcontractors to purchase the same types and limits of insurance in compliance with the terms of this Contract/Agreement, including adding the City as an Additional Insured to the Subcontractor's policies.

6.2 Standard Form of Agreement

The contractor will enter into an agreement with the City based upon the contents of the RFP and the contractor's proposal.

6.3 Disclaimer

This RFP does not commit the City to award a contract, or to pay any costs incurred in the preparation of the proposal. The City reserves the right to extend the due date for the proposal, to accept or reject any or all proposals received as a result of this request, to negotiate with any qualified contractor, or to cancel this RFP in part or user-definable entirety. The City may require the selected contractor to participate in negotiations and to submit such technical, fee, or other revisions of their proposals as may result from negotiations.

6.4 Assigned Representatives

The City will assign a responsible representative to administer the contract and to assist the contractor in obtaining information. The contractor also shall assign a responsible representative (project manager) and an alternate, who shall be identified in the proposal. The contractor's representative will remain in responsible charge of the contractor's duties from the notice-to-proceed through project completion. If the contractor's primary representative should be unable to continue with the project, then the alternate representative identified in the proposal shall become the project manager. The City's representative shall first approve any substitution of representatives or subcontractors identified in the proposal in writing. The City reserves the right to review and approve/disapprove all key staff and subcontractor substitution or removal and may consider such changes not approved to be a breach of contract.

6.5 City Business License

A city business license will be required of the contractor and any subcontractors for services performed in connection with any agreement entered into through this RFP process.

7. EVALUATION & SELECTION PROCESS

The City's selection of qualified Vendor will be based on the following:

- Quality and completeness of submitted proposal (**10 points**);
- Understanding of project objectives and PLATFORM requirements (**20 points**);
- Project approach, timeline, implementation and training plan (**20 points**);
- Fee Proposal/Proposed Cost (**30 points**); and
- Qualifications and experience with similar types of efforts (**20 points**).

Vendors will be notified of any additional required information and/or demonstrations and product testing after the written proposals have been evaluated.

Additional information related to the vendor selection process will be made available in the future once the City has executed this contract. Please refrain from making any verbal inquiries or requests for a formal debriefing related to the subject RFP until the City of Alhambra completes the ongoing contract process.

8. ADMINISTRATION SPECIFICATIONS

8.1 The City of Alhambra's Rights to Proposals

All proposals, upon submission to the City of Alhambra, shall become its property for use as deemed appropriate. By submitting a proposal, the Contractor covenants not to make any claim for or have any right to damages because of any misinterpretation or misunderstanding of the specification or because of any misinformation or lack of information. The City of Alhambra reserves the right to take one or more of the following actions as determined in the best interest of the organization:

1. to accept or reject in whole or in part any or all proposals;
2. to cancel this RFP in whole or in part without prior notice. Thereafter, City may issue a solicitation for new proposals;
3. The City makes no guarantee as to the usage of the services by City;
4. to waive, at its discretion, any minor errors, informalities or irregularities, which the City deems correctable or otherwise not warranting rejection of the RFP;
5. to correct any arithmetic errors in any or all proposals submitted;
6. to negotiate with any Vendor as necessary to serve the best interest of the City and to negotiate the final contract(s) with the most responsive, responsible Vendor
7. to investigate the qualifications of any Vendor under consideration;
8. to disqualify a proposal upon evidence of collusion with the intent to defraud or other illegal practices on the part of the Vendor;
9. to require confirmation of information furnished by the Vendor;
10. to award one contract for the total PLATFORM, or make multiple awards for separate PLATFORM components if it is deemed to be in the best interest of the City.
11. to utilize any or all the ideas from proposals submitted;
12. to change the proposal's due date upon appropriate notification;
13. to adopt any or all of a vendor's proposal; and
14. to negotiate modifications to the scope and fee with selected Vendor(s) prior to contract award.

8.2 Interviews/Demonstrations/Equipment Testing

City reserves the right to conduct interviews, and/or to require demonstrations and/or product testing with some or all of the Vendors at any point during the evaluation process. However, the City may determine that interviews/ demonstrations/equipment testing are not necessary. In the event interviews/ demonstrations/equipment testing are conducted, information provided during the interview/ demonstrations/ equipment testing shall be taken into consideration when evaluating the stated criteria. The city shall not reimburse the Vendor for the costs associated with the interview/ demonstrations/equipment testing process. Equipment testing will be held at a time and place specified by the City. The Vendor's key project team members will be invited to attend the interview and/or demonstrations and/or equipment testing. The Vendors should be prepared to discuss at the interview, their specific experience providing services and equipment similar to those described in this RFP, project approach, estimated work effort, available resources, and other pertinent things distinguishing the Vendor from others.

8.3 Proposal Instructions

Deadline for submitting proposals is 10:00 a.m., Monday, September 30, 2024. Mail or deliver to:

City of Alhambra, Police Department
Attn: Lieutenant Debbie Gomez
211 South First Street
Alhambra, CA 91801

Please submit one (1) original and four (4) color copies of the proposal and in addition to the hard copies, an electronic copy shall be included with the proposal submitted. If no document can be identified as original bearing original signatures, Vendor's proposal may be rejected at the discretion of the City. Proposals received after the deadline will be returned, unopened, to the Vendor.

