DRAFT ENVIRONMENTAL IMPACT REPORT

HARBOR GATEWAY CENTER

EIR No. 96-0090-SUB(ZV)(CUB)(DA)
State Clearinghouse No. 96051050

February 6, 1997

CITY OF LOS ANGELES

BOE-C6-0115126

EIR No. 96-0090-SUB(ZV)(CUB)(DA)
STATE CLEARINGHOUSE No. 96051050

Vesting Tentative Tract No. 52172

HARBOR GATEWAY CENTER

PROJECT: The demolition of approximately 2.4 million square feet of industrial/ warehouse facilities and construction of about 3 million square feet of retail, office, and industrial park development on a 170-acre site located on the south side of 190th Street, between Normandie and Western Avenues. Area 1, which occupies the northernmost 40 acres of the site, is to be developed with 450,000 square feet of retail uses, including about 355,000 square feet of large scale retailers, a maximum 65,000 square foot (4,000 seat) movie theater complex, and up to 30,000 square feet of restaurants. Area 2, which occupies the remainder of the site, is to be developed with about 500,000 square feet of office uses and 2 million square feet of industrial park uses.

REQUIRED CITY ACTIONS:

- Vesting tentative tract map
- Conditional Use Permits (CUP) for the sale of alcoholic beverages in conjunction with restaurant and retail uses and for Floor Area Ratio (FAR) averaging
- Development Agreement
- Significant modification from sign regulations for two signs
- Variance or other entitlement for shared parking in Area 1
- Building permits
- Any other ministerial actions or approvals required

APPLICANT: McDonnell Douglas Realty Company
4060 Lakewood Boulevard
Long Beach, CA 90808

DATE: February 1997

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B Notice of Preparation/Comments and Responses

C Preliminary Geotechnical Investigation, prepared by Norcal Engineering, March 1996.

D Air Quality Worksheets

E Noise Worksheets

F Traffic Analysis, prepared by Crain & Associates, October 1996.

F-1 Alternative Trip Generation Calculations, Prepared by Crain & Associates, January 1997

G Utility Calculations

H Environmental Assessments (Hazardous Materials)

- Phase I Environmental Assessment, Parcel A, prepared by Kennedy Jenks Consultants, June, 1996
- Phase I Environmental Assessment, Parcel B, prepared by Kennedy Jenks Consultants, June, 1996
- Phase I Environmental Assessment, Parcel C, prepared by Kennedy Jenks Consultants, June, 1996
- Phase II Subsurface Investigation, Parcel A, prepared by Kennedy Jenks Consultants, June, 1996
- Report of Technical Documents Review and Groundwater Sampling, prepared by Kennedy/Jenks/Chilton, June, 1991
- Prioritization Asbestos Assessment Study, prepared by Hall-Kimbrell Environmental Services, Inc., February, 1990

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I. Summary

I. SUMMARY

A. BRIEF SUMMARY OF THE PROPOSED PROJECT

The proposed project involves the demolition of approximately 2.4 million square feet of industrial/warehouse facilities and construction of about three million square feet of retail, office, and industrial park development on a 170-acre site. The applicant proposes to divide the site into up to 45 lots to be developed in two areas: Area 1 to be developed with retail uses; and Area 2 to be developed with office/industrial park uses. The retail center proposed for the northernmost portion of the site along the 190th Street frontage would include an estimated 355,000 square feet of large scale retailers, a maximum 65,000 square foot (4,000 seat) movie theater complex, and up to 30,000 square feet of restaurants, for a total of 450,000 square feet of floor area. The remainder of the site would be developed with about 500,000 square feet of office uses and two million square feet of industrial park uses. All proposed development would be consistent with the current M3-1 zoning for the project site.

The project would require discretionary approvals and permits from the City of Los Angeles, including the following:

- Vesting tentative tract map;
- Conditional Use Permits (CUP) for the sale of alcoholic beverages in conjunction with restaurant and retail uses and for Floor Area Ratio (FAR) averaging;
- Development Agreement;
- Significant modification from sign regulations for two signs; and
- Variance or other entitlement for shared parking in Area 1.

Required ministerial approvals may include:

- Building permits; and
- Any other ministerial actions or approvals required.

B. PROJECT LOCATION

The project site is located within the Harbor Gateway community of the City of Los Angeles. It is about fourteen miles southwest of downtown Los Angeles and eight miles north

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of Los Angeles Harbor. The site is bounded by 190th Street on the north, Normandie Avenue on the east, industrial and residential properties on the south, and the Capitol Metals Company and former International Light Metals properties and Western Avenue on the west. Properties directly across Normandie Avenue from the project site are in unincorporated Los Angeles County while properties across Western Avenue are within the City of Torrance.

C. PROJECT BACKGROUND

The project applicant, McDonnell Douglas Realty Company, submitted an Environmental Assessment Form (EAF) to the City of Los Angeles Department of City Planning on March 21, 1996. After review of the information provided, the City's Environmental Staff Advisory Committee (ESAC) determined that the proposed project may have a significant impact on the environment. The ESAC directed that an Environmental Impact Report (EIR) be prepared to address the potential impacts of the project. On April 29, 1996, the ESAC notified the project Applicant that the following issue areas must be evaluated in the EIR:

- Earth: Grading, Drainage and Geological Hazards
- Air Quality (Stationary and Mobile Sources)
- Water: Surface Water Hydrology and Drainage
- Plant Life
- Noise (Stationary and Mobile Sources)
- Light and Glare
- Land Use
- Transportation/Circulation/Driveway/Access/Regional Traffic
- Public Services: Police and Fire Protection
- Energy Conservation: Electrical Power, Natural Gas, Construction
- Utilities: Communications, Water, Sewer, and Solid Waste
- Risk of Upset: Soil and/or Groundwater Contamination Issues
- Aesthetics

A copy of the ESAC comments and the Initial Study prepared by the Department of City Planning staff are included in Section XI, ESAC Action, Initial Study, and Worksheet/EAF.

Environmental Review Section staff initiated a Notice of Preparation (NOP) circulation process in which responsible agencies and interested parties were invited to submit comments

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on the EIR scope on May 7, 1996. The 45-day NOP circulation period ended on June 21, 1996.

Subsequent to circulation of the NOP, a minor change to the proposed project was made by the applicant. This change involved the combination of Development Areas 2 and 3 of the project site into one 115.6-acre development area, now called Area 2. However, because the allowable building area for the former Areas 2 and 3 was simply combined to determine overall allowable building area in the new Area 2 and this area would continue to be developed with office/industrial park uses, the overall on-site development proposed for the project site has not changed. Consequently, no impacts beyond those described in the NOP are anticipated.

During a subsequent EIR scoping meeting, several other issues were identified for inclusion in the EIR. These issues are:

- Traffic impacts at school and pedestrian routes to schools (Traffic Section)
- Traffic induced noise and air emissions at schools (Noise and Air Quality Sections)
- Impact analysis on the entrance ramps to the Harbor (I-110) and San Diego (I-405) Freeways, and the extension of Del Amo Boulevard (Traffic Section)

This Draft EIR addresses each of the issues identified by Environmental Staff Advisory Committee (ESAC), as well as those concerns disclosed through pre-draft circulation comments. These letters and responses to the Notice of Preparation are on file with the Department of City Planning, Environmental Review Section, Room 1540, 221 North Figueroa Street and are included in Appendix B.

D. AREAS OF PUBLIC CONTROVERSY

Areas of potential public controversy are environmental issue areas for which significant and unavoidable impacts would occur as a result of project implementation. For the Harbor Gateway Center project, these include air quality, transportation/circulation, and solid waste. Air pollutant emissions associated with project construction of the proposed project would exceed the South Coast Air Quality Management District (SCAQMD) significance thresholds for nitrogen oxides (NOx) and fine particulate matter (PM10). Energy use and vehicle trips associated with operation of the project would generate emissions of carbon monoxide (CO), reactive organic gases (ROG), and NOx that exceed the SCAQMD significance thresholds for those pollutants. However, localized CO impacts at area intersections would be below SCAQMD thresholds. Although both construction and operational emissions could be

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substantially reduced through implementation of recommended measures, neither could be reduced to below significant levels. Project-related traffic would create a significant and unavoidable impact at the Western Avenue/190th Street and Normandie Avenue/190th Street intersections, as well as on area freeways. Again, although recommended mitigation measures, including cumulative programs such as regional transit system improvements, ridesharing requirements, and regional roadway capacity enhancements, would reduce impacts at these locations, impacts would remain above significance thresholds. Solid waste generated by the proposed project would constitute a relatively small proportion of overall solid waste generated in the City of Los Angeles. However, because of ongoing concerns about the shortage of available landfill capacity in the region, any increase in solid waste generation is considered significant.

E. ALTERNATIVES

Section VII of this EIR evaluates six alternatives to the proposed project, including: Alternative 1 - No Project; Alternative 2 - Master Planned Block Development; Alternative 3 - Alternative Land Use; Alternative 4 - Reduced Intensity; Alternative 5 - Golf Course; and Alternative 6 - Large Parcelization. Each of these alternatives is briefly described below, as well as how the alternative's environmental impacts compare to those of the proposed project.

Alternative 1 - No Project

Under the No Project alternative, no redevelopment of the project site would occur and on-site conditions would remain as they are today.

This alternative would not change existing conditions on the project site. As such, it would have none of the significant, adverse impacts with respect to traffic and air quality, but also would not have any of the potentially beneficial impacts of the project related to aesthetics, remediation of soil contamination and asbestos removal.

Alternative 2 - Master Planned Block Development

This alternative involves the development of a master planned block-wide development on the proposed project site and the adjacent International Light Metals site. Implementation of this alternative would combine the current development proposals by the Applicant and the adjacent property owner, who also has a development application presently pending before the City, to provide an integrated and comprehensively planned retail, service, office, and industrial

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park development on the two sites. The alternative would include 480,000 square feet of retail development (including a 5,000 seat theater complex), 320,000 square feet of hotel/local service development (including a 350 room hotel), and 3.347 million square feet of office/industrial park development. By comparison, combination of the two pending development applications would result in the development of approximately 1.2 million square feet of retail uses, theaters totalling approximately 3,500 to 4,000 seats and approximately 2.5 million square feet of office/ industrial park uses on the combined site. Because this alternative would involve development of the adjacent property as well as the project site, it would require the cooperation of the adjacent property owner in order to be feasible.

The impacts of this alternative to physical resources such as earth and water would be similar to those of the combined projects. Traffic generation would be reduced by approximately 16,000 daily trips, or 37% compared to the combined projects. Overall traffic impacts are expected to be lower because of reduced retail development. The integrated, coordinated development that would be accommodated under this alternative would also be expected to reduce impacts related to land use, public services, noise, and air quality. Overall, the Master Planned Block Development alternative would be superior compared to the two projects developed individually. The impact of the alternative would generally be higher compared to the proposed project by itself because the alternative would represent a larger project than the proposed project alone.

Alternative 3 - Alternative Land Use

The Alternative Land Use scenario involves the redevelopment of the project site with a different mix of uses along the 190th Street frontage of the project site and increased intensity of development within the office/industrial park component. In place of the proposed 450,000 square foot retail/theater/restaurant component on a 40 acre site facing 190th Street, a 192,000 square foot hotel/local service component consisting of a 200 room hotel, a sports club, supporting limited retail and restaurant development, and a one-half acre plaza, would be developed on a 12 acre site. The 2.5 million square foot office/industrial park component of the proposed project on a 115.6 acre site would be increased to 4.2 million square feet on a 148.4 acre site. The office/industrial park component would be developed at an FAR of 0.63:1, rather than the 0.44:1 FAR for the proposed project.

The more intense office/industrial park development that would be accommodated under this alternative would have somewhat greater impacts upon local drainage infrastructure, solid waste generation, water and utility consumption as well as a greater potential to adversely affect residences immediately south of the site in terms of aesthetics and nighttime lighting. Because

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trip generation associated with this alternative would be nearly identical to the proposed project, traffic, air quality, and noise impacts would be similar. Overall, the environmental impact of this alternative would be similar to the proposed project.

Alternative 4 - Reduced Intensity

This alternative would reduce the development intensity of the proposed project. The types of on-site uses (retail and office/industrial park development) would be the same as those of the proposed project. However, overall building area for each project component would be reduced by approximately 25%. Overall on-site development at project buildout would total about 2.2 million square feet, as compared to the nearly 3 million square feet that would be developed under the proposed project.

The impacts of the alternative would generally be less than the proposed project due entirely to the reduced size of the alternative. Significant traffic impacts would occur under the alternative, although traffic impacts would generally be lower than those of the proposed project. Overall, this alternative would be environmentally superior to the proposed project.

Alternative 5 - Golf Course

Area 1 development under this alternative would be identical to that of the proposed project. However, in place of the 2.4 million square feet of office/industrial park development in Area 2, a 130.2-acre, 18-hole golf course would be constructed.

This alternative would be allowed by right under existing zoning but would not fulfill the General Plan Framework policy objectives for areas designated as Regional Centers. Traffic and traffic-related air quality and noise impacts would be lower under this alternative, as would impacts to local drainage infrastructure, public services, and utilities.

Alternative 6 - Large Parcelization

Under this alternative, the entire 170.2-acre site would be developed with office/ industrial park uses. However, instead of being developed as a coordinated office/industrial park, this alternative would consist of a series of large parcels designed to accommodate a limited number of individual users. Overall office/industrial park development at buildout would be just over 3.7 million square feet of building area.

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This alternative would generate about 31 percent fewer vehicle trips than the proposed project. The impacts of this alternative with respect to traffic, noise, and air emissions would therefore be lower. However, the potential for internal land use compatibility conflicts would be greater while the aesthetic benefits associated with redevelopment of the site would be fewer than under the proposed project. Overall impacts would be similar to those of the proposed project.

Environmentally Superior Alternative

The No Project, Reduced Intensity and Golf Course alternatives would have generally lower impacts than the proposed project for most environmental issue areas. The Reduced Intensity alternative is considered the overall environmentally superior alternative. However, these alternatives do not meet all of the objectives of the project as proposed.

The Master Planned Block Development alternative would have less impacts than the combined impacts of the individual projects on the project site and adjacent former International Light Metals site. The impacts of this alternative with respect to physical resources such as earth and water would be similar to those of the combined individual projects. However, the coordinated development that would occur under this alternative would be expected to reduce impacts related to land use, traffic, public services, utilities, noise, and air quality. However, the Master Planned Block Development alternative may not be feasible because it would require the cooperation of the adjacent property owner. The City has no authority to compel such cooperation.

F. SUMMARY OF PROJECT IMPACTS

The impacts of the proposed project are summarized in Table 1, beginning on page 8.

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Table 1
SUMMARY CHART

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
A. EARTH		
An estimated 473,300 cubic yards of earth would be graded during project construction, 421,100 cubic yards of which would be imported fill material. The depth of excavation would be less than the depth to groundwater, which lies 80-90 feet below the surface level. In addition, no distinct or prominent geologic features would be affected by on-site grading and on-site grading would be conducted in accordance with applicable regulations to minimize erosion. Therefore, grading and erosion impacts are considered less than significant.	1. All grading shall be performed in accordance with the current City of Los Angeles Building Code and the requirements of the responsible agencies including, but not limited to, the Department of Building and Safety and the Bureau of Engineering. 2. No on-site grading or import or export of earth materials to the project site shall commence or be performed without first obtaining a permit from the Los Angeles Department of Building and Safety. In accordance with Section B-164 of the Building and Safety Code, the following shall be conducted prior to issuance of a grading permit: (1) grading plans and specifications meeting all Department of Building and Safety requirements shall be prepared; and (2) evidence shall be provided that adjacent property owners have received a 30-day written notice of any pending excavation work to a depth deeper than the foundation of adjoining buildings and located closer to the property line than the depth of excavation. 3. Grading and excavation operations shall be conducted under the observation of a registered soils engineer or geologist. Grading plans for the site shall conform to the General Specifications for all Grading Plans promulgated by the City of Los Angeles Department of Building and Safety.	None.

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	4. Vegetation and demolition debris shall be removed and hauled from the site prior to the start of grading operations.	
	5. Any existing low density soils and/or saturated soils shall be removed under the inspection of the soils engineer/geologist. After the exposed surface has been cleansed of debris and/or vegetation, it shall be scarified until it is uniform in consistency, brought to the proper moisture content and compacted to a minimum of 90 percent relative compaction.	
	6. Overexcavation shall extend a minimum of five horizontal feet beyond all sides of the foundations or a distance equal to the depth of compacted fill placed, whichever is greater.	
	7. Any underground structures or utility lines encountered during grading shall be either removed or properly abandoned prior to the start of construction.	
	8. Any imported fill material shall be low to moderate in expansion potential, preferably granular or similar to the upper soils encountered at the project site.	
	9. Any imported fill material shall be approved by the project soils engineer/geologist.	
	10. Approved fill soils shall be placed in layers not in excess of six inches in thickness.	

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	11. Each lift shall be uniform in thickness and thoroughly blended, compacted to a minimum of 90 percent relative compaction, and approved by the soils engineer/geologist prior to the placement of the next layer of soil.	
	12. Fill soils shall be brought to within 15 percent of the optimum moisture content, unless otherwise specified by the soils engineer/geologist.	
	13. Compaction tests shall be conducted at a minimum of one test for every 500 cubic yards placed and/or for every two feet of compacted fill placed.	
	14. Final grade of structural areas shall be in a dense and smooth condition prior to placement of slabs-on-grade or pavement areas.	
	15. Minimum relative compaction shall be obtained in accordance with accepted methods in the construction industry.	
	16. No fill soils shall be placed, spread or compacted during unfavorable weather conditions.	
	17. When grading is interrupted by heavy rains, compaction operations shall not be resumed until approved by the soils engineer/geologist.	
	18. Adequate lateral support shall be provided for all adjacent improvements and structures at all times during grading operations and throughout the construction phase.	

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CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

SUMMARY SHEET

(Article IV — City CEQA Guidelines)

POSSIBLE IMPACTS (Check where a Yes is appropriate)

A—Significant Adverse Impact; B—Mitigation Measures Available; C—Unavoidable Significant Adverse Impact	A	B	C
1. EARTH			
a. Change in topography or ground surface relief features?			
b. Increase in wind or water erosion?		X	
c. Unstable or hazardous geologic or oil conditions?		X	
2. AIR			
a. Increased mobile or stationary air emissions or air quality?	X	X	X
b. Creation of objectionable odors?			
3. WATER			
a. Change in absorption rates, drainage patterns, or surface runoff?	X	X	
b. Alteration to direction of any water course?			
c. Reduction in amount of water available for public water supplies?			
d. Exposure to flood hazards?			
4. PLANT LIFE			
a. Reduction of the numbers of any unique or endangered species of plants?			
b. Reduction of existing mature trees?		X	
c. Change in diversity of species?			
5. ANIMAL LIFE			
a. Reduction of the numbers of any unique or endangered species of animals?			
b. Introduction or increase of any new animals?			
c. Impact on any existing animal habitat?			
6. NOISE			
a. Increase in existing noise levels?	X	X	
b. Exposure of people to noise levels?	X	X	
7. LIGHT Will proposal produce light or glare?			
8. LAND USE Alteration of the present or planned land use of the area?			
9. NATURAL RESOURCES*			
a. Increase in consumption of any natural resource?			
b. Depletion of any non-renewable natural resource?			
10. POPULATION* Any increase or alteration of the distribution, density of growth rate of the population?			
11. HOUSING* Any increase in the demand for housing or reduction in existing housing?			
12. TRANSPORTATION/CIRCULATION			
a. Increase in traffic volume or change in circulation patterns?	X	X	X
b. Increase in parking demand (not met by on-site parking provided by the project)?			
c. Increased hazards to vehicles, bicyclists or pedestrians?			
d. Impact on existing transportation systems?	X	X	X
13. PUBLIC SERVICES			
a. Increase in demand for fire, police or other governmental services?	X	X	
b. Impact on school or recreational services?			
c. Increase in maintenance of public facilities including roads?			
14. ENERGY			
a. Use of additional amounts of fuel or energy?		X	
b. Increase in demand upon existing sources of energy or required development of new sources of energy?		X	
15. UTILITIES			
a. Demand on water, gas, power or communication systems?		X	
b. Impact on sewer or solid waste disposal?	X	X	X
c. Impact on storm water drainage?	X	X	
16. SAFETY			
a. Creation of any health hazard?		X	
b. Potential risk of explosion or release of chemicals or radiation in event of accident?			
17. AESTHETICS Will this project result in a diminishment or obstruction of a publicly available scenic vista, or in the creation of an offensive site visible to the public?		X	
18. CULTURAL RESOURCES* Will this project impact or alter any archaeological, paleontological or historical site, structure, or object?			
OTHER			

Form Gen. 149 2-81 Appendix B

*Determined not significant by the Initial Study.

APPENDIX B

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	19. The project structural engineer shall review all proposed loads to be imposed for further recommendations regarding slab thickness and steel reinforcement.	
	20. All retaining walls shall include a backfill zone of non-expansive material, consisting of a wedge beginning a minimum of one horizontal foot from the base of the retaining wall and extending upward at an inclination no less than 3/4 to 1 (horizontal to vertical).	
	21. All retaining walls shall be waterproofed and protected from hydrostatic pressure by a reliable permanent subdrain system.	
	22. All concrete slabs-on-grade shall be a minimum of five inches in thickness, reinforced a minimum of No. 4 bars eighteen inches in each direction, and positioned in the center of the slab.	
	23. Any concrete slabs with moisture sensitive floor coverings shall be underlain by an impervious membrane.	
	24. All concrete slab areas to receive floor coverings shall be moisture tested to meet all manufacturer requirements prior to placement.	
	25. Additional sulfate testing shall be performed at the conclusion of the rough grading operation to determine if special cement is required. If a high sulfate concentration is found, a non-corrosive cement mix such as Type 5 shall be used.	

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
No known active or potentially active faults cross the project site. In addition, the potential for liquefaction at the site is very low because site soils are stiff in nature and because the depth to groundwater is greater than 50 feet. Project development would result in up to 6,170 additional employees and visitors on the site who could be exposed to earthquake hazards. The proposed mitigation measures would reduce the potential risks from seismic hazards to less than significant but would not eliminate them.	26. Design and construction of the proposed project shall include all requirements of the City of Los Angeles Building Code with respect to seismic safety and shall be approved by the City Department of Building and Safety prior to the issuance of building permits. 27. To assist in response to a seismic event, an emergency response and building-specific evacuation plan for project structures shall be developed and posted in each on-site building at the site. Such information shall be disseminated to occupants to reduce the potential for human injury.	None.

Cumulative Impact - Impacts related to geotechnical issues are localized on-site. With adherence to applicable building codes and good engineering practice in all development, no significant cumulative earth impacts would occur.

B. AIR QUALITY

Project construction would generate emissions of fugitive dust (PM10) and nitrogen oxides (NOx) that exceed SCAQMD daily and quarterly significance thresholds. Emissions of other criteria pollutants would not exceed threshold levels. Nevertheless, construction impacts are considered significant.	1. The Applicant shall secure any necessary permits from the SCAQMD, including an approved fugitive dust emissions control plan pursuant to SCAQMD Rule 403, as amended. 2. Non-toxic soil stabilizers shall be applied according to manufacturers' specifications or vegetation shall be planted on all inactive construction areas (previously graded areas inactive for thirty days or more and not scheduled for additional construction activities within twelve months). Permanent landscaping shall be installed upon completion of construction.	Recommended measures would reduce construction emissions to the degree feasible. Nevertheless, construction-related emissions of PM10 and NOx would remain above SCAQMD significance thresholds.

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	3. Areas graded shall be wetted down sufficiently to form a crust on the surface, with repeated soaking as necessary to maintain the crust and to prevent dust from being raised by on-site operations, using water trucks or sprinkler systems. Further, construction areas shall be wetted down in the late morning or after work is completed for the day.	
	4. All grading activities shall cease during second stage smog alerts and periods of high winds (i.e. greater than 25 mph) if dust is being transported to off-site locations and cannot be controlled by watering.	
	5. All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer).	
	6. A construction relations officer shall be established by the Applicant to act as a liaison with neighbors and residents concerning on-site construction activity, including resolution of issues related to PM_{10} generation.	
	7. All construction roads within the project site that have a traffic volume of more than 50 daily trips by construction equipment, or 150 total daily trips for all vehicles, shall be surfaced with base material or decomposed granite.	
	8. Streets shall be swept at the end of the day if visible soil material has been carried onto adjacent public paved roads (reclaimed water shall be used if available.)	

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	9. Construction equipment shall be inspected prior to leaving the site and loose dirt shall be washed off with wheel washers as necessary.	
	10. Water or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to preclude off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces.	
	11. Traffic speeds on all unpaved roads shall not exceed 15 mph.	
The combined mobile and stationary source emissions associated with operation of the proposed project would exceed SCAQMD operational thresholds for NOx, carbon monoxide (CO), and reactive organic gases (ROG). The proposed project's operational impacts are therefore considered significant.	12. The Applicant or future owners of property within the project subdivision shall provide public education regarding the importance of reducing vehicle miles traveled and the related air quality impacts through the use of brochures, classes, and other informational tools.	Recommended measures would reduce operational emissions to the degree feasible. Nevertheless, operational emissions of NOx, CO, and ROG would remain above SCAQMD significance thresholds.
	13. On-site office/industrial park development shall provide preferential parking for high occupancy vehicles and alternative fuel vehicles, as well as other forms of parking management that would encourage higher vehicle occupancy rates.	
	14. Project occupants shall comply with SCAQMD Rule 2202, which applies to any employers who employs 100 or more employees on a full or part-time basis at a worksite. This rule, which aims to reduce volatile organic compounds (VOCs), No_x, and CO, provides employers a menu of options that they can choose from to implement and meet the emission reduction target for their worksite.	

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	15. The Applicant or future owners within the project subdivision shall, as feasible, schedule deliveries during off-peak periods in order to encourage the reduction of trips during the most congested periods.	
The increase in vehicle trips to and from the site associated with the proposed project would increase concentrations of carbon monoxide along area roadways, particularly at heavily congested intersections. However, the increase in CO levels associated with the proposed project would be less than the SCAQMD significance threshold level. Local area impacts are therefore considered less than significant.	None required.	None.
The proposed project is consistent with growth projections contained in the 1994 AQMP, as well as with SCAQMD, SCAG, and City of Los Angeles policies related to land use and air quality.	None required.	None.

Cumulative Impact - The proposed project is consistent with the growth projections upon which the 1994 AQMP is based. It would also serve to implement a number of SCAQMD and SCAG policies designed to reduce vehicle miles traveled and improve regional air quality. Nevertheless, air pollutant emissions related to cumulative development would contribute to the high pollutant levels projected for the region.

BOE-C6-0115152

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
C. SURFACE WATER		
Although the proposed project is not anticipated to increase the rate or amount of stormwater flows from the site, the on-site storm drain system would be upgraded in conjunction with project buildout to address existing deficiencies. Localized flooding could occur on-site under severe weather conditions (i.e., 50-year storm); however, on-site or off-site retention would be designed to avoid damage to any on and off-site structures. Therefore, no significant impacts are anticipated.	1. The Applicant shall prepare detailed flood control plans for the City of Los Angeles Department of Public Works and Los Angeles County Flood Control District, including hydrology/hydraulic calculations and drainage improvement plans, showing quantitatively how projected stormwater runoff would be adequately conveyed to off-site storm drain facilities. Such plans shall be approved by the City and LACFCD prior to issuance of building permits. 2. All major and minor drainage infrastructure shall be designed and constructed per applicable design standards. All designs shall be submitted to the City of Los Angeles Department of Public Works for review and approval, prior to issuance of building permits. 3. The Applicant shall implement on-site retention that is capable of detaining the difference between runoff from the 50 year storm and discharge of 1.0 cfs per acre.	None.
On-site construction could adversely affect surface water quality through the following: (1) discharges related to the storage, handling, use, and disposal of chemicals; and (2) increased sediment transport due to erosion. Each of these potentially impacts is considered potentially significant.	In order to avoid piecemeal effects, all lots approved under Tract No. 52172 shall comply with the following mitigation measures (No. 4, 5 and 6) regardless of size:	

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	4. Prior to issuance of grading permits, the Applicant shall file a Notice of Intent with the State Water Resources Control Board and shall develop and implement a Storm Water Pollution Prevention Plan, monitoring program, and reporting plan for the construction period, in accordance with National Pollution Discharge Elimination System general construction permit requirements.	None.
	5. The Applicant shall conduct inspections of the site before and after storm events to determine whether control practices to reduce pollutant loadings identified in the Storm Water Pollution Prevention Plan are adequate and properly implemented.	
	6. Future projects within the office/industrial park component of the proposed project shall comply with the requirements of the NPDES general permit for solid waste discharges. Compliance shall be certified by the Regional Water Quality Control Board prior to issuance of building permits.	

Cumulative Impact - Cumulative development in the site vicinity could add to the current shortfall in drainage capacity, as well as potentially degrading surface water quality in the area. However, the proposed project would not increase the quantity of stormwater runoff, nor would it significantly affect stormwater quality. The project's contribution to cumulative impacts to the local drainage system and to surface water quality is therefore considered less than significant.

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
D. PLANT LIFE		
Project implementation would involve the removal of all landscaped and remnant ruderal areas on-site. However, no sensitive plant or wildlife species or communities inhabit the site. In addition, landscaping associated with the project would greatly exceed the amount of landscaping currently on-site. No significant impacts to plant life are anticipated.	1. All existing on-site trees (32 trees) that would be removed in conjunction with project buildout shall be replaced at a minimum ratio of 1:1. 2. All open areas on-site that are not used for buildings, walkways, and other hardscape shall be landscaped.	None.

Cumulative Impact - The proposed project, together with related projects in the site vicinity, represents the redevelopment of already disturbed lands in a heavily urbanized area. Because such development would not be expected to disturb any sensitive plant communities, no significant cumulative impacts are anticipated.

E. NOISE		
Project construction activity would have the potential to generate noise levels that exceed the 75 dBA level allowed for construction under the City Noise Ordinance. Nearby receptors that may be affected by construction noise include residential properties to the south, nearby commercial and industrial uses, and on-site uses. Construction-related impacts are considered potentially significant.	1. On-site construction activity that generates noise in excess of 75 dBA at a distance of 50 feet shall be limited to between 7:00 A.M. and 6:00 P.M. Monday through Friday and 8:00 A.M. and 6:00 P.M. on Saturdays. 2. All construction equipment shall be in proper operating condition and fitted with standard factory silencing features. 3. Sound blankets shall be used on all construction equipment for which use of sound blankets is technically feasible.	None.

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	4. A construction relations officer shall be established by the applicant to act as a liaison with neighbors and residents concerning on-site construction activity. If noise levels from construction activity are found to exceed 75 dBA at the property line and construction equipment is left stationary and operating for more than one day, a temporary noise barrier shall be erected between the noise source and receptor. 5. Any other noise reduction measures deemed technically feasible by the City of Los Angeles at the time of any specific construction project shall be implemented. 6. During construction, the project shall comply with applicable Sections 112.03 of City Noise Ordinance Nos. 144,331 and 161,574 and subsequent ordinances.	
Project operation would not be expected to include any significant noise-generating activities on-site. A proposed 8-foot sound wall at the southern end of the site would minimize noise impacts to adjacent residences. Noise from adjacent operations (Capitol Metals Company), though audible on-site, would not be expected to significantly affect project operations.	None required.	None.

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
Vehicle movement associated with project operation would increase noise levels along roadways in the site vicinity. However, in no case would the increase in vehicular noise be greater than 0.4 dBA. Such noise level increases would not discernable above ambient noise levels and are considered less than significant. Portions of the site along major roadways (190th Street, Normandie Avenue, Western Avenue) would, however, be exposed to traffic noise exceeding clearly acceptable levels. This is considered a potentially significant impact.	7. In order to ensure a suitable interior noise environment in all on-site uses, appropriate sound attenuation features shall be incorporated into the design of any retail uses proposed within 200 feet of 190th Street, any industrial park uses proposed within 100 feet of either Western Avenue or Normandie Avenue, and any office uses proposed within 400 feet of either Western Avenue or Normandie Avenue. Such features as closed windows and fresh air supply systems or air conditioning will normally suffice. 8. A minimum 8-foot high thematic wall shall be constructed between the southern boundary of Area 2 and adjacent residential properties as individual lots in this area are developed. Graffiti resistant paint shall be utilized on both sides of the wall. 9. Buildings within lots located adjacent to the residential area south of the project site shall be set back a minimum of 25 feet from the southerly property boundary of the project site.	None.

Cumulative Impact - Traffic associated with proposed project and cumulative development in the area would increase noise levels along major roadways in the area. Such increases would represent an adverse cumulative impact. However, because noise level increases would be less than level considered discernable (3 dBA) on all roadways, cumulative impacts are considered less than significant.

BOE-C6-0115157

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
F. LIGHT AND GLARE		
F.1 Light		
Lighting associated with the proposed project would be perceptible from off-site and would increase ambient light levels in the site vicinity. However, lighting would generally be directed inward and would be reduced by minimum landscape parkway requirements for the site. The 45-foot maximum building height in the southwestern portion of the site and proposed 8-foot project theme wall at the southern site boundary would further reduce lighting impacts to adjacent residences. No significant lighting impacts are anticipated.	1. The project applicant shall comply with all applicable exterior lighting limitations of the City of Los Municipal Code. 2. All outdoor lighting shall be shielded and directed downward to the greatest extent possible taking into account the function of the proposed lighting. 3. Mercury-vapor street light fixtures shall not be utilized on any public or private streets included within the project. 4. Mercury-vapor exterior light fixtures shall not be utilized for outdoor lighting, unless substantial evidence supporting the need for mercury-vapor is presented to the Department of Building and Safety. 5. Effective structural and/or vegetative screening shall be provided between sensitive land uses (i.e., the 203rd Street residential area) and all parking lot/ structure lighting or other large area, high-intensity broadcast lighting sources. 6. Exterior lighting shall be designed such that illumination is confined to the project site or confined to areas which do not include sensitive uses.	None.

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	7. Exterior windows shall be tinted or contain a light-reflective film to reduce visible illumination levels from the building. Windows facing residential areas shall be constructed such that they are not allowed to be opened. Developers of future projects within the proposed subdivision shall consult with the Department of Water and Power regarding light-reflective film which would not interfere with energy conservation goals. 8. Within 300 feet of the property lines of adjacent residences on the north side of 203rd Street, on-site building height shall be limited to 45 feet. 9. A minimum 8-foot high thematic wall shall be constructed between the project site and adjacent residential properties to the south. Graffiti resistant paint shall be utilized on both sides of the wall. 10. Buildings shall be set back a minimum of 25 feet from the southerly property line of the project site.	
F.2 Glare		
The use of concrete, metal panels, and limited reflectivity glass in building construction, coupled with landscape setbacks for the entire property, would minimize the potential for glare effects upon adjacent roadways. The potential for nighttime glare effects on adjacent residences would be minimized by the 8-foot them wall proposed for the southern site boundary. No significant glare impacts are anticipated.	None Required.	None.

BOE-C6-0115159

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
Cumulative Impact - The extent of cumulative light and glare impacts cannot be fully determined at this time because project-specific lighting specifications have not been developed for all related projects. Such increases in light and glare would, however, represent incremental additions within the context of a highly urbanized environment. Moreover, all individual projects will be subject to mitigation requirements on a case-by-case basis.		
G. LAND USE		
The proposed project would be allowed under the existing General Plan land use designation (Heavy Industrial) and zoning (M3) for the site. It would also serve to implement several policy objectives of the City's General Plan Framework for areas designated as Regional Centers, as well as SCAG Regional Comprehensive Plan and Guide policies related to encouraging infill development that minimized the need for new infrastructure. No inconsistencies with local or regional land use policy are anticipated.	1. The applicant shall comply with all conditions for the Conditional Use Permit for FAR averaging. 2. The land use on-site shall be limited to that delineated in the chart on page 203 of the Land Use Section (355,000 square feet of retail; 65,000 square feet of theater (4,000 seats); 30,000 square feet of restaurant; 507,000 square feet of office; 2,010,700 square feet of industrial park) and this limitation shall be recorded in a covenant and agreement and Development Agreement, if any.	None.
The proposed project components would be internally compatible and would generally be compatible with the mix of uses in the site vicinity. The addition of retail and office/industrial park uses would be consistent with ongoing land use trends in the area. Although on-site development could create compatibility conflicts with adjacent residences, such conflicts would be minimized through various design features, in combination with measures to mitigate impacts related to localized air quality, noise, light and glare, human health, and aesthetics. No significant compatibility conflicts are anticipated.	3. The applicant shall implement all mitigation measures as defined in Sections IV.A, Earth, IV.E, Noise, IV.F, Light and Glare, IV.H, Transportation/ Circulation, and IV.L, Hazardous Materials.	None.

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
Cumulative Impact - The proposed project would contribute to an ongoing trend in the area away from industrial development and toward retail, office, and industrial park uses. By and large, this shift would not create any significant compatibility conflicts and may, in some instances, create land use patterns more compatible with nearby residential uses. Any compatibility conflicts associated with individual projects would be addressed on a case-by-case basis. No significant cumulative land use impacts are anticipated.		
H. TRANSPORTATION/CIRCULATION		
Project operation would result in significant traffic impacts at 30 of 41 study intersections during the morning and/or evening peak hours. It would also incrementally add to congested conditions on area freeways, resulting in significant impacts at up to 3 freeway locations.	1. Compliance with Ordinance No. 168,700 (Transportation Demand Management and Trip Reduction Measures). This ordinance focuses on incorporating TDM facilities into the design of new buildings to promote alternative modes of transportation (see Appendix F). It should be followed in the design and construction of the project site and buildings. 2. Compliance with SCAQMD Rule 2202. The South Coast Air Quality Management District (SCAQMD) has adopted a rule designed to reduce the air pollution impacts of commute trips. This rule, unlike the rules it replaces, does not mandate trip reduction programs but allows individual employers to select from a variety of options. Most employers have, however, continued to select ridesharing programs as the most cost-effective method of reducing air quality impacts. If site employers implement these trip reduction measures, 15 percent or more of the peak hour traffic generation from the office/industrial park component of the project could be eliminated.	With the recommended mitigation measures, impacts at most locations would be reduced to a less than significant level. However, significant impacts would remain at four intersections (Western Avenue/190th Street and Western Avenue/Torrance Boulevard during A.M. and P.M. peak hours, and Western Avenue/Carson Street and Western Avenue/Pacific Coast Highway during A.M. peak hour only), as well as on area freeways. Cumulative programs, such as transit system improvements, ridesharing requirements, and regional capacity enhancements, would further mitigate, but not eliminate, these impacts.

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	3. Bus Transit Improvements. The applicant should work with the appropriate transit districts (i.e., Gardena Transit, Torrance Transit and MTA) to improve transit service to the site. Further, sidewalks throughout the site should be designed to provide attractive pedestrian routes to and from transit stops.	
	4. Hawthorne Boulevard and 190th Street -- Restripe 190th Street and restrict parking to convert the existing eastbound and westbound right-turn-only lanes to through/right optional lanes. Modify the signal to remove the existing eastbound right-turn phase.	
	5. Crenshaw Boulevard and 190th Street -- Remove median islands, restripe and restrict parking along 190th Street to convert the existing eastbound and westbound right-turn-only lanes to through/right optional lanes.	
	6. Crenshaw Boulevard and Del Amo Boulevard-- Restripe Del Amo Boulevard and modify the traffic signal to provide two left-turn-only lanes, a through/ left optional lane and a right-turn-only lane in the westbound direction.	
	7. Western Avenue and Artesia Boulevard-- Restripe Western Avenue and restrict parking to convert the existing northbound and southbound right-turn-only lanes to through/right optional lanes.	

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	8. Western Avenue and San Diego Freeway Northbound On/Off- Ramps -- Widen and restripe the off-ramp to from two lanes to three lanes to provide two left-turn lanes and a right-turn lane satisfactory to LADOT, Caltrans and the City of Torrance.	
	9. San Diego Freeway Southbound On/Off-Ramps and 190th Street -- Flare the west leg of the intersection, restripe 190th Street, restrict parking and modify the signal to provide dual left-turn lanes in the eastbound direction.	
	10. Western Avenue and 190th Street -- Any mitigation would require a reduction below 11 foot interior lane widths on a high speed state facility and/or acquisition of right-of-way. Therefore, no feasible mitigation is available.	
	11. Western Avenue and 195th Street -- The Applicant shall fund the installation of the Automated Traffic Surveillance and Control (ATSAC) System at this location satisfactory to LADOT.	
	12. Western Avenue and Del Amo Boulevard -- Restripe the eastbound approach for dual left-turn lanes and modify the signal to provide east-west opposed phasing, satisfactory to LADOT, Caltrans and the City of Torrance. The proposed mitigation should also include removal of the north crosswalk. The applicant shall also fund ATSAC installation at this location. This mitigation measure shall be implemented satisfactory to LADOT.	

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	13. Western Avenue and Torrance Boulevard -- Any mitigation would require removal of parking, narrowing of the median containing the railroad tracks or acquisition of additional right-of-way, none of which is considered feasible. Therefore, no feasible mitigation is available.	
	14. Western Avenue and Carson Street -- Mitigation of this impact would require removal of parking on ,Carson Street, for which there is a heavy demand. Therefore, no feasible mitigation is available.	
	15. Western Avenue and Sepulveda Boulevard -- Prohibit parking to add northbound and southbound right-turn lanes satisfactory to LADOT, Caltrans and the City of Torrance. The mitigation shall not include modification of the median islands on Western Avenue. The northbound right-turn lane can be installed utilizing existing red curb along the frontage of a mini-shopping center.	
	16. Western Avenue and Pacific Coast Highway -- Installation of mitigation would require interior lane width of less than 11 feet on a high speed state facility or an offsetting of lanes across the intersection. Therefore, no feasible mitigation is available.	

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	17. Project Roadway and 190th Street -- Remove the existing traffic signal on 190th Street and the McDonnell Douglas driveway approximately 1,300 feet west of Normandie Avenue and construct a new driveway and traffic signal at this location to serve the major north-south internal road, satisfactory to LADOT. Mitigation shall also include restriping 190th Street for three through lanes in both directions and a left-turn lane in the westbound direction.	
	18. Normandie Avenue and Artesia Boulevard -- Provide dual left-turn lanes in the southbound direction by restriping Normandie Avenue and modifying the signal.	
	19. Normandie Avenue and San Diego Freeway Northbound On/Off-Ramps -- Widen and restripe the northbound approach to provide two through lanes and an exclusive right-turn-only lane to facilitate freeway access. Fund ATSAC installation at this location.	

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	20. San Diego Freeway Southbound Off-Ramp/Project Driveway and 190th Street -- Flare and restripe 190th Street to provide three travel lanes and dual left-turn lanes in the westbound direction and three travel lanes and a "pre-left-turn lane" for Normandie Avenue in the eastbound direction. Construct the project driveway to provide dual left-turn lanes and a right-turn-only lane in the northbound direction. Install a signal with opposed northbound and southbound phasing. Fund ATSAC installation at this location. If a review of operations shows interference with operation of the signal at 190th Street and Normandie Avenue, LADOT shall restrict turn movements into and/or out of the project driveway.	

BOE-C6-0115166

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	21. Normandie Avenue and 190th Street -- Relocate the railroad gates and remove the raised median island from the west leg of 190th Street, subject to approval by the California Public Utilities Commission (PUC). Without PUC approval there is insufficient roadway width to restripe 190th Street for dual left-turn lanes and three through lanes in both directions. Modify the signal to provide east-west left-turn signal phasing with a southbound right-turn overlap phase and fund the installation of ATSAC at this location. Install east-west left-turn signal phasing contingent on PUC approval to relocate the railroad gates so that 190th Street can be restriped for dual left-turn lanes and three through lanes in each direction. Install a southbound right-turn overlap signal and provide ATSAC funding at this location. This intersection is also under the jurisdiction of the Los Angeles County Department of Public Works.	
	22. Normandie Avenue and Project Roadway/Francisco Street -- Construct the project roadway and restripe the eastbound approach, for a left-turn lane, a through/left lane and a right-turn lane and modify the signal to provide opposed east-west phasing satisfactory to LADOT and the Los Angeles County Department of Public Works.	
	23. Normandie Avenue and Torrance Boulevard -- Fund the installation of ATSAC at this intersection satisfactory to LADOT. The South Bay Phase II ATSAC system is proposed for this location.	

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	24. Normandie Avenue and Carson Street -- Fund the installation of ATSAC at this intersection satisfactory to LADOT. The South Bay Phase II ATSAC system is proposed for this location.	
	25. Vermont Avenue and Artesia Boulevard -- Widen and restripe the northbound approach to Vermont Avenue for dual left-turn lanes. The additional left-turn lane can be installed within the existing 80 foot roadway width without any additional widening on Vermont Avenue. Provide a northbound right-turn phase overlapping the existing westbound left-turn phase. Install a northbound right-turn lane. This mitigation measure shall be implemented satisfactory to LADOT, Caltrans and the City of Gardena.	
	26. Vermont Avenue and 190th Street -- Restripe 190th Street to provide three lanes in each direction and fund the installation of ATSAC at this intersection, satisfactory to LADOT.	
	27. Vermont Avenue and Torrance Boulevard -- Restrict parking and restripe Vermont Avenue to provide a right-turn-only lane in the northbound and southbound directions, satisfactory to the Los Angeles County Department of Public Works.	
	28. Vermont Avenue and Carson Street -- Restrict parking and restripe Vermont Avenue to convert the existing eastbound right-turn-only lane into a through/right optional lane, satisfactory to the Los Angeles County Department of Public Works.	

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	29. Harbor Freeway Southbound Off-Ramp and 190th Street -- Restripe 190th Street to provide three travel lanes in the westbound directions, satisfactory to LADOT. Modify the signal to provide a southbound right-turn phase extension concurrent with the initiation of the eastbound through phase, satisfactory to LADOT and Caltrans. Fund the installation of ATSAC at this intersection.	
	30. Harbor Freeway Northbound On-Ramp and 190th Street -- Install a traffic signal at this location. Modify the median island, prohibit parking on the south side of 190th Street and restripe 190th Street to provide dual eastbound left-turn lanes, including an HOV lane in the inside left-turn lane and two through lanes, satisfactory to LADOT and Caltrans. The on-ramp shall be striped for two lanes and the inside lane on the on-ramp shall be designated as an HOV lane.	
	31. Figueroa Street and 190th Street -- Prohibit parking and add a right-turn lane on the southbound approach of Figueroa Street, satisfactory to LADOT and the City of Carson.	
	32. Hamilton Avenue and Torrance Boulevard -- Restripe Hamilton Avenue to provide a left/right optional lane and a right-turn-only lane.	

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	33. Figueroa Street and Torrance Boulevard -- Remove the sidewalk along the south curb, restrict parking and restripe Torrance Boulevard to provide a left-turn-only lane, a through/left optional lane, and through/right optional lane in the eastbound direction. Modify the signal to provide opposed east-west phasing.	
	34. Harbor Freeway Southbound On-Ramps and Carson Street -- Restripe Carson Street to provide a right-turn-only lane in the eastbound direction.	
	35. Crossing gates and signals will be installed or upgraded, as appropriate, at the two proposed new retail center driveways off of Normandie Avenue that cross the Southern Pacific Railroad tracks in accordance with State of California Public Utilities Commission standards.	
	36. The design of all internal roadways on the project site, off-site roadway improvements, sidewalks and associated improvements will be subject to the approval of the City of Los Angeles Bureau of Engineering.	
	37. A detailed site plan for the retail center shall be submitted to LADOT for approval, indicating the number of parking spaces to be provided and shared.	

Cumulative Impact - The analysis of project traffic impacts considers the effects of both background growth in the region and the related projects. Consequently, cumulative impacts are equivalent to those of the proposed project. After implementation of the recommended mitigation measures, the project, in combination with cumulative development, would contribute to significant impacts at four study intersections and on area freeways.

BOE-C6-0115170

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
I. PUBLIC SERVICES		
I.1 Fire Protection		
Although both project construction and project operation may cause minor delays in emergency response due to increased traffic in the site vicinity, neither would significantly affect Los Angeles Fire Department response times in the area. Access to the project site would be enhanced by the proposed project. The distance to the nearest fire station exceeds that maximum allowed under the City Fire Code; however, installation of fire sprinklers and other supplemental fire protection devices specified by the Fire Chief would compensate for this exceedance. Impacts are therefore considered adverse, but less than significant.	1. On-site development at the Harbor Gateway Center shall comply with all applicable State and local codes and ordinances, and guidelines found in the Fire Protection and Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles. 2. Definitive plans and specifications shall be submitted to the Los Angeles Fire Department and requirements for necessary permits shall be satisfied prior to commencement of any portion of the proposed project. 3. In order to mitigate the inadequacy of fire protection in travel distance, sprinkler systems shall be required throughout any structure to be built, in accordance with the Los Angeles Municipal Code, Section 57.09.07. 4. The applicant shall submit plans that show the access road and the turning area for Fire Department approval. 5. On-site development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan D-22549.	

BOE-C6-0115171

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	6. Standard cut-corners will be used on all turns.	
	7. During demolition, the Fire Department access will remain clear and unobstructed.	
	8. The width of private roadways for general access use and fire lanes shall not be less than 20 feet clear to the sky.	
	9. Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.	
	10. Where access for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface of the roadway.	
	11. No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.	
	12. Adequate off-site public and on-site private fire hydrants may be required. Their number and location are to be determined after the Fire Department's review of the plot plan.	

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	13. The on-site water delivery system shall be improved to the satisfaction of the Fire Department prior to occupancy.	
	14. All first-story portions of any commercial building shall be within 300 feet of an approved fire hydrant.	
	15. Fire lanes and dead-ending streets shall terminate in a cul-de-sac or other approved turning area. No dead-ending street or fire lane shall be greater than 700 feet in length without a secondary access being provided.	
	16. All access roads, including fire lanes, shall be maintained in an unobstructed manner. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.	

BOE-C6-0115173

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
I.2 Police Protection		
The proposed project may generate demand for additional police officers in order to maintain existing levels of service. Although project construction and operation may result in minor delays in emergency response due to increased traffic in the site vicinity, neither is expected to significantly affect response times. Although the impacts are not considered significant, impacts to police protection service are therefore considered adverse and are not eliminated.	1. Plot plans for all proposed commercial, office, and industrial development shall be submitted to the Los Angeles Police Department's Crime Prevention section for review and comment. Security features subsequently recommended by the LAPD, possibly including the provision of on-site security, shall be implemented to the extent feasible. 2. Building plans shall be filed with the LAPD Harbor Area Commanding Officer. Plans shall include access routes, building numbers, and any additional information that might facilitate prompt and efficient police response. Project developers within the project subdivision shall also consult with the LAPD with respect to other on-site security measures which will minimize demand for LAPD services. 3. Parking areas, entryways, lobbies, and elevators shall be well illuminated and designed with minimum dead space to eliminate areas of concealment. 4. Alarms and/or locked gates shall be installed on doorways providing public access. 5. Landscaping shall not be planted in a way that could provide cover for persons tampering with doors or windows. 6. Additional lighting shall be installed where appropriate.	None.

BOE-C6-0115174

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
Cumulative Impact - Cumulative development in the site vicinity and throughout the City could result in the need for increased staffing and equipment at the City Fire Police Departments. Cumulative impacts are therefore considered potentially significant. However, because the implementation of cumulative development projects would increase City revenues through sales taxes and increased property values, they would provide means to fund any necessary improvements in service. Cumulative impacts to both fire and police protection service are therefore considered less than significant.		
J. ENERGY CONSERVATION		
J.1 Electric Power		
Full occupancy of the Harbor Gateway Center would increase on-site electricity consumption by about 21 million kilowatt hours per year. The Halldale receiving station has sufficient capacity to meet this increase in demand, while connections to existing distribution lines, with the exception of the 203rd Street line, could be established. Because adequate infrastructure would be provided, no significant impacts are anticipated.	1. The proposed project shall adhere to all applicable Los Angeles Department of Water and Power (DWP) rules and regulations. All necessary infrastructure improvements shall be constructed to meet the requirements of the DWP.	None.
	2. Should SCE supply the site at buildout, the proposed project shall adhere to all applicable SCE rules and regulations. SCE shall take the necessary measures to ensure CPUC approval and CEQA compliance, for construction of any new facilities over 50 kV. It is the intent of this EIR to provide compliance with the public notice provision of CPUC General Order 131D for these facilities.	
	3. The proposed project shall comply with and implement all energy conservation measures required by Title 24 of the California Administrative Code, and, whenever feasible, exceed them.	

BOE-C6-0115175

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	4. Built-in appliances, refrigerators, and space-conditioning equipment should exceed the minimum efficiency levels mandated in the California Code of Regulations. 5. Install high-efficiency air conditioning controlled by a computerized energy-management system in the office and retail spaces which provides the following: - A variable air-volume system which results in minimum energy consumption and avoid hot water energy consumption for terminal reheat; - A 100 percent outdoor air-economizer cycle to obtain free cooling in appropriate climate zones during dry climatic periods; - Sequentially staged operation of air-conditioning equipment in accordance with building demands; and - The isolation of air-conditioning to any selected floor or floors. - Consider the applicability of the use of thermal energy storage to handle cooling loads. 6. Cascade ventilation air from high-priority areas before being exhausted, thereby, decreasing the volume of ventilation air required. For example, air could be cascaded from occupied space to corridors and then to mechanical spaces before being exhausted.	

BOE-C6-0115176

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	7. Recycle lighting-system heat for space heating during cool weather. Exhaust lighting-system heat from the buildings, via ceiling plenums, to reduce cooling loads in warm weather.	
	8. Install low and medium static-pressure terminal units and ductwork to reduce energy consumption by air-distribution systems.	
	9. Ensure that buildings are well-sealed to prevent outside air from infiltrating and increasing interior space-conditioning loads. Where applicable, design building entrances with vestibules to restrict infiltration of unconditioned air and exhausting of conditioned air.	
	10. A performance check of the installed space-conditioning system should be completed by the developer/installer prior to issuance of the certificate of occupancy to ensure that energy-efficiency measures incorporated into the project operate as designed.	
	11. Finish exterior walls with light-colored materials and high-emissivity characteristics to reduce cooling loads. Finish interior walls with light-colored materials to reflect more light and, thus, increase lighting efficiency.	
	12. Install thermal insulation in walls and ceilings which exceeds requirements established by the California Code of Regulations.	

BOE-C6-0115177

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	13. Design window systems to reduce thermal gain and loss, thus, reducing cooling loads during warm weather and heating loads during cool weather.	
	14. Install heat-reflective draperies on appropriate exposures.	
	15. Install fluorescent and high-intensity-discharge (HID) lamps, which give the highest light output per watt of electricity consumed, wherever possible including all street and parking lot lighting to reduce electricity consumption.	
	16. Install occupant-controlled light switches and thermostats to permit individual adjustment of lighting, heating, and cooling to avoid unnecessary energy consumption.	
	17. Install time-controlled interior and exterior public area lighting limited to that necessary for safety and security.	
	18. Control mechanical systems (HVAC and lighting) in the building with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied space.	
	19. Incorporate windowless walls or passive solar inset of windows into the project for appropriate exposures.	
	20. Design project to focus pedestrian activity within sheltered outdoor areas.	

BOE-C6-0115178

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
J.2 Natural Gas		
At buildout, the Harbor Gateway Center is estimated to consume 76.1 million cubic feet (mcf) of natural gas per year, a net increase of 62.8 mcf as compared to existing on-site conditions. The Southern California Gas Company's 6-inch main line in Normandie Avenue has sufficient capacity to accommodate on-site energy needs. Therefore, no significant impacts to natural gas service are anticipated.	1. The proposed project shall adhere to all applicable Southern California Gas Company (SCGC) rules and regulations. All necessary infrastructure improvements shall be constructed to meet the requirements of the SCGC. 2. The proposed project shall comply with and implement all energy conservation measures required by Title 24 of the California Administrative Code, and, whenever feasible, exceed them.	None.
J.3 Construction		None.
Project construction would consume an estimated 2.79 quadrillion BTUs of energy. It would not, however, use energy in a wasteful manner or adversely affect energy supplies.	None required.	

Cumulative Impact - Cumulative development would result in both short-term and long-term consumption of electricity, natural gas, and other energy resources. However, no significant cumulative impacts to energy resources or energy conveyance infrastructure would occur.

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
K. UTILITIES		
K.1 Communications		
By filed tariff, rule, or custom, it is the responsibility of the telephone service company to provide adequate service capacity; therefore, local service providers (Pacific Bell or others are expected to meet the needs of the proposed project. Continental Cablevision may provide broadband communications and video service to the site, although other companies have expressed interest in doing so. No significant impacts to either telephone or non-telephone communication services are anticipated.	1. The proposed project shall adhere to all applicable rules and regulations of the telecommunications service provider and the serving cable television company. All necessary infrastructure improvements shall be constructed to meet the requirements of Pacific Bell and the serving cable television company.	None.
K.2 Water		
Full occupancy of the proposed project would consume an estimated 269.4 million gallons of water per year, which represents an annual increase in on-site demand of 263.4 million gallons. Most of the project site would be served by the LADWP, although a portion of Area 2 would be served by the Dominguez Water Company (DWC). With infrastructure improvements proposed in conjunction with project buildout, the DWP and the DWC would be able to supply both domestic and fire water to the site. Therefore, impacts are considered less than significant.	1. The proposed project users and occupants shall adhere to all applicable Los Angeles Department of Water and Power (DWP) and Dominguez Water Company rules and regulations. All necessary infrastructure improvements shall be constructed to meet the requirements of the DWP and the Dominguez Water Company. 2. Proposed projects shall comply with all applicable sections of the City of Los Angeles Water Conservation Ordinance (Ordinance No. 166,080). Specifically, no hose washing of roadways, paved parking areas, and walkways shall be allowed.	None.

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	3. The proposed project shall comply with the City's Water Conservation Regulations defined in Ordinance No. 165,004, including installation of low-flow toilets and plumbing fixtures that prevent water loss. Also, plants selected for landscaping shall comply with xeriscape (low maintenance, drought-resistant) requirements. 4. Users shall be responsible for obtaining any required Industrial Wastewater Discharge permits required by Sanitation Districts of Los Angeles County (SDLAC). 5. The project shall comply with the provisions contained in City Landscape Ordinance No. 170,978, including water conservation measures for landscaping. The following Mitigation Measures Nos. 6 to 11 are recommended by the DWP to minimize on-site water consumption: 6. Automatic sprinklers should be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. However, care must be taken to reset sprinklers to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation. 7. Reclaimed water should be investigated as a source to irrigate large landscaped areas.	

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	8. Selection of drought-tolerant, low water consuming plant varieties should be used to reduce irrigation water consumption. For a list of these plant varieties, refer to Sunset Magazine, October 1976, "Good Looking - Unthirsty," pp. 78-85, or consult a landscape architect. 9. Recirculating hot water systems can reduce water waste in long piping systems where water must be run for considerable periods before hot water is received at the outlet. 10. Lower-volume water closets and water-saving shower heads must be installed in new construction and when remodeling. 11. Plumbing fixtures should be selected which reduce potential water loss from leakage due to excessive wear of washers.	
K.3 Sewer		
At project buildout, on-site wastewater generation is estimated to be 244.6 million gallons per year, an increase of 239.1 million gallons per year over existing on-site conditions. This would incrementally add to the sewage generated by development in the project area and create additional impact to the existing wastewater treatment plant. On-site sewer system improvements proposed in conjunction with project buildout would enable the system to adequately handle wastewater flows from the site. Thus, project implementation is not expected to significantly impact sewer service.	1. Individual projects proposed as part of the Harbor Gateway Center shall apply for all required Sanitation Districts of Los Angeles County (SDLAC) permits, including Industrial Wastewater Discharge Permits. 2. All necessary infrastructure improvements shall be constructed to meet the requirements of the SDLAC.	None.

BOE-C6-0115182

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	3. The proposed project shall comply with all provisions of Ordinance No. 162,532, which reduces water consumption levels, thereby restricting wastewater flows. Water saving devices to be installed shall include low-flow toilets and plumbing fixtures that prevent water loss.	
K.4 Solid Waste		
Project construction activity would require the one-time hauling an disposal of demolition debris. Project operation would increase annual on-site solid waste generation by an estimated 22,000 tons per year, an amount that represents about 0.5 percent of the waste generated annually in the City of Los Angeles. Impacts are considered significant because of ongoing concerns about available landfill capacity in the Southern California region.	1. Trash compaction facilities shall be provided in all occupied structures, where deemed necessary and feasible. 2. To the extent feasible, one or more of the following yard waste management techniques shall be incorporated into the maintenance of the project: • Planting drought tolerant plants so as to minimize yard waste. • Mulching and grass recycling. • Composting of regular landscape maintenance waste where appropriate.	Although the recommended measures would reduce solid waste generation to the extent feasible, impacts to area landfills would remain significant.

BOE-C6-0115183

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	3. Prior to approval of demolition permits, the project sponsor shall be required to demonstrate how demolition debris will be salvaged and recycled in a manner that is practical, available, and assessable during the demolition phase. The project sponsor shall develop explicit language that clearly sets the requirements for a demolition debris recycling plan. The Integrated Solid Waste Management Office (ISWMO) will provide model specification language for project sponsor's use, which includes a format for developing a Solid Waste and Resources Action Plan.	
	4. Prior to approval of building permits, the project sponsor shall be required to demonstrate how construction debris will be recycled in a manner that is practical, available, and accessible during the construction phase. The project sponsor shall develop explicit language in the contractor proposal that clearly spells out the requirements for implementing a construction debris recycling plan. ISWMO shall provide model specification language for project sponsor's use, which includes a format for developing a Solid Waste and Resources Action Plan.	

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	5. Prior to approval of building permits, the project sponsor shall submit to the ISWMO a statement detailing the use of recycled materials in building materials, furnishing, operations, and maintenance of the project complex including grounds. The project developer shall maximize the employment of recycled content materials though construction and landscaping application that meet all approved local codes. ISWMO shall provide a summary format for the materials usage statement.	

Cumulative Impact - No significant cumulative impacts to communications, water, or sewer systems are anticipated. However, because of the limited capacity of area landfills, any project that generates additional solid waste is considered to contribute to a significant cumulative impact to regional landfill capacity.

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Table 1
SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
L. RISK OF UPSET		
Phase I environmental site assessments have been conducted for the entire project site. In addition, a Phase II assessment has been conducted for most of Area 1. The Phase I assessments identified several areas of interest throughout the site while the Phase II assessment identified four specific areas of concern in Area 1 (Buildings 29, 36, 37, and 44). Commencement of construction activity that results in soil disturbance prior to remediation of on-site soil contamination exceeding regulatory action levels would have the potential to pose health hazards. However, no such construction activity would occur without clearance from the appropriate regulatory agency. Therefore, no significant impacts are anticipated. Implementation of a Remediation Plan for the site would result in a long-term reduction in hazards related to soils and groundwater contamination.	1. Prior to issuance of grading permits, the applicant shall assess, as appropriate, the areas of continued environmental interest identified in the Subsurface Investigation prepared by Kennedy/Jenks Consultants for the area proposed for retail, restaurant, and theater uses (Parcel A in Appendix H of EIR No. 96-0060), and shall implement to the satisfaction of the appropriate regulatory agency any remediation plan that may be required as a result of the data generated by such assessment. 2. A Phase II subsurface investigation shall be conducted for the area proposed for office and industrial park uses (those portions of Parcels B and C in Appendix H of EIR No. 96-0060, for which areas of environmental interest were identified in the June 1996 Phase I Environmental Assessment). The applicant shall fully implement any recommendations for further assessment and/or remediation activity contained in the Phase II investigation, to the satisfaction of the appropriate regulatory agency. 3. No building permits shall be issued for construction of new structures on any portion of the project site in which soil contamination exceeding regulatory action levels exists until contamination on that portion of the project site affected by such activity is remediated to the satisfaction of the appropriate regulatory agency.	None.

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	4. Remediation of groundwater contamination having its source in the vicinity of Building 36 shall be undertaken by the applicant separately from the proposed project in coordination with the appropriate regulatory agency. However, on-site development shall be designed and sited so as not to interfere with future groundwater treatment.	
	5. All underground storage tanks on the project site shall be removed in conformance with State and City of Los Angeles Fire Department regulations.	
A total of 26 on-site buildings have been found to have asbestos containing materials (ACMs). Demolition of these structures without first removing friable ACMs would pose a potentially significant health hazard. However, all demolition activity would be conducted in full compliance with applicable regulations relating to ACMs, thereby reducing impacts to a less than significant level.	6. All contractors involved in demolition and/or renovation activity on the project site will fully comply with the requirements of SCAQMD Rule 1403, pertaining to the removal of ACMs.	None.

Cumulative Impact - Remediation of existing soil or groundwater contamination would generally be required prior to the development of any site. Therefore, cumulative development would reduce health hazards related to soil and groundwater contamination over the long term. Because all demolition activity in the area is subject to SCAQMD Rule 1403, no significant impacts related to the release of asbestos are anticipated.

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II. Project Description

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
M. AESTHETICS		
Proposed development is consistent with applicable General Plan Framework policies regarding regional centers. The replacement of aging industrial facilities and vast parking lots with development to a smaller scale, and landscaped setbacks would also be consistent with the established trend in the area. This would be a beneficial aesthetic impact.	None required.	None.
Proposed Area 1 development includes two 120-foot tall pole-mounted signs. The height of the signs represents a substantial departure from City of Los Angeles sign regulations, which specify a maximum pole sign height of 42 feet. Otherwise, the signs would be compatible with project design standards. If approvals for the signs are granted, the signs would, by definition, be in conformance with sign regulations. Therefore, no significant impact is anticipated.	None required.	None.
Project structures and signs would be visible from various public and private vantages in the site vicinity and may partially block distant views. However, on-site development would not block any unique or valued views or scenic vistas. Impacts to views are therefore considered less than significant.	1. Building height shall not exceed 45 feet within 300 feet of the residential properties south of the project site. 2. A minimum 8-foot wall shall be constructed along the southern property line between the project site and adjacent residential properties on the north side of 203rd Street. Graffiti resistant paint shall be used on both sides of the wall. 3. Buildings shall be set back a minimum of 25 feet from the southern property line adjoining residential properties along 203rd Street.	None.

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Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
Cumulative Impact - The only related project sufficiently close to the project site to contribute to a cumulative visual impact upon the immediate area is the redevelopment of the former International Light Metals site. The shopping center and movie theater proposed for that site would be similar in nature to the proposed project. Cumulatively, the two projects would implement General Plan Framework policies promoting the development of attractive commercial corridors. The cumulative aesthetic impact of the two projects would therefore be beneficial.		

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II. PROJECT DESCRIPTION
A. STATEMENT OF PROJECT OBJECTIVES

The Project Applicant, McDonnell Douglas Realty Company, a wholly owned subsidiary of the McDonnell Douglas Corporation, is seeking entitlement to subdivide and subsequently develop the project site, located at 1414 West 190th Street in the Harbor Gateway community of the City of Los Angeles. The Applicant proposes to divide the project site into 45 lots to be developed in two areas: (1) a retail area containing a total of approximately 450,000 square feet of retail uses, including up to 30,000 square feet of restaurants and a theater complex with up to 4,000 seats; and (2) an office/industrial park containing approximately 2.5 million square feet of new development. The project site is currently used for warehousing and distribution operations, which would continue to be conducted on-site until they can be relocated, either on- or off-site. The site was formerly used by the Douglas Aircraft Company, another wholly-owned subsidiary of the McDonnell Douglas Corporation, for the manufacture of aircraft parts. This manufacturing activity ceased in 1992.

The proposed project would meet the requirements of the existing City of Los Angeles M3-1 zoning. Required discretionary approvals and permits may include:

- Vesting tentative tract map;
- Conditional Use Permits (CUP) for the sale of alcoholic beverages in conjunction with restaurant and retail uses and for Floor Area Ratio (FAR) averaging;
- Development Agreement;
- Significant modification from sign regulations for two signs;
- Variance or other entitlement for shared parking in Area 1;

Required ministerial approvals may include:

- Building permits;
- Any other ministerial actions or approvals required.

Pursuant to the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15124(b)), the objectives for the project are:

- To redevelop the project site, which is owned by the Applicant and consists of approximately 170.2 gross acres, in a manner that would replace underutilized,

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obsolete and inefficient industrial facilities with a mix of economically viable, modern and efficient retail and office/industrial park uses.

- To conform with the existing Harbor Gateway Community Plan and the existing M3-1 Zone.
- To be compatible with both the scale of surrounding structures and the mix of land uses in the site vicinity.
- To provide high-quality retail development that meets community needs for goods and services.
- To create a master planned office/industrial park environment that meets the need for high quality industrial land in the City of Los Angeles, as cited in the Harbor Gateway District Plan and the General Plan Framework as well as the New Economy Project Report dated September 16, 1994 prepared for the Community Redevelopment Agency and the Department of Water and Power.
- To create a comprehensive planned development which capitalizes upon natural synergies between employment-generating land uses and supporting retail and restaurant amenities.
- To provide opportunities for the development of high-quality office/industrial park projects that enhance the productive use of the project site and are complementary to other office and industrial users in the surrounding area.
- To provide development entitlements for the site which are sufficiently flexible to allow the owner and successors in interest to address evolving market conditions without the need to seek additional entitlement action from the City.
- To provide opportunities to develop large scale, high technology, state-of-the-art industrial park activities which require large sites not available in other parts of the City of Los Angeles.
- To provide high quality, high wage employment opportunities in a range of occupations, including manufacturing, assembly, distribution, services, administration and management during both construction and occupancy of the project.
- To provide for phased development that accommodates the existing warehousing and distribution uses on the site and allows for the relocation of ongoing functions in the least disruptive manner.
- To accommodate the relocation and consolidation of on-site warehousing and distribution operations in a new facility located on the project site, if appropriate.
- To enhance the aesthetic character of this area of the Harbor Gateway community by developing planned office/industrial park "campuses", in conjunction with

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appropriate landscaping, which would visually connect with, and thus extend, similar patterns of development presently existing on adjoining properties, in both the City of Los Angeles and the adjacent City of Torrance and County of Los Angeles.

- To develop safe, efficient, and attractive pedestrian and vehicular circulation systems that minimize traffic impacts both within the development and upon the surrounding community and the adjacent cities of Torrance, Carson, and Gardena.
- To provide on-site infrastructure facilities that are adequately sized and phased to serve new development on the project site as it occurs.
- To remove unneeded and abandoned infrastructure and transportation facilities on the project site.
- To provide adequate on-site parking located close to new users.
- To promote the remediation of existing contamination on the project site and removal of asbestos in accordance with existing regulations.
- To generate a commercially acceptable return on the investment necessary to redevelop the property.
- To maximize the fiscal benefits to the City in terms of sales and property tax revenues.

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II. PROJECT DESCRIPTION
B. PROJECT LOCATION

The project site is located in the Harbor Gateway Community of the City of Los Angeles, in southwestern Los Angeles County. It is about 14 miles southwest of downtown Los Angeles and eight miles north of Los Angeles Harbor. The location of the site within the region is illustrated on Figure 1 on page 57.

The 170.2-acre L-shaped site is bounded on the north by 190th Street, on the east by Normandie Avenue, on the south by adjacent industrial and residential properties, and on the west by the adjacent former International Light Metals site, owned by Lockheed Martin Corporation and currently undergoing demolition of structures on the site, the Capitol Metals Company property, and Western Avenue (see Figure 2 on page 58). An existing Southern Pacific rail line runs in a north-south direction along the eastern property boundary, parallel to Normandie Avenue.

Properties directly across Normandie Avenue from the project site are within unincorporated Los Angeles County. The eastern boundary of the City of Torrance follows Western Avenue, adjacent to the westernmost portion of the project site. The southern boundary of the City of Gardena is about one-half mile north of the project site, at 182nd Street.