All submissions must be sealed in an envelope/package marked on the outside with:

SEALED PROPOSAL FOR
REAL-TIME DATA VISUALIZATION PLATFORM
RFP NO. 2M24-21
DO NOT OPEN WITH REGULAR MAIL

8.4 Addendum and Supplements to the RFP

If it becomes necessary to revise any part of this RFP, an addendum or revision will be transmitted to all prospective vendors by email and will be posted on the City's website. Questions concerning the RFP document must be submitted in writing to City of Alhambra, Attn: Lieutenant Debbie Gomez, 211 South First Street, Alhambra, CA 91801, or email at dgomez@alhambrapd.org. Questions will be received through September 17, 2024, at 5:00 p.m. Responses to all questions will be distributed in writing via email to all known vendors and will be posted on the City of Alhambra's website (www.cityofalhambra.org) as an addendum on September 19, 2024. Vendors are cautioned that any statements made by the contact person that materially change any portion of the RFP shall not be relied upon unless subsequently ratified by a formal written amendment to this RFP.

8.5 Award of Contract

The City reserves the right to reject any and all Proposals. A formal contract award is anticipated for the best overall vendor as determined by the Evaluation Committee and approved by City Council as a result of this RFP. The City reserves the right, in its sole discretion, to waive minor irregularities in proposals. A minor irregularity is a variation of the RFP, which does not affect the funding request, or gives one party advantage or benefit not enjoyed by the other parties, or adversely impacts the interest of the City. Waivers, when granted, shall in no way modify the RFP requirements or excuse the party from full compliance with the RFP specifications and other contract requirements if the party is awarded the contract.

8.6 False or Misleading Statements

Any submittals containing, in the opinion of the City, false or misleading statements will be rejected.

8.7 Prospective Contractor Costs

Costs for developing submittals are entirely the responsibility of the vendor and shall not be chargeable in any manner to the City.

8.8 Evaluation Process

The City will form an Evaluation Committee to review all submittals received by the deadline. Any submittal failing to meet any of the qualifications documented in this RFP may be rejected. The purpose of the Evaluation Committee is to recommend which vendor is best able to provide, install, maintain, and support the PLATFORM to the City's requirements and within the City's budget. Submission in response to this RFP indicates your acceptance of the City's evaluation criteria.

8.9 Clarification of Proposals

The City reserves the right to obtain clarification on any item in any vendor's submittal or to obtain additional related information necessary to properly evaluate the submittal. Failure of a vendor to respond to a request for more information may result in the proposal being rejected.

8.10 Confidential Information

All responses to this RFP become the property of City and will be kept confidential until such time as a recommendation for award of contract has been announced. Thereafter, proposals are subject to public inspection and disclosure under the California Public Records Act (Cal. Government Code Section 6250, et seq.). If a contractor believes that any portion of its proposal is exempt from public disclosure, such portion may be marked "confidential." The City will use reasonable means to ensure that such confidential information is safeguarded but will not be held liable for inadvertent disclosure of such materials, data, and information. Proposals marked "confidential" in their entirety will not be honored, and City will not deny public disclosure of all or any portion of proposals so marked. By submitting information with portions marked "confidential", the Contractor represents it has a good faith belief that such material is exempt from disclosure under the California Public Records Act and agrees to reimburse the City for, and to indemnify, defend and hold harmless City, its officials, officers, employees and agents from and against: (a) any and all claims, damages, losses, liabilities, suits, judgments, fines, penalties, costs and expenses including, (collectively, "Claims") arising from or relating to OCFA's non-disclosure of any such designated portions of a proposal if disclosure is deemed required by law or court order. Additionally, City may request that the Vendor directly defend any action for disclosure of any information marked confidential.

8.11 City Use of RFP Ideas

The City reserves the right to use any and all service and product ideas presented from prospective contractors. Selection or rejection of a contractor does not affect this right.

8.12 Copyrights and Patents

The vendor shall hold the City of Alhambra and its officers, agents, servants, and employees harmless from liability of any nature or kind because of any copyrighted information, secret or proprietary process, patented or unpatented invention, disclosed or used in response to this RFP, and agrees to defend, at its own expense, any and all actions brought against the City of Alhambra or its officers, agents, servants, or employees or the Vendor alleging or arising from unauthorized use of such information, process or invention.

8.13 Reliance on Information

VENDORS MAY RELY ONLY UPON WRITTEN INFORMATION AND/OR INSTRUCTIONS FROM THE CITY GIVEN HEREIN OR SUBSEQUENT TO THE ISSUANCE OF THIS RFP. CONTRACTOR MAY NOT RELY ON ANY ORAL INFORMATION AND/OR INSTRUCTIONS GIVEN WITH REGARD TO THIS RFP.

Any City response to a question or request for clarification by a contractor will be made in the form of an addendum to the RFP, which will be sent via email to all parties to whom the RFP has been issued not later than five (5) business days prior to the due date for receipt of the Proposal and will become part of the RFP.