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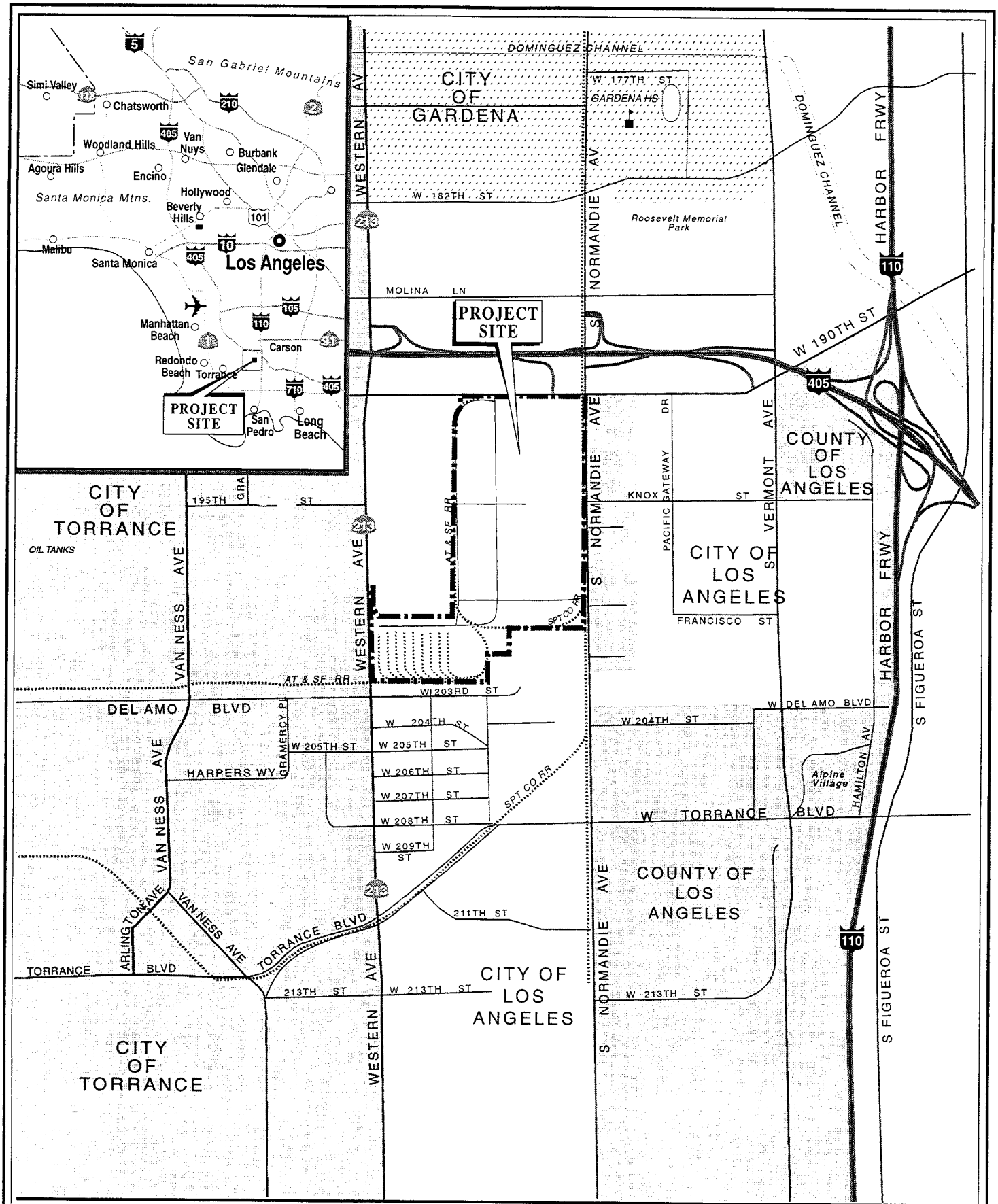


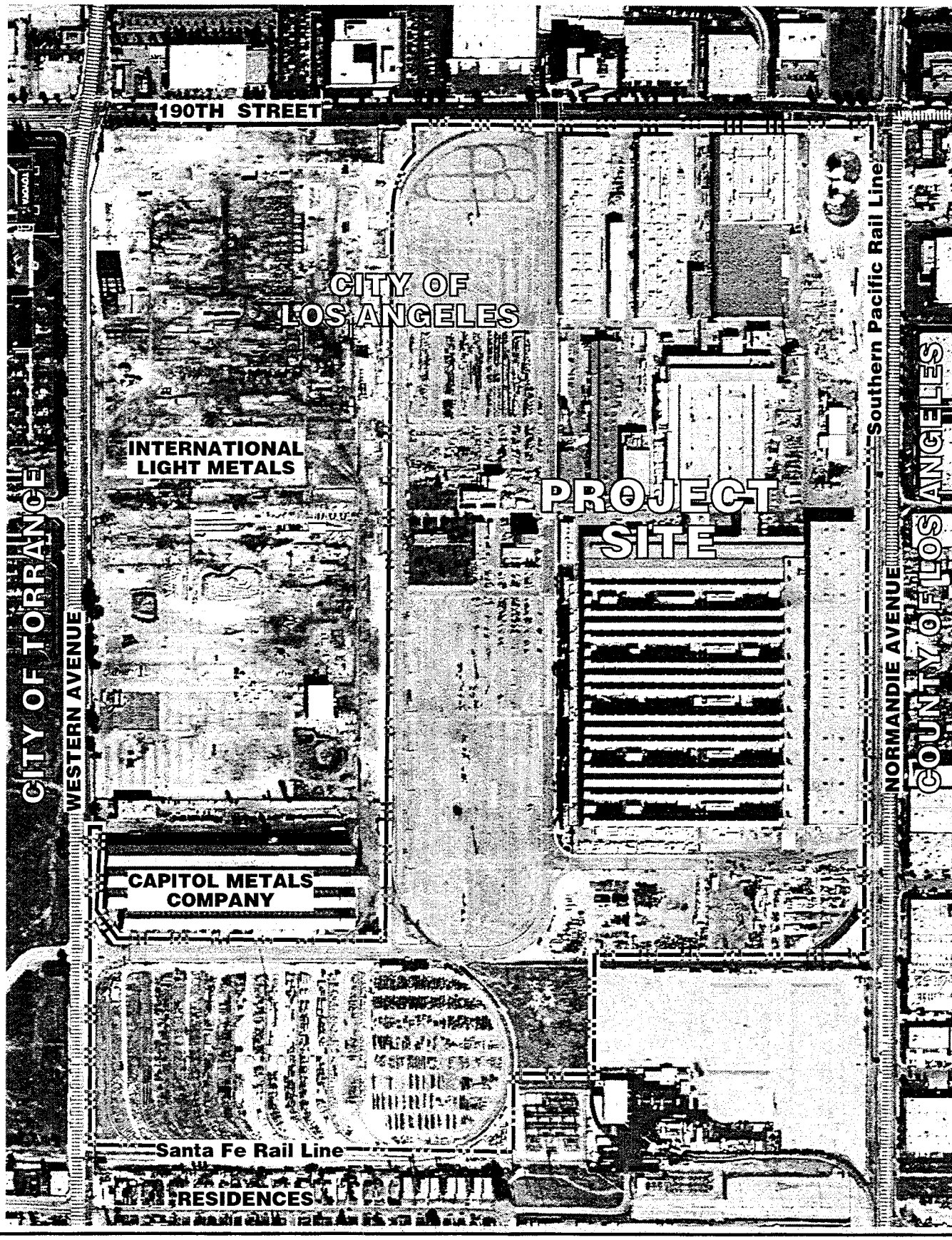
Planning Consultants Research

Project Site Boundary

N

0 .25 .5 Mile

Figure 1
Regional Location Map



Planning Consultants Research

N

Project Site Boundary

Corporate Boundary

Figure 2
Project Site and Vicinity

The project site was used as farmland until 1941, at which time the U.S. government developed the site as an aluminum casting plant. The Douglas Aircraft Company took over the facility in the 1950s, eventually purchasing the property in 1970. The Douglas Aircraft Company subsequently became a subsidiary of the McDonnell Douglas Corporation. Since the 1950s, historical manufacturing activities on the site have included aircraft parts manufacturing and warehousing.

On-site employment peaked around 1990, when approximately 5,500 people worked at the McDonnell Douglas facility. Since that time, however, employment on the site has steadily declined, consistent with the general decline in employment in the Southern California aerospace industry. Most manufacturing activities on-site have been either phased out or moved to other McDonnell Douglas facilities. About 380 employees remain on the site, most of whom are involved in warehousing and distribution activities.

The project site is currently dominated by approximately 2.4 million square feet of aging and largely underutilized industrial and warehouse buildings and vast paved areas used for parking and outdoor storage of airplane parts. On-site structures primarily consist of massive metal industrial/warehouse buildings that stress function over form and appearance. Building exteriors are non-descript while interior areas are primarily open, warehouse-style settings containing stored parts, equipment, and administrative records. Former administrative buildings are located in the west-central portion of the site, as is the only real landscaped area on the site, a small grassy area with such urban tree plantings as alder and sycamore. Current views of the existing facility are provided on Figures 3, 4, and 5 on pages 60 through 62.

The site is no longer the center of industrial activity that it was less than ten years ago, having been supplanted by more modern facilities located elsewhere within the McDonnell Douglas Corporation. This relative lack of ongoing operations, combined with the condition of many on-site buildings and minimal landscaping on most of the site, contributes to a perception of relative inactivity at the facility.

By contrast, although development has slowed in the past few years due to the slow economy in the Los Angeles region, much of the 190th Street corridor in the vicinity of the project site has undergone something of a renaissance in the past two decades (i.e., from

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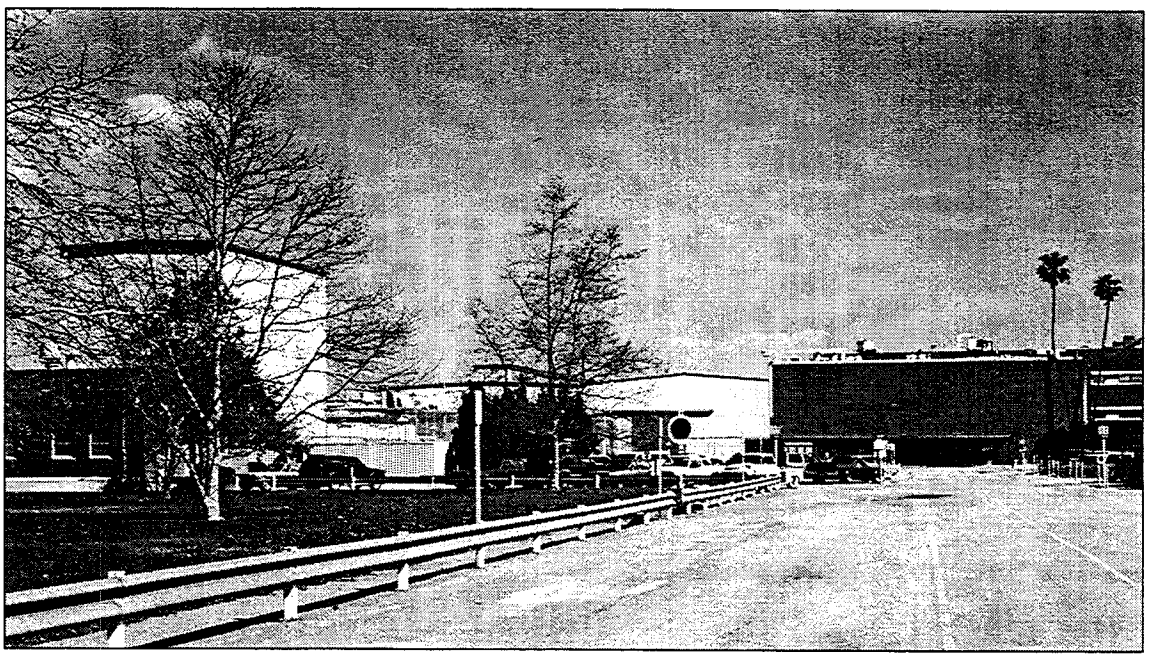
View looking southwest at Building 37 from across 190th street. This and other buildings along the 190th Street frontage would be demolished prior to construction of the Area 1 retail power center.

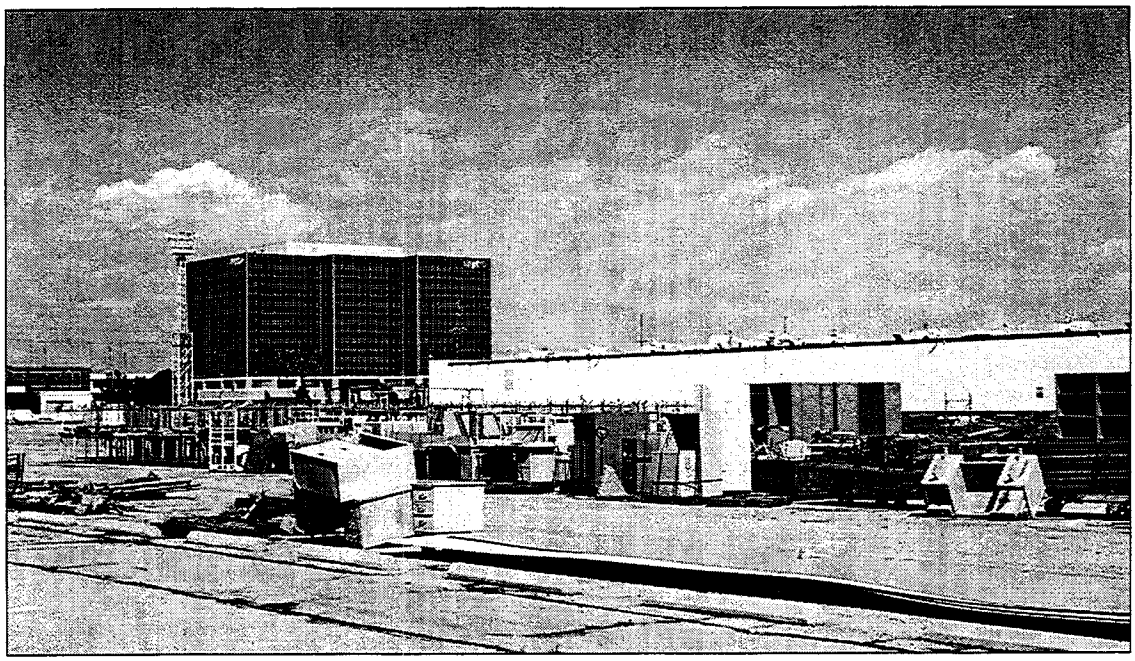


View looking east at the west-central portion of the project site. The landscaped area at left, which includes such tree species as alder and sycamore, is typical of landscaping in this part of the site. All buildings shown would be demolished as part of Area 2 redevelopment.

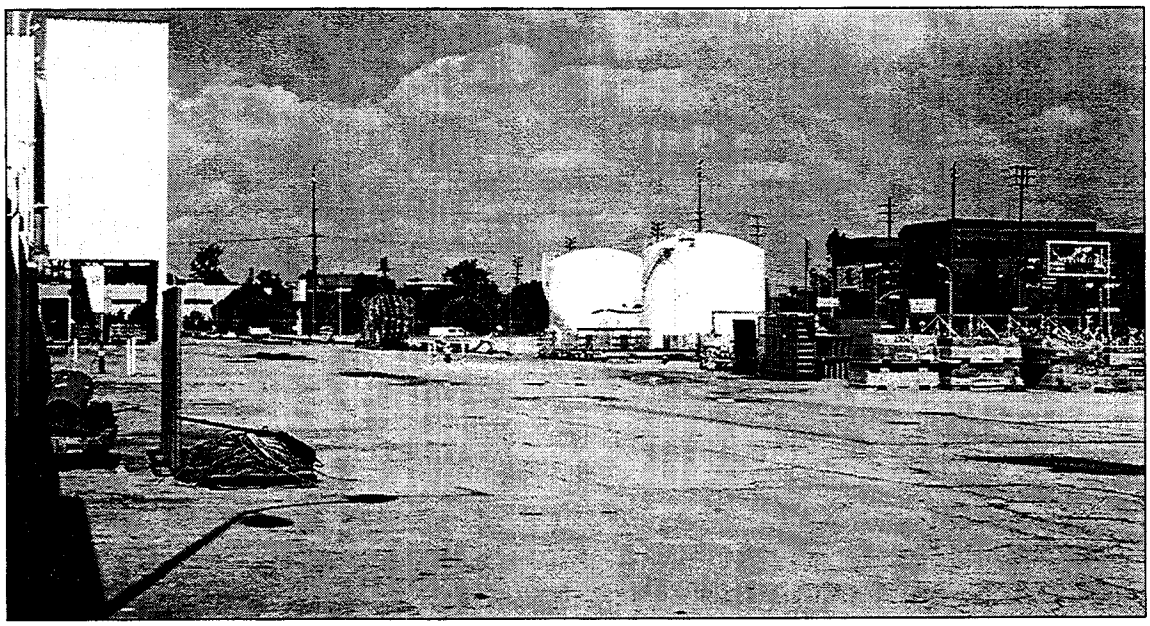
Planning Consultants Research

Figure 3
Photographs of Existing Site Structures

BOE-C6-0115198



View looking northeast toward Building 67, in the north-central portion of the site. This building would be demolished as part of Area 1 redevelopment. The scattered materials in the foreground are representative of current conditions throughout the site. The Sanyo Building in the background is typical of newer development along 190th Street.



View looking northeast at on-site water tanks near the project site's eastern boundary. These tanks would be removed as part of the redevelopment of Area 1.

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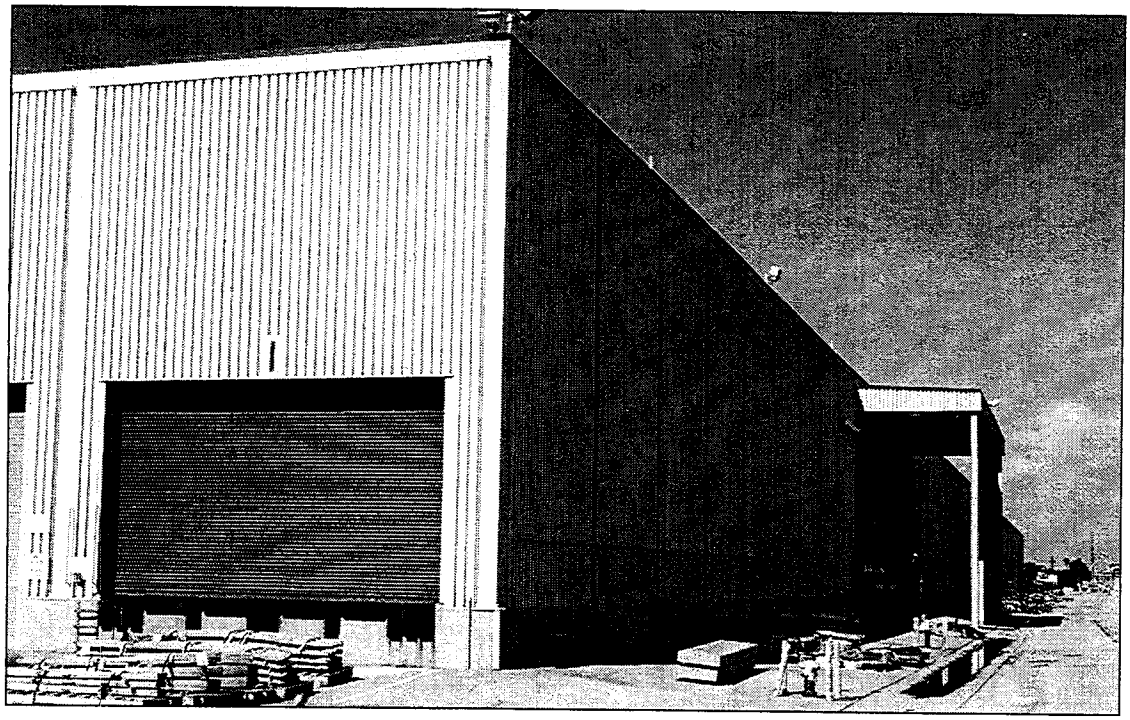
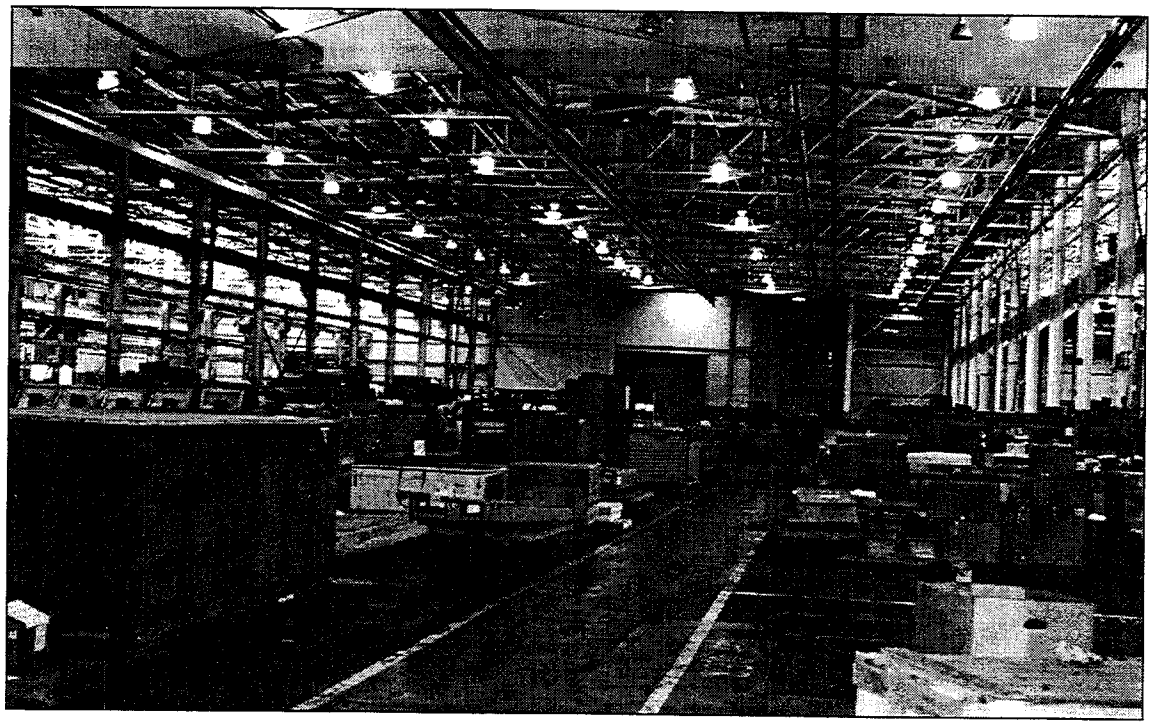
Figure 4
Photographs of Existing Site Structures

BOE-C6-0115199



View looking northeast at Building 66, in the southeastern portion of the site. This building, typical of the warehouse facilities on-site, would be demolished as part of Area 2 redevelopment.



View of the interior of Building 2, which would be demolished as part of Area 2 redevelopment. The interior of this building, used for airplane parts storage, is typical of on-site warehouse structures.

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Figure 5
Photographs of Existing Site Structures

BOE-C6-0115200

approximately the mid 1970s to the early 1990s). Newer office and business park development is evident on both sides of 190th Street, typified by such development as the National Headquarters of Toyota Motor Sales U.S.A., a corporate campus at the southwest corner of 190th Street and Western Avenue. That campus, located just west of the McDonnell Douglas facility in the City of Torrance, provides a corporate office setting, with extensive landscaping and a high level of employee and visitor amenities. Other similar quality development in the area includes the Torrance Business Center, a commercial project on the north side of 190th Street west of Western Avenue, and the Gateway Towers, a pair of approximately 12-story office buildings located east of the site near the corner of 190th Street and Vermont Avenue.

As part of its long-term goal of redeveloping the project site, McDonnell Douglas plans to eventually phase out the current warehousing activities on the project site and relocate such activity, either to its existing Long Beach or St. Louis facilities, or to a new state-of-the-art distribution facility on the project site. In place of the current uses, the company plans to develop a mix of retail and office/industrial park uses that would provide a logical extension of the pattern of retail and office park development that has occurred in the Harbor Gateway area in recent years. The characteristics of the proposed redevelopment of the project site are described in the following section.

BOE-C6-0115201

1. PROPOSED DEMOLITION AND CONSTRUCTION PROGRAM

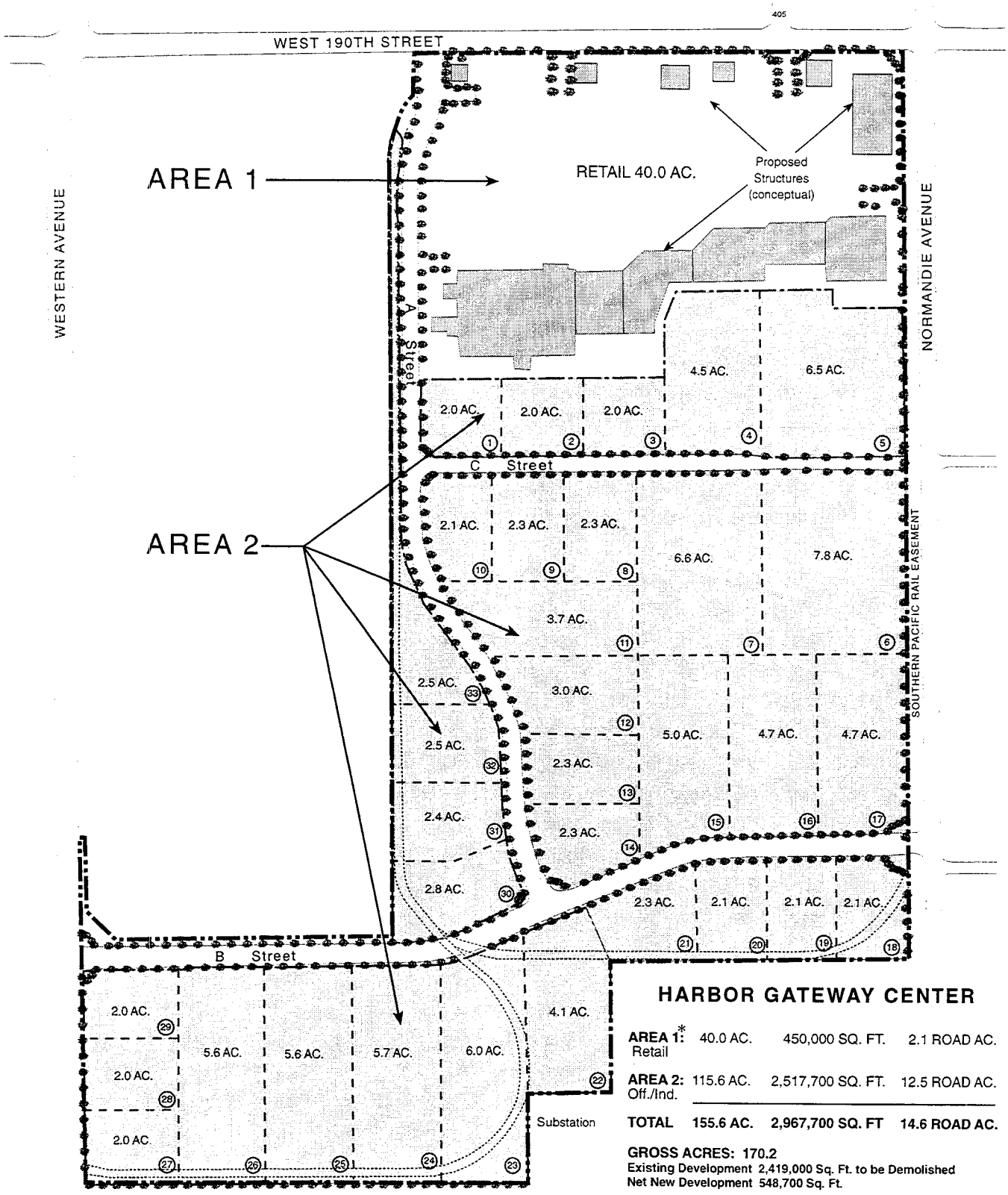
The proposed project involves the demolition of an estimated 2.4 million square feet of existing industrial/warehouse buildings and construction of slightly less than three million square feet of retail and office/industrial park uses over a ten year period. The net increase in on-site building area would be nearly 550,000 square feet. The project site has been divided into two construction/demolition areas (see Figure 6 on page 65). Area 1 consists of 40 developable acres in the northernmost portion of the site along the south side of 190th Street. Area 2 encompasses 115.6 developable acres covering the remainder of the site. The remaining 14.6 acres would be utilized for roadway development.

The development programs for the two project areas are summarized in Table 2 on page 66. Infrastructure systems would be provided as required within each development area. Buildout of Area 1 would result in a net reduction in overall building area of nearly 175,000 square feet and conversion of land use from industrial/warehousing to retail/restaurant. Area 2 buildout would result in a net increase of over 700,000 square feet of on-site building area and transition of the land use from industrial/warehousing to office/business park. Buildout of Areas 1 and 2 is projected to occur in 1998 and 2006, respectively. While the overall development intensity on the project site would be below 0.5:1, floor-to-area ratio (FAR) averaging may be utilized as discussed below beginning on page 77. Consequently, some areas on the site would experience more intense development, which would be offset by the provision of more open space in other areas. The subsections that follow detail the specific development programs for each area.

a. Area 1 Development

Area 1 development involves the construction of a 450,000 square foot retail center in a 40-acre area in the northernmost portion of the site. Prior to commencement of new construction, about 625,000 square feet of existing industrial warehouse buildings would be demolished. Buildout of this Area is projected to occur in 1998.

BOE-C6-0115202



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N

0 200 400 feet

Site Boundary
Parcel Number
1.0 AC. Parcel Acreage

Figure 6
Harbor Gateway Center Concept Plan

Table 2

PROPOSED PROJECT DEVELOPMENT SUMMARY

Project Area	Construction (square feet)	Demolition (square feet)	Net Change in Building Area (square feet)	Estimated Buildout Year
1	450,000[a]	624,519	-174,519	1998
2	2,517,700[b]	1,794,419	723,281	2006
Total	**2,967,700[c]**	**2,418,938**	**548,762**	

[a] *Represents an approximately 0.26:1 FAR.*

[b] *Represents an approximately 0.50:1 FAR.*

[c] *Overall average FAR of 0.44:1 on entire site.*

Source: McDonnell Douglas Realty Company, March 1996.

The composition of the proposed retail center is summarized in Table 3 below, while the Area 1 site plan is shown on Figure 7 on page 67. As currently proposed, the retail center would include about 355,000 square feet of retail development, a maximum 65,000 square foot (4,000 seat) motion picture theater complex, and approximately 30,000 square feet of restaurants on separate pads, most likely adjacent to the street. At full buildout, employment in the Area 1 retail center is projected to be between 1,000 and 1,100 persons. Area 1 development would represent an overall Floor Area Ratio (FAR) of 0.26:1, and would be developed on up to twelve individual lots.

Table 3

PROPOSED AREA 1 DEVELOPMENT

Land Use	Building Area (square feet)
Retail Stores	355,000
Motion Picture Theater Complex (4,000 seats)	65,000
Restaurants	30,000
Total	**450,000**

Source: McDonnell Douglas Realty Company, March 1996.

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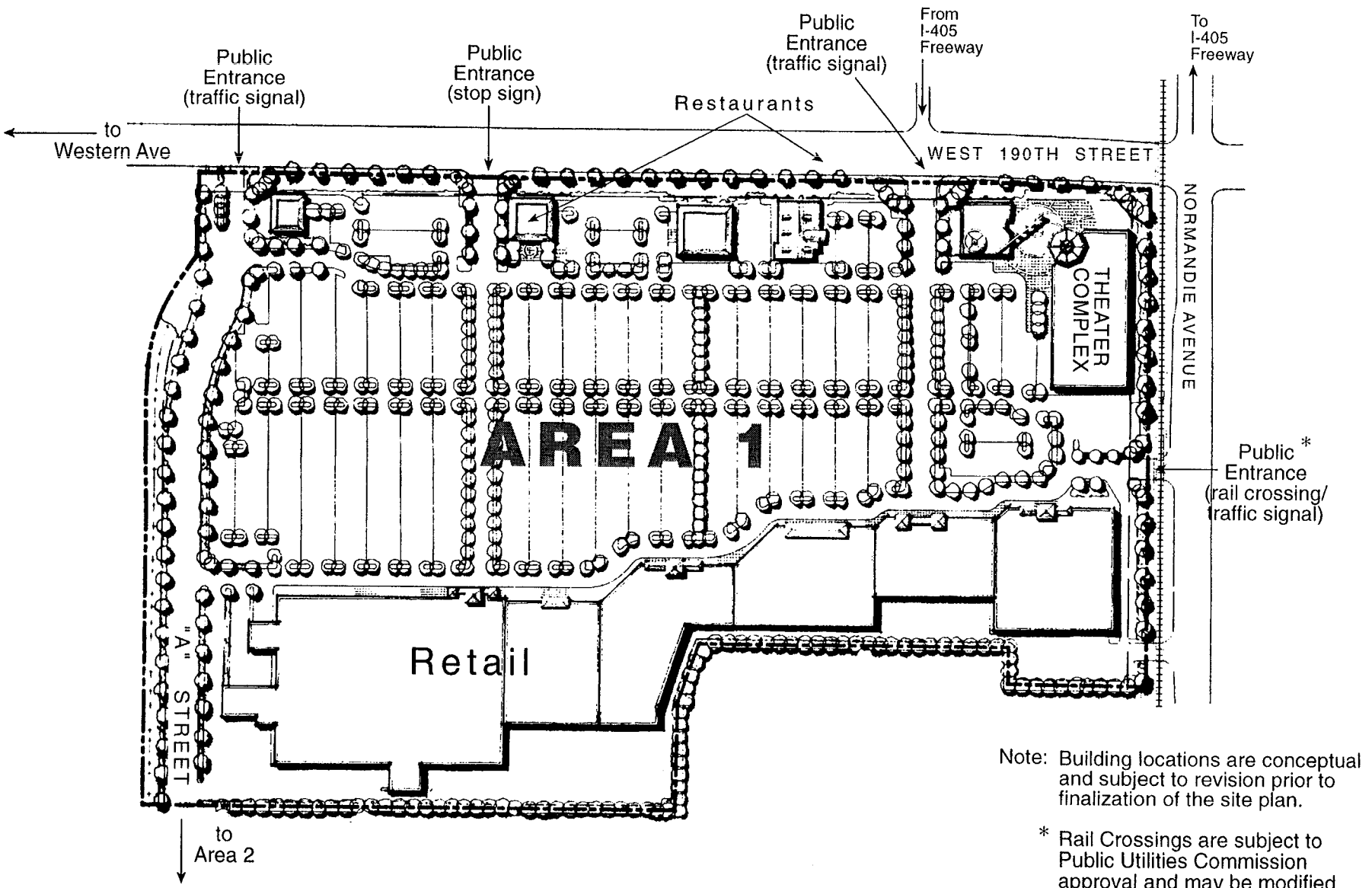

Note: Building locations are conceptual and subject to revision prior to finalization of the site plan.

* Rail Crossings are subject to Public Utilities Commission approval and may be modified as to location or eliminated.

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N

Figure 7
Conceptual Area 1-Site Plan

BOE-C6-0115205

The retail development would consist of large scale retail users located along the southern edge of Area 1, set back, on average, about 700 feet from 190th Street. The theater complex and restaurants would be located on separate pads generally located in the northern portion of Area 1. An approximately 2,200-space surface parking lot would be located in the central portion of Area 1.

Area 1 retail development would be typical of that found along much of the 190th Street corridor, with structures of one to three stories, with a maximum height of about 45 feet and surface parking in front of the main row of retail buildings. Area 1 height limits are shown on Figure 8 on page 69. Landscaping would be provided along the 190th Street frontage. A typical elevation of this component of the Project is shown in Figure 9 on page 70.

b. Area 2 Development

Area 2 development includes the demolition of about 1.8 million square feet of existing industrial/warehouse buildings and construction of up to slightly over 2.5 million square feet of office and industrial park space in the 115.6 developable acre area. The new development would include just over two million square feet of industrial park uses and about 500,000 square feet of stand-alone office uses (see Table 4 below). Buildout of this phase is projected to occur in 2006. At full occupancy, Area 2 employment is projected to be about 4,000 persons in a wide range of occupations including manufacturing, assembly, distribution, services, administration and management.

Table 4

PROPOSED AREA 2 DEVELOPMENT

Use	Building Area (square feet)
Office	507,000
Industrial Park	2,010,700
Total	**2,517,700**

Source: McDonnell Douglas Realty Company, March 1996.

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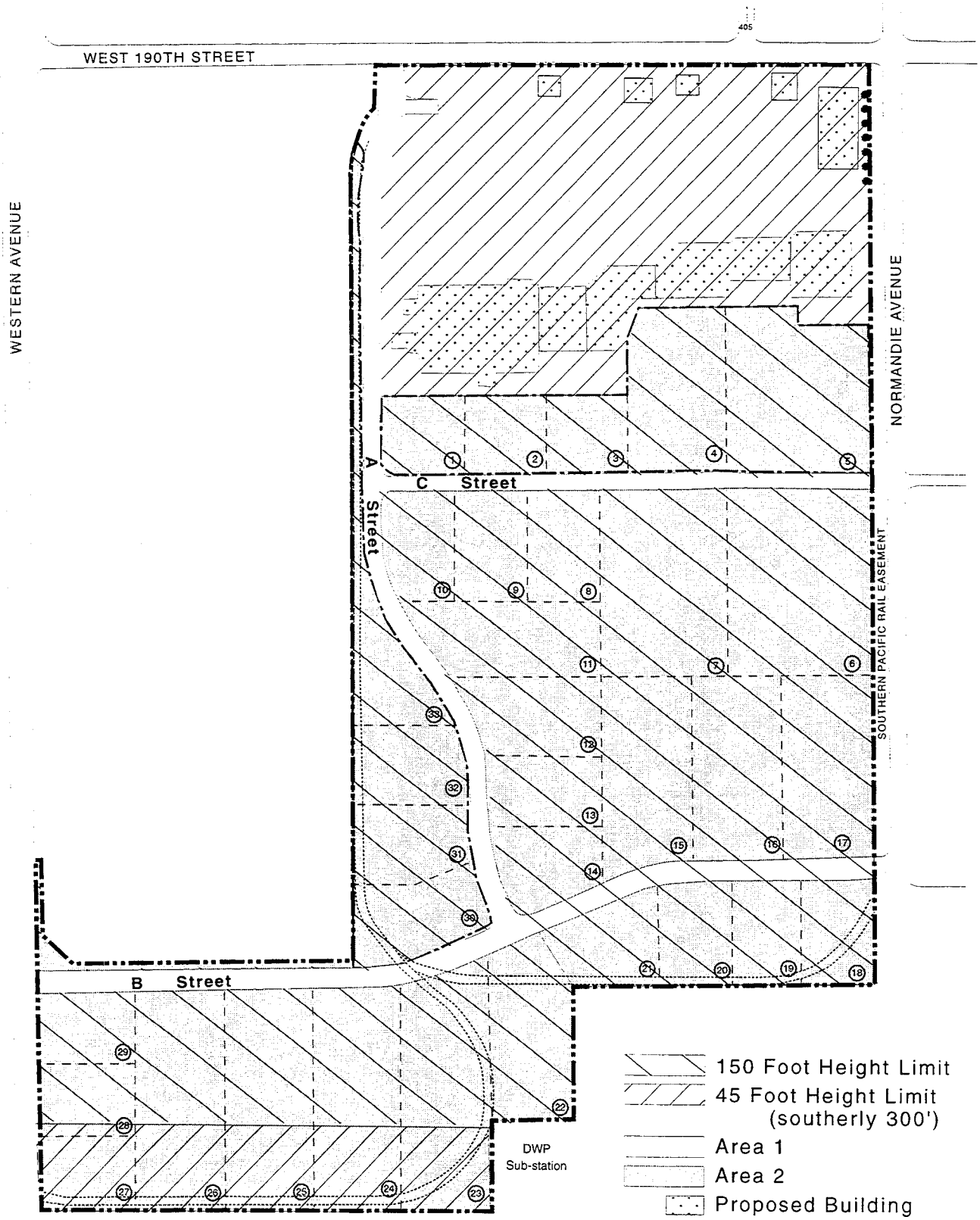


NOTE: Building locations as shown are conceptual and subject to revision prior to finalization of site plans.