8.14 Replacement of Incompatible Staff

The City reserves the right to request and receive a replacement for any vendor staff member whom the City, in its sole and absolute discretion, determines is not working effectively with the City's staff assigned to this project, or who is inadequately qualified to perform the services to be provided, or who is unsuitable to be performing services in secure areas.

8.15 Security Check

All vendor personnel and subcontractors are required to pass an extensive security background check before they will be allowed to perform any services for the City. The vendor or individual employees of the vendor may be excluded from providing services based on the results of the background checks, in the sole and absolute discretion of the City. All proposals should acknowledge this fact, and project timelines should reflect this fact.

AGREEMENT FOR PROFESSIONAL SERVICES
Contract No. _____

This AGREEMENT FOR PROFESSIONAL SERVICES ("AGREEMENT") is made and entered into effective as of the _____ day of _____, 20__, by and between the CITY OF ALHAMBRA, a charter law city, located at 111 South First Street, Alhambra, CA 91801, ("CITY") and _____ [inset corporation, LLC, partnership etc.], located at _____ ("CONSULTANT").

W I T N E S S E T H:

For and in consideration of the promises and of the mutual covenants and agreements herein contained, said parties hereby agree as follows:

1. RECITALS. This AGREEMENT is made and entered into with respect to the following facts:

a. CITY requires professional _____ services ("SERVICES"); and

b. On _____, 20__, CITY issued a Request for Proposals #_____ ("RFP") to obtain professional _____ services for the CITY's and based on review and rating of RFPs received CONSULTANT was selected; and

c. CONSULTANT is qualified to provide those certain services to the CITY necessary for said SERVICES; and, therefore, the Alhambra City Council has elected to engage the services of CONSULTANT upon the terms and conditions hereinafter set forth.

2. SCOPE OF SERVICES.

a. CONSULTANT shall furnish to the City all labor, materials, tools, equipment, services, and incidental customary work necessary to fully and adequately perform those services described in CONSULTANT's Proposal for Services dated _____, ("PROPOSAL") consistent with the CITY's Request for Proposals dated _____ ("RFP") attached hereto as Exhibits "A" and "B" respectively and hereby incorporated by reference.

b. Performance of the SERVICES specified herein is made an obligation of CONSULTANT under this AGREEMENT, subject to any changes made subsequently upon the mutual written agreement of the parties.

c. The scope of services to be performed by CONSULTANT under this AGREEMENT shall include, but not be limited to, those services specified in Paragraph 2A hereof.

3. PERFORMANCE STANDARDS. While performing this AGREEMENT CONSULTANT will use the appropriate generally accepted professional standards of practice existing at the time of performance utilized by persons engaged in providing similar services. CONSULTANT shall cooperate with CITY if CITY opts to monitor CONSULTANT's services. CITY will notify CONSULTANT of any deficiencies and CONSULTANT will have fifteen (15) days after such notification to cure any shortcomings to CITY's satisfaction. Costs associated with curing the deficiencies will be borne by CONSULTANT.

4. FAMILIARITY WITH WORK.

a. By executing this AGREEMENT, CONSULTANT agrees that, to the best of CONSULTANT's knowledge and belief, CONSULTANT has

i. Carefully investigated and considered the scope of services to be performed;

ii. Carefully considered how the services should be performed; and

iii. Understands the facilities, difficulties, and restrictions attending performance of the services under this Agreement.

b. If services involve work upon any site, CONSULTANT agrees that CONSULTANT has or will investigate the site and is or will be fully acquainted with the conditions there existing, before commencing the services hereunder. Should CONSULTANT discover any latent or unknown conditions that may materially affect the performance of the services, CONSULTANT will immediately inform CITY of such fact and will not proceed except at CONSULTANT's own risk until written instructions are received from CITY.

5. CITY SUPERVISION. The Director of the Department of _____ of CITY, or the Director's designee, shall have the right of general supervision of all work performed by CONSULTANT and shall be the CITY's agent with respect to obtaining CONSULTANT's compliance hereunder. No payment for any services rendered under this AGREEMENT shall be made without the prior approval of the Director of _____ or the Director's designee.

6. FEE. Compensation to CONSULTANT for the total services to be rendered pursuant to this AGREEMENT shall be in an amount not to exceed $_____ to be billed in a manner described in CONSULTANT's PROPOSAL, consistent with the CITY's RFP. If any discrepancies exist between the RFP and the CONSULTANT's PROPOSAL exist, then the terms of the RFP shall control.

7. EXTRA SERVICES. Notwithstanding any other provision herein, no extra services shall be rendered by CONSULTANT under this AGREEMENT unless such extra services first shall have been authorized in writing by the CITY. Any such services so authorized shall be paid by the CITY at rates approved of by the CITY.

8. PAYMENT BY CITY. CONSULTANT shall send invoices to the City on a monthly basis, based upon the services already rendered at the time of the submission. City shall pay all proper costs within thirty (30) days of receipt of such invoice(s).

9. TERM. The term of this AGREEMENT shall be as provided for in the RFP from after the date on which the CITY issues CONSULTANT a Notice to Commence Work. CONSULTANT shall complete all those services set forth in its PROPOSAL by that certain date set forth in said Notice to Commence Work or until such time as the services have been completed by the CONSULTANT and accepted by the CITY, whichever occurs first. The CITY may extend said time of completion for delays caused by circumstances beyond the control of either party to this AGREEMENT. Should the consulting contract extend beyond the estimated time for completion of said services, CITY hereby reserves the right to continue CONSULTANT's services hereunder with any and all fees for such additional services to be compensated by the CITY at rates approved by the CITY.

10. DISPUTES AND REMEDIES.

a. Claims, disputes, and other matters in question between the Parties arising out of or relating to this AGREEMENT or the breach thereof, must be resolved by the following procedure:

i. CITY and CONSULTANT will exercise their best efforts to resolve disputes through the development of a consensus. A meeting may be requested by CITY or CONSULTANT at any time for the purpose of resolving a dispute. A determination by CITY'S Director of the Department of _____ will be made within two (2) weeks after a meeting to resolve the dispute;

ii. If unresolved within thirty (30) days, then City Manager, or his designee, will make a final determination;

iii. Following the City Manager's final determination, the Parties may submit any unresolved matters to non-binding mediation. The parties may, but are not required to be, represented by counsel in mediation;

iv. If the Parties do not agree to mediation, or if mediation does not resolve the Parties' dispute, the matter may be pursued in Los Angeles County Superior Court, or the United States District Court, Central District of California, if federal jurisdiction exists.

b. The Parties' rights and remedies under this Agreement are in addition to any other rights and remedies provided by law.

11. PREVAILING WAGE. CONSULTANT is aware of the requirements of California Labor Code Section 1720, *et seq.*, and 1770, *et seq.*, as well as California Code of Regulations, Title 8, Section 1600, et seq., ("Prevailing Wage Laws"), which require the payment of prevailing wage rates and the performance of other requirements on "public works" and "maintenance" projects. If the SERVICES are being performed as part of an applicable "public works" or "maintenance" project, as defined by the Prevailing Wage Laws, and if the total compensation is $1,000 or more, CONSULTANT agrees to fully comply with such Prevailing Wage Laws. The CITY shall provide CONSULTANT with a copy of the prevailing rates of per diem wages in effect at the commencement of this Agreement. CONSULTANT shall make copies of the prevailing rates of per diem wages for each craft, classification or type of worker needed to execute the SERVICES available to interested parties upon request, and shall post copies at the Consultant's principal place of business and at the project site. CONSULTANT shall defend, indemnify and hold the City, its elected officials, officers, employees and agents free and harmless from any claim or liability arising out of any failure or alleged failure to comply with the Prevailing Wage Laws.

12. TERMINATION OF AGREEMENT. The CITY may terminate this AGREEMENT upon giving a ten (10) day advance written notice of such termination to CONSULTANT. In that event, the City Manager, or his designee, based upon work accomplished by CONSULTANT prior to notice of such termination, shall determine the amount of fees to be paid to CONSULTANT for such services based upon accepted accounting practices. This finding by the City Manager, or his designee, shall be considered by the Alhambra City Council and the Council's determination shall be final and conclusive as to the amount of such fee.

13. INDEPENDENT CONTRACTOR. CONSULTANT shall act as an independent contractor in the performance of the services provided for in this AGREEMENT and shall furnish such services in CONSULTANT's own manner and method and in no respect shall CONSULTANT be considered an agent or employee of the CITY.

14. OWNERSHIP OF DOCUMENTS. All financial documents, data, studies, and reports prepared by CONSULTANT under this AGREEMENT are CITY's property. CONSULTANT may retain copies of said documents and materials as desired, but will deliver all original materials to CITY upon CITY's written notice. CITY agrees that use of CONSULTANT's completed work product, for purposes other than identified in this AGREEMENT, or use of incomplete work product, is at CITY's own risk. CITY will indemnify and hold CONSULTANT harmless for any use of the work product other than as contemplated by this AGREEMENT.

15. PUBLICATION OF DOCUMENTS. Except as necessary for performance of service under this AGREEMENT, no copies, sketches, or graphs of materials, including graphic art work, prepared pursuant to this Agreement, will be released by CONSULTANT to any other person or City without CITY's prior written approval. All press releases, including graphic display information to be published in newspapers or magazines, will be approved and distributed solely by CITY, unless otherwise provided by written agreement between the parties.

16. NONASSIGNMENT. This AGREEMENT is not assignable either in whole or in part by CONSULTANT without the written consent of CITY.

17. TAXPAYER IDENTIFICATION NUMBER. CONSULTANT will provide CITY with a valid Taxpayer Identification Number.

18. PERMITS AND LICENSES. CONSULTANT, at its sole expense, will obtain and maintain during the term of this AGREEMENT, all necessary permits, licenses, and certificates that may be required in connection with the performance of services under this Agreement.