SOURCE: PBR, 1996

Planning Consultants Research

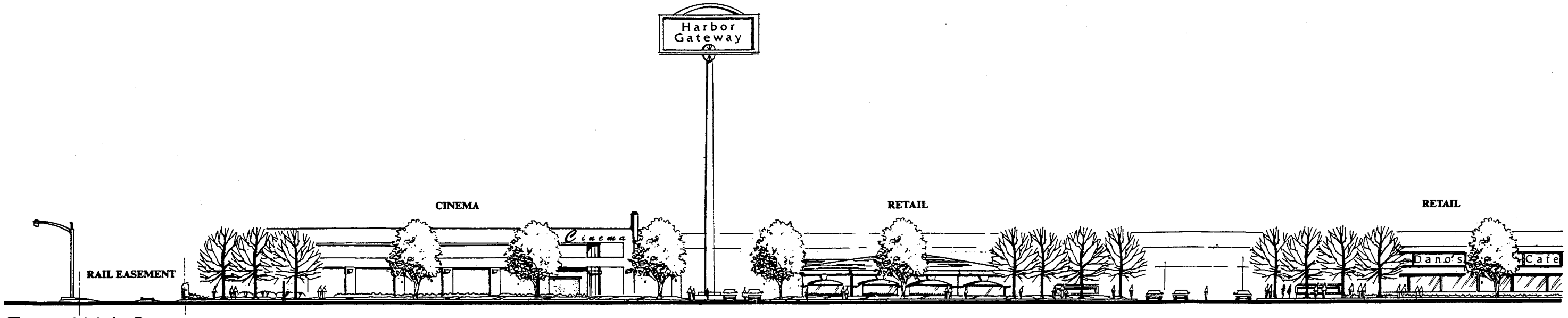
N

0 200 400 feet

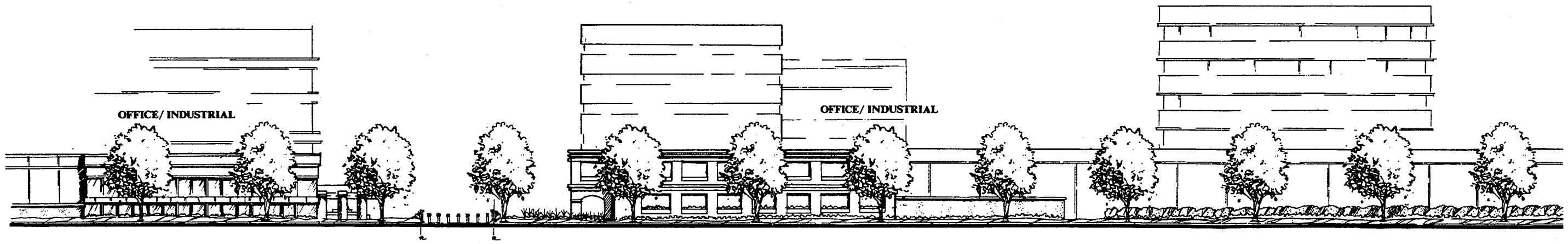
Site Boundary

Parcel Number

Figure 8
Project Height Districts



From 190th Street
Looking South - Area 1



From Normandie Avenue
Looking West - Area 2

NOTE: Elevations depict possible buildings within the Harbor Gateway Center property. Architecture and site planning are preliminary and conceptual.

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Scale: 1"=40'

SOURCE: PBR, 1996

Figure 9
Typical Post-Project Views

BOE-C6-0115208

Although no specific site plans have been prepared for projects within Area 2, some general building parameters have been developed. Maximum building height in most of Area 2 would be 150 feet, or about 12 stories. However, within 300 feet of the residential properties south of the southwest corner of the site, building height would be limited to 45 feet (3 stories - see Figure 8 on page 69). Following buildout, the average FAR in Area 2 would be approximately 0.5:1. A typical view of this component of the Project is shown in Figure 9 on page 70.

2. INTERNAL CIRCULATION AND PARKING

a. Vehicular Circulation

The proposed project would include the development of an internal road system on the project site. Although internal roadways may remain privately owned, all would be constructed to City of Los Angeles standards. The proposed circulation system is shown on Figure 10 on page 72, and is described below.

One north-south roadway ("A" Street) would be added near the western edge of site from 190th Street to its intersection with a new east-west roadway ("B" Street) near the project site's southern boundary. The northernmost segment of "A" Street would be added in conjunction with buildout of Area 1, and would serve as the main entrance for the Area 1 retail development (see Figure 10 on page 72). The construction of "A" Street would also entail the relocation of the existing traffic signal at the McDonnell Douglas driveway on 190th Street, roughly 500 feet west to the intersection of 190th Street and "A" Street.

The southern end of "A" Street would be added in conjunction with Area 2 development, as would both "B" and "C" Streets (see Figure 10 on page 72). "B" Street would follow an existing private internal roadway that would be upgraded to City standards, intersecting Western Avenue at an existing traffic signal. This would provide an eastern extension of the existing Allied Signal driveway across Western Avenue. The eastern terminus of "B" Street would be at Normandie Avenue. An existing rail crossing on the Southern Pacific line along the west side of Normandie Avenue may need to be upgraded in conjunction with the upgrade of "B" Street.

"C" Street would begin at "A" Street and would extend to Normandie Avenue. The proposed "C" Street alignment is designed to allow the possibility of continuing 195th Street through the project site. The 195th Street alignment currently terminates at Normandie Avenue

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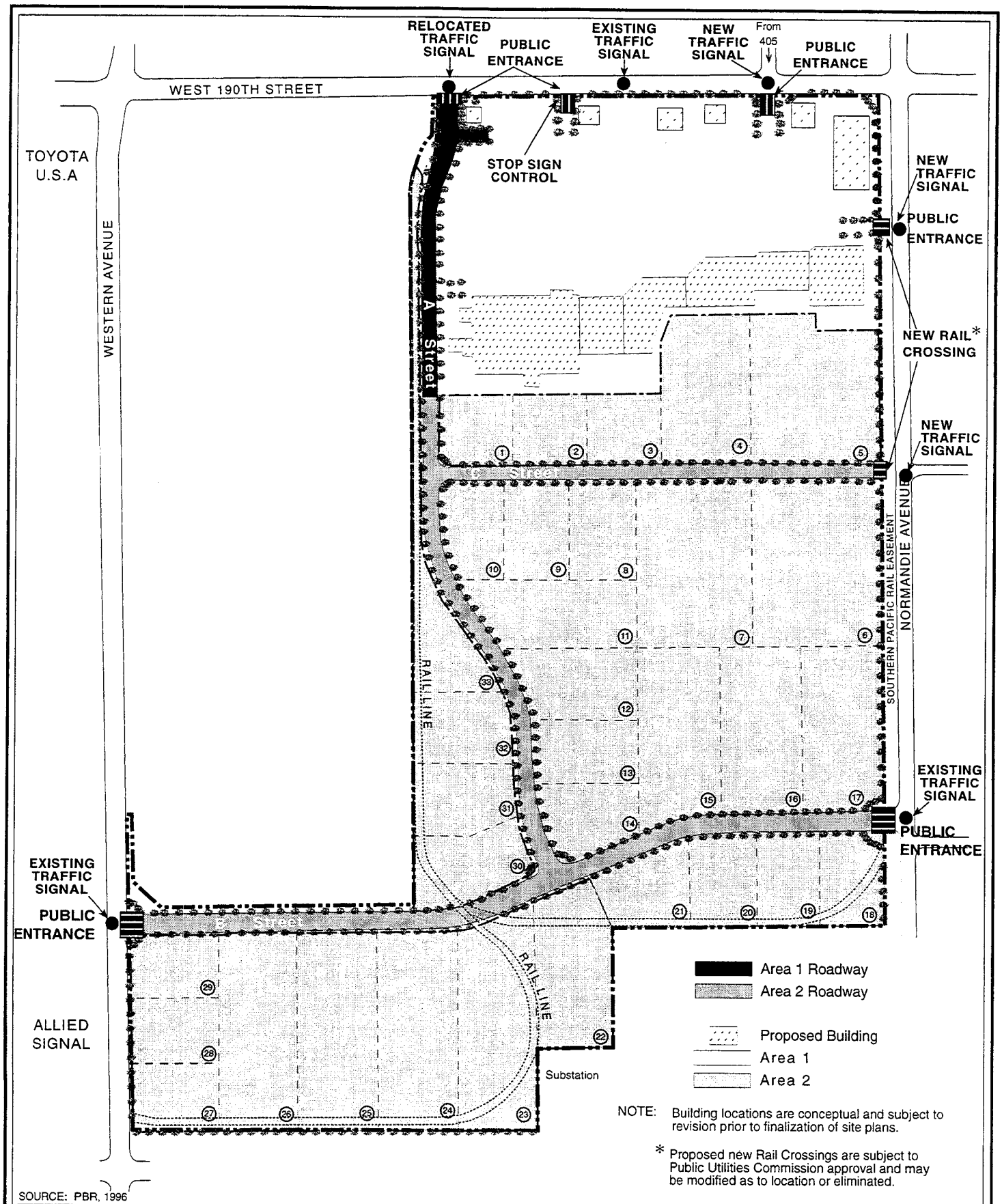

Planning Consultants Research

N

0 200 400 feet

Site Boundary

Parcel Number

Figure 10
Internal Circulation System

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on the east and continues across Western Avenue where it provides east-west access to the Toyota Motor Sales U.S.A. facility and other areas located west of the project site.

As currently proposed, the project would provide seven public entrances. These would include three entrances on 190th Street, three on Normandie Avenue, and one on Western Avenue. Two of the public entrances on 190th Street would be driveways providing access to the Area 1 parking lot. The third would be "A" Street, which would provide direct access to Area 2, as well as serving the retail area. The three public entrances on Normandie Avenue would include: (1) a new driveway providing access to the Area 1 surface parking lot, including a new rail crossing and associated signal timing improvements at the existing Southern Pacific rail line; (2) the proposed new "C" Street, which would also include a new rail crossing and would provide direct access to Area 2 and indirect access to Area 1 via a frontage road on the west side of Normandie Avenue; and (3) "B" Street, which has an existing rail crossing. The two new Normandie Avenue rail crossings at the existing Southern Pacific rail line are subject to the approval of the California Public Utilities Commission. Depending upon the outcome of this process, internal roadways would be subject to realignment in order to support adequate internal circulation within the project site. The Western Avenue public entrance would also be on "B" Street, which provides access to Area 2.

b. Pedestrian Circulation

Safe and clear pedestrian circulation is planned to be provided between buildings, parking areas, and entries on all parcels. All streets located on the project site would include curb adjacent sidewalks for pedestrian movement. Where bus stops are located adjacent to the site, direct pedestrian circulation would be provided from the bus stop to the site, where practical.

c. Parking

A total of 2,200 surface parking spaces are proposed to serve Area 1 development. Although parking lots have not been designed for Area 2, parking for Area 2 development would be provided in accordance with City requirements, either in surface lots or structures. No on-street parking would be permitted on the two primary internal streets or on the adjacent arterial streets. Shared or reduced parking would be used on sites where off-setting peak parking relationships can be demonstrated.

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Designated spaces would be provided in convenient locations for handicap, carpool, motorcycle, and bicycle parking, as required by the City of Los Angeles. Parking areas for motorcycles and bicycles would be designed for orderly and uncluttered parking.

3. URBAN DESIGN STANDARDS

With the exception of the proposed Area 1 retail development (which provides a conceptual site plan), the proposed project does not specify the design or siting of specific structures or facilities. However, development within Area 2 would occur in accordance with proposed urban design standards regulating the physical organization of the site. Design standards that would apply to future development on-site are discussed in the following sections.

a. Site Planning/Architecture

The retail component of the project in Area 1 is planned to be oriented to 190th Street and Interstate 405. Building frontages would be oriented so that good visibility to storefronts and signage are provided. Site organization is envisioned to be functional by locating sufficient parking in close proximity to building entrances and direct convenient access provided from 190th Street, Normandie Avenue, and "A" Street. Several small to moderate size buildings on individual pads may be located directly adjacent to 190th Street, thereby allowing convenient access to high traffic users. A typical view of this component of the Project is shown in Figure 9 on page 70.

To promote the planned image of a distinctive high technology center, site planning for the office/industrial park in Area 2 is planned to be developed in a manner that emphasizes a smooth, contemporary "high-tech" environment and produces an effect that is consistent with the quality and setting of new "Tech Parks" recently developed in other parts of Los Angeles and Orange Counties.

Specific architectural designs have not been determined for site structures. However, to promote general design quality and consistency, architectural design would follow the following general parameters:

- Within the office/industrial park component, the architectural style is planned to be contemporary, straightforward, and consistent. No residential or period styles would be permitted. Building massing is planned to consist of large scale retail structures.

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- Buildings may be from one to twelve stories high, with estimated heights above grade ranging from 20 to 150 feet (including parapets and mechanical screens). Buildings within 300 feet of adjacent residential properties to the south would not exceed 45 feet in height (see Figure 8 on page 69).
- Within the office/industrial park component, exterior building materials are to be of a contemporary nature that expresses the high technology image intended for the Harbor Gateway Center, such as smooth concrete, smooth metal panels and low-reflectivity glass. New technology materials would be acceptable if compatible with other materials used in the complex.
- Exterior colors are planned to be light, with limited use of accent color to enhance visual unity and a contemporary appearance. All colors, textures, and materials on exterior elevations are planned to be coordinated to achieve continuity of design.
- Roof-mounted mechanical equipment and communications devices are planned to be hidden behind building parapets to screen these devices from off-site ground level view. Ground level mechanical equipment, refuse collectors, and storage tanks are planned to be screened from view with dense landscaping and/or walls of materials and finishes compatible with adjacent buildings.
- Building design would meet the minimum standards of the City of Los Angeles to attenuate interior noise to required levels.

A typical view of this component of the Project is shown in Figure 9 on page 70.

b. Landscaping Plan

Landscaping would be an important element contributing to the identity and unity of the Harbor Gateway Center. All on-site landscaping would be designed to:

- Promote a pleasant, distinctive, high technology environment for the office/industrial park district and a retail/shopping setting for the retail component;
- Identify primary entries at both the overall complex and individual site levels;
- Identify a clear hierarchy of streets and vehicular circulation;
- Augment internal cohesion and continuity within the Harbor Gateway Center;
- Create a pleasing and comfortable pedestrian environment; and
- Screen and buffer parking and service areas to the extent practical.

To implement these objectives, the following general landscape design parameters would be followed throughout the Harbor Gateway Center:

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- All landscaping zones and areas not covered by structures or paving are planned to be planted with trees, shrubs, and/or groundcovers.
- To provide a unified appearance, plant palettes would be limited to those in a plant selection list to be developed.
- Parking lot trees are planned to be provided at a minimum ratio of one tree per four parking stalls.
- All landscape areas would be provided with a complete, automatic irrigation system, serviced by recycled water, when possible.

Landscaping along peripheral arterials and internal streets would be designed to provide a unified appearance along street frontages. All landscape setbacks along project site streets would consist of groundcover, shrub massings, and overstory trees.

Minimum building setbacks have been established for all front, side, and rear yards of buildings and for parking lots. These setbacks meet or exceed those required by overlaying zoning standards. The goal is to provide sufficient and appropriate space for distinctive landscape themes, screening, and enhancement to building architecture. The minimum landscape setbacks for each peripheral arterial and internal street are as follows:

190th Street/Western Avenue - A total landscape setback averaging 30 feet in width would be provided between the curb and the adjacent parking lot. This setback would include an on-site landscape setback averaging 20 feet in width.

Normandie Avenue - Adjacent to the Area 1 retail component, a landscape edge averaging seven feet in width would be provided between the retail area and the Southern Pacific rail line. For the office/industrial park areas, edge treatments would consist of either a project theme wall or on-site landscaping of a width determined by the side or rear yard setback of individual building sites.

"A" and "B" Streets - Total landscape setbacks averaging 25 feet in width would be provided between the curb and adjacent parking lot. These setbacks would include 15-foot average width landscape zones on-site.

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"C" Street - Total landscape setbacks averaging 15 feet in width would be provided between the curb and adjacent parking lot. These setbacks would include 5-foot average width landscape zones on-site.

In order to minimize visual conflicts with adjacent residences, office/industrial park development contiguous with the southern edge of the project site would be required to provide additional on-site buffering treatments. A minimum 8-foot high thematic project boundary wall would be constructed between the southern boundary of Area 2 and the adjacent residential properties as individual sites in this area are developed. A conceptual view of the thematic wall from the residential neighborhood to the south is shown in Elevation 6 on Figure 42 on page 330.

c. Signage

A planned sign program would be established so that all exterior signs are consistent in design character and quality. Signing would meet all requirements of the City of Los Angeles, including the City sign ordinance, with the exception of two signs which would represent significant modifications from City of Los Angeles sign regulations. Both are pole-mounted signs, approximately 120 feet in height, and would serve the retail uses to be located in Area 1. This height has been determined to be the minimum required to provide project visibility from adjacent streets after taking into consideration the height and location of intervening buildings. Specific designs for the signs have not yet been developed. However, the style and character is intended to be compatible with the architecture of the retail component of the project. The signs are planned to display overall project identity and major anchor identities only.

d. Density/FAR Averaging

Under the existing M3-1 zoning on the project site, the total floor area contained in all of the main buildings on a lot may not exceed one-and-one half times the buildable area of the lot. As noted above, while the overall development intensity of the office/industrial park in Area 2 would be below one half times the area of the site (0.5:1), FAR averaging may be used to permit individual buildings to exceed the maximum floor area otherwise allowed by the existing zoning. Pursuant to Section 12.24 C 58 of the Municipal Code, the Zoning Administrator may permit the averaging of FARs for buildings that would comprise "a unified commercial, industrial, or mixed use development in the C or M zones ... even if buildings on each individual parcel or lot would exceed the permitted floor area ratio," so long as "the floor

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area ratio for the unified development when calculated as a whole may not exceed the maximum permitted floor area ratio for the height district in which such unified development is located." For the proposed project the maximum permitted FAR is 1.5:1. Since the overall FAR for the project is 0.5:1, this requirement of the Municipal Code would be met by the project.

For purposes of such Section of the Municipal Code, a "unified development" means a development that is: (1) a combination of functional linkages, such as pedestrian or vehicular connections; (2) in conjunction with common architectural and landscape features, which constitute distinctive design elements of the development; (3) is composed of two or more contiguous parcels, or lots of record separated only by a street or alley; and (4) when the development is viewed from adjoining streets to be a consolidated whole." As proposed, the project would appear to qualify as a "unified development."

e. Other Design Issues

(1) Service Areas

Service, storage, maintenance, loading, and refuse collection areas would be located generally out of view of public roadways and buildings on adjacent sites, or screened by dense landscaping and/or architectural barriers. Walls used to screen service areas are planned to be of materials and finishes compatible with adjacent buildings. No wood or chainlink fences would be located within view of public streets.

All service areas would be located so that service vehicles have clear and convenient access and do not disrupt vehicular and pedestrian circulation. No loading would be permitted from public streets.

(2) Utilities

Utility systems, including water, electricity, telephone, gas, sewer, and storm drains would be installed underground whenever feasible.

BOE-C6-0115216

III. General Description of Environmental Setting

III. GENERAL DESCRIPTION OF ENVIRONMENTAL SETTING
A. OVERVIEW OF PROJECT SETTING

The project site is located on the south side of West 190th Street, between Western and Normandie Avenues, in the Harbor Gateway District of the City of Los Angeles. Owned by the Douglas Aircraft Company (DAC), a wholly-owned subsidiary of the McDonnell Douglas Corporation, the site was formerly used for the manufacture of domestic aircraft parts. At peak operation around 1990, DAC employed about 5,500 persons on the project site. In recent years, however, manufacturing functions have been moved to other McDonnell Douglas locations. Today, the site is primarily used for the warehousing of airplane parts and only about 380 employees remain. On-site structures include an estimated 2.4 million square feet of industrial, warehouse, and office buildings. The environmental setting of the project site vicinity is described below.

1. TOPOGRAPHY, GEOGRAPHY, AND HYDROLOGY

The project site is in the southwestern portion of the Los Angeles Basin. Like the entire area, the site lacks significant topography. There are no Alquist-Priolo special seismic study zones or other significant geologic hazards in the site vicinity. The nearest active fault, the Palos Verdes Hills Fault Zone, is located about three miles southwest of the site. Other nearby active or potentially active faults include the Charnock, Newport-Inglewood, Potrero and Cherry Hill Faults.

2. ATMOSPHERIC CONDITIONS

Although air quality in the Los Angeles Metropolitan Area has shown improvement in recent years, it continues to exceed state and federal standards more frequently than any other metropolitan area in the nation. Ozone levels in the site vicinity are relatively low as compared to much of the Los Angeles area. In 1994, the Southwest Coastal - Los Angeles County monitoring station, the station nearest the site, registered three days in which the state ozone standard was exceeded and no days in which the federal standard was exceeded. By contrast, the East San Gabriel Valley monitoring station registered 132 days in which ozone levels exceeded the state standard and 88 days in which the federal standard was exceeded. Carbon monoxide levels in the site vicinity are, however, among the highest in the region, with five

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violations of the federal standard and eight violations of the state standard at the Southwest Coastal station in 1994.

3. LAND USE

The project site vicinity is characterized by a mix of older industrial and residential uses, and newer commercial development. The site itself is industrial in nature, as are immediately adjacent properties to the west (Capitol Metals Company) and south (Jones Chemical Company and Farmer Brothers Coffee). The former International Light Metals property, immediately west of the site and presently owned by Lockheed Martin Corporation, was previously used for industrial purposes but has recently been cleared. Also to the south of the site is the currently vacant Montrose Chemical Company site and a residential neighborhood of single family homes constructed primarily from the 1940s to the 1960s, mixed with newer multiple family dwellings. Along the 190th Street corridor north, east, and west of the site is a mix of primarily newer mid-rise office buildings, large scale retail facilities, and business park development. Many of the non-residential districts in the project area, particularly along 190th Street, transformed from heavy industrial uses to retail and high end office and business park uses between the mid 1970s and early 1990s.

4. PLANT AND ANIMAL LIFE

The project site is in a highly urbanized area that is completely devoid of natural biotic habitats. On-site landscaping is generally sparse, although various introduced ornamental tree species are scattered around the site. These include such species as alder, olive, eucalyptus, juniper, and Mexican fan palm. Adjacent commercial and industrial properties are similarly landscaped. Residential uses to the south are typical of the Los Angeles area, including lawns, shrubs, and various street trees. Landscaping at the nearby Toyota U.S.A. National Sales Headquarters, located to the west across Western Avenue in the City of Torrance, is representative of newer development in the area, with a streetscape consisting of lawns and planned landscaping, with extensive tree plantings.

5. TRANSPORTATION/CIRCULATION

Regional access to the project site is provided by the San Diego Freeway (Interstate 405), which is located about 500 feet north of the site across 190th Street. The Harbor

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Freeway (I-110) is located slightly less than one mile east of the site. Major arterials in the area include 190th Street, Western Avenue, and Normandie Avenue. There is no rail transit service in the immediate site vicinity, although the site is served by two bus lines: Gardena Transit Line 2 and Torrance Transit Line 6. The Metropolitan Transit Authority (MTA) Blue Line is located about 5 miles east of the site. Freight rail service is provided by a Southern Pacific rail line on the east side of the project site along Normandie Avenue.

6. PUBLIC SERVICES AND INFRASTRUCTURE

Public services and utilities are provided to the project site by a variety of public and private entities. Police and fire protection are provided by the Los Angeles Police and Fire Departments. Water and electrical service to the project site are provided by the Los Angeles Department of Water and Power. Dominguez Water Company and Southern California Edison also provide service to other properties in the vicinity of the project site. Natural gas service is provided by the Southern California Gas Company. Sewerage is provided by the Los Angeles County Sanitation Districts.

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Table 5 on pages 83 through 86 lists other projects that are currently on file with the cities of Los Angeles, Torrance, Carson, and Gardena. These projects, which are either planned, under construction, or completed but not fully occupied, are used to assess the cumulative effects associated with development throughout the study area. Figure 11 on page 87 shows the locations of the related projects.

BOE-C6-0115221

Table 5

RELATED PROJECTS

Case No.	Map No.[a]	Project Location	Residential (DUs)[b]	Industrial (Sq.Ft.)[c]	Retail (Sq.Ft.)	Office (Sq.Ft.)	Other Space (Sq.Ft.)	Notes
	G1	1251 West Redondo Beach Boulevard					25,000	Church
	G2	1116 West Redondo Beach Boulevard			29,000 sq.ft. expansion			
	LA3	NEC Vermont Avenue & Artesia Boulevard			54,000			Grocery Store
CUP94-0001	T4	4502 186th Street	195					Senior Housing
CUP95-0006	T5	SEC 190th Street & Crenshaw Boulevard					14,000	Fitness Center
CUP94-0005	T6	4101 Torrance Boulevard					135,000	Hospital Addition
CUP94-0035	T7	3500 Challenger Street				44,326		Office/ Warehouse
CUP94-0025	T8	540 Maple Avenue			8,000			
CUP93-0005	T9	23860 Los Codona Avenue	72					Senior Housing
CUP90-32	T10	SEC Arnie Avenue & Torrance Boulevard				46,000		

[a] *G indicates that the project is in the City of Gardena; LA = Los Angeles; T = Torrance; C = Carson*

[b] *Dwelling Units*

[c] *Square Feet*

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Table 5 (continued)

RELATED PROJECTS

Case No.	Map No.[a]	Project Location	Residential (DUs)[b]	Industrial (Sq.Ft.)[c]	Retail (Sq.Ft.)	Office (Sq.Ft.)	Other Space (Sq.Ft.)	Notes
CUP95-0016	T11	21880 Hawthorne Boulevard			7,219			Restaurant
	T12	NWC Hawthorne Boulevard & 230th Street				33,898		
CUP76-90	T13	3330 Lomita Boulevard					24,530	Hospital Expansion
PP72-14	T14	3400/3440 Lomita Boulevard					60,000	Hospital Expansion
CUP93-0036	T15	235th Street SS between Elm Avenue & Crenshaw Boulevard	36					Senior Condominiums
CUP96-0002	T16	Amapola Avenue between 208th Street & Dominguez Street		191,196				
	T17	WS Crenshaw Boulevard N/O Lomita Boulevard			6,175		167,000	Storage

[a] *G indicates that the project is in the City of Gardena; LA = Los Angeles; T = Torrance; C = Carson*

[b] *Dwelling Units*

[c] *Square Feet*

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Table 5 (continued)

RELATED PROJECTS

Case No.	Map No.[a]	Project Location	Residential (DUs)[b]	Industrial (Sq.Ft.)[c]	Retail (Sq.Ft.)	Office (Sq.Ft.)	Other Space (Sq.Ft.)	Notes
	T18	Rolling Hills Plaza Shopping Center			-13,775		-29,944	+14 movie screens
2C91-2	T19	220 Via Rivera	28					Single Family
	C20	Carson Towne Center		127,000	640,000	159,000		Carson Towne Center
	C21	Metro 2000 Outlet Center			1,870,000			
CUP94-0013	T22	1425 Engracia	18					Single Family
MOD95-0006	T23	NEC Madrid & Dominguez Way				20,400		Office/ warehouse
CUP88-62	T24	5501 Torrance Boulevard	90					Condominiums
CUP90-2	T25	4921 Spencer Street	54					Condominiums
CUP95-0026	T26	4625 Garnet Street					11,094	Church
PD89-1	T27	2801 Sepulveda Boulevard	131					Condominiums
PD89-2	T28	2801 Sepulveda Boulevard	52					Condominiums

[a] *G indicates that the project is in the City of Gardena; LA = Los Angeles; T = Torrance; C = Carson*

[b] *Dwelling Units*

[c] *Square Feet*

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Table 5 (continued)

RELATED PROJECTS

Case No.	Map No.[a]	Project Location	Residential (DUs)[b]	Industrial (Sq.Ft.)[c]	Retail (Sq.Ft.)	Office (Sq.Ft.)	Other Space (Sq.Ft.)	Notes
ZC90-1	T29	2825 Plaza del Amo	84					Condominiums
CUP94-0022	T30	SEC Artesia Boulevard & Prairie Avenue					14,200	Auto Service
	G31	NEC Western Avenue & Artesia Boulevard			190,000			
	G32	NWC Vermont Avenue & Artesia Boulevard			3,245			
	LA33	SEC Western Avenue & 190th Street			755,000			
	T34	NWC El Prado & Cravens Avenue	44					
	T35	SWC Western Avenue and 195th Street (Allied Signal Property)		2,512,000				
	T36	Lomita Boulevard W/O Crenshaw Boulevard			156,000			
	Total		**804**	**2,830,196**	**3,704,864**	**303,624**	**420,880**	

[a] *G indicates that the project is in the City of Gardena; LA = Los Angeles; T = Torrance; C = Carson*

[b] *Dwelling Units*

[c] *Square Feet*

Cutoff Date for Related Project Information: April 1996

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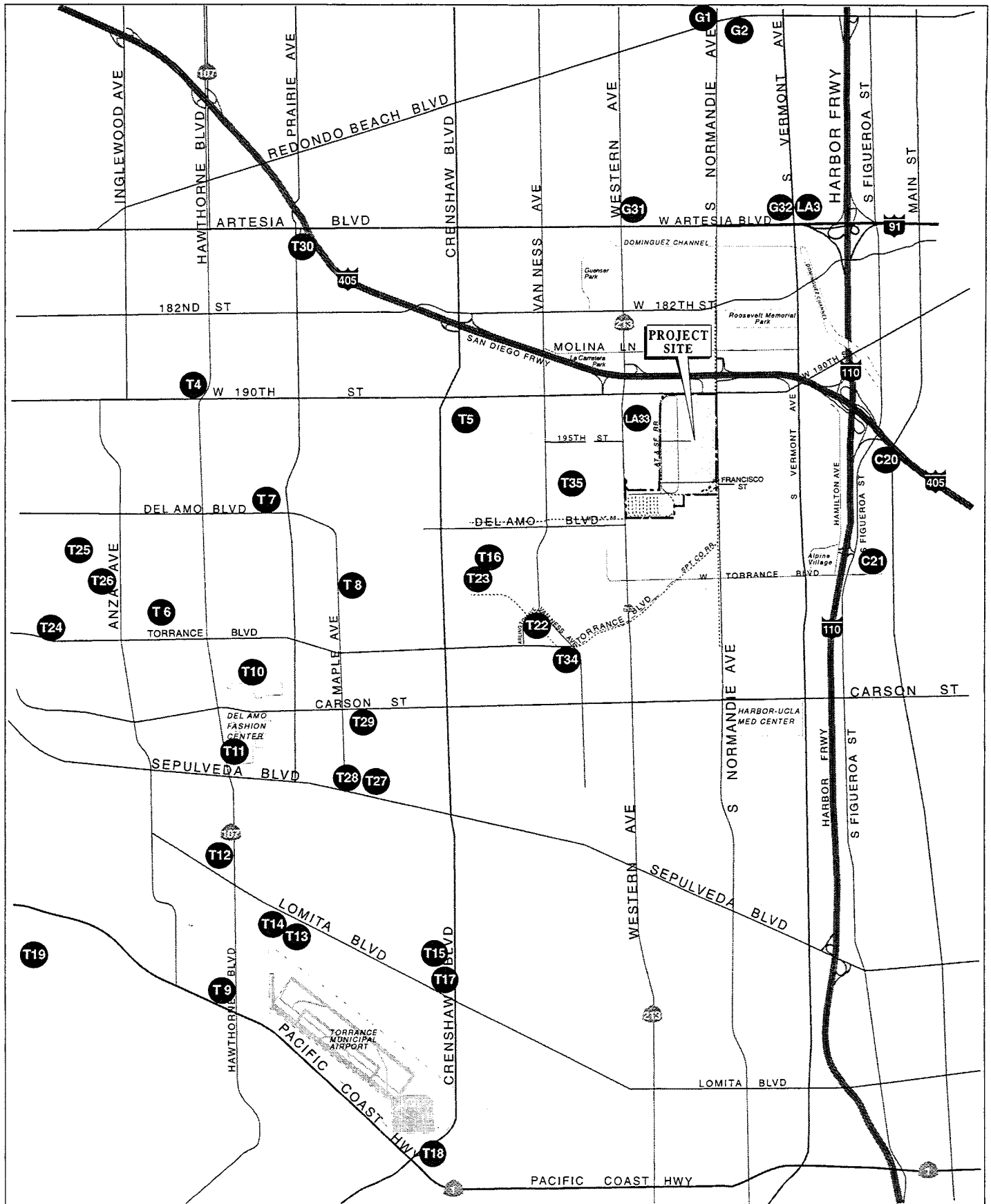

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C - CARSON, G - GARDENA, LA - LOS ANGELES, T - TORRANCE

Project Site Boundary

N

0 .5 1 Mile

Figure 11
Related Projects Map

IV. Environmental Impact Analysis

IV. ENVIRONMENTAL IMPACT ANALYSIS
A. EARTH

The following section is based on a geotechnical analysis of the project site conducted by NorCal Engineering.[1] The findings of this report are summarized here and presented in full as Appendix C to the DEIR. Final grading plans for individual on-site lots would be submitted to the Grading Division of the City of Los Angeles Department of Building and Safety prior to construction.

1. ENVIRONMENTAL SETTING

a. Topography

The irregular L-shaped project site is approximately 170 acres in size. The topography of the site is relatively level with a maximum relief of a few feet in a south to north direction.

The site currently consists of several large metal and steel girder and masonry brick buildings. The remaining area around the buildings is paved with concrete and asphalt pavement. The southerly portion of the site is occupied by a storage equipment yard with several railroad spurs for loading and unloading access. A majority of this storage area is covered at the surface with gravel.

b. Soils

The site is located within the Torrance Plain, a broad alluvial plain consisting of undifferentiated late Holocene alluvium deposits. A field investigation of the earth materials underlying the project site was conducted, including exploratory borings. These borings revealed that soils on-site consist of pockets of artificial fill and a natural soil zone, as described below.

Artificial Fill. In areas where artificial fill exists, fill soil ranges in depth from one to four feet below the ground surface, consisting of a dark brown to brown silty clay to a yellowish brown clayey silt. This soil was observed to be soft to stiff and moist to very moist.

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1 *NorCal Engineering, Preliminary Geotechnical Investigation - Harbor Gateway Center, March 18, 1996.*

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The pavement section consists of an asphalt pavement overlying a layer of base material. A few of the borings were observed to contain some minor gravel and small pieces of asphalt and brick.

Alluvium. Beneath the artificial fill is a native and undisturbed alluvium soil consisting predominately of a dark brown to brown silty clay to a yellowish brown clayey silt. These soils were observed to be generally stiff and moist. A stiff sandy silt was observed below twelve feet while a dense fine grained silty sand was encountered from 23 feet to about 42 feet below ground level.

The overall engineering characteristics of the earth material were relatively uniform with each boring. No ground water was encountered to the depth of the boring and no caving occurred during the field investigation. Ground water depth in the area is approximately 80 to 90 feet below the surface.

c. Seismicity

(1) Groundshaking

There are no known active or potentially active faults on-site (see Figure 12 on page 90). The proposed development lies outside any Alquist Priolo Special Studies Zone.[2] The site is located in an area of high regional seismicity and a maximum peak credible ground acceleration of 0.52g[3] at the project site could occur from a magnitude 6.6 event along the Palos Verdes Hills zone, the nearest active fault zone, which is located approximately three miles southwest of the project site.