19. INDEMNIFICATION.

a. CONSULTANT hereby agrees to the following:

i. Indemnification for Professional Services. CONSULTANT will save harmless and indemnify CITY and, at CITY's request, reimburse defense costs for CITY and all its officers, volunteers, employees and representatives from and against any and all suits, actions, or claims, of any character whatever, brought for, or on account of, any injuries, including death or damages sustained by any person or property resulting or arising from any negligent or wrongful act, error or omission by CONSULTANT or any of CONSULTANT's officers, agents, employees, or representatives, in the performance of this Agreement.

ii. Indemnification for other Damages. CONSULTANT indemnifies and holds CITY harmless from and against any claim, action, damages, costs (including, without limitation, attorney's fees), injuries, or liability, arising out of this Agreement, or its performance. Should 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 this Agreement, or its performance, CONSULTANT will defend CITY (at CITY's request and with counsel satisfactory to CITY) and will indemnify CITY for any judgment rendered against it or any sums paid out in settlement or otherwise.

b. For purposes of this section "CITY" includes CITY's officers, officials, employees, agents, and representatives.

c. It is expressly understood and agreed that the foregoing provisions will survive termination of this Agreement.

d. CITY does not, and shall not, waive any rights against CONSULTANT which it may have by reason of the aforesaid hold-harmless AGREEMENT because of the acceptance by CITY or the deposit with CITY by CONSULTANT, of any of the insurance policies hereinafter described in this AGREEMENT.

e. The aforesaid hold-harmless AGREEMENT by CONSULTANT shall apply to all damages and claims for damages of every kind suffered, or alleged to have been suffered, by reason of any of the aforesaid operations of CONSULTANT, or any subcontractor of CONSULTANT, regardless of whether such insurance policies shall have been determined to be applicable to any of such damages or claims for damages.

f. Notwithstanding any provision of this Agreement to the contrary, design professionals shall be required to defend and indemnify the City only to the extent allowed by Civil Code Section 2782.8, namely for claims that arise out of, pertain to, or relate to the negligence, recklessness, or willful misconduct of the design professional. The term "design professional" includes licensed architects, licensed landscape architects, registered professional engineers, professional land surveyors and the business entities which offer such services in accordance with the applicable provisions of the Business and Professions Code.

g. The provisions of this section do not apply to Claims occurring as a result of the City's sole negligence or willful acts or omissions.

20. INSURANCE. CONSULTANT shall not commence work under this contract until CONSULTANT shall have obtained all insurance required by this AGREEMENT and such insurance shall have been approved by CITY as to form, amount and carrier, nor shall CONSULTANT allow any subcontractor of CONSULTANT to commence work on any subcontract until all similar insurance required of the subcontractor of CONSULTANT shall have been so obtained and approved.

a. COMPENSATION INSURANCE. CONSULTANT shall take out and maintain, during the life of this contract, Worker's Compensation Insurance for all of CONSULTANT'S employees employed to perform the SERVICES as described section 2 of the AGREEMENT; and, if any work is sublet, CONSULTANT shall require the subcontractor of CONSULTANT similarly to provide Worker's Compensation Insurance for all of the latter's employees, unless such employees are covered by the protection afforded by CONSULTANT. If any class of employees engaged in work under this AGREEMENT is not protected under any Workers' Compensation law, CONSULTANT shall provide and shall cause each subcontractor of CONSULTANT to provide adequate insurance for the protection of employees not otherwise protected. CONSULTANT shall indemnify CITY for any damage resulting to it from failure of either CONSULTANT or any subcontractor of CONSULTANT to take out or maintain such insurance.

b. COMPREHENSIVE GENERAL LIABILITY, PROFESSIONAL LIABILITY, COMPREHENSIVE AUTOMOBILE LIABILITY AND CONTRACTUAL GENERAL LIABILITY INSURANCE. CONSULTANT shall take out and maintain during the life of this contract comprehensive general liability, products/completed operations hazard, comprehensive automobile liability and contractual general liability insurance and shall protect CITY, its elective and appointive boards, officers, agents and employees, CONSULTANT, and any subcontractor of CONSULTANT performing work covered by this contract, from claims for damage for personal injury, including death, as well as from claims for property damage which may arise from CONSULTANT'S or any subcontractor of CONSULTANT'S operations under this contract, whether such operations be by CONSULTANT or by any subcontractor of CONSULTANT, or by anyone directly or indirectly employed by either CONSULTANT or any subcontractor of CONSULTANT, and the amounts of such insurance shall be as follows:

i. Commercial General Liability Insurance in an amount of not less than ONE MILLION DOLLARS ($1,000,000);

ii. Professional Liability Insurance in an amount of not less than ONE MILLION DOLLARS ($1,000,000);

iii. Comprehensive Automobile Liability Insurance in an amount of not less amount of not less than ONE MILLION DOLLARS ($1,000,000).

A combined single limit policy with aggregate limits in an amount of not less than TWO MILLION DOLLARS ($2,000,000) shall be considered equivalent to the said required minimum limits set forth in subsections (i),(ii), and (iii) above.

c. PROOF OF INSURANCE. The insurance required by this Agreement shall be with insurers which are Best A+ rated, and California-Admitted, or better. The CITY of Alhambra shall be named as "additional insured" on all policies required hereunder, except for Professional Liability Insurance, and CONSULTANT shall furnish the CITY Clerk, concurrently with the execution hereof, with satisfactory proof of carriage of the insurance required, and adequate legal assurance that each carrier will give CITY at least thirty (30) days' prior notice of the cancellation of any policy during the effective period of the contract.

d. NOTICE TO COMMENCE WORK. The CITY will not issue any notice authorizing CONSULTANT or any subcontractor to commence work under this AGREEMENT until CONSULTANT has provided to the CITY Clerk the proof of insurance as required by subparagraph (C) of this article.