The maximum credible earthquake (MCE) is the theoretical maximum event that could occur along the fault. The highest magnitude of ground shaking which can be attributed to an individual fault is known as the maximum probable earthquake[4] (MPE). The MPE, MCE, and the distance to the associated causative fault in the vicinity of the project site are summarized

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2 *Alquist Priolo Special Studies Zones have been established throughout California. These zones identify areas where potential surface rupture along a fault could prove hazardous, and identify where special studies are required to characterize hazards to habitable structures.*

3 *One g is equivalent to the accelerative force of gravity at sea level (32.2 feet/second)^2. For example, the force that pushes a person back in his/her seat when taking off in a commercial jetliner is about 0.5 g. A force of 0.5 g is also enough to move a refrigerator across a room in an earthquake.*

4 *MPE is a seismic event with 10 percent probability of being exceeded in 50 years, or the largest historic event known to have occurred at the project site. This constitutes the earthquake that would be highly likely to occur within the life of a given project.*

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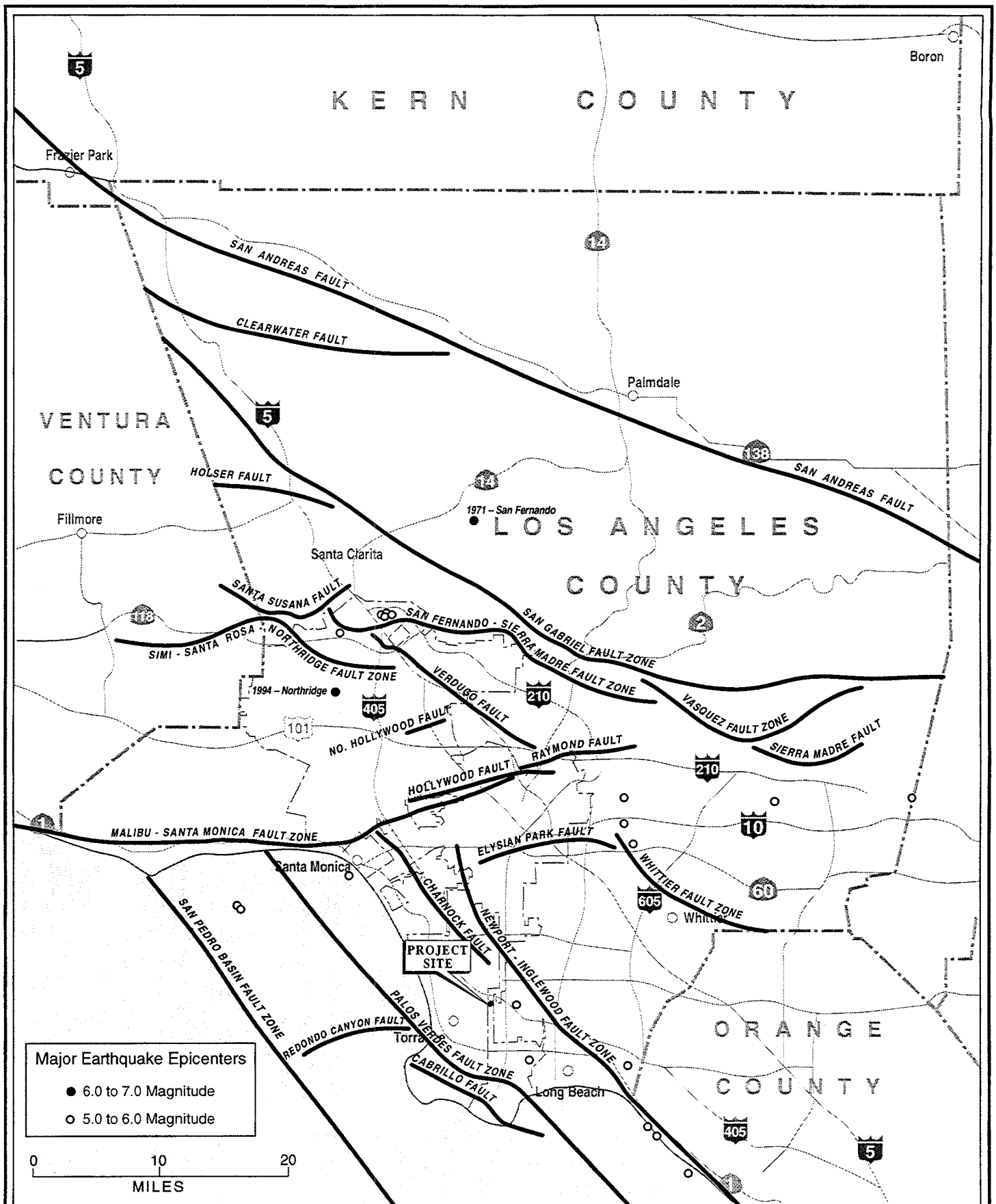

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Figure 12
Major Earthquakes and Recently Active Faults

Source: Department of Regional Planning County of Los Angeles, 1990

on Table 6 on page 92. As identified in this table, the maximum probable earthquake generated by faults in the immediate vicinity of the project site which include the Palos Verdes and Newport-Inglewood Faults, would be expected to range in magnitude to 6.6 on the Richter Scale. Also included in this table for comparison purposes is the San Andreas fault which, although 48 miles from the site, is anticipated to generate the highest magnitude seismic event (8.1) in the southern California area.

(2) Liquefaction

Liquefaction is defined as a phenomenon wherein the structure of saturated soil collapses during strong ground shaking of considerable duration, causing water pressure in the soil to rise sufficiently to make the soil behave like a fluid for a short period. The effects of liquefaction can include the loss of the soil's ability to support footings and foundations, thus causing buildings and foundations to buckle. Liquefaction may occur if both of the following conditions are met: (1) soils are sandy and loose to medium dense in consistency; and (2) the water table is shallower than 50 feet below the surface.

2. PROJECT IMPACTS

Information contained within the aforementioned geotechnical report was analyzed for this section. Soil mapping was done for the entire site. The field investigation was conducted by competent geotechnical engineering professionals and included testing and analysis for direct shear, consolidation, soil moisture and densities.

a. Grading

A project would have a significant grading (landform alteration) impact if distinct and prominent geologic or physical features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, wetlands) were destroyed, permanently covered, or modified.

The proposed development is anticipated to occur over two phases and will require the demolition of the existing structures and preparation of individual building sites in order to construct commercial, industrial and retail buildings with associated interior streets and landscape areas. The project consists of retail development within Area 1 and office/industrial development within Area 2 (see Figure 6 in Section II.D, Project Characteristics). An estimated 473,300 cubic yards (cy) of earth will be graded during the construction of the project. An

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Table 6

ESTIMATED MAXIMUM PROBABLE GROUND MOTION PARAMETERS

Fault Name	Approximate Distance (mi)	Maximum Credible Event[a]	Maximum Probable Event[b]
Elysian Park	14	7.00	5.75
Holser	42	6.60	5.75
Malibu Coast	19	7.50	6.50
Newport-Inglewood	5	7.00	6.60
Palos Verdes	3	7.50	6.60
San Andreas	48	8.30	8.10
San Gabriel	26	7.00	5.75
Santa Monica-Hollywood	16	7.50	5.25
Santa Susana	33	7.00	6.00
San Fernando-Sierra Madre	25	7.50	6.00
Simi-Santa Rosa	37	7.00	5.25
Verdugo	20	6.70	4.50
Whittier-North Elsinore	18	7.50	6.70

[a] *The maximum credible earthquake is the theoretical maximum event which could occur along a fault. The maximum credible earthquake assigned to a fault is derived from formulas which correlate the length of the fault trace to the theoretical maximum Richter magnitude earthquake.*

[b] *The maximum probable earthquake is the maximum earthquake that may reasonably be expected within a 100-year period.*

Source: NorCal Engineering, 1996; Harbor Gateway Retail Center Draft EIR, August 1996.

estimated 88,100 cy would be graded in Area 1. About 71,500 cy of this total would be imported fill; the remaining 16,600 cy would be on-site cut and fill. An estimated 385,700 cy of earth materials would be graded in area 2. About 349,600 cy of this total would be imported fill material; the remaining 35,600 cy would be on-site cut and fill.

Although any removed soils can be reutilized as compacted fill once any deleterious material or oversized materials (in excess of eight inches) are removed, the importation of soil would still be required. The import of earth materials would be via a haul route using the San Diego Freeway Western and Normandie Avenue ramps to and from the Harbor Freeway and 190th Street (see Figure 13 on page 93). Each haul truck is able to carry about 14 cy of

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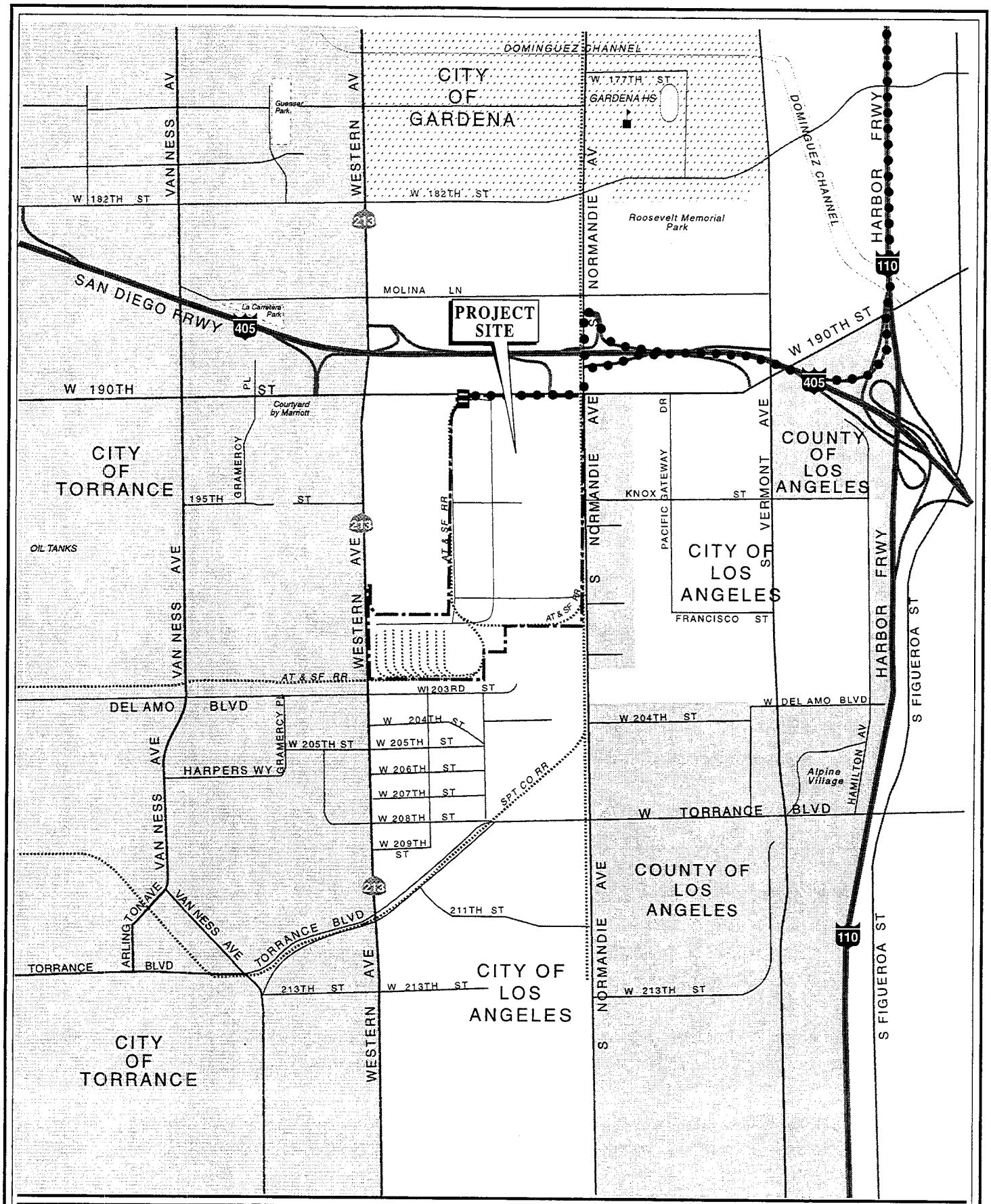

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●●●● Haul Route
Project Site Entrance
Project Site Boundary

N

0 .25 .5 Mile

Figure 13
Construction Haul Route

material. Earth moving activities would require an average of about 15 truck trips per day over the course of the eight-year construction period, assuming 21.5 working days per month for eight years. In actuality, substantially more truck trips would occur on certain days, while fewer or no trips would occur on most days during the construction period.

Because the depth of excavation associated with project construction would be substantially less than the depth to ground water (approximately 80 to 90 feet), no constraints with respect to groundwater exist on-site. Tests conducted for the geotechnical analysis indicated that soil shrinkage would probably be on the order of 20 percent due to excavation and recompaction. Subsidence would be approximately 0.2 feet during construction. These effects are typical of recompaction and are taken into account in all grading calculations.[5]

Representative samples of surficial soils revealed high levels of sulfate concentrations, typical of the subgrade soils expected to be encountered. Since a high sulfate concentration can corrode cement unless a special anti-corrosive cement mix is used, special cement recommendations could be necessary for building foundations. Additional sulfate testing will be required at the conclusion of rough grading operation to verify this conclusion.

Absent proper site preparation, potentially significant impacts could occur from construction on the soils located within the project site. With implementation of the mitigation measures indicated below, proposed structures within both Areas 1 and 2 would be safe from excessive settlements under the anticipated design loadings and conditions. In addition, the site does not include any distinct or prominent geologic or physical features. Therefore, potential impacts associated with project grading operations would be considered less than significant.

b. Erosion

A project would normally have a significant erosion impact if it causes a geologic or structural hazard to other properties by causing or accelerating geologic instability as a result of erosion.

On-site grading would be conducted subject to applicable rules and regulations to prevent or minimize erosion and runoff into nearby streets and storm drains, as discussed in Section IV.C, Surface Water of this DEIR, which includes erosion control mitigation measures. Potential impacts due to fugitive dust are discussed in Section IV.B, Air Quality. The proposed

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5 *Scott Spensiero, NorCal Engineering, telephone conversation, October 8, 1996.*

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project is not anticipated to cause or accelerate geologic instability within the two project development areas during construction. Therefore, no erosion-related impacts are anticipated.

c. Seismicity

A significant seismic impact would normally occur if the project would pose an increased threat[6] to public safety or destruction of property by exposing people, property, or infrastructure to seismically-induced hazards.

(1) Groundshaking

There are no known active or potentially active faults which cross the project site (see Figure 12 on page 90). Accordingly, the potential for fault-related ground rupture on the site is low to nonexistent and would not be considered significant.

The project site is located within the seismically active Southern California region. Therefore, the introduction of an estimated 5,870 to 6,170 additional employees and visitors on the site[7] would increase the potential for on-site exposure to possible hazards associated with groundshaking. However, the location of the project site in relation to known active faults indicates that it is not expected to be exposed to any greater seismic risk from groundshaking than found in other locations within Southern California. The project site is not within an Alquist-Priolo Special Studies Zone. Any groundshaking hazard present on the project site would be considered adverse but not significant with implementation of the required Building Code provisions related to seismic design.

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6 *Measurement of risk for geologic hazards is based on knowledge and geologic principles. Acceptability of risk is based on subjective criteria (public policy) and is a function of social, political and economic factors. Evaluation of a geologic hazard impact is accomplished using engineering data (risk measurement) and by determination of the degree of acceptable risk (subjective criteria, including professional judgment and experience). Some level of risk is inherent on nearly every project and is typically evaluated on a site-specific basis. The level of risk is controlled by implementing engineering design and is a function of the potential hazard occurrence and magnitude. For example, a project may have a high degree of risk regarding mudflow and landslide hazard, but if the area impacted by the hazard is isolated, relatively minor, and does not endanger people, property or infrastructure, the hazard impact may be considered low.*

7 *Based upon an estimated daytime population of 6,250 to 6,550 (from McDonnell Douglas Realty Company), less the 380 current on-site employees.*

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(2) Liquefaction

The field analysis performed by NorCal Engineering for this project indicates that the potential for liquefaction at the site is considered very low and would not constitute a significant impact because: 1) the clayey and silty soil on-site is stiff in nature; and 2) the ground water depth in the vicinity of the project is greater than 50 feet below the ground surface (approximately 80 to 90 feet.)

3. MITIGATION MEASURES

The following mitigation measures shall apply to proposed retail development in Area 1 and to any future project proposed within the office/industrial park in Area 2.

a. Grading/Erosion

1. All grading shall be performed in accordance with the current City of Los Angeles Building Code and the requirements of the responsible agencies including, but not limited to, the Department of Building and Safety and the Bureau of Engineering.

2. No on-site grading or import or export of earth materials to the project site shall commence or be performed without first obtaining a permit from the Los Angeles Department of Building and Safety. In accordance with Section B-164 of the Building and Safety Code, the following shall be conducted prior to issuance of a grading permit: (1) grading plans and specifications meeting all Department of Building and Safety requirements shall be prepared; and (2) evidence shall be provided that adjacent property owners have received a 30-day written notice of any pending excavation work to a depth deeper than the foundation of adjoining buildings and located closer to the property line than the depth of excavation.

3. Grading and excavation operations shall be conducted under the observation of a registered soils engineer or geologist. Grading plans for the site shall conform to the General Specifications for all Grading Plans promulgated by the City of Los Angeles Department of Building and Safety.

4. Vegetation and demolition debris shall be removed and hauled from the site prior to the start of grading operations.

5. Any existing low density soils and/or saturated soils shall be removed under the inspection of the soils engineer/geologist. After the exposed surface has been cleansed of debris and/or vegetation, it shall be scarified until it is uniform in

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consistency, brought to the proper moisture content and compacted to a minimum of 90 percent relative compaction.

6. Overexcavation shall extend a minimum of five horizontal feet beyond all sides of the foundations or a distance equal to the depth of compacted fill placed, whichever is greater.

7. Any underground structures or utility lines encountered during grading shall be either removed or properly abandoned prior to the start of construction.

8. Any imported fill material shall be low to moderate in expansion potential, preferably granular or similar to the upper soils encountered at the project site.

9. Any imported fill material shall be approved by the project soils engineer/ geologist.

10. Approved fill soils shall be placed in layers not in excess of six inches in thickness.

11. Each lift shall be uniform in thickness and thoroughly blended, compacted to a minimum of 90 percent relative compaction, and approved by the soils engineer/ geologist prior to the placement of the next layer of soil.

12. Fill soils shall be brought to within 15 percent of the optimum moisture content, unless otherwise specified by the soils engineer/geologist.

13. Compaction tests shall be conducted at a minimum of one test for every 500 cubic yards placed and/or for every two feet of compacted fill placed.

14. Final grade of structural areas shall be in a dense and smooth condition prior to placement of slabs-on-grade or pavement areas.

15. Minimum relative compaction shall be obtained in accordance with accepted methods in the construction industry.

16. No fill soils shall be placed, spread or compacted during unfavorable weather conditions.

17. When grading is interrupted by heavy rains, compaction operations shall not be resumed until approved by the soils engineer/geologist.

18. Adequate lateral support shall be provided for all adjacent improvements and structures at all times during grading operations and throughout the construction phase.

19. The project structural engineer shall review all proposed loads to be imposed for further recommendations regarding slab thickness and steel reinforcement.

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20. All retaining walls shall include a backfill zone of non-expansive material, consisting of a wedge beginning a minimum of one horizontal foot from the base of the retaining wall and extending upward at an inclination no less than 3/4 to 1 (horizontal to vertical).

21. All retaining walls shall be waterproofed and protected from hydrostatic pressure by a reliable permanent subdrain system.

22. All concrete slabs-on-grade shall be a minimum of five inches in thickness, reinforced a minimum of No. 4 bars eighteen inches in each direction, and positioned in the center of the slab.

23. Any concrete slabs with moisture sensitive floor coverings shall be underlain by an impervious membrane.

24. All concrete slab areas to receive floor coverings shall be moisture tested to meet all manufacturer requirements prior to placement.

25. Additional sulfate testing shall be performed at the conclusion of the rough grading operation to determine if special cement is required. If a high sulfate concentration is found, a non-corrosive cement mix such as Type 5 shall be used.

b. Seismicity

26. Design and construction of the proposed project shall include all requirements of the City of Los Angeles Building Code with respect to seismic safety and shall be approved by the City Department of Building and Safety prior to the issuance of building permits.

27. To assist in response to a seismic event, an emergency response and building-specific evacuation plan for project structures shall be developed and posted in each on-site building at the site. Such information shall be disseminated to occupants to reduce the potential for human injury.

4. ADVERSE EFFECTS

The proposed project would expose 5,870 to 6,170 additional employees and visitors to on-site seismic hazards but would not pose a significantly increased threat to public safety or destruction of property by exposing people, property, or infrastructure to geotechnical or seismic hazards nor would it cause damage to another property in the event of a seismic event. The project site is not subject to any greater seismic risk than any other site within the City of Los Angeles. Therefore, with implementation of the recommended mitigation measures, any potential geotechnical impacts would be reduced to less than significant levels.

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5. CUMULATIVE IMPACTS

Impacts related to geotechnical issues are localized on-site and do not affect any off-site areas. Cumulative development in the area would increase the overall potential for exposure to seismic hazards. Nevertheless, with adherence to applicable Building Codes and good engineering practices, none of these issues would remain potentially significant. No cumulative impacts would be associated with the proposed project with respect to geotechnical issues.

BOE-C6-0115239

1. ENVIRONMENTAL SETTING

a. Regulatory Setting

In response to longstanding concerns about air pollution, federal, state and local authorities have adopted various rules and regulations requiring evaluation of the impact on air quality of a planned project and appropriate mitigation of air pollution emissions. The following sections focus on current air quality planning efforts, and the responsibilities of agencies involved in these efforts. A discussion of ambient air quality standards is also provided.

(1) Authority for Current Air Quality Planning

A number of plans and policies have been adopted which address air quality concerns. Plans and policies relevant to the proposed project are discussed below.

(a) California Clean Air Act

The California Clean Air Act (CCAA), signed into law in September of 1988, is the most comprehensive state air quality legislation to be enacted in many years. The CCAA requires all areas of the state to achieve and maintain the California ambient air quality standards by the earliest practical date. Air pollution from commercial and industrial facilities is regulated by local districts. All air pollution control districts have been formally designated as attainment or nonattainment for each state air quality standard. Nonattainment designations are further categorized into three levels of severity: (1) moderate, (2) serious, and (3) severe.

The South Coast Air Basin is designated as a "severe" nonattainment area for ozone, carbon monoxide, nitrogen dioxide and PM_{10}. Severe nonattainment areas are required to revise their air quality management plans to include specified emission reduction strategies in an effort to meet clean air goals. The requirements include:

- Application of Best Available Retrofit Control Technology to existing sources;

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- Developing control programs for area sources (e.g., architectural coatings and solvents), and indirect sources (e.g., motor vehicle use generated by residential and commercial development);
- A District permitting system designed to allow no net increase in emissions from any new or modified permitted sources of emissions;
- Implementing reasonably available transportation control measures, and assuring a substantial reduction in the growth rate of vehicle trips and miles travelled;
- Significant use of low-emission vehicles by fleet operators;
- Sufficient control strategies to achieve a 5% or more annual reduction in emissions (or 15% or more in a three-year period) for ROG, NO_x, CO and PM_{10}. However, air basins may use an alternative emission reduction strategy which achieves a reduction of less than 5% per year under certain circumstances; and
- Demonstrating compliance with California Air Resources Board's established reporting periods for compliance with air quality goals. A seven-year initial reporting period from January 1, 1988 to December 31, 1994, was established. Subsequent reporting periods occur every three years (i.e., 1997, 2000, etc.). The 1991 Air Quality Management Plan (AQMP) sought to achieve a 35% emissions reduction for the initial reporting period. The goal of the 1994 AQMP is to achieve a 15% reduction in emissions. Each subsequent reporting period must also strive to achieve a 15% reduction in emissions.

(b) Air Quality Management Plan

The South Coast Air Basin is regulated by the South Coast Air Quality Management District (SCAQMD). The 1994 SCAQMD AQMP describes a comprehensive air pollution control program focused on attaining the state and federal ambient air quality standards in the South Coast Air Basin, and those portions of the Desert Air Basin that are under the jurisdiction of the SCAQMD (the Antelope Valley and the Coachella Valley). This 1994 revision to the AQMP also addresses several state and federal planning requirements, and incorporates many new programs and process developments implemented since the 1991 AQMP. It still calls for the implementation of all feasible control measures and the advancement and use of technologies for which breakthroughs are on the horizon.

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b. Existing Air Quality

(1) Regional Air Quality

The project site is located within the South Coast Air Basin of California, a 6,600 square-mile area encompassing all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The distinctive climate of this area is determined primarily by its terrain and geographical location. Regional meteorology is largely dominated by a persistent high pressure area which commonly resides over the eastern Pacific Ocean. Seasonal variations in the strength and position of this pressure cell cause seasonal changes in the weather patterns of the area. Local climatic conditions are characterized by warm summers, mild winters, infrequent rainfall, moderate daytime on-shore breezes, and moderate humidity. This normally mild climatic condition is occasionally interrupted by periods of hot weather, winter storms, and Santa Ana winds.

The South Coast Air Basin is an area of high air pollution potential, particularly from June through September. The poor ventilation is generally attributed to light winds and shallow vertical mixing. This frequently results in insufficient dispersion, thus causing elevated air pollution levels. Pollutant concentrations in the South Coast Air Basin vary with location, season and time of day. Ozone 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 Basin and adjacent desert.

Significant progress has been made in reducing air pollutant concentrations over the past decade in the South Coast Air Basin. Between 1976 and 1994, the number of days that the federal standard for ozone was exceeded decreased by over 60 percent. Reductions in emissions of other criteria pollutants show similar downward trends; however, air quality in this region is still the worst in the nation.

(2) Local Area Conditions

(a) Ambient Air Quality Standards

Over the past several decades, both the state and federal governments have set and periodically revised ambient air quality standards for pollutants that are of the greatest health concerns. These standards encompass the most common varieties of airborne materials which can pose a health hazard. Pollutants with ambient standards remain the chief focus of air quality management activities around the nation.

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Air quality standards are typically set at levels which provide a reasonable margin of safety and protect the health of the most sensitive individuals in the population. Pollutants for which ambient standards have been set are referred to as "criteria pollutants." Criteria pollutants include: (1) ozone, (2) carbon monoxide, (3) nitrogen dioxide, (4) sulfur dioxide, (5) PM_{10} (a general category of airborne particles less than or equal to 10 microns in diameter), and (6) lead, a specific particulate pollutant. Different standards for these and other pollutants have been set by California and other states. California standards tend to be more restrictive than federal standards, and are based on objective health and welfare concerns. California has also set standards for sulfates, hydrogen sulfide, vinyl chloride and visibility-reducing particles. Table 7 on page 104, shows the state and national ambient air quality standards currently in effect for criteria pollutants.

(b) Pollutant Levels at Nearby Monitoring Stations

The SCAQMD maintains a network of air quality monitoring stations located throughout the South Coast Air Basin. The most representative monitoring station for the project area is Hawthorne Monitoring Station. Criteria pollutants, including ozone, carbon monoxide, sulfur dioxide, nitrogen dioxide, particulates, and lead, are monitored at this station. Sulfate, a non-criteria pollutant is also measured. The most recent data available from this monitoring station is from the years 1990 - 1994. This data, shown in Table 8 on page 105 shows, the following pollutant trends:

Ozone - The maximum ozone concentration recorded during the 1990-1994 period was 0.15 ppm, which was recorded in 1992. During this period, the state standard of 0.09 ppm was exceeded between three and 17 times annually, with the lowest number of exceedances recorded in 1990 and 1994. The federal standard was exceeded twice during the five-year period, once in 1992 and once in 1993.

Particulates (PM_{10}) - The highest recorded concentration during the period 1990-1994 was 127 micrograms per cubic meter of air ($\mu g/m^3$) of particulates, which was recorded in 1990. During this same time period, the state PM_{10} standard was exceeded between five and seventeen times annually, with the lowest number of exceedances recorded in 1992. PM_{10} is monitored every six days coincident to a national schedule; thus, PM_{10} exceedances are based on the number of days that sampling actually occurred.

Carbon Monoxide - The maximum recorded 1-hour concentration during the 1990-1994 period was 19.0 ppm, which was recorded in 1990. During this time period, there were no exceedances of the state 1-hour carbon monoxide standard. The maximum recorded 8-hour

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Table 7
AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards[a]	National Standards[a]	Pollutant Health Effects	Major Pollutant Sources
Ozone (O^3)	1 Hour	0.09 ppm (180 $\mu g/m^3$)	0.12 ppm (235 $\mu g/m^3$)	High concentrations can directly affect lungs, causing irritation. Common effects are damage to vegetation and cracking of untreated rubber.	Motor vehicles.
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	Interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)		
Nitrogen Dioxide (NO_2)	Annual Average	—	0.05 ppm (100 $\mu g/m^3$)	Irritating to eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum refining operations, industrial sources, aircraft, ships, railroads.
	1 Hour	0.25 ppm (470 $\mu g/m^3$)	---		
Sulfur Dioxide (SO_2)	Annual Average	—	80 $\mu g/m^3$ (0.03 ppm)	Irritates upper respiratory tract; injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants and metal processing.
	24 Hour	0.05 ppm (131 $\mu g/m^3$)	365 $\mu g/m^3$ (0.14 ppm)		
	3 Hour	---	---		
	1 Hour	0.25 ppm (655 $\mu g/m^3$)	---		
Suspended Particulate Matter (PM_{10})	Annual Geometric Mean	30 $\mu g/m^3$	---	May irritate eyes and respiratory tract. Absorbs sunlight, reducing amount of solar energy reaching the earth. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities such as wind-raised dust and ocean spray.
	24 Hour	50 $\mu g/m^3$	150 $\mu g/m^3$		
	Annual Arithmetic Mean		50 $\mu g/m^3$		

[a] *ppm = parts per million, $\mu g/m^3$ = micrograms per cubic meter, mg/m^3 = milligrams per cubic meter.*

Source: Planning Consultants Research based on SCAQMD, Air Quality Handbook for Preparing Environmental Impact Reports, Revised April 1993 and CARB, ARB Fact Sheet 38, Revised 1988.

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Table 8

AIR QUALITY LEVELS MEASURED AT THE HAWTHORNE AIR MONITORING STATION

Pollutant	Year	Maximum Level	Days State Standard Exceeded	Days Federal Standard Exceeded
Ozone (O_3)	1990	0.10 ppm	3	0
1 hour				
California Standard: 0.09 ppm	1991	0.11 ppm	17	0
Federal Standard: 0.12 ppm	1992	0.15 ppm	11	1
	1993	0.13 ppm	9	1
	1994*	0.11 ppm	3	0
Carbon Monoxide (CO)				
1 hour	1990	19.0 ppm	0	0
California Standard: 20 ppm	1991	18.0 ppm	0	0
Federal Standard: 35 ppm	1992	18.0 ppm	0	0
	1993*	16.0 ppm	0	0
	1994	14.0 ppm	0	0
8 hour	1990	12.7 ppm	11	10
California Standard: ≥ 9 ppm	1991	11.3 ppm	10	7
Federal Standard: ≥ 9 ppm	1992	12.3 ppm	11	7
	1993*	10.7 ppm	6	3
	1994	12.0 ppm	8	5
Nitrogen Dioxide (NO_x)	1990	0.23 ppm	0	0
1 hour	1991	0.21 ppm	0	0
California Standard: 0.25 ppm	1992	0.19 ppm	0	0
	1993	0.16 ppm	0	0
	1994	0.22 ppm	0	0
Sulfur Dioxide (SO_x)	1990	0.035 ppm	0	0
24 hour	1991	0.019 ppm	0	0
California Standard: 0.05 ppm	1992	0.035 ppm	0	0
	1993	0.014 ppm	0	0
	1994	0.010 ppm	0	0
Suspended Particulates (PM_{10})[a]	1990	127 ug/m^3	17	0
California Standard: 50 ug/m^3	1991	79 ug/m^3	14	0
(24-hour)	1992	67 ug/m^3	5	0
Federal Standard: 150 ug/m^3	1993	91 ug/m^3	9	0
	1994	81 ug/m^3	11	0

ppm = parts per million
ug/m^3 = micrograms per cubic meter
** May not be representative due to less than 12 months of data.*

[a] *Exceedances based on the number of pollutant samples.*

Source: California Air Resources Board. Air Monitoring Data. 1990-1994.

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carbon monoxide was 12.7 ppm, which was recorded in 1990. The state 8-hour carbon monoxide standard was exceeded between six and eleven times annually during the period, with the greatest number of exceedances occurring in 1990 and 1992. The federal standard was exceeded between three and ten times annually, with the highest number of exceedances occurring in 1990.

Sulfur Dioxide - The highest recorded concentration of sulfur dioxide during the period 1990-1994 was 0.035 ppm, which was recorded in 1990 and 1992. No violations of the state or federal standards were recorded during this time period.

Nitrogen Dioxide - The highest recorded concentration of nitrogen dioxide during the period 1990-1994 was 0.23 ppm, which was recorded in 1990. No violations of either the state or federal standards occurred during this time period.

(c) Emissions from Current On-Site Activity

The project site currently operates as an aircraft parts warehousing and distribution facility. Operation of the existing 2.4 million square foot facility generates air pollutants from energy (electricity and natural gas) consumption, as well as from automobile trips to and from the site by employees and visitors. Estimates of current emissions associated with stationary sources (electricity and natural gas consumption), based upon SCAQMD methodologies and emission factors, are shown in Table 9 on page 107. Estimates of emissions associated with the 8,560 daily vehicle trips to and from the project site expected to occur in the absence of the project are shown in Table 10 on page 107.

(d) Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others because they involve more sensitive population groups or activities, such as children, the elderly, the acutely ill and the chronically ill, especially those with cardio-respiratory diseases.

Residential areas are also considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial and commercial areas are considered the least sensitive to air pollution. Exposure periods are

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Table 9

ESTIMATED EXISTING STATIONARY SOURCE EMISSIONS

Pollutant	Electricity		Natural Gas		
	Emission Factor (lbs/million kWh/day)	Emissions (lbs/day)	Emission Factor (lbs/cubic foot/day)	Emissions (lbs/day)	Total Emissions (lbs/day)
CO	0.2	14.4	20	1.0	15.4
ROG	0.01	0.7	5.3	0.3	1.0
NO_x	1.15	82.9	120	6.1	89.0
SO_x	0.12	8.7	Neg.	0.0	8.7
PM_{10}	0.04	2.9	0.2	0.0	2.9

Source: Planning Consultants Research, based on current electricity and natural gas consumption, as presented in Sections IV.J.1 and IV.J.2. See Appendix D for calculations.

Table 10

ESTIMATED CURRENT EMISSIONS FROM SITE-RELATED VEHICLE TRIPS [a]

Pollutant	Estimated Emissions (lbs/day)
CO	914.0
ROG	87.0
NO_x	155.0
SO_x	12.0
PM_{10}	35.0

[a] *Based on 8,560 daily vehicle trips to and from the site expected to occur in the absence of the project, as presented in Section IV.H, Transportation/Circulation. See Appendix D for calculations.*

Source: Planning Consultants Research. See Appendix D for calculations.

relatively short and intermittent as the majority of the workers tend to stay indoors most of the time. In addition, the working population is generally the healthiest segment of the public.

Sensitive receptors in the immediate vicinity of the project site include the residences immediately south of the project site. The next nearest sensitive receptors, all of which are separated from the project site by the San Diego Freeway, are the residences north and northwest of the project site, 186th Street Elementary School, and La Carretera Park. Land uses in the immediate vicinity of the project site are primarily commercial and light industrial.

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2. ENVIRONMENTAL IMPACT

The SCAQMD's primary regulatory focus is on emissions from industrial and commercial facilities. In addition, the SCAQMD has established thresholds of significance for the assessment of air quality impacts attributable to private development projects. These thresholds are set forth in the SCAQMD's EIR Handbook and apply to all construction activities as well as stationary and regional mobile emissions occurring during post-construction occupancy. These regional significance thresholds are summarized in Table 11 on page 109.

Air quality planning within the South Coast Air Basin is based on conformance with the National Ambient Air Quality Standards (NAAQS) established by the United States Environmental Protection Agency (EPA). Carbon monoxide (CO) is the indicator pollutant utilized in the examination of local emissions because it tends to remain in the vicinity of the source (principally automobiles). The State of California has adopted ambient CO air quality standards which are more stringent than the NAAQS. Accordingly, significant environmental impacts occur when either NAAQS or state standards for CO are exceeded or measurably increased as defined by the SCAQMD.

a. Regional Emissions

(1) Construction

Future development on the project site would generate pollutant emissions from the following activities: (1) grading operations; (2) travel by construction workers to project sites; (3) delivery of construction materials and supplies to project sites; (4) fuel combustion by on-site construction equipment; and, (5) the application of architectural coatings and other building materials that release volatile organic compounds (VOCs).

Construction impacts are calculated based on total square footage of development which would be accommodated under the proposed project, the time line for project development, and emission factors from the SCAQMD's EIR Handbook. Construction emissions are calculated for the proposed project in accordance with SCAQMD protocol. Area 1 construction was determined to produce the greatest construction impact due to the proposed four month demolition and site preparation/grading schedule. Estimates of construction emissions are based upon the following assumptions:

- All construction equipment would be diesel-powered and operate simultaneously for 8 hours per day;

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Table 11

SIGNIFICANCE THRESHOLDS

	Construction Pounds per Day	Construction Tons per Quarter	Post-Construction Occupancy (Pounds per Day)
Carbon Monoxide	550	24.75	550
Nitrogen Oxides	100	2.50	55
Reactive Organic Compounds	75	2.50	55
Particulate Matter	150	6.75	150
Sulfur Oxides	150	6.75	150

Source: South Coast Air Quality Management District.

- Equipment used would include one scraper, two motor graders, two off-highway trucks, 1 track-type tractor, two wheel loaders, two backhoe loaders, one hydraulic excavator, four bottom dump trucks, one water wagon, and one soil compactor; and
- 1.2 tons of particulate matter (50% of which is PM_{10}) emitted per acre per month of construction activity, in accordance with EPA's AP-42.

Construction emissions will vary over this time period by phase of construction, with the demolition and grading phases generating the largest quantity of emissions. This results from the large number of construction vehicles that will be utilized on-site plus the truck trips for deliveries and to haul demolition materials to local landfills. Area 2 development will also involve demolition and construction activity; however, because Area 2 buildout would occur over an eight-year period, construction emissions at any given time during that period would be expected to be less than those occurring during Area 1 construction.