21. NON-DISCRIMINATION. CONSULTANT shall not discriminate in its recruiting, hiring, promotion, demotion or termination practices on the basis of race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, marital status, sex, age, or sexual orientation in the performance of this AGREEMENT and shall comply with the provisions of the California Fair Employment and Housing Act as set forth in Part 2.8 of Division 3, Title 2 of the California Government Code; the Federal Civil Rights Act of 1964, as set forth in Public Law 88-352, and all amendments thereto; Executive Order 11246; and all administrative rules and regulations issued pursuant to such acts and order.

22. UNAUTHORIZED ALIENS. CONSULTANT hereby promises and agrees to comply with all of the provisions of the Federal Immigration and Nationality Act (8 USCA 1101, *et seq.*), as amended; and, in connection therewith, shall not employ unauthorized aliens as defined therein. Should CONSULTANT so employ such unauthorized aliens for the performance of work and/or services covered by this AGREEMENT, and should the Federal Government impose sanctions against the CITY for such use of unauthorized aliens, CONSULTANT hereby agrees to, and shall, reimburse CITY for the cost of all such sanctions imposed, together with any and all costs, including attorney's fees, incurred by the CITY in connection therewith.

23. CONFLICT OF INTEREST. CONSULTANT will comply with all conflict of interest laws and regulations including, without limitation, CITY's conflict of interest regulations.

24. WAIVER. Waiver by any party hereto of any term, condition, or covenant of this AGREEMENT shall not constitute the waiver of any other term, condition or covenant hereof.

25. ATTORNEY'S FEES. If litigation is reasonably required to enforce or interpret the provisions of this AGREEMENT, the prevailing party in such litigation shall be entitled to an award of reasonable attorney's fees, in addition to any other relief to which it may be entitled.

26. BINDING EFFECT. This AGREEMENT shall be binding upon the heirs, executors, administrators, successors and assigns of the parties hereto.

27. PROVISIONS, CUMULATIVE. The provisions of this AGREEMENT are cumulative and in addition to and not in limitation of any rights or remedies available to CITY.

28. NO PRESUMPTION RE: DRAFTER. The parties acknowledge and agree that the terms and provisions of this AGREEMENT have been negotiated and discussed between the parties and their attorneys, and this AGREEMENT reflects their mutual AGREEMENT regarding the same. Because of the nature of such negotiations and discussions it would be inappropriate to deem any party to be the drafter of this AGREEMENT; and, therefore, no presumption for or against validity or as to any interpretation hereof, based upon the identity of the drafter, shall be applicable in interpreting or enforcing this AGREEMENT.

29. ASSISTANCE OF COUNSEL. Each party to this AGREEMENT warrants to each other party as follows:

a. That each party either had the assistance of counsel or had counsel available to it, in the negotiation for, and execution of, this AGREEMENT, and all related documents; and,

b. That each party has lawfully authorized the execution of this AGREEMENT.

30. MODIFICATION. This AGREEMENT shall not be modified except by written agreement of the parties.

31. GOVERNING LAW. This AGREEMENT shall be interpreted and construed according to the laws of the State of California.

32. NOTICE. Whenever it shall be necessary for either party to serve notice on the other regarding this AGREEMENT, such notice may be furnished in writing by either party to the other and shall be served by personal service as required in judicial proceedings or by certified mail, postage prepaid, return receipt requested, addressed to the parties as follows:

CITY: _____
_____
City of Alhambra
111 South First Street
Alhambra, CA 91801

CONSULTANT: _____
_____
_____
Tel: _____
Fax: _____

33. FORCE MAJEURE. Neither party shall be responsible for delays or failures in performance resulting from acts beyond the control of the offending party. Such acts shall include, but not be limited to, acts of God, fire, flood, earthquake, or other natural disaster, nuclear accident, strike, lockout, riot, freight embargo, public regulated utility, or government statutes or regulations superimposed after the fact.

34. ELECTRONIC TRANSMISSION OF CONTRACT AND SIGNATURE. The Parties agree that this Agreement may be transmitted and signed by electronic mail by either/any or both/all Parties, and that such signatures shall have the same force and effect as original signatures, in accordance with California Government Code section 16.5 and Civil Code section 1633.7.

IN WITNESS WHEREOF, the parties hereto have caused this AGREEMENT to be executed on its effective date by their respective officers duly authorized on their behalf.

"CITY"
CITY OF ALHAMBRA, a Charter Law City

ATTEST:

By _____
_____, Mayor

_____
Lauren Myles, City Clerk

APPROVED AS TO FORM:
JOSEPH M. MONTES, CITY ATTORNEY

By _____

"CONSULTANT"

(FULL NAME OF CONSULTANT)

TAXPAYER ID # _____

By _____
Print Name: _____
Title: _____

By _____
Print Name: _____
Title: _____

SAMPLE

REAL-TIME DATA VISUALIZATION PLATFORM ~ RFP2M24-21
RESPONSES TO QUESTIONS

Below are the answers to the questions the City received for clarification in reference to the RFP. No additional answers will be provided.

1. Is the City seeking to procure a platform for the historical analysis of data or a real-time sensor and video solution? If so, how many video streams is the City looking to incorporate?

   The City is looking to procure a platform that combines several platforms together, in an all-in-one user interface (UI). The City is not looking to integrate a video solution, but ALPR/FLOCK data would be required.

2. What is the existing Reporting Tool / Software in use?

   No existing tool.

3. Are there any existing API's that can be exposed to interface the required/stated 3rd party systems?

   Yes, some of the existing systems have API's already in place. The proposing vendor would need to meet the 3rd party vendor's requirements to integrate.

4. Is there any existing technology stack that can be provided to build the asked pre-built connectors as part of the required hub to interface with 3rd party systems?

   Not currently.

5. If there is no such stack currently available, what technology stack is expected by the city to be implemented?

   The City expects the proposing vendor to make this recommendation.

6. Does the City have a set of indicators that these sources (Spillman CAD, Spillman RMS, Flock ALPR, Vigilant ALPR, Axon Evidence.com and Laserfiche) would provide? Is there a priority to any specific indicators?

   All data currently displayed by the aforementioned platforms shall be provided by the data integration platform.

7. To the point above, we would imagine working with the stakeholders of the department to define a set of glanceable indices that this dashboard would provide. Whether these are custom (a result of aggregating or combining multiple metrics from multiple sources) or just the standard display of indicators from the requested sources. Please let us know if this phase of exploration and strategy is in-line with how you envision the execution of this project to go.

   Same as above

8. Please provide the number of authorized dispatchers.

Fourteen (14) .

9. Please provide the name of any other sources outside of what is listed within the RFP and whether the source is static or dynamic (is there new data being added or removed from the source) that the City wishes to have ingested into the Real Time Data Visualization software?

The City expects the proposing vendor to address the possibility of adding any new data sources in the future.

10. Does the City have access to booking photos that need to be included in the Real Time Data Visualization software and if Alhambra Police Department is the custodian of such records?

Yes, the City has access to booking photos and is the custodian of the records.

11. Does the City have a replication server that the Real Time Data Visualization software can connect to?

The City does have a replication server.

12. What single-sign on platform does Alhambra PD use?

The City is in process of implementing DUO.

13. 3.2 Equipment Warranty: *Vendor shall include a copy of each manufacturer's written warranty statement for each piece of equipment furnished and installed into the PLATFORM with their proposal. Vendors shall also provide the details of all warranties that are applicable to the services and equipment provided to the City.*

This requirement is only applicable if any equipment is provided or recommended.

14. How will the evaluation committee gauge the capability of a vendor during the "Mandatory On-Site or Virtual Demonstration"?

The evaluation committee will be evaluating each vendor to determine if all requirements reflected on the RFP have been met.

15. Is there an expected ideal "Go-Live" date for the initiative?

Award of contract is scheduled for October 23, 2024. The City expects three (3) months after a fully executed contract.

16. Please detail the stakeholders involved in this project.

Members of the Command Staff, Patrol, Detectives, Dispatchers and Records.

17. Is the City looking for a Commercial Off-The-Shelf solution, or a custom implementation?

Whichever option is the best fit.

18. Is the City looking for an On-Premises solution or a cloud solution?

The City is seeking for a solution that is DOJ CJIS approved.

19. Is the City open to offshoring work from the project to countries beyond the U.S territorial borders; say Canada or India?

No

20. Can the work detailed within the RFP be performed remotely?

If this question pertains to the mandatory on-site demonstration, a virtual presentation will suffice.

21. Please list the data sources that will be used for reporting.

Please refer to 4.1 General Requirements on the RFP for the list of data sources that will be used for reporting.

22. Size of data contained in each source.

Data sizes range changes constantly.

23. Total number of tables in the data sources that need to be modelled.

The City expects the proposing vendor to make this recommendation.

24. What is the volume of data in total from all sources as of now?

Volume of data ranges and changes constantly.

25. What volume of incremental data is expected daily from these data source?

Volume of incremental data varies depending on daily activity and usage.

26. How many users are expected to access the PLATFORM?

Approximately 110-130

27. How many reports would you require from the PLATFORM?

The City expects the proposing vendor to make this recommendation.

28. Could you please detail your software architecture preferences (if any)?

The City expects the proposing vendor to make this recommendation.

29. Please specify the budget allocated for the project.

The budget allocated for this project is based upon available funds through UASI.

30. Please detail the existing software licenses with you.

Software licenses are either per site license and/or user-based.

31. Extension for proposal.

The due date for all responsive proposals is Monday, September 30, 2024 by 10:00 am. The deadline will not be extended.