Construction-related emissions for the proposed project are presented in Table 12 on page 110. These emissions are summarized as follows: CO - 5.2 tons/quarter; ROG - 0.8 tons/quarter; NO_x - 11.9 tons/quarter; SO_x - 1.3 tons/quarter; and, PM_{10} - 24.9 tons/quarter. Quarterly emissions of NO_x and PM_{10} would exceed SCAQMD significance thresholds. Average daily emissions of NO_x and PM_{10} also exceed the SCAQMD daily thresholds. Thus, emissions of these pollutants would be considered significant air quality impacts. Emissions of CO, ROG, and SO_x are considered adverse, but not significant, since levels of these emissions fall below the significance thresholds.

Uses in the vicinity of the project site, including the residences immediately south of the site and adjacent commercial and industrial properties, would be expected to be exposed to

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Table 12

PROJECT-RELATED CONSTRUCTION EMISSIONS[a]

	Estimated Emissions				
	CO	ROG	NO_x	SO_x	PM_{10} [b]
Average Quarterly Emissions (tons/quarter)	5.2	0.8	11.9	1.3	24.9
SCAQMD Quarterly Threshold (tons/quarter)	24.75	2.5	2.5	6.75	6.75
Tons/Quarter Over (Under)	**(19.55)**	**(1.7)**	**9.4**	**(5.45)**	**18.15**
Average Daily Emissions (lbs/day) [c]	160.3	25.1	369.7	39.2	770.9
SCAQMD Daily Threshold (lbs/day)	550	75	100	150	150
Lbs/Day Over (Under)	**(389.7)**	**(49.9)**	**269.7**	**(110.8)**	**620.9**

[a] *Area 1 construction is assumed to occur in 1998; buildout of Area 2 is assumed to occur between 1998 and 2006. Worst-case construction impacts are based upon the highest quarterly emissions occurring during Area 1 construction. Totals shown include combined emissions from Construction Fuel Consumption and Combustion and Construction Worker trips as provided in Appendix D.*

[b] *Fugitive dust emissions based on a rate of 1.2 tons of dust per acre per month. An estimated 50% of total dust is assumed to be PM_{10}. Grading is assumed to occur for a one-month period within the worst-case quarter.*

[c] *Daily estimate based on 21.5 working days per month.*

Source: Planning Consultants Research, June 1996.

increased dust levels during excavation and grading. In addition to the residential neighborhood to the south, other sensitive receptors in the vicinity of the project site include the 186th Street School and residential areas located north of the San Diego Freeway. Sensitive receptors in these areas could also experience increased dust levels generated by on-site grading. Such increases in dust levels (which could be experienced in the form of increased PM_{10} concentrations at any of the identified sensitive receptor locations) would constitute a significant air quality impact associated with construction of the proposed project.

(2) Post-Construction Occupancy

Air pollutant emissions associated with project occupancy and operation would be generated both by consumption of electricity and natural gas, and by the operation of motor vehicles travelling throughout Southern California. Emission factors for use in the regional mobile air quality analysis were compiled using the EMFAC7F1.1 emission factor model. The Caltrans version of this model compiles emission rates based on a desired year of analysis,

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specified fleet mix, percentage of hot starts and cold starts, vehicle speed, and whether or not these emissions are projected to occur during the summer or the winter months. These emission rates are specified across a user-defined temperature profile. Because project-specific data were unavailable, regional default values from the SCAQMD's EIR Handbook were used.

Emissions associated with energy production (electricity and natural gas) are classified by the SCAQMD as area or regional stationary source emissions. Electricity is considered an area source since it is produced at various locations within, as well as outside of, the SCAB. Since it is not possible to isolate geographically where electricity production occurs, these emissions are considered to be regional in nature. Emissions of criteria pollutants associated with the production of energy were calculated using emission factors from the SCAQMD's EIR Handbook.

Table 13 on page 112, presents regional stationary and mobile source emissions attributable to operation of the proposed project. Total regional pollutant emissions attributable to operation of the proposed project are determined by combining emissions resulting from electricity production, natural gas consumption, and mobile sources. As indicated in Table 13, total air pollutant emissions associated with project operation would exceed the SCAQMD's significance thresholds for CO, ROG, and NO_x. Thus, project-related emissions of these pollutants would be considered significant impacts. Project-related emissions of SO_x and PM_{10} would not exceed the SCAQMD's significance threshold; therefore, emissions of these two pollutants during project operation are considered to be adverse, but less than significant.

b. Local Area CO Emissions

Redevelopment of the project site is expected to affect traffic volumes within, and surrounding this area. Specific analysis locations were identified in the project site vicinity where traffic volumes and traffic congestion attributable to project buildout would be highest. As such, the analysis intersections represent the greatest potential for local air quality impacts associated with the proposed project, and thus, constitute the "worst case" scenario for determining the potential significance of project impacts. In accordance with the SCAQMD CO

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Table 13

PROJECT-RELATED OPERATIONAL EMISSIONS
(Pounds per Day)

	CO	ROG	NO_x	SO_x	PM_{10}
EMISSION SOURCE					
Mobile Sources [a]	2,944	280	499	39	115
Stationary Sources (electricity and natural gas consumption) [b]	37	4	211	18	6
Total (Proposed Project)	**2,981**	**284**	**710**	**57**	**121**
Less Existing Emissions [c]	929	88	244	21	38
Net Increase	**2,052**	**196**	**466**	**36**	**83**
SCAQMD Significance Thresholds	550	55	55	150	150
Over (Under)	**1,502**	**141**	**411**	**(114)**	**(67)**

[a] *Calculated based on 29,900 daily trips, as presented in Section IV.H, Transportation/Circulation.*

[b] *Based on electricity and natural gas consumption presented in Section IV.J, Energy Conservation, and the emission factors presented in Table 9 on page 107.*

[c] *From Tables 9 and 10 on page 107.*

Source: Planning Consultants Research, June 1996. See Appendix D for calculations.

modelling protocol, all four corners of each intersection analyzed were evaluated to determine whether or not project development would create a CO "hotspot." The following intersections were selected for this analysis:

- 190th Street and Normandie Avenue
- 190th Street and Project Driveway
- 190th Street and Western Avenue
- Western Avenue and Torrance Boulevard

The CALINE-4 model generates results of CO concentrations averaged over a one-hour time period under typical atmospheric conditions for the area. Eight-hour concentrations were manually calculated by converting one-hour concentrations to eight-hour equivalents, using a

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persistence factor which assumes that eight-hour CO concentrations are equivalent to 70% of one-hour CO concentrations.

The CALINE-4 model determines future CO concentrations by adding the predicted increase in CO concentrations attributable to development of the project site to an existing ambient concentration. In support of the 1994 AQMP, the SCAQMD has forecast future CO concentrations for each area of the SCAB as represented by a particular monitoring station, in this case, the Hawthorne Monitoring Station. SCAQMD forecasts of future CO concentrations were prepared based on implementation of all adopted SCAQMD rules and regulations, in addition to all AQMP proposed rules, regulations, and strategies. This is considered the "Control Forecast." The use of control forecast ambient concentrations in this analysis is consistent with SCAQMD methodology.

The first step in the evaluation of local area impacts was to evaluate baseline conditions in the expected buildout year of 2006, which reflect ambient CO concentrations without implementation of the proposed project. The proposed project's contribution to CO concentrations at four study intersections was then determined by taking the difference between baseline traffic conditions (i.e., future traffic not including the project) and the baseline-plus-project scenario. Finally, the proposed project's contribution was added to the projected 2006 Control Ambient Concentration, to determine 2006 CO conditions expected to result from project development. The Control Ambient Concentration, provided by the SCAQMD, reflects implementation of all adopted SCAQMD rules and regulations, in addition to all of the AQMP proposed rules, regulations and strategies.

The proposed project's contributions to 1-hour CO levels are presented in Table 14 on page 114. Table 15 on page 115 presents estimated project contributions to 8-hour CO levels. Based on the CALINE 4 analyses performed, project-related traffic is not anticipated to result in any exceedances of the State or Federal CO 1-hour CO standards at any of the four study intersections. Under the Control scenario in which SCAQMD control measures are fully implemented, one-hour concentrations at all four intersections would remain below the State and Federal standards.

Under the Baseline scenario in which future control measures are not fully implemented, the State 8-hour standard would be exceeded at all four intersections. However, because the 9.90 Baseline Ambient 8-hour CO concentration forecast by SCAQMD would already exceed the 9 ppm standard, the SCAQMD's threshold of a measurable increase (defined as 0.45 ppm for the 8-hour concentration) applies to analysis of the proposed project's impact. Because

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Table 14

ONE-HOUR CARBON MONOXIDE CONCENTRATIONS [a] (PPM)

	2006 Baseline Conditions		2006 Control Conditions		
Intersection	**Ambient Concentration**	**Ambient + Project**	**Ambient Concentration**	**Ambient + Project**	**Project Impact[b]**
190th Street and Normandie Avenue					
Northeast	14.4	14.6	9.2	9.4	0.2
Southeast	14.4	14.5	9.2	9.3	0.1
Southwest	14.4	14.7	9.2	9.5	0.3
Northwest	14.4	14.8	9.2	9.6	0.4
190th Street and Project Driveway					
Northeast	14.4	14.5	9.2	9.3	0.1
Southeast	14.4	14.5	9.2	9.3	0.1
Southwest	14.4	14.7	9.2	9.5	0.3
Northwest	14.4	14.6	9.2	9.4	0.2
190th Street and Western Avenue					
Northeast	14.4	14.7	9.2	9.5	0.3
Southeast	14.4	14.7	9.2	9.5	0.3
Southwest	14.4	14.7	9.2	9.5	0.3
Northwest	14.4	14.5	9.2	9.3	0.1
Western Avenue and Torrance Boulevard					
Northeast	14.4	14.6	9.2	9.4	0.2
Southeast	14.4	14.5	9.2	9.3	0.1
Southwest	14.4	14.4	9.2	9.2	0.0
Northwest	14.4	14.4	9.2	9.2	0.0

[a] *The State Standard for 1-hour CO concentration is 20 ppm and the Federal Standard is 35 ppm.*
[b] *Project impact is the difference between the "Ambient + Project" condition and the "Ambient Concentration."* The 1-hour Ambient Concentrations shown (Baseline and Control conditions) are derived from the 1991 AQMP, Technical Report V-1, Table 6-5.

Source: Planning Consultants Research.

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Table 15

EIGHT-HOUR CARBON MONOXIDE CONCENTRATIONS[a] (PPM)

	2006 Baseline Conditions		2006 Control Conditions		
Intersection	Ambient Concentration	Ambient + Project	Ambient Concentration	Ambient + Project	Project Impact[b]
190th Street and Normandie Avenue					
Northeast	9.90	10.04	6.30	6.44	0.14
Southeast	9.90	9.97	6.30	6.37	0.07
Southwest	9.90	10.11	6.30	6.51	0.21
Northwest	9.90	10.18	6.30	6.58	0.28
190th Street and Project Driveway					
Northeast	9.90	9.97	6.30	6.37	0.07
Southeast	9.90	9.97	6.30	6.37	0.07
Southwest	9.90	10.11	6.30	6.51	0.21
Northwest	9.90	10.04	6.30	6.44	0.14
190th Street and Western Avenue					
Northeast	9.90	10.11	6.30	6.51	0.21
Southeast	9.90	10.11	6.30	6.51	0.21
Southwest	9.90	10.11	6.30	6.51	0.21
Northwest	9.90	9.97	6.30	6.37	0.07
Western Avenue and Torrance Boulevard					
Northeast	9.90	10.04	6.30	6.44	0.14
Southeast	9.90	9.97	6.30	6.37	0.07
Southwest	9.90	9.90	6.30	6.30	0.00
Northwest	9.90	9.90	6.30	6.30	0.00

[a] *The State and Federal 8-hour CO standards are 9 ppm.*
[b] *"Project Impact" is the difference between the "Ambient + Project" condition and the "Ambient Concentration." The 8-hour impact is calculated by multiplying the modeled 1-hour concentration by a persistence factor of 0.7. The 8-hour Ambient Concentrations shown (Baseline and Control Conditions) are derived from the 1991 AQMP, Technical Report V-1, Table 6-5.*

Source: Planning Consultants Research.

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the greatest CO concentration increase attributable to project-related traffic would be 0.28 ppm (at the northwest corner of the 190th Street-Normandie Avenue intersection), the 0.45 ppm increase threshold would not be exceeded at any study intersection. Because no significant impact would occur at the intersections most affected by project traffic, no significant impacts are anticipated at any other locations in the study area. Consequently, sensitive receptors in the area (including residences and schools) would not be significantly affected by project traffic. Localized impacts related to mobile source emissions are therefore considered less than significant.

c. Consistency with Adopted Plans and Policies

An important step in an air quality analysis is to determine the proposed project's relationship to applicable local and regional plans and programs. Within this context, and analysis of the project's consistency with the SCAQMD's AQMP, SCAG's Regional Comprehensive Plan and Guide (RCPG), and the City of Los Angeles General Plan Air Quality Element must be conducted.

(a) SCAQMD, SCAG Policies

The following criteria are required to be addressed in order to determine project consistency with SCAQMD and SCAG policies:

- Will the project result in any of the following:
  - An increase in the frequency or severity of existing air quality violations; or
  - Cause or contribute to new air quality violations; or
  - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP; and;
- Will the project exceed the assumptions in the AQMP?

SCAQMD methodologies require that an air quality analysis for projects such as the proposed Harbor Gateway Center include forecasts of project emissions in a regional context during construction, and in a regional as well as local context, during project occupancy. Since the consistency criteria identified above all pertain to pollutant concentrations, rather than to total regional emissions, the analysis of the project's impact on localized CO concentrations is used as the basis for evaluating project consistency with the first criterion.

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As previously indicated, carbon monoxide has been identified by the ARB and the SCAQMD as the preferred pollutant for assessing local area air quality impacts. Based on methodologies set forth by the ARB and the SCAQMD, the assessment of local area air quality impacts is based on changes in CO concentrations at selected receptor locations located in close proximity to the project site.

Carbon monoxide emissions were analyzed using the CALINE4 model. Under this scenario, no violations of the State and Federal carbon monoxide standards are projected to occur as discussed above. Thus, the project is consistent with the first criteria established by the SCAQMD for determining project consistency (i.e., no increase in frequency or severity of existing air quality violations, does not cause or contribute to new air quality violations, does not delay timely attainment of standards).

Air quality planning within the South Coast Air Basin focuses on the attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing and growth trends. Thus, the SCAQMD's second criteria for determining project consistency focuses on whether or not the proposed project exceeds AQMP assumptions.

Determining whether or not a project exceeds the assumptions in the AQMP involves the evaluation of three criteria: (1) consistency with population, housing and employment growth projections, (2) proposed project mitigation measures, and (3) appropriate incorporation of land use planning strategies. The following discussion provides a detailed analysis of each of these three criteria.

1. Is the project consistent with the population, housing and employment growth projections upon which AQMP forecasted emission levels are based?

For a project to be consistent with the AQMP, it must be consistent with the population, housing and employment assumptions which were used in the plan's development. In the case of the 1994 AQMP, there are three sources of employment data that form the basis for the projections of air pollutant emissions shown in the AQMP. These include: (1) projections of population, housing and employment growth proposed by the City in the Los Angeles City General Plan Framework; (2) projections of regional population and employment growth contained in SCAG's Regional Growth Management Chapter (GMC) of the Regional Comprehensive Plan, and (3) projections of regional housing growth contained in SCAG's Regional Housing Needs Assessment (RHNA).

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Employment forecasts contained in the AQMP are based in part upon the growth projections contained in the City of Los Angeles General Plan Framework, and the Harbor Gateway District Plan. As discussed in Section IV.G, Land Use, the proposed project is consistent with the types and intensity of land use envisioned for the site vicinity in the General Plan Framework and the District Plan. Thus, it can be concluded that the proposed project is considered consistent with the employment growth projections upon which the AQMP attainment strategies are based.

SCAG locates the project site within the Los Angeles City subregion. The GMC projects that employment in the City of Los Angeles will grow by about 184,000 jobs between 1996 and 2010.[8] The number of jobs that would be accommodated by project buildout (about 5,000) constitutes less than three percent of total projected employment growth for the subregion. Because the SCAQMD has incorporated these same projections into the AQMP, it can be concluded that project buildout would be consistent with the projections in the AQMP.

2. Does the project implement all feasible air quality mitigation measures?

Implementation of all feasible mitigation measures is proposed by the Applicant in order to substantially reduce air quality impacts. The proposed project would incorporate a wide array of key air pollution control strategies identified by the SCAQMD, as described in Section IV.B.3, Mitigation Measures. Thus, all mitigation measures considered feasible would be incorporated into project buildout.

3. To what extent is project development consistent with the land use policies set forth in the AQMP?

As discussed in Section IV.G, Land Use, the proposed project would serve to implement a number of land use policies of both the City of Los Angeles General Plan Framework and the SCAG Regional Comprehensive Plan and Guide. The concentration of employment opportunities on the project site, which is within an area designated as a Regional Center in the General Plan Framework, would provide improved opportunities for the use of public transit and other alternative transportation modes, thereby fulfilling the objective of reducing vehicle miles traveled and vehicular air emissions. Consequently, the proposed project is considered consistent with AQMP land use policy.

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8 *The 1996 employment estimate is based upon interpolation between the 1990 and 2000 estimates contained in the Growth Management Chapter.*

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(b) City of Los Angeles Policies

The City of Los Angeles General Plan Air Quality Element was prepared in response to California state law requiring that each city and county adopt a long-term comprehensive general plan. This plan must be integrated, internally consistent, and present goals, objectives, policies and implementation guidelines for decision makers to use. The planning area for the City's Air Quality Element covers the entire City of Los Angeles, which encompasses an area of about 465 square miles.

The 1992 revision of the City's General Plan Air Quality Element serves to aid the greater Los Angeles region in attaining the state and federal ambient air quality standards at the earliest feasible date, while still maintaining economic growth, and improving the quality of life. The Air Quality Element and the accompanying Clean Air Program acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and clean air goals. With the City's adoption of the Air Quality Element and the accompanying Clean Air Program, the City is seeking to achieve consistency with regional Air Quality, Growth Management, Mobility and Congestion Management Plans.

To achieve these goals, performance-based standards have been adopted to provide flexibility in implementation of the policies and objectives of the City's Air Quality Element. The following General Plan Goals, Objectives and Policies are relevant to the proposed project:

GOAL 2 - *Less reliance on single occupant vehicles with fewer commute and non-work trips.*

Objective 2.1 - It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.

Policies

2.1.1 Utilize compressed work week schedules and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in an effort to reduce vehicle trips and/or vehicle miles travelled as an employer and encourage the private sector to do the same to reduce vehicle trips and traffic congestion.

As previously discussed, a number of measures to assist in reducing vehicle trips would be incorporated into the proposed project. Two local bus routes directly serve the project site. In addition, connections to MTA buses link this area with other employment and residential areas throughout the region. The high concentration of employment accommodated by the

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proposed project would facilitate increased use of public transit for commuting. In addition, the mix of employment-generating and retail uses would encourage walking/bicycling between uses on-site, as well as combining of trips. The proposed project is therefore considered consistent with this City policy.

Objective 2.2 - It is the objective of the City of Los Angeles to increase vehicle occupancy for non-work trips by creating disincentives for single passenger vehicles, and incentives for high occupancy vehicles.

Policies

2.2.1 Discourage single-occupant vehicle use through a variety of measures such as market incentives, mode-shift incentives, trip reduction plans, and rideshare incentives.

2.2.2 Encourage multi-occupant vehicle travel and discourage single occupant vehicle travel by instituting parking management practices.

2.2.3 Minimize the use of single occupant vehicles associated with special events, or in areas and times of high levels of pedestrian activities.

Employer-demonstrated compliance with SCAQMD employer trip reduction requirements will provide a mechanism for encouraging employee ridesharing, transit and rail use and other transportation alternatives. The proposed project would accommodate a high concentration of employment located along several major transportation arteries. This would serve to encourage the use of alternatives to the single occupant vehicle. Consequently, the proposed project is considered consistent with these City policies.

GOAL 4 - *Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation and air quality.*

Objective 4.1 - It is the objective of the City of Los Angeles to include regional attainment of ambient air quality standards as a primary consideration in land use planning.

Policies

4.1.1 Coordinate with all appropriate regional agencies in the implementation of strategies for the integration of land use, transportation and air quality policies.

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Redevelopment of the McDonnell Douglas property offers the opportunity to utilize existing infrastructure to support growth. As discussed above, the proposed project would serve to implement a number of City, SCAG, and SCAQMD policies related to regional land use planning. Therefore, it is considered consistent with the policy to coordinate with all appropriate regional agencies.

Based upon this evaluation of the proposed project in light of policies and goals set forth in the Air Quality Element for the City of Los Angeles, the proposed Harbor Gateway Center project is considered consistent with these policies and goals. No inconsistencies are indicated.

3. MITIGATION MEASURES

The following mitigation measures set forth a program of air pollution control strategies designed to lessen the project's significant air quality impacts.

(1) Construction

The following mitigation measures are recommended to address potentially significant impacts of project-generated PM_{10} emissions during construction.

(a) Grading

1. The Applicant shall secure any necessary permits from the SCAQMD, including an approved fugitive dust emissions control plan pursuant to SCAQMD Rule 403, as amended.

2. Non-toxic soil stabilizers shall be applied according to manufacturers' specifications or vegetation shall be planted on all inactive construction areas (previously graded areas inactive for thirty days or more and not scheduled for additional construction activities within twelve months). Permanent landscaping shall be installed upon completion of construction.

3. Areas graded shall be wetted down sufficiently to form a crust on the surface, with repeated soaking as necessary to maintain the crust and to prevent dust from being raised by on-site operations, using water trucks or sprinkler systems. Further, construction areas shall be wetted down in the late morning or after work is completed for the day.

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4. All grading activities shall cease during second stage smog alerts and periods of high winds (i.e. greater than 25 mph) if dust is being transported to off-site locations and cannot be controlled by watering.

5. All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer).

6. A construction relations officer shall be established by the Applicant to act as a liaison with neighbors and residents concerning on-site construction activity, including resolution of issues related to PM_{10} generation.

(b) Paved Roads

7. All construction roads within the project site that have a traffic volume of more than 50 daily trips by construction equipment, or 150 total daily trips for all vehicles, shall be surfaced with base material or decomposed granite.

8. Streets shall be swept at the end of the day if visible soil material has been carried onto adjacent public paved roads (reclaimed water shall be used if available.)

9. Construction equipment shall be inspected prior to leaving the site and loose dirt shall be washed off with wheel washers as necessary.

(c) Unpaved Roads

10. Water or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to preclude off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces.

11. Traffic speeds on all unpaved roads shall not exceed 15 mph.

(2) Post-Construction Occupancy

Long-term mobile source emissions associated with the proposed project shall be reduced through the following transportation systems management measures:

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12. The Applicant or future owners of property within the project subdivision shall provide public education regarding the importance of reducing vehicle miles traveled and the related air quality impacts through the use of brochures, classes, and other informational tools.

13. On-site office/industrial park development shall provide preferential parking for high occupancy vehicles and alternative fuel vehicles, as well as other forms of parking management that would encourage higher vehicle occupancy rates.

14. Project occupants shall comply with SCAQMD Rule 2202, which applies to any employers who employs 100 or more employees on a full or part-time basis at a worksite. This rule, which aims to reduce volatile organic compounds (VOCs), No_x, and CO, provides employers a menu of options that they can choose from to implement and meet the emission reduction target for their worksite.

15. The Applicant or future owners within the project subdivision shall, as feasible, schedule deliveries during off-peak periods in order to encourage the reduction of trips during the most congested periods.

4. ADVERSE EFFECTS

On the worst-case day of construction, the project would generate an estimated 160 lbs. of CO, 25 lbs. of ROG, 370 lbs. of NO_x, 39 lbs. of SO_x, and 771 lbs. of PM_{10}. In the operational phase, the project would result in a net increase in emissions of 2,052 lbs. per day of CO, 196 lbs. per day of ROG, 466 lbs. per day of NO_x, 36 lbs. per day of SO_x and 83 lbs. per day of PM_{10}. These levels exceed SCAQMD significance thresholds for CO, ROG and NO_x. No significant impacts to localized CO concentrations would occur, even without considering the effects of mitigation measures. The recommended mitigation measures would reduce project-related regional air emissions to the degree technically feasible. Nevertheless, both construction and operational regional emissions would remain above SCAQMD significance thresholds. In addition, although the mitigation measures listed above would serve to reduce the potential impacts of increased concentrations of PM_{10} generated by the project on nearby sensitive receptors during construction, significant impacts from PM_{10} emissions could potentially remain at these locations under worst case meteorological conditions. Project impacts are therefore considered significant and unavoidable.

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5. CUMULATIVE IMPACTS

Operational emissions associated with buildout of the proposed project, in combination with the related projects listed in Table 5 on pages 83 through 86, are summarized in Table 16 below. Total emissions of all pollutants from all cumulative projects would exceed the SCAQMD significance thresholds for specific projects. Although infill development such as the related projects is generally accounted for in SCAQMD air pollution forecasts, emission associated with cumulative development would contribute to continued high pollutant levels projected for the region.

Table 16

CUMULATIVE OPERATIONAL AIR EMISSIONS

Emission Source	Emissions (lbs/day) [a]				
	CO	ROG	NO_x	SO_x	PM_{10}
Mobile Sources	25,476	2,403	4,323	335	998
Stationary Sources	110	11	634	52	18
Total	**25,586**	**2,414**	**4,957**	**387**	**1,016**

[a] *Includes emissions associated with both the proposed project and related projects from Table 5 on pages 83 through 86. Calculations for related projects are shown in Appendix D, to which project emissions from Table 13 (less existing emissions from Tables 9 and 10) have been added. The calculations for all cumulative operational emissions are shown in Appendix D.*

Source: Planning Consultants Research.

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1. ENVIRONMENTAL SETTING

a. Surface Water Runoff

(1) Drainage Background

Drainage impacts are generally identified in terms of storm drain capacity, measured in cubic feet per second (cfs) of storm water discharge. Storm drain capacity refers to the capacity to which a given storm drain has been designed. This capacity is determined by anticipating the quantity of all runoff which could enter the storm drain from its tributary drainage area, calculating the quantity of runoff that would be generated by a given storm event which would then require conveyance by the proposed storm drain, and then sizing the storm drain to accommodate this calculated flow. Changes within a storm drain's tributary drainage area over time may affect the quantity of storm water which will drain into the tributary area's storm drain. If, for example, a large amount of impermeable surfaces are developed within the tributary drainage area of an existing storm drain, the increased runoff associated with those impermeable surfaces may cause the design capacity of the storm drain to be exceeded.

(2) Existing Drainage Conditions in the Project Site Vicinity

The project site does not contain surface water bodies, nor does it contain any blueline stream, as designated by the United States Geological Survey. The project site is within Federal Emergency Management Agency Flood Zone C, which indicates an area of minimal flooding.[9]

Drainage within the project site is served by on-site storm drains and internal streets which convey storm water runoff to off-site drainage facilities, as indicated in Figure 14 on page 126. One on-site storm drain conducts storm water flow from the northerly portion of the project site to a 6.25 foot wide by 4.0 foot high box culvert which flows easterly along the northern boundary of the property, adjacent to 190th Street. This box culvert leads to a 72-inch storm drain located near the intersection of Normandie Avenue and 190th Street, which connects in turn with a 66-inch storm drain running under Normandie Avenue. Another on-site storm

[9] *Flood Insurance Rate Map, Community Panel 060137 0068 D, revised February 4, 1987.*

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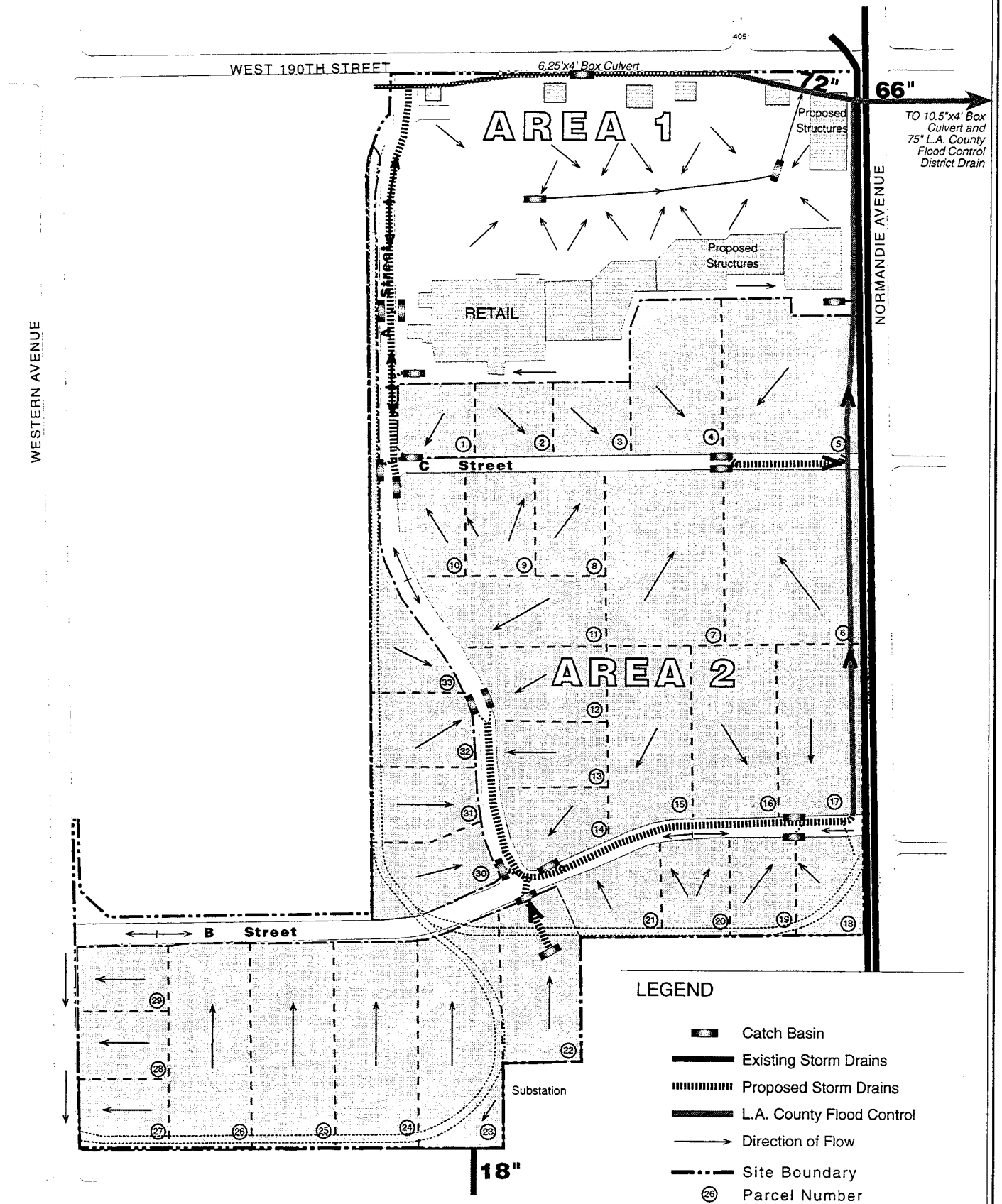

SOURCE: Tait & Associates, Inc.

Planning Consultants Research

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0 200 400 feet

Figure 14
Existing and Proposed Storm Drains

drain flows in a northerly direction along the eastern side of the property, adjacent to Normandie Avenue. This drain flows into the 66-inch storm drain under Normandie Avenue. In addition, an 18-inch storm drain runs southerly under Denker Avenue and drains the southerly portion of the property between the railroad tracks and the single family residences.[10]

Off-site, the 66-inch line under Normandie Avenue flows into a 10.5 foot wide by 4 foot high box culvert. The drainage then continues into Los Angeles County Flood Control District Line "A" of Project No. 3984, a 75-inch storm drain that flows easterly on 190th Street to the Dominguez Channel. The 75-inch storm drain is designed for outlet capacity and is limited to discharge of 236 cubic feet per second (cfs) at the Channel.[11] The drainage area bounded on the north by the San Diego (I-405) Freeway, on the south by Del Amo Boulevard, on the east by Normandie Avenue, and on the west by Western Avenue, discharges its storm water into this drain. A 10-year flood would generate approximately 440 cfs within this area. Hence, the 10-year flow within the tributary drainage area of these facilities currently exceeds design capacity.

b. Surface Water Quality

(1) Construction Related Turbidity

Surface water quality can be affected by a number of variables, including: (1) land use; (2) hydrology; (3) meteorology; (4) geology; and (5) soils. Excess sediments in receiving waters cause high turbidity and rapid accumulation of sediments in lakes and ponds, with adverse impacts on biological organisms. In urban areas, toxins such as zinc, copper and lead, which can cause toxic effects when found in high concentrations, are most commonly associated with surface runoff. Additionally, other toxic elements, especially those associated with hazardous waste, can be present within surface flows.

The U.S. Environmental Protection Agency (EPA) considers street surfaces to be the primary source of storm water pollution in urban areas. Street-generated pollutants typically contain atmospheric pollution, tire wear residue, petroleum products, oil and grease, fertilizer and pesticide, as well as litter and animal droppings. The majority of these pollutant loads are

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10 *Letter from Tait and Associates, May, 1996.*

11 *Ibid.*

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usually washed away during the first flush of storm activity occurring after the dry-season period.

(2) Regulatory Setting

In 1972 the Federal Water Pollution Control Act, also referred to as the Clean Water Act (CWA), was amended to provide that the discharge of pollutants to waters of the United States from any point source is unlawful, unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) general permit. In 1990, the EPA issued regulations requiring that discharges of storm water associated with construction activity that includes clearing, grading, or excavation resulting in soil disturbance of at least five acres of total land area be regulated by a NPDES construction storm water general permit. In California, NPDES permits are issued through the State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCB). The SWRCB has adopted one statewide general construction permit that applies to most construction activities. This permit allows storm water discharges under certain conditions during the construction period. Permit compliance is monitored through the review of individual project applications by the local RWQCB, which issues the permit upon concurrence with project compliance with the conditions of the general permit. The primary objectives of the construction storm water permit are to:

1. Reduce excessive erosion potential;
2. Minimize excessive sedimentation;
3. Prevent other materials used at the site from causing off-site contamination;
4. Eliminate non-storm water discharge from the construction site;
5. Install appropriate measures to reduce impacts on watering from the finished project, and ensure that these measures will be maintained; and
6. Establish maintenance commitments on the post-construction site.

The NPDES general construction permit requires that all developers of land where construction activities will occur over more than five acres do the following:

1. Eliminate or reduce non-storm water discharges to storm sewer systems and other waters of the nation;
2. Develop and implement a Storm Water Pollution Prevention Plan (SWPPP); and
3. Develop and implement a monitoring program and reporting plan in accordance with NPDES requirements.

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The NPDES general construction permit prohibits the discharge of materials other than storm water. However, the permit recognizes that certain non-storm water discharges, including pipe flushing and testing, street washing, and dewatering may be necessary. Such discharges are allowed if they are infeasible to eliminate, do not cause or contribute to a violation of water quality standards, and are not required to be permitted by the local RWQCB.

In order to obtain a permit for an individual project under the NPDES construction general permit, the applicant must submit a Notice of Intent to the SWRCB. The aforementioned SWPPP identifies activities that could cause pollutants to enter the storm water system and a description of measures to control these pollutants. The SWPPP includes a list of Best Management Practices (BMP) which are typically designed to do all or some of the following:

1. Minimize erosion and sedimentation during construction;
2. Describe measures which eliminate pollution of storm runoff by any chemicals and materials used during the construction period;
3. Contain waste;
4. Minimize the amount of area that is disturbed at any one time;
5. Stabilize the disturbed area;
6. Protect slopes and channels;
7. Control the perimeter of the site;
8. Control internal erosion;
9. Show areas of long-term post-construction control measures.

The applicant is required to conduct inspections of the site before and after storm events to identify areas contributing to construction related storm water discharge and to evaluate whether SWPPP control practices are adequate and properly implemented or whether additional control practices are needed.

An additional NPDES general permit has been established for the discharge of solid waste associated with operational activities, excluding construction activities. Land uses that fall under this category include many industrial and manufacturing uses. The retail component of the proposed project (Area 1) would not fall within this category. The office/industrial park area of the proposed project (Area 2) may or may not fall under this category, depending on the type of industry or manufacturing that would be located within the proposed industrial park.[12]

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[12] *Camp Dresser & McKee, California Storm Water Best Management Practices Industrial Handbook, Appendix A, Table 2.*

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2. ENVIRONMENTAL IMPACTS

The proposed project would normally have a significant impact with regard to flood hazards and surface water quality if, during a projected 50-year storm event or as a result of an increase in storm water runoff or alterations to the existing storm drainage facilities or drainage patterns, the project would:

- Cause on-site flooding which poses a hazard to structures or people on-site; or
- Cause increased flood hazard[13] to upstream or downstream properties, human safety or biological resources.

a. Storm Drain System

Impacts to the local drainage system were evaluated by determining whether or not post-project storm water flows could be accommodated by the local storm drain system, including on-site storm drain improvements proposed as part of the project.