City of Gardena

Gardena City Council Meeting

AGENDA REPORT SUMMARY

Agenda Item No. 15.C
Section: DEPARTMENTAL ITEMS - POLICE
Meeting Date: January 14, 2025

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

AGENDA TITLE: Notification of Eligibility for Funding in the Amount of $99,023 Under the Tobacco Grant Program Award for the 2024 - 2028 Grant Cycle

COUNCIL ACTION REQUIRED:

Staff Recommendation: Accept Grant Award and Authorize Expenditures

RECOMMENDATION AND STAFF SUMMARY:

Staff respectfully recommends that the City Council accept the $99,023 grant award from the U.S. Department of Justice, Division of Operations, for expenditures to be funded under the Tobacco Grant Program for the 2024 - 2028 grant cycle. Utilizing these funds, it is the intent of the Gardena Police Department to conduct minor decoy operations to ensure licensed retailers are not selling tobacco products to youth. Additionally, the department will conduct follow-up retail checks to ensure sustainability of the enforcement. A portion of the funding will also be used towards conducting local tobacco retail license inspections. These inspections will increase compliance among tobacco retailers as well as ensure they are adequately educated regarding tobacco related regulations. The Police Department seeks to reach out to the community through neighborhood watch meetings and community education workshops, to provide education on the dangers of tobacco use amongst our youth. This forum will provide a more collaborative environment where law enforcement can work with the community to address the issue of tobacco use among school aged youth.

FINANCIAL IMPACT/COST:

Tobacco Grant Program Award Amount: $99,023

ATTACHMENTS:

Gardena_PD_Summary_of_Award_24-25.pdf

APPROVED:

_____

Clint Osorio, City Manager

Tobacco Grant Program
GRANT SERVICES BRANCH – LOCAL ASSISTANCE
DIVISION OF OPERATIONS

TOBACCO GRANT SUMMARY OF AWARD

DOJ-PROP56-2024-25-1-029

GARDENA POLICE DEPARTMENT

This Summary of Award document will be used by the Tobacco Grant Program when determining whether an activity or expense claimed was approved for funding and is reimbursable. Activities other than those presented here may not be reimbursable. A Grant Modification may be necessary for material deviations. Please consult with your Grant Program Officer *before* engaging in any activity beyond this scope.

By signing the Memorandum of Understanding, your agency agrees to the commitments outlined below and this document becomes part of the Grant Agreement.

AWARD SUMMARY

Award Amount: $99,023

Requested Amount: $123,276

Removed from Award: AADAP contract for community education supplies

Reduced Line Items: N/A

Other Changes or Stipulations: Community education not approved.

IMPORTANT PROVISIONS FOR ALL GRANTEES

I. Enforcement Activities

a. Authorized - If enforcement activities were proposed, **only** activities that target retailers for illegal sales/marketing of tobacco products were approved. It is expected that the flavor ban will be enforced within one or more enforcement activities.

b. Unauthorized - Community or school patrols, or other enforcement actions related to tobacco use and possession, are **not** permitted.

II. Educational Activities

a. Authorized – Retailer and/or officer educational activities on tobacco laws and ordinances, if included, are authorized as noted below.

b. Unauthorized – School or community education efforts, including media campaigns, are **not** permitted as part of this award. All educational efforts should be directed to retailers and/or officers.

III. Removed Personnel or Other Items

a. If specific personnel or other items were removed and not funded, they cannot be reinstated during the grant term.

IV. Reduced Line Items

a. If a specific line item was reduced, the intention was to not fully fund it or the activities it represents.

V. Mileage/Fuel

a. Budgets that include mileage or fuel were amended to include both together in one line item for flexibility and the type of backup documentation available. Mileage is limited to the state rate in effect at the time of travel.

VI. Equipment

a. All equipment items must be purchased during the first year of the grant as noted on the Budget Detail. Their awarding is intended to support project goals and be used to support grant activities throughout the grant term.

Please reference the Tobacco Grant Program Grantee Handbook for more information regarding allowable costs.

GOALS AND ACTIVITIES

Retail Inspections

- Per year, **69** retailers will be inspected.
- Additional details regarding these inspections:

Minor Decoy Operations

- Per year, **4** minor decoy operations will be conducted.
- Per year, **20** retailers will be targeted through these operations.
- Additional details regarding these operations:
    - Follow-up retail checks will ensure sustained enforcement, alongside regular license inspections to uphold local regulations.
    - Each operation, led by one supervisor, supported by two officers, and including one voluntary decoy, will span approximately six hours.

Shoulder Tap Operations

N/A

Undercover Buys

N/A

Retailer Education

- Per year, **69** retailers will receive educational materials.
- Per year, **69** retailers will receive on-site education.
- Additional details regarding these retailer education activities:

- Retailer education workshops and regular interactions with law enforcement officers will serve as crucial platforms for educating retailers.

Enforcement Officer Education

N/A

Prosecution

N/A

Task Force

N/A

Other Activities

N/A

PARTNERING AGENCIES

Based upon the proposal submitted and any subsequent modifications approved by DOJ, the following agencies are expected to partner with and support the activities and fulfillment of goals referenced above:

N/A

Please notify your Grant Program Officer of any proposed changes to partnering agencies, particularly if they are included within your budget.