Although project implementation would include the development of impermeable surfaces, the quantity of runoff generated on-site is anticipated to decline, since the amount of impermeable surface area on-site is projected to decline from over 90% of the site to about 85% of the site at project buildout. Nevertheless, new storm drains would be required for the project site to accommodate changes to flow patterns within the site. New storm drains would be constructed in conjunction with project site buildout under A, B, and C streets (see Figure 14 on page 126). These would connect to the existing culvert running along 190th Avenue and into the existing 66-inch storm drain running under Normandie Avenue. Preliminary hydrology calculations indicate that the site would generate runoff of approximately 430 cfs during the 10-year storm and approximately 575 cfs during the 50-year storm. Because of the limited flow capacity of the local storm drain system, the surface water flows from the project site would need to be limited to a maximum of 0.8 cfs per acre during a 10-year storm event. Sump conditions on the site dictate that on-site retention would need to be capable of retaining the difference between the 50-year storm and the allowable release of 0.8 cfs per acre. The proposed project would not cause significant impacts on the local storm drain system because it would not increase the total quantity of storm water flows currently entering the LACFCD drain from the project site.

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[13] *Flood hazard is defined as posing a threat to life, safety or property.*

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Localized flooding on-site could occur under severe weather conditions (i.e., 50-year storm). However, because on-site retention would be designed to avoid damage to any on-site structures, no significant impacts are expected.

As the retail component of the proposed project does not fall under the category of land use that would require a NPDES General Permit for its daily operations, it is anticipated that operational impacts on the storm drain system with regard to the discharge of solid waste would be less than significant. Future projects within the office/industrial park component of the project would be required to comply with the requirements of the NPDES general permit for solid waste discharge as needed, on a case-by-case basis. With such compliance, no significant impact would be indicated.

b. Construction Related Turbidity

Surface water quality impacts were determined by evaluating the potential for proposed development to adversely affect surface runoff in light of the regulatory requirements described in Section IV.C.1.b (2).

The primary concerns relating to surface water quality associated with project construction are: (1) discharges relating to the storage, handling, use and disposal of chemicals, fertilizers, pesticides, adhesives, coatings, lubricants, fuel, and other potentially hazardous materials; and (2) sediment transport to the receiving water from construction site runoff.

Grading activities associated with construction are anticipated to temporarily increase the amount of suspended solids from surface flows derived from the project site during a concurrent storm event due to sheet erosion of exposed soil. In addition, on-site watering activities (utilized to reduce airborne dust) are anticipated to contribute marginally to increased sediment loading of surface runoff during dry weather conditions. Each of these potential impacts upon surface water resources is potentially significant, but mitigable with implementation of the aforementioned BMPs that would be stipulated as part of the SWPPP, as required under the NPDES permit.

3. MITIGATION MEASURES

a. Surface Water Runoff

1. The Applicant shall prepare detailed flood control plans for the City of Los Angeles Department of Public Works and Los Angeles County Flood Control

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District, including hydrology/hydraulic calculations and drainage improvement plans, showing quantitatively how projected storm water runoff would be adequately conveyed to off-site storm drain facilities. Such plans shall be approved by the City and LACFCD prior to issuance of building permits.

2. All major and minor drainage infrastructure shall be designed and constructed per applicable design standards. All designs shall be submitted to the City of Los Angeles Department of Public Works for review and approval, prior to issuance of building permits.

3. The Applicant shall implement on-site retention that is capable of detaining the difference between runoff from the 50 year storm and discharge of 1.0 cfs per acre.

b. Surface Water Quality

In order to avoid piecemeal effects, all lots approved under Tract No. 52172 shall comply with the following mitigation measures (Nos. 4, 5, and 6), regardless of size:

4. Prior to issuance of grading permits, the Applicant shall file a Notice of Intent with the State Water Resources Control Board and shall develop and implement a Storm Water Pollution Prevention Plan, monitoring program, and reporting plan for the construction period, in accordance with National Pollution Discharge Elimination System general construction permit requirements.

5. The Applicant shall conduct inspections of the site before and after storm events to determine whether control practices to reduce pollutant loadings identified in the Storm Water Pollution Prevention Plan are adequate and properly implemented.

6. Future projects within the office/industrial park component of the proposed project shall comply with the requirements of the NPDES general permit for solid waste discharges. Compliance shall be certified by the Regional Water Quality Control Board prior to issuance of building permits.

4. ADVERSE EFFECTS

With implementation of the mitigation measures outlined above, the proposed project would have less than significant construction-related and long term impacts on drainage and surface water quality.

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5. CUMULATIVE IMPACTS

a. Surface Water Runoff

As discussed in Section IV.C.1.a (2), the flow from a 10-year storm event exceeds the capacity of the existing storm drain system that serves the project site. Although the existing drainage area is currently developed and thus unlikely to generate a large quantity of additional storm water in the future, infill development in the area could potentially add to the current shortfall in capacity of the storm drain system serving this drainage area. The proposed project would not contribute to any potential future significant and adverse cumulative impact on the local storm drain system because it would not increase the total quantity of storm water flows currently entering the Los Angeles County Flood Control Channel from the project site.

b. Surface Water Quality

A total of 37 related projects are located within the project study area, including a mix of residential, commercial and industrial land uses. Although these projects could contribute to the overall area-wide degradation of surface water quality within the Harbor Gateway area, the majority of these projects would be required to develop and implement BMPs to address point source discharges and storm water runoff and quality. The project's contribution after mitigation to the cumulative condition is less than significant, since the previously described mitigation measures would reduce the project's individual contribution to less than significant levels.

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IV. ENVIRONMENTAL IMPACT ANALYSIS
D. BIOTIC RESOURCES

1. ENVIRONMENTAL SETTING

a. Project Area

The project site is located within the Harbor Gateway District of the City of Los Angeles, eight miles north of Los Angeles Harbor and fourteen miles southwest of downtown Los Angeles. The Harbor Gateway District, as identified by the City of Los Angeles General Plan, is mapped as a linear band aligned along the Harbor (110) Freeway to the north and Normandie Avenue to the south. The unincorporated community of Athens and the Cities of Gardena and Torrance define the district boundaries to the north and northwest. The district represents one of four industrial clusters located outside the region's primary industrial centers of the Port of Los Angeles, downtown Los Angeles, Los Angeles International Airport and Sun Valley. As such, it is an area of substantial industrial development, as well as low to medium density residential development. Figure 2 in Section II.B, Project Location, shows the project site and surrounding land uses.

b. Project Site

The project site comprises an irregular, L-shaped, 170.2 acre parcel of land occupying the majority of a city block. The site lies within the relatively flat Torrance Plain, approximately 50 feet above sea level. It exhibits little topographic relief, limited to several feet of elevation in the north. The site is bounded to the north by the 190th Street commercial corridor and to the east by a Southern Pacific rail line and right-of-way and Normandie Avenue. The site is bounded to the southeast by industrial properties and a Department of Water and Power (DWP) power substation, and to the southwest by residential properties along 203rd Street. To the west, the site is bordered by the Capitol Metals industrial property, the former International Light Metals property, currently undergoing redevelopment, and Western Avenue, a major highway.

The project site has most recently served as the Douglas Aircraft Company's aircraft parts manufacturing, warehousing and distribution facility. McDonnell Douglas has ceased manufacturing activities on the site and is currently using the site for warehousing and distribution activities. The site contains approximately 2.4 million square feet of aging industrial and warehouse-type buildings, predominantly located in the northern and eastern

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portions of the site. Former administrative facilities are located in the west-central portion of the project site. Additional on-site structural features include a 150-foot water tower, water storage tanks, parking lot light standards and street lights.

The remainder of the project site is occupied by employee parking lots, extending along the site's western property line, and scattered storage and salvage yards. The yards contain rail spurs and stockpiled equipment, parts, shipping containers and assorted scrap. The primary internal access road enters the site from 190th Street; an additional gated east-west access road traverses the southern portion of the site between Western and Normandie Avenues. The project site is fenced around the entire perimeter. The site supports reduced industrial operations and activity as compared to former conditions. No areas of natural habitat remain on-site. Existing vegetation is limited to landscaped areas and vacant waste places supporting "weedy" grass and herbaceous species.

c. History of Human Disturbance

Prior to 1941, the project site and much of the surrounding area supported undeveloped farmland, as shown in the historical photograph in Figure 15 on page 136. No undisturbed natural habitat existed in proximity to the site by this date. Scattered industrial properties and residential neighborhoods were already present to the north and south; urban development was most concentrated to the north, toward downtown Los Angeles. In 1941, the United States government developed the site as an aluminum casting plant. Figure 16 on page 137 is an historical photograph of the project site and surrounding area in 1946; the majority of on-site buildings in existence today were already in place and little open land remained on-site. The Douglas Aircraft Company took over the facility in the 1950s for aerospace operations, as previously mentioned, and purchased the property in 1970. Figure 17 on page 138 shows the site in 1950; although open farmland remains in the area, the trend toward substantial industrial development in the area is evident. Until the recent cessation and transition to warehousing and distribution activities, the project site supported continuous manufacturing activities from the time of initial development.

d. Vegetation

Vegetation within the project site is predominantly confined to three areas: the landscaped area surrounding the former administration buildings; the landscaped strip along the western facade of Building No. 3, and a vacant, ruderal field in the south-central portion of the site. These landscaped areas contain lawn, shrubs and trees; the ruderal field is comprised of grasses and alien herbaceous species. Small, remnant ruderal areas are also found within the tool storage yard in the southwestern corner of the site and twin containment basins surrounding

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Planning
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Figure 15
Historic Photograph - 1932
(View Looking Northeast)

Source: UCLA Dept. of Geography, Spence Archives (3-22-1932)

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Planning
Consultants
Research

Figure 16
Historic Photograph - 1946
(View Looking North)

Source: UCLA Dept. of Geography, Spence Archives (11-1-1946)

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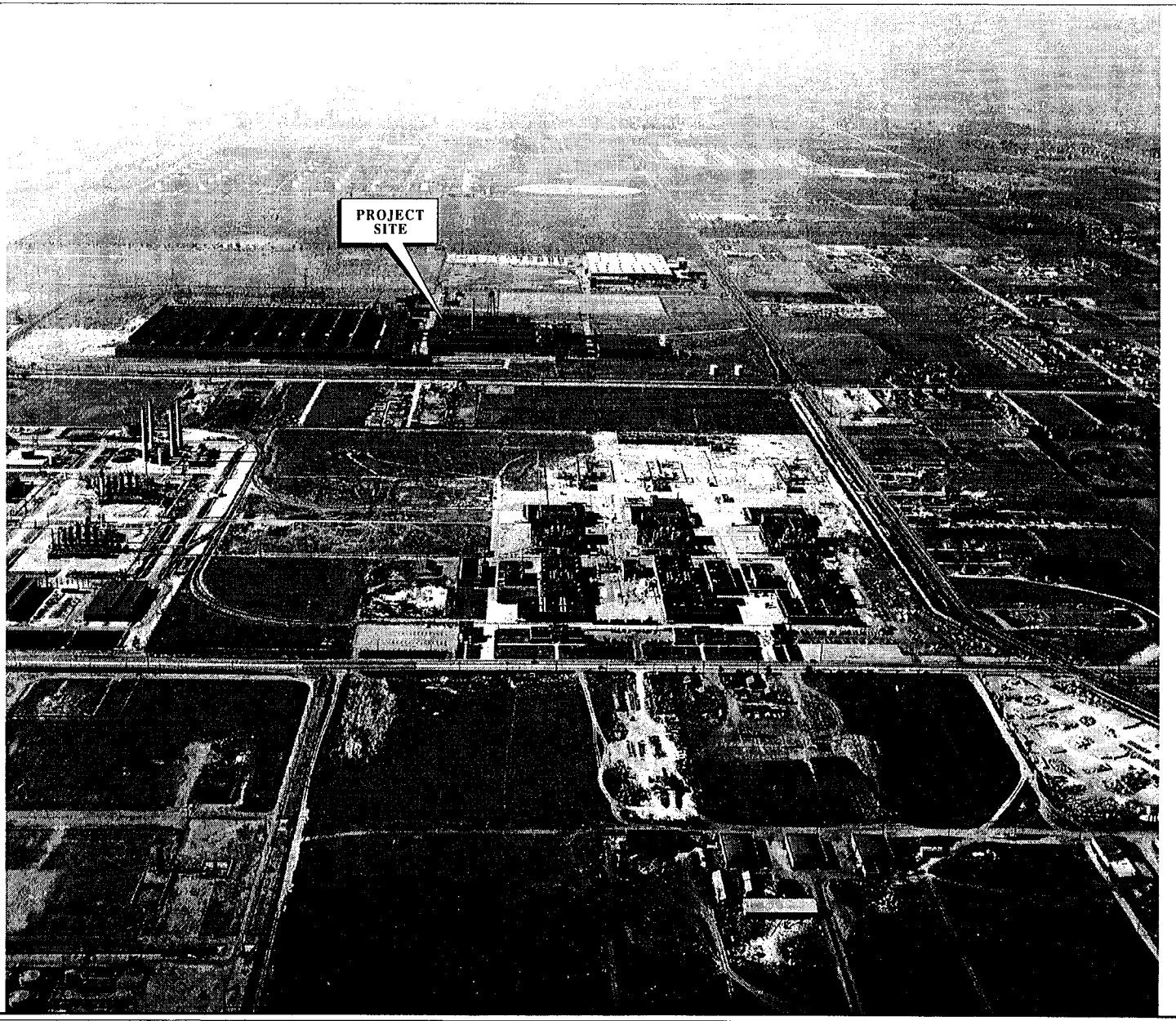

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Figure 17
Historic Photograph - 1950
(View Looking West)

Source: UCLA Dept. of Geography, Spence Archives (12-9-1950)

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the water tanks in the northeastern corner of the site. A small number of single tree specimens, limited to carrotwood, and shrubs, limited to junipers, nandina, mulefat, and India hawthorn, are found in planters scattered throughout the site. On-site vegetation is almost exclusively non-native and no sensitive species or communities are present or indicated by sources consulted to be present. With the exception of a small area of juniper shrub plantings along 190th Street, no on-site landscaping or other vegetation is visible from off-site. Figure 18 on page 140 depicts the location of vegetation across the site.

Due to the paucity of native taxa present and the disturbed condition of the project site, it is difficult to establish what natural community was once present on-site. The elevational range of the site suggests that the site may have supported transitional scrub, grassland or oak savannah communities, once common to this area of southern California. The proximity of the Dominguez Channel to the northwest and the Los Angeles River to the east, together with the site's low elevation above MSL, suggest that periodic inundation could have been a common event. Therefore, depending upon original topographic and hydrologic conditions, riparian community elements could also have been present at various times near the easterly boundary of the project site. No vestiges of these communities remain.

A listing of tree, shrubs and herbaceous species surveyed and fauna surveyed and expected on-site is presented in Table 17 on page 141. Native floral species are indicated with a square (■). Birds were observed with 10X50 power binoculars and identified using Scott (1987, 2nd Ed.), *National Geographic Society Field Guide to the Birds of North America*, or Peterson (1990, 3rd Ed.), *A Field Guide to Western Birds,* updated to conform with changes in nomenclature consistent with the most recent American Ornithological Union checklist. Faunal species observed in the project site are noted with a dot (●).

(1) Former Administration Buildings Landscaping

The former administrative buildings are centrally located within the employee parking lot immediately adjacent to the western property line. Totaling approximately 2.5 acres, this area constitutes the largest and most fully landscaped area on-site. Landscaping is limited to lawn, composed of non-native fescue, bermuda and crab grasses and associated weedy herbaceous species; 32 small to medium-sized native and non-native sycamore trees, some tethered to support poles; and shrub plantings surrounding the buildings. Shrubs include ornamental junipers, abelia, fern pine and other common, exotic landscape species. No

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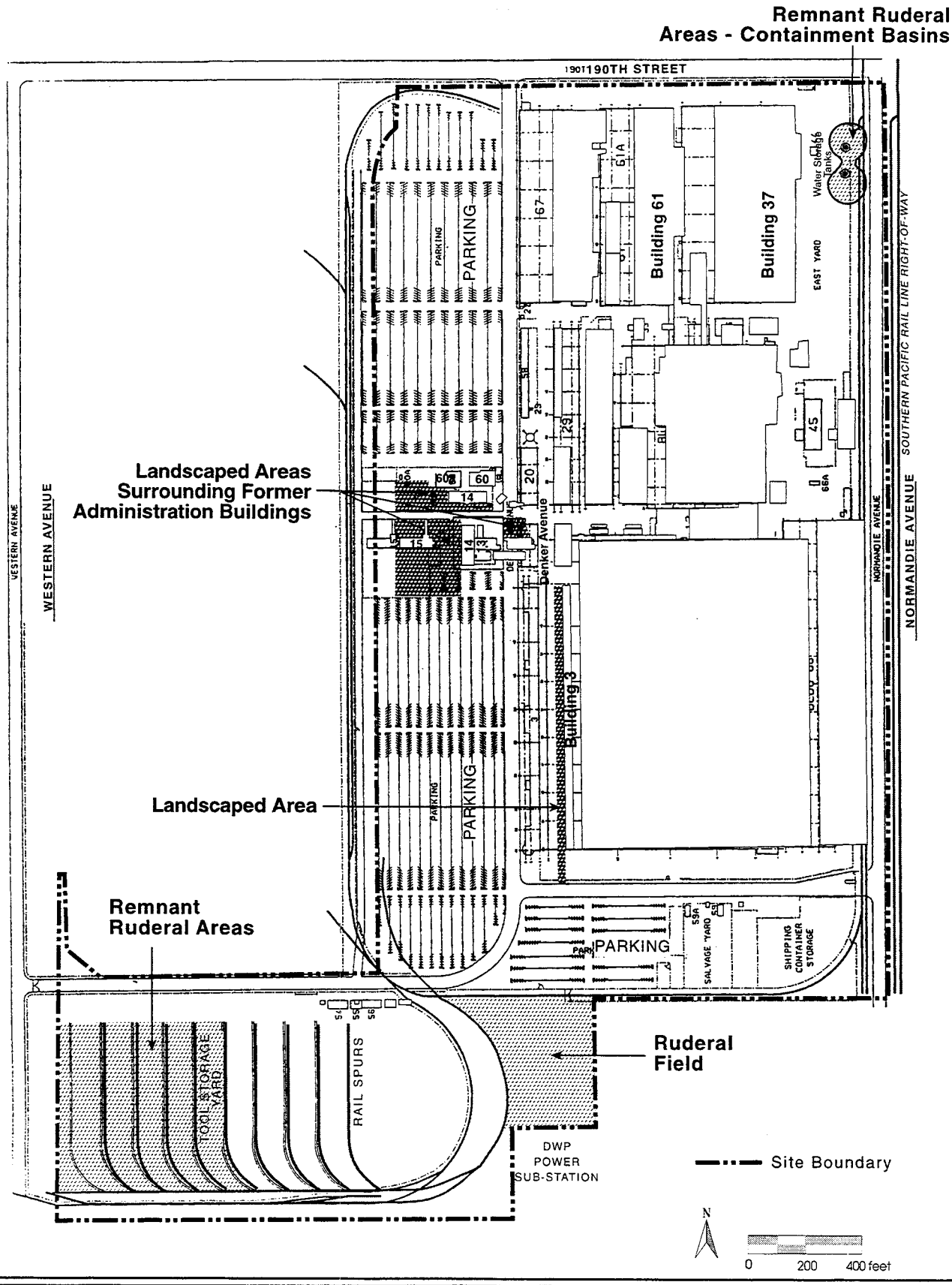

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Figure 18
Vegetation Map

Table 17

FLORAL AND FAUNAL LIST FOR PROJECT SITE

Scientific Name	Common Name
PLANTS	
Aquifoliaceae	
Ilex aquifolium	English holly
Arecaceae	
Washingtonia robusta ■	Mexican fan palm
Asteraceae	
Ambrosia psilostachya	Western ragweed
Gazania sp.	
Gnaphalium sp. ■	Everlasting
Hemizonia sp. ■	Tarweed
Malacothrix saxatilis `	Wire lettuce
Taraxacum officinale	Dandelion
Berberidaceae	
Nandina domestica	Heavenly bamboo
Brassicaceae	
Brassica nigra	Black mustard
Centaurea melitensis	Yellow star thistle
Caprifoliaceae	
Abelia X. grandiflora	Glossy abelia
Chenopodiaceae	
Salsola tragus	Russian thistle
Convolvulaceae	
Dichondra spp.	
Cupressaceae	
Juniperis chinensis spp.	Juniper
Fabaceae	
Lotus corniculatus	Bird's foot lotus
Melilotus alba	White sweet clover
Geraniaceae	
Pelargonium spp.	Geranium

Key

■ = Native Floral Species
● = Observed Faunal Species

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Table 17 (continued)

FLORAL AND FAUNAL LIST FOR PROJECT SITE

Scientific Name	Common Name
Graminae	
Avena fatua	Wild oats
Cynodon dactylon	Bermuda grass
Digitaria sanguinalis	Crab grass
Festuca spp.	Fescue
Pennisetum setaceum	Fountain grass
Liliaceae	
Agapanthus africanus	Lily-of-the-Nile
Lobeliaceae	
Lobelia spp.	
Myrtaceae	
Melaleuca quinquenervia	Paperbark
Oleaceae	
Olea europaea	European olive
Platanaceae	
Platanus racemosa ■	Western Sycamore
Rosaceae	
Baccharis salicifolia ■	Mulefat
Rhaphiolepis indica	India hawthorne
Saxifragaceae	
Philadelphus mexicanus	Mock orange
Solanaceae	
Solanum marginata	White-margined nightshade
Strelitzaceae	
Strelitzia nicolai	Bird-of-Paradise
REPTILES AND AMPHIBIANS	
Bufo boreas halophilus	California toad
Sceloporus occidentalis biseriatus	Great western fence lizard
Uta stansburiana	Side-blotched lizard

Key

■ = Native Floral Species
● = Observed Faunal Species

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Table 17 (continued)

FLORAL AND FAUNAL LIST FOR PROJECT SITE

Scientific Name	Common Name
BIRDS	
Accipitridae Buteo jamaicensis ●	Red-tailed hawk
Bombycillidae Bombycilla cedrorum	Cedar waxwing
Charadriidae Charadrius vociferous ●	Killdeer
Columbidae Columba livia ● Zenaida macroura ●	domestic pigeon (rock dove) mourning dove
Corvidae Corvus brachyrynchos Corvus corax ●	American crow Common raven
Emberizidae Euphagus cyanocephalus Molothrus ater Sturnella neglecta ●	Brewer's blackbird Brown-headed cowbird Western meadow lark
Falconidae Falco sparverius ●	American kestrel
Fringillidae Carpodacus mexicanus ●	House finch
Hirundinidae Hirundo rustica	Barn swallow
Mimidae Mimus polyglottos ●	Northern mockingbird
Muscicapidae Chamaea fasciata Turdus migratorius	Wrentit American robin
Strigidae Bubo virginiensis	Great horned owl

Key

■ = Native Floral Species
● = Observed Faunal Species

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Table 17 (continued)

FLORAL AND FAUNAL LIST FOR PROJECT SITE

Scientific Name	Common Name
Sturnidae Sturnus vulgaris ●	European starling
Trochilidae Calypte anna	Anna's hummingbird
Troglodytidae Troglodytes aedon	House wren
Tyrannidae Sayornis nigricans ●	Black phoebe
Tytonidae Tyto alba	Barn owl
MAMMALS	
Canus latran ochropus	Coyote
Didelphis v. virginiensis	Virginia opossum
Mephitis mephitis holzneri	Striped skunk
Mus musculus	House mouse
Rattus spp.	Rat
Scapanus latimanus occultus	Broad-handed mole
Spermophilus beechyi	California ground squirrel
Sylvilagus audubonii sanctdiegi	Audubon's cottontail
Thomomys b. bottae	Botta's pocket gopher

Key

■ = Native Floral Species
● = Observed Faunal Species

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irrigation was observed and the area appears to be largely unmaintained. Figure 19 on page 146 shows a portion of this area.

(2) Building No. 3 Landscaping

Landscaping in front of Building No. 3 is contained within a narrow strip averaging twenty feet in width and extending the length of the building facade. Landscaping consists of lawn, mature paperbark, olive and palm trees, and assemblages of shrub plantings and annual flowering species planted against the building and at entrances. Shrub species include bird of paradise, natal plum, nandina, India hawthorn, English holly and juniper species, and other similarly exotic landscape species. This area is fully irrigated and appears to be more regularly maintained (i.e., mowed, pruned, weeded and replanted) than the area around the former administration buildings. Figure 20 on page 147 depicts the western facade of building 3.

(3) Vacant Ruderal Field

An area of approximately 4.8 acres, adjacent to the DWP power substation, has apparently never been developed and remains a sparsely colonized field of weedy herbaceous species, similar to other undeveloped lots in the area. Grass species present include fountain grass, wild oats, foxtail and other non-natives. Herbaceous species are dominated by plants of the sunflower family, including ragweed, tarweed and dandelion, as well as the mustard family, including star thistle and mustard, and other alien species that typically colonize vacant land and waste places. Native species are limited to tarweed, everlasting and sweet fennel.

(4) Remnant Ruderal Areas

Additional, small on-site areas that support concentrations of weed species include the western end of the tool yard and rail spurs abutting Western Avenue and the containment basins surrounding the water tanks at the intersection of 190th Street and Normandie Avenue. Vegetative species present are similar to those in the vacant ruderal field, as previously discussed. Both areas are partially developed and contain structures, infrastructure and some paving. Rabbit's foot grass, a non-native, facultative wetland species, was observed within the water tank containment basins where runoff accumulates. Additional waste places across the site support a variety of primarily non-native weed species including grasses, sunflower and mustard species.

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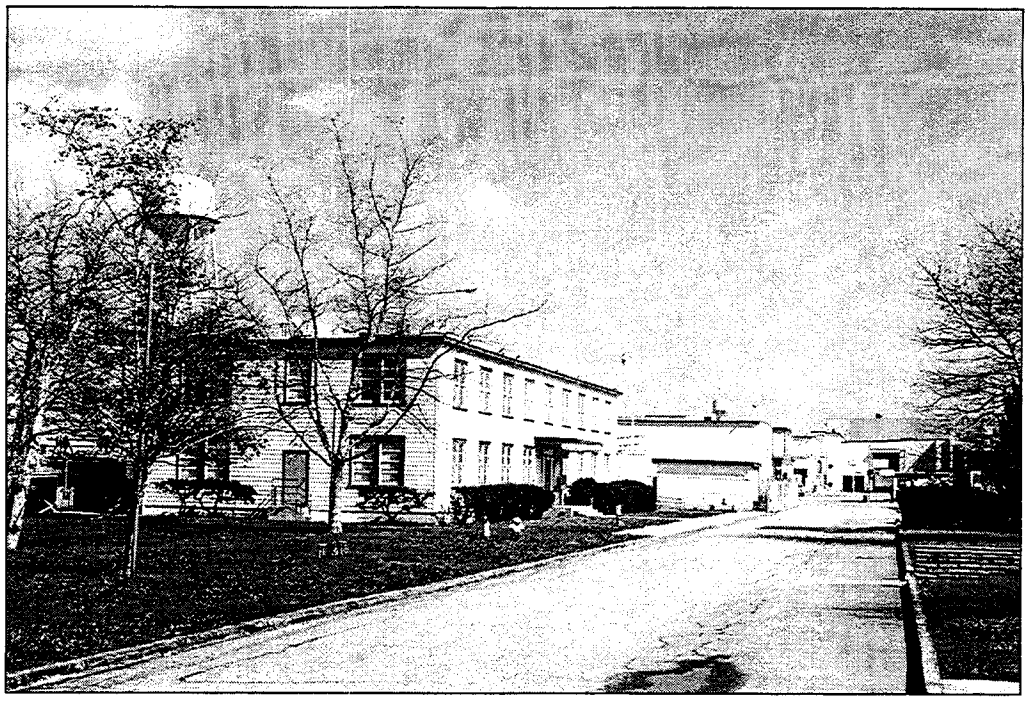

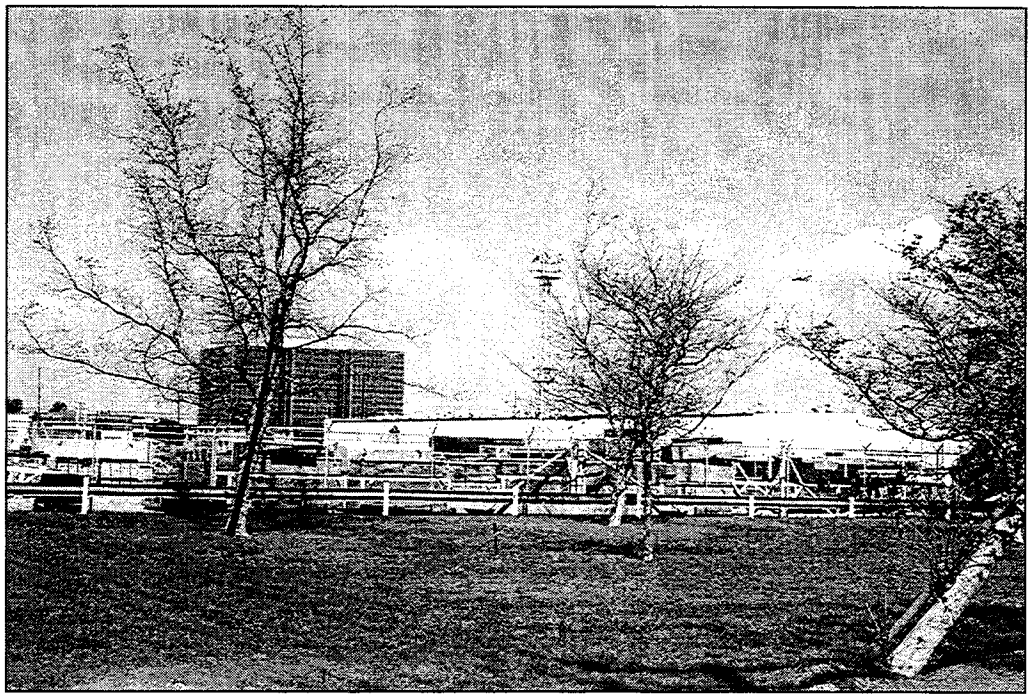

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Figure 19
Ground Photographs - Landscaping Around Former Administration Buildings

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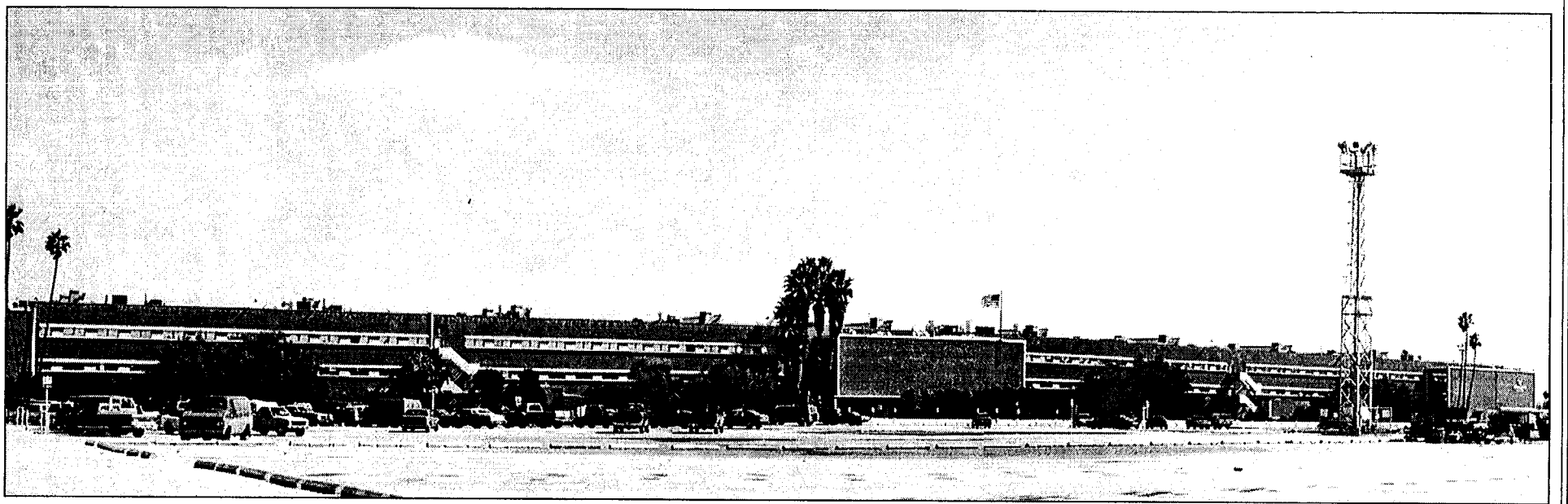

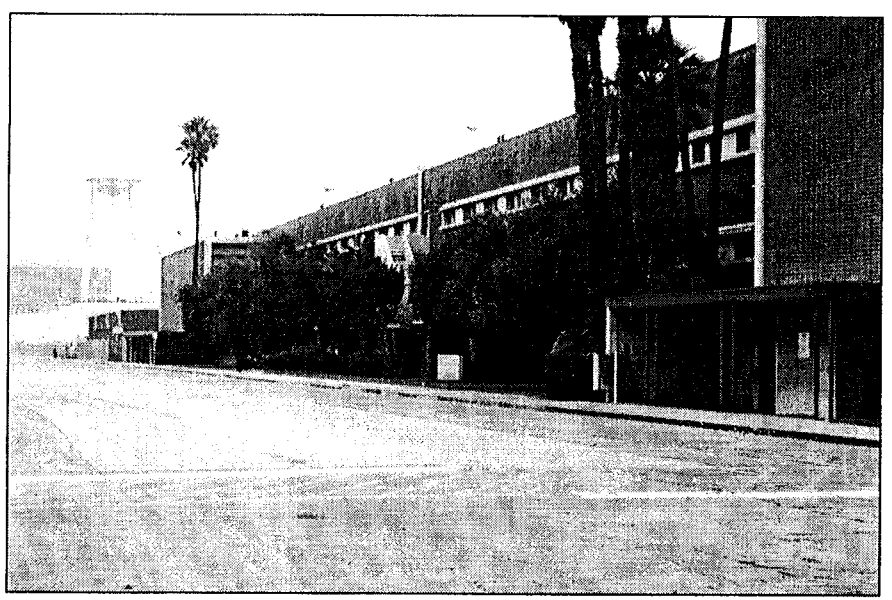

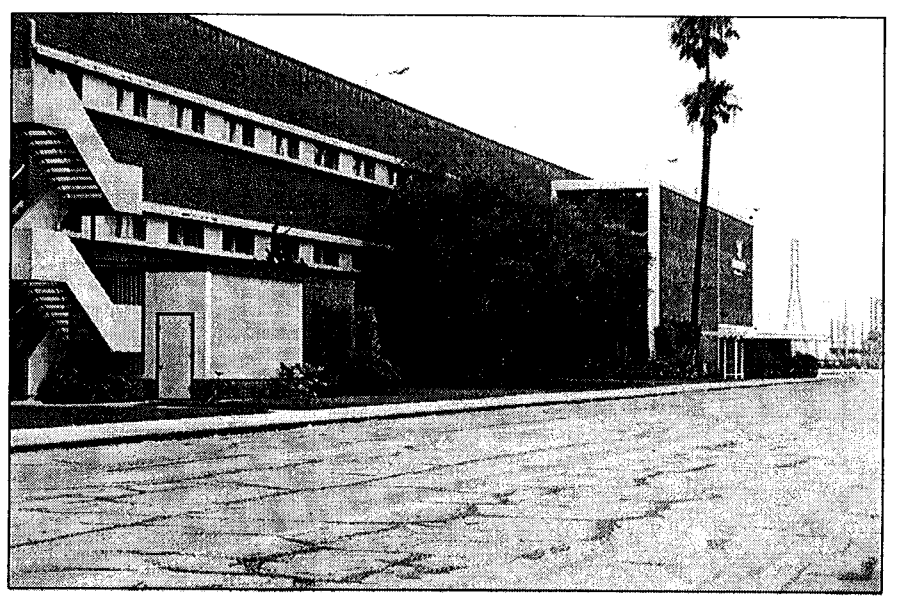

Planning
Consultants
Research

Figure 20
Ground Photographs - Landscaping Along Building No. 3, West Facade

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e. Wildlife

Wildlife resources in this area of the City of Los Angeles have been in decline for many decades, initially disturbed by ranching and agricultural practices. Subsequent urban and industrial development over a large area have eliminated all but the most disturbance-tolerant species both on-site and in the vicinity of the general area.

Faunal diversity and use of the project site is very low, as would be expected of a developed site within an urbanized area. The poor quantity and condition of on-site wildlife resources is a predictable consequence of the development history of the site, and no natural habitats or functional equivalents, such as a non-native grassland, is extant. These conditions notwithstanding, several common, urban bird and mammal species were either observed or are reasonably expected to occur on-site. No sensitive species (protected or candidate status) were detected on-site and no suitable habitat exists to support any sensitive species.

(1) Mammals

Mammals expected on-site would be predominantly smaller animals utilizing vacant ruderal areas and, to a lesser extent, landscaped areas or structural features. Such mammals would include introduced mouse and rat species, Audubon cottontail, California ground squirrels, gophers and moles. Evidence of gophers and moles was observed in lawn areas surrounding the former administration buildings; rabbit scat was observed in the south-central portion of the site. Coyotes could presumably use the site for forage; however, the site is reached only with great difficulty from the nearest substantial areas of open space (e.g., Palos Verdes Peninsula, Ken Malloy Harbor Regional Park) and the site possesses few resources to attract wildlife. No other evidence of small or large mammal activity was observed.

(2) Birds

A modest number of birds were observed on-site, primarily on the western boundary of the project site near areas of lawn and landscaping and in the ruderal field. Species include mockingbird, killdeer, American kestrel, mourning dove, domestic pigeon, American crow, common raven, house wren, house sparrow, meadowlark, and the European starling.

Several other species of birds would be expected to occur on-site from time to time, including, but not limited to, the red-tailed hawk above open fields, black phoebe in lawn areas, great horned and barn owls in tall storage buildings, and Anna's hummingbird in areas with nectar-producing flowering species.

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(3) Reptiles and Amphibians

Records of recent sightings of reptile and amphibian species in southern California are relatively scarce, due both to local extirpation of species and to the reduced practice of scientific collecting and recording. The South Bay and Long Beach area were, at one time, known for diverse herpetofauna found in coastal estuaries, sloughs, marshes, coastal strands, dune formations and adjacent upland habitats. However, on-going development of the region has fragmented, degraded or eliminated most natural habitat in the area.

No reptiles or amphibians were observed on the project site. The only amphibian potentially present on-site would be the western toad, likely found in lawns or temporary ponding areas. The ruderal field in the south-central site provides marginally suitable habitat for species such as western fence lizard and gopher snake, but these common species were not detected despite survey efforts.

f. Sensitive Species

No currently listed threatened or endangered species were identified or expected to inhabit the project site. A number of sensitive species were predicted to be present within the Torrance Quadrangle, according to the California Department of Fish and Game Natural Diversity Data Base, the state's most comprehensive and authoritative inventory of sensitive species and communities.[14] The species listed include California least tern, California gnatcatcher, tricolored blackbird, San Diego horned lizard, sandy beach tiger beetle, Palos Verdes Blue butterfly, Monarch butterfly, South Coast saltbush and Mexican flannelbush. The majority of these species occur in or around the Palos Verde Peninsula, to the south, or along the coastline and associated saltwater marshes; no habitat exists on-site to support any of the species and none are expected to occur.

g. Habitat Linkages and Connectivity

The project site is distant and isolated from any natural areas of substantial size and harbors very little in the way of wildlife resources. The nearest natural areas of substantial size are found within the Palos Verdes Peninsula, three miles to the south. The Peninsula represents large areas of contiguous, natural vegetation, primarily coastal sage scrub, and contains several County-designated Significant Ecological Areas (SEA). However, it is separated from the project area by dense urban development and no natural connections remain to the project site

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[14] *Natural Diversity Data Base, Natural Heritage Division, California Department of Fish and Game, report for the Torrance Quadrangle, May 20, 1996.*

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or area. The nearest natural area to the project site is Madrona Marsh, an SEA and remnant of the freshwater wetlands once ubiquitous throughout the coastal area located two miles to the southeast. There are also various community parks and areas of open space in the project area; however, they consist almost entirely of typical urban park lawns and ornamental plantings and generally have very low resource values.

The distance to the site from all of the above open space areas, in conjunction with intervening urban development and major highway and freeway corridors, precludes all animal movement into the project area, except for a limited number of common bird and small mammal species as previously discussed. The project site itself is surrounded on three sides by major highways, in addition to rail lines on two sides and additional development. Furthermore, the entire project site is currently fenced with 6-foot chain link fencing, preventing access to the site for larger mammals. Biogeographically, the project site does not serve as a destination or lie within any animal movement pathways, such as migration corridors or habitat links, and only common, disturbance-tolerant wildlife species would utilize the project site.

2. ENVIRONMENTAL IMPACTS

Existing biological conditions for the project were initially investigated by review of pertinent scientific literature. Additional sources of information included maps, museum specimen records, consultations with recognized experts in various relevant fields, published and unpublished biotic reports. Current field conditions and recent aerial photography were compared against historic air photographs from 1932, 1946 and 1950, supplied by the Air Photo Archives of the UCLA Department of Geography (Spence and Fairchild Collections). Pertinent references are cited within the text of this assessment.

Determination of potential occurrence of sensitive species or habitats was based, in part, upon existing information sources, including California Natural Diversity Data Base records and pertinent literature. Plant classification follows Hickman, ed. (1993), *The Jepson Manual, Higher Plants of California.* Species are listed by common name only in the text.

Observable and potential biological resource conditions on the project site were investigated by a field survey team comprised of Samuel Reed and Anne Doehne, PCR Staff ecologists, on May 17, 1996. Early spring weather conditions were suitable during surveys for biological resource investigation. Field work was conducted on foot throughout the site. Animal species were identified via direct sightings, calls and indirect evidence of activity.

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Because no federal or state endangered or threatened species are resident on-site, habitat-based assessments, rather than focused surveys, were made for sensitive species potentially occurring within the study area. Variables considered during habitat assessment included the presence or absence of permanent support resources (such as rock outcrops, flowing water, specific host plants, nest sites, etc.), proximity and relative level of human disturbance and surrounding land use patterns. Secretive, rare or nocturnally-active faunal species require focused surveys, performed during optimal seasons of activity for each species, to absolutely determine presence, absence, distribution, density, or resident status. Existing habitat conditions did not appear to warrant such surveys.

The proposed project consists of demolition of existing facilities, subdivision of the site into up to 45 lots and development of retail, office and industrial facilities. Project buildout is to be accomplished in two areas of the project site, with development of the Area 1, the northern portion of the site, to be completed by 1998, and development of Area 2 to be completed by 2006. For purposes of this assessment, a project impact upon biotic resources would normally be considered significant if it could result in a loss of individuals of protected species or natural ecological processes for native species, natural habitats or wildlife migration corridors, and which may therefore diminish the chances for long-term survival of biological resources.

a. Area 1 Development

Development of Area 1 includes a 450,000 square foot retail center encompassing the northern 40 acres of the project site. Proposed development includes large-scale retail facilities at the southern end of Area 1; restaurant facilities and a 4,000-seat movie theater complex on separate pads; surface parking for approximately 2,200 cars; and the northernmost portion of the internal road system providing access to the entire site. On-site landscaping and landscaped setbacks along the 190th Street frontage are proposed as part of development. Development of Area 1 entails demolition and removal of all existing structures and vegetation. Figure 7 in Section II.D, Project Characteristics, depicts the Area 1 site plan.

No sensitive vegetation or wildlife species exist on the project site. Vegetation proposed for removal is limited to ruderal species surrounding the water tanks in the northeast corner of the site and scattered ornamental landscape shrub specimens. These species are not, nor do they constitute habitat for, sensitive species. Wildlife utilizing these vegetative resources are limited to common, disturbance-tolerant species. In addition, proposed on-site landscaping, though planned to be ornamental in nature, would exceed existing landscaping in species diversity and area landscaped. No significant impact is anticipated from the removal of existing, on-site vegetation.

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b. Area 2 Development

Area 2 encompasses development of 130.2 acres in the central and southern portion of the site. Proposed development includes slightly over 2 million square feet of industrial park uses and approximately 500,000 square feet of office space, as well as the completion of the internal road network. The development program includes ornamental landscaping throughout the site. As with development of Area 1, development of Area 2 includes the demolition and removal of all existing structures and vegetation. Figure 6 in Section II.D, Project Characteristics, shows the illustrative site plan for Area 2.

Development of Area 2 would remove all remaining landscaped and remnant ruderal areas on-site, including scattered single plant specimens in planters. As previously mentioned, no sensitive vegetative species or communities exist on the site and no sensitive wildlife species utilize the existing minimal landscaping and open space (e.g., ruderal field). Proposed landscaping would exceed the existing amount of landscaping on-site (i.e., landscaped area under the project is estimated to comprise 15% of total area compared to 3% at present). In addition, the project's proposed landscaping plan would be expected to result in 1-for-1 replacement of any existing tree on-site which is removed in the course of project construction. Although the proposed development of Area 2 would remove a small amount of existing open space, the open space does not comprise sensitive habitat nor is it utilized by sensitive species. Therefore, removal of existing vegetation is not anticipated to result in a significant impact.

3. MITIGATION MEASURES

Although the project is not expected to result in significant impacts to biotic resources with respect to protected species, ecological processes, natural habitats or wildlife migration, the following mitigation measures are recommended:

1. All existing on-site trees (32 trees) that would be removed in conjunction with project buildout shall be replaced at a minimum ratio of 1:1.

2. All open areas on-site that are not used for buildings, walkways, and other hardscape shall be landscaped.

BOE-C6-0115292

4. ADVERSE EFFECTS

The proposed project would result in (1) the removal of a small amount of open space (approximately 4.8 acres) in the south-central portion of the site, and two landscaped areas associated with existing structures, (2) the introduction of increased levels of activity, and (3) the introduction of increased levels of nighttime lighting. The landscaped and open space areas to be removed are utilized by common wildlife species, generally tolerant of urban levels of activity and nighttime lighting and typical of species found in adjacent vacant and landscaped properties. Nevertheless, the removal of the vegetation on-site would constitute a temporary, non-significant adverse impact upon most of the species utilizing the site and most of the sedentary species (i.e., reptiles) would be permanently removed. However, subsequent landscaping would introduce a net increase in landscaping across the site (from about 3% of the site to about 15% of the site) and increased activities would not be expected to adversely affect such species.

5. CUMULATIVE IMPACTS

The proposed project, together with related projects within the Harbor Gateway District Area, represent already-developed lands within a heavily urbanized area. Moreover, no sensitive species or communities exist on the project site and few sensitive species would be expected in the project area. Therefore, no significant cumulative impact would be anticipated. Individual projects will be subject to mitigation requirements on a project-by-project basis.

BOE-C6-0115293

1. ENVIRONMENTAL SETTING

a. Noise Background

(1) Noise Characteristics

Noise is usually defined as "unwanted sound". Increasingly recognized as an environmental pollutant that can produce physiological or psychological damage, noise can interfere with communication, work, rest, recreation, and sleep.

To the human ear, sound has two significant characteristics: pitch and loudness. At undesirable levels, pitch is generally an annoyance, while loudness can affect the ability to hear. The quality referred to as pitch is a function of the number of complete vibrations, or individual sound waves, striking our ears per unit of time. As this number (measured in cycles per second) increases, we hear a rising pitch; as it decreases, we hear a deepening pitch.

Loudness is a function of the amount of energy in a sound wave. This energy is, in turn, a function of sound pressure. A sound wave consists of a moving front of pressure that exceeds the ambient atmospheric pressure, followed by a trough that is below ambient atmospheric pressure. The more this pressure front varies from the ambient pressure, the louder, or more intense, the sound. Whether or not a given sound is perceived as too intense depends upon the reception characteristics of the ear that the sound is striking. The human ear is tuned to receive sound that is within a specific intensity range. Sound below that range is inaudible, while sound above that range can become painful and damaging to the ear.

(2) Sound Measurement

Sound intensity is measured in units called decibels (dB). The decibel system of measuring sound provides a simplified relationship between the physical intensity of sound and its perceived loudness to the human ear. The decibel scale is logarithmic; therefore, sound intensity increases or decreases exponentially with each decibel of change. For example, a 10 dB level is ten times more intense than one dB, while a 20 dB level is one hundred times more intense, and a 30 dB level is one thousand times more intense.

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When the basic dB unit is adjusted to correct for the relative frequency response of the human ear, the unit is referred to as the "A-weighted" decibel (dBA). A-weighting de-emphasizes low frequencies, thus placing greater emphasis upon mid and high frequencies. This is consistent with the relatively low sensitivity of normal human hearing at low frequencies. Zero on the dBA scale is based upon the lowest sound level that a healthy, unimpaired human ear can detect.

A 3 dBA increase in noise levels represents a doubling of noise energy. However, because of the physical characteristics of noise transmission and reception, a 10 dBA noise level increase is normally required to perceive a doubling of loudness. A 1 to 2 dBA change in ambient noise levels generally is not audible, although sensitive receptors may sense a slight change in noise level.

The decibel level of a sound decreases (or attenuates) exponentially as the distance from the source of that sound increases. For a single point source such as a piece of mechanical equipment, the sound level normally attenuates by about 6 dBA for each doubling of distance from the source. Sound that originates from a linear, or "line" source such as a heavily traveled traffic corridor, attenuates by about 3 dBA per doubling of distance, provided that the surrounding environment is "hard" (free from soft, sound absorbing objects such as vegetation). Noise from less heavily traveled roadways in "soft" environments attenuates more rapidly, at about 4.5 dBA for each doubling of distance.

Various noise indices have been developed to express the way in which varying noise levels over the course of a defined time period are experienced by the receptor community. The most commonly used index is the equivalent sound level, or L_{eq}, which is the average sound level over a given time period. Another commonly used index is the maximum noise level occurring during a given time period, or L_{max}.

The time of day when a sound is emitted is another important factor in determining whether or not it is a noise nuisance. For example, sounds that may be barely noticeable at midday may be seriously disruptive at midnight. To account for the increased sensitivity of people to noise occurring at night, a number of measurement scales have been developed. Two of the more commonly used scales are the Day-Night Sound Level (L_{dn}) and the Community Noise Equivalent Level (CNEL). The L_{dn}, which was developed by the U.S. Environmental Protection Agency, is a 24-hour average sound level (similar to a 24-hour L_{eq}), in which a 10 dBA penalty is added to any sounds occurring between the hours of 10:00 P.M. and 7:00 A.M. The CNEL, which was developed for use in the California Airport Noise Regulations, is similar to the L_{dn} except that a 5 dBA penalty is also added for noise occurring during evening hours from 7:00 P.M. to 10:00 P.M.

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Figure 21 on page 157, illustrates various sound levels corresponding to typical sources of noise. Sound levels below 50 dBA are generally accepted while complaints are possible when levels exceed 70 dBA. About 9 percent of people report being "highly annoyed" by a CNEL of 60 dBA, while 15 percent report being highly annoyed at a CNEL of 65 dBA.[15]

(3) Noise Regulation

(a) City of Los Angeles Noise Element of the General Plan

To limit population exposure to physically and/or psychologically damaging noise levels, the State of California, various county governments, and most municipalities in the state have established guidelines and ordinances to control noise. The City of Los Angeles has adopted a modification of the community noise compatibility guidelines established by the State Department of Health Services, Office of Noise Control, for use in assessing the compatibility of various land use types with a range of noise levels. Figure 22 on page 158, illustrates the City guidelines, which are set forth in the Noise Element of the City's General Plan and are expressed in terms of CNELs. As indicated, a CNEL of 60 dBA is considered the dividing line between a "clearly acceptable" and "normally acceptable" noise environment for single family residential uses.[16] For less sensitive office and professional uses, the dividing line between clearly and normally acceptable is set at 65 dBA CNEL. For retail and industrial uses, the dividing line is set at 70 dBA CNEL.

(b) City of Los Angeles Noise Ordinance

Ordinance No. 156,363 of the Los Angeles Municipal Code limits noise from stationary mechanical equipment and vehicles other than those traveling on public streets. In accordance with the Noise Ordinance, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is a noise violation. The presumed minimum ambient noise level for properties zoned M3 is 70 dBA, both during the day and at night. At the boundary between the M3 zone and the CM zoned properties south of the site,[17] the presumed daytime ambient level is 60 dBA, while the presumed nighttime ambient level is 55 dBA. For purposes of determining whether or not a violation of the Noise Ordinance is

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15 *U.S. Department of Transportation, Federal Interagency Committee on Urban Noise, Guidelines for Considering Noise in Land Use Planning Control, June 1980.*

16 *In a normally acceptable noise environment, new construction or development should generally be undertaken only after a detailed noise analysis is conducted and any necessary noise insulation features are included.*

17 *The residential properties immediately south of the project site are actually within zone CM, as discussed in Section IV.G, Land Use.*

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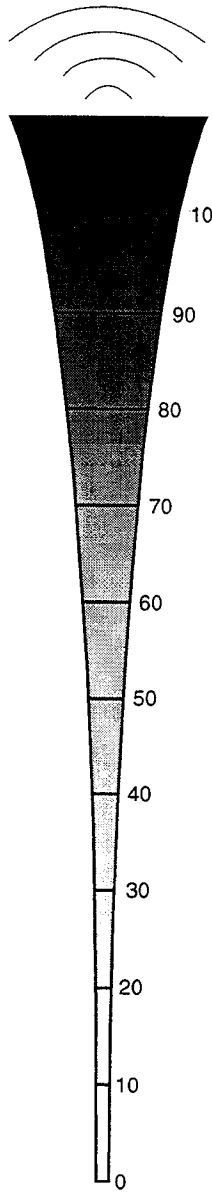

NOISE LEVEL (dBA)	COMMON INDOOR NOISE LEVELS	COMMON OUTDOOR NOISE LEVELS
110	Rock Band	
		Jet Flyover at 1,000 ft.
100	Inside Subway Train	Gas Lawn Mower at 3 ft.
90	Food Blender at 3 ft.	Diesel Truck at 50 ft.
80	Garbage Disposal at 3 ft. Shouting at 3ft.	Noisy Urban Daytime
70	Vacuum Cleaner at 10 ft. Normal Speech at 3 ft.	Gas Lawn Mower at 100 ft. Commercial Area
60	Large Business Office	Heavy Traffic at 300 ft.
50	Dishwasher Next Room	Quiet Urban Daytime
40	Small Theater, Conference Room (Background)	Quiet Urban Nighttime Quiet Suburban Nighttime
30	Library Bedroom at Night Concert Hall (Background)	Quiet Rural Nighttime
20	Broadcast and Recording Studio	
10		
0	Threshold of Hearing	

Planning Consultants Research

Figure 21
Common Noise Levels

SOURCE: Caltrans Noise Manual, California Department of Transportation, March, 1980.

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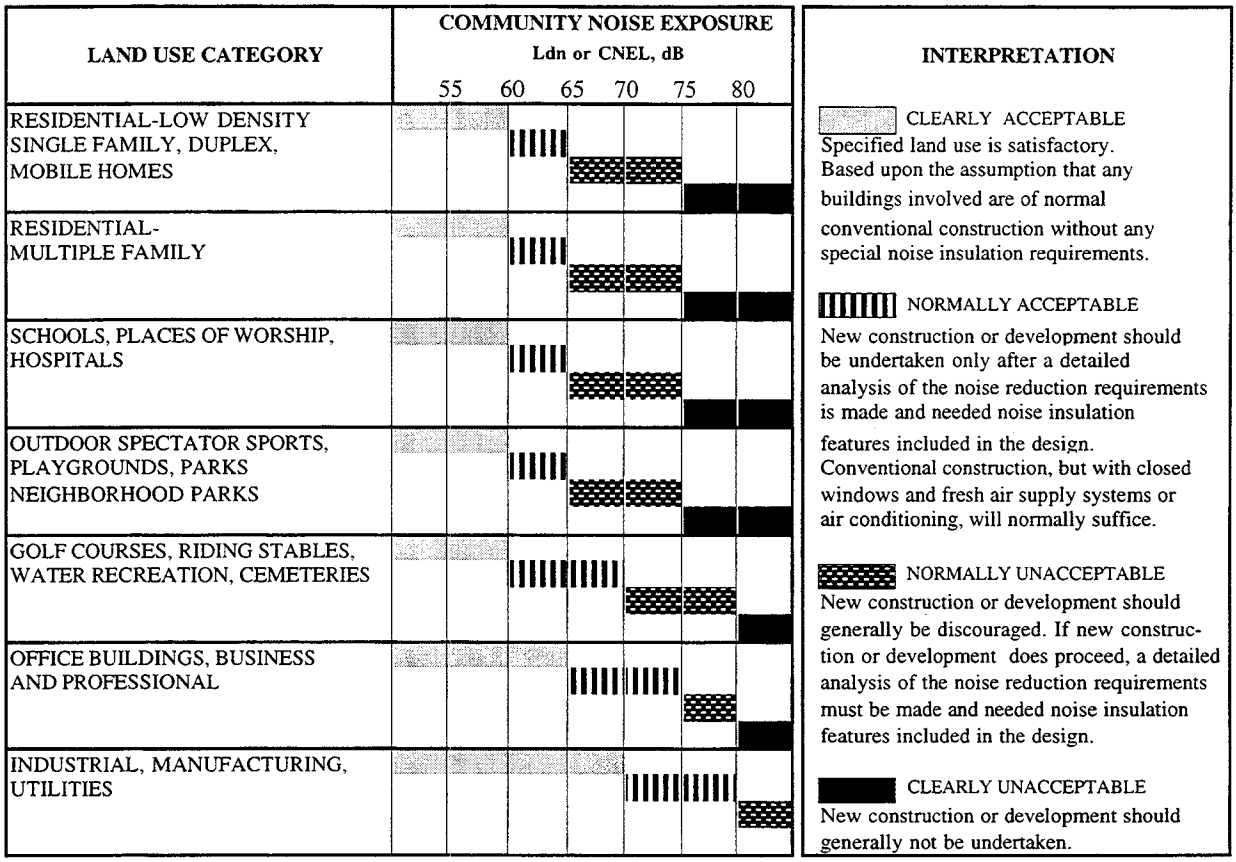

Planning Consultants Research

Figure 22
Community Noise Compatibility Criteria

SOURCE: City of Los Angeles, Environmental Impact Report Manual for Private Projects, 1975.

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occurring, the sound level measurement of an "offending noise" is reduced by 5 dBA if the noise occurrence is only 5 to 15 minutes and by 10 dBA if the noise occurrence is for less than 5 minutes.

The City Noise Ordinance also limits noise from construction equipment within 500 feet of a residential zone to 75 dBA, measured at a distance of 50 feet from the source, unless attainment of such a level is technically infeasible.

b. Local Noise Conditions

(1) Traffic Noise

Noise measurements were taken at three locations on and around the project site on April 19, 1996 to gauge noise levels along major roadways in the area. Measured noise levels are shown in Table 18 below. Measured daytime noise levels (L_{eq}'s) along 190th Street, Normandie Avenue, and Western Avenue range from about 69 to 74 dBA, levels which are typical for major arterial roadways with high traffic volumes and speeds.

Table 18

MEASURED NOISE LEVELS ALONG MAJOR ROADWAYS IN THE SITE VICINITY

Location	Measured Noise Level (dBA L_{eq})	Major Noise Sources
South side of 190th Street, approximately 1,500 feet east of Western Avenue (60 feet from 190th Street centerline)	69.1	Traffic on 190th Street, construction equipment at International Light Metals site
East side of Normandie Avenue, north of the Normandie Avenue-196th Street intersection (40 feet from Normandie Avenue centerline)	72.6	Traffic on Normandie Avenue
East side of Western Avenue, at the northeast corner of Western and Del Amo Boulevard (55 feet from Western Avenue centerline)	73.5	Traffic on Western Avenue

Source: Planning Consultants Research, April 1996.

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(2) Stationary Source Noise

Stationary noise sources in the site vicinity are primarily limited to industrial equipment operating on the project site and on adjacent properties. The facility that most affects noise levels on the project site is the adjacent Capitol Metals Company. Noise levels near that facility were measured during normal business hours on April 19, 1996. Noise from the facility is projected primarily to the south. About 50 feet south of the Capitol Metals property line, the L_{eq} was measured at 64.7 dBA. The L_{max}, which was associated with a heavy truck start-up, was measured at 78.3 dBA. At two locations east of the Capitol Metals facility toward the center of the project site, L_{eq}'s were measured at 56.3 and 56.9 dBA, while the L_{max} was measured at 65.6 and 66.0 dBA at the same two locations. These levels are similar to ambient conditions throughout the central portion of the project site. Thus, it is apparent that the area affected by operations at the Capitol Metals Company is limited to that portion of the site immediately south of the Capitol Metals property.

(3) Rail Noise

A Southern Pacific rail line is located at the eastern edge of the project site along the west side of Normandie Avenue. An estimated two trains per day pass the project site on this line. Trains from this line periodically access the Capitol Metals Company site immediately west of the project site via the spur located at the southern edge of the project site.

Based on the typical number of train operations per day (two) on the Southern Pacific line, the noise level on the project site associated with rail activity was estimated using the methodology and assumptions contained in the U.S. Department of Housing and Urban Development Noise Assessment Guidelines. The overall CNEL from rail activity at a distance of 50 feet from the rail line is estimated at 58.7 dBA. This level is substantially lower than the noise level associated with automobile traffic on adjacent Normandie Avenue and therefore contributes relatively little to the overall noise environment on the project site.

(4) Sensitive Receptors

Uses that are typically considered noise sensitive include residences, schools, hospitals, and convalescent care facilities. The nearest sensitive receptors are the residential properties south of the southwest corner of Area 2. The property lines of residences on the north side of 203rd Street are within about 75 feet of the southern project site boundary, separated from the site only by a railroad right-of-way. There are no hospitals or convalescent care facilities in the area. The nearest school is the 186th Street School, which is about 1,500 feet north of the project site and is separated from the site by the San Diego Freeway.

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2. PROJECT IMPACTS

Construction-related impacts are considered significant if construction activity would violate the provisions of the City Noise Ordinance that govern noise from construction equipment, as described in Section IV.E.1.a(3)(b).

Impacts related to motor vehicle traffic generated by the proposed project are considered significant if project traffic would do any of the following:

- Increase the noise level along any roadway segment by 5 dBA or more if: (1) the pre-project noise levels at all affected receptor locations along that segment are within the clearly acceptable range on the community compatibility matrix shown on Figure 22 on page 158; and (2) noise levels would remain in the clearly acceptable range with the addition of project traffic; or
- Increase the noise level along any roadway segment by 3 dBA or more if either of the following is true: (1) the pre-project noise level at any use along that segment is within the normally acceptable or worse range on the community compatibility matrix, or (2) the noise level increase would cause the noise condition at a receptor location to move to the next higher level on the community compatibility matrix (clearly acceptable to normally acceptable, for example).

Impacts are also considered significant if new development proposed as part of the project would be exposed to noise levels (from either a stationary or mobile source) exceeding levels considered clearly acceptable on the community compatibility matrix.

Noise levels generated by construction activity were projected based upon levels reported in Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances, prepared for the EPA by Bolt, Beranek and Newman in 1971.

Noise levels associated with project-generated and cumulative traffic were estimated using Caltrans' LeqV2 noise model based upon the projected traffic levels reported in Section IV.G, Transportation/Circulation. Eight roadway links, selected because they would potentially experience substantial noise increases and/or are located adjacent to sensitive receptors, were modeled for three scenarios: (1) existing (1996) conditions; (2) 2006 baseline conditions; and (3) 2006 with project buildout. In accordance with the findings of the traffic study prepared for the Harbor Gateway Center by Crain & Associates, peak hour traffic volumes were multiplied by twelve to conservatively estimate the daily traffic levels on roadway links.[18]

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[18] *Appropriate conversion factor given traffic patterns in the area. Source: Crain & Associates, April 1996.*

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L_{eq} estimates were then generated for the average daytime, evening, and nighttime hours in order to estimate the effect of project and cumulative traffic upon the 24-hour average community noise level (CNEL).

Field measurements, conducted with a Quest M-28 sound meter, were used to gauge the effect of operations at existing facilities in the area on the project site.

The effect of noise from rail activity on the adjacent Southern Pacific rail line on proposed operations on the project site was evaluated based upon the existing noise levels associated with rail operations, as described in Section IV.E.1.b(3).

a. Construction Noise

Construction activity typically takes place in five fairly distinct phases: (1) ground clearing; (2) excavation; (3) foundation construction; (4) building erection; and (5) finishing and cleanup. Each phase involves the use of different kinds of construction equipment and, therefore, has its own distinct noise characteristics. Clearing and excavation typically involve the use of earth moving equipment such as heavy duty trucks, scrapers, backhoes, front-end loaders, and a rock crusher. Foundation construction generally entails the use of heavy concrete trucks and mixers, cranes, and pneumatic tools. Building erection typically involves the use of hammers, generators, compressors, and light trucks, while noise sources associated with finishing and site cleanup generally include trucks, landscape rollers, and compactors.

Typical noise level ranges associated with each construction phase at a distance of 50 feet from the noise source are presented in Table 19 on page 163. All five phases would have the potential to generate noise levels exceeding the 75 dBA City standard for construction equipment at that distance. Noise levels related to construction activity would typically attenuate at a rate of 6 dBA per doubling of distance. The potential impact of such levels on both on-site and off-site receptors during each project phase are described below.

(1) Area 1

Area 1 construction would begin in approximately mid-1997 and end in late 1998. The off-site receptors nearest Area 1 are commercial uses to the north across 190th Street. The nearest structure is about 125 feet from the northernmost construction site. At this distance, noise levels associated with Area 1 construction activity would be about 8 dBA lower than the levels presented in Table 19 on page 163. Therefore, maximum noise levels with all pertinent equipment on use would be about 81 dBA, during the excavation and finishing phases. Although such levels would be experienced only temporarily, if at all, during construction

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Table 19

TYPICAL NOISE LEVELS AT CONSTRUCTION SITES

Construction Phase	Noise Level (dBA) at 50 Feet: Minimum Required Equipment in Use	Noise Level (dBA) at 50 Feet: All Pertinent Equipment in Use
Ground Clearing	84	84
Excavation	79	89
Foundation Construction	78	78
Building Erection	76	85
Finishing and Site Cleanup	76	89

Source: Bolt, Beranek and Newman, "Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances," prepared for the U.S. Environmental Protection Agency, December 31, 1971.

activity in the northernmost portion of Area 1, noise associated with some Area 1 construction activity would have the potential to exceed the level normally allowed under the City Noise Ordinance. Impacts associated with Area 1 construction are therefore considered potentially significant.

(2) Area 2

Area 2 construction would occur intermittently in various locations over a nine-year period between 1997 and 2006. The off-site receptors nearest Area 2, and therefore potentially most affected by Area 2 construction activity, are the residences south of the southwest corner of the site. The current ambient noise level at these locations is estimated to be 55 to 60 dBA based upon noise measurements taken at comparable locations on the project site. The City Noise Ordinance standard limits construction noise to 75 dBA regardless of existing ambient levels. Construction activity could occur as close as about 75 feet from those properties. At that distance, noise levels would be about 3 dBA lower than presented in Table 19 on page 163. Nevertheless, maximum noise levels with all pertinent equipment operating could be as high as about 86 dBA during the excavation and finishing phases. Although such levels would be experienced only temporarily, if at all, during construction activity in the southernmost portion of the Area 2 area, noise levels associated with some Area 2 construction activity would have the potential to exceed the level normally allowed under the City Noise Ordinance.

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Because most Area 2 development would likely occur after the development of Area 1, construction activity associated with Area 2 would also have the potential to affect Area 1 development. Construction activity could occur as close as about 50 feet from the retail center retail structures at the south end of Area 1. Thus, the maximum noise levels would be similar to those shown in Table 19 above. However, because only the backs of the buildings would be facing the construction activity, the approximately 45-foot high retail buildings themselves would effectively shield retail employees and visitors from construction noise. Consequently, no exceedance of the levels normally allowed under the City Noise Ordinance is anticipated in Area 1. Given that Area 2 construction activity would occur over a period of up to about ten years, however, construction occurring near the end of the construction period may cause noise levels exceeding normally allowed levels at previously constructed projects within Area 2. Impacts to these uses associated with Area 2 construction are therefore considered potentially significant.

The sensitive receptor nearest Area 1 is the 186th Street School, located about 1,500 feet to the north. Based upon an attenuation rate of 6 dBA per doubling of distance, the maximum construction-related noise level at the school would be about 60 dBA, which is within the level allowed under the City Noise Ordinance. In actuality, noise related to on-site construction activity would be lower at the 186th Street School due to the additional attenuation provided by the San Diego Freeway right-of-way. Impacts to school facilities are therefore considered less than significant.

b. Operational Noise

(1) Traffic-Related Noise

Traffic generated by project buildout would generally increase noise levels on area roadways. The noise level increases associated with the project-related traffic on several roadway segments in the vicinity of the project site are shown in Table 20 on page 165. As indicated, project traffic would increase noise levels at all eight studied roadway segments. The greatest noise level increase (0.4 dBA) associated with project traffic would occur on Normandie Avenue north of 182nd Street. Project-related noise level increases on other segments would range from 0 to 0.3 dBA. In no case would the noise level increase associated with project traffic approach the 3 dBA[19] change normally required to be perceptible. The segment of 190th Street east of Western Avenue, directly in front of the Area 1 retail area, would experience the greatest overall noise level increase (2.3 dBA). However, the increase

[19] *Existing ambient noise levels in this area are in the 69 to 74 dBA range, which is above the clearly acceptable level for all uses. Therefore, the 3 dBA increase threshold applies for determining significance.*

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Table 20

TRAFFIC-RELATED NOISE LEVELS ON SELECTED ROADWAY SEGMENTS

	Noise Level 50 Feet from Roadway Edge (in dBA CNEL)			Noise Level Change (dBA)	
Roadway Segment	**Existing**	**2006 Baseline**	**2006 with Project**	**Project (2006 with Project minus 2006 Baseline)**	**Cumulative (2006 with Project minus Existing)**
190th Street west of Western Avenue	74.0	74.9	75.1	+0.2	+1.1
190th Street east of Western Avenue	73.3	75.3	75.6	+0.3	+2.3
190th Street east of Normandie Avenue	72.9	73.8	74.1	+0.3	+1.2
Western Avenue south of Del Amo Boulevard	72.3	72.9	72.9	--	+0.6
Torrance Boulevard west of Western Avenue	72.4	73.2	73.3	+0.1	+0.9
Torrance Boulevard east of Normandie Avenue	70.9	72.1	72.2	+0.1	+1.3
Normandie Avenue north of 182nd Street	70.5	70.8	71.2	+0.4	+0.7
182nd Street west of Western Avenue	68.7	69.8	70.0	+0.2	+1.3

Source: Planning Consultants Research, May 1996, based upon traffic data from Crain & Associates, April 1996. The increase in traffic-related noise associated with project buildout is based upon the estimated 21,340 increase in daily vehicle trips at project buildout. See Appendix E for calculations.

in traffic noise on that segment is primarily attributable to background traffic growth associated with cumulative development in the area.

Project-related traffic is projected to cause a 0.4 dBA increase in the traffic noise level at Gardena High School (at Normandie Avenue north of 182nd Street). Although the noise level at portions of Gardena High School would continue to exceed the normally acceptable range, the 0.4 dBA change would not perceptibly change the community noise environment.

At the western edge of the residential neighborhood south of the project site (Western Avenue south of Del Amo Boulevard), project-related traffic would not measurably increase noise levels. Although noise levels in parts of the residential neighborhood area would continue

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to exceed the clearly acceptable range for residential uses, the noise level increase associated with project traffic (less than 0.1 dBA) would not perceptibly change the noise environment in the area.

Project buildout would create traffic noise level increases less than 3 dBA in all cases. Therefore, no significant traffic noise impact would occur. However, because noise levels along major roadways exceed clearly acceptable levels on most major roadways in the area, any increase in traffic-related noise associated with the project is considered to have an adverse effect.

Although traffic increases associated with implementation of the proposed project would not create audible noise level increases in the site vicinity, portions of the project site along major roadways that abut the site (190th Street, Western Avenue, and Normandie Avenue) are exposed to noise levels exceeding 70 dBA CNEL. This exceeds the clearly acceptable level for retail, office, and industrial park uses. Based upon the projected noise level along 190th Street, retail uses within about 200 feet of the southern edge of 190th Street would be exposed to noise exceeding the upper limit of the clearly acceptable range for retail uses (70 dBA CNEL). Industrial park uses within about 100 feet of either Western Avenue or Normandie Avenue would be exposed to levels exceeding the upper limit of the clearly acceptable range for industrial uses (70 dBA CNEL). Office uses within about 400 feet of either Western Avenue or Normandie Avenue would be exposed to noise exceeding the upper limit of the clearly acceptable range for office uses (65 dBA CNEL). Impacts to these receptors are considered potentially significant.

(2) Stationary Source Noise

The development proposed for the project site is not expected to include any major stationary sources of noise. Nevertheless, the industrial park uses proposed for Area 2 could potentially include some stationary noise sources with the potential to generate noise that could be perceptible to residential receptors south of the southwest corner of the project site. To ensure that any noise generated in Area 2 does not adversely affect adjacent residential receptors, the development plan for the project includes a sound wall a minimum of eight feet in height along the boundary between the project site and residential properties. This wall would reduce noise from on-site activities by up to about 9 dBA on the ground floor of the nearest residential properties, thereby minimizing the effect of noise from the project site.[20] Such a wall would also comply with City of Los Angeles requirements for screening walls

[20] *An 8-foot wall would not provide any noise attenuation for the second stories of the nearest residences, although no violations of the City Noise Ordinance are anticipated even without barrier attenuation.*

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between office/industrial park and residential uses. Consequently, on-site operations are not anticipated to violate the City Noise Ordinance or create any significant noise impact to the residential uses south of the project site, although periodic peak noise levels may cause noise annoyance to some nearby residents and, because the existing ambient noise level in this area exceeds the clearly acceptable level for residential uses, any increase in noise level would constitute an adverse effect, even though project traffic noise level increases would be less than 3 dBA in all cases.

The southwest corner of the Area 2 area would be exposed to noise from operations at the existing Capitol Metals Company. As discussed in Section IV.E.1.b.(2) above, the noise level (L_{eq}) associated with the operations at the Capitol Metals Company was measured at 64.7 at a distance of 50 feet from the southern property line of the Capitol Metals Company property. Such a noise level is within the clearly acceptable range for office and industrial uses (the maximum levels considered clearly acceptable for office and industrial uses are 65 and 70 dBA, respectively). The 64.7 dBA level is also less than the 70 dBA ambient level presumed in the City Noise Ordinance for properties zoned M3. Consequently, no violation of the City Noise Ordinance that could affect future uses within Area 2 is anticipated.

The peak level measured from the Capitol Metals Company (78.3 dBA) may cause periodic annoyance to receptors immediately south of the facility. However, given that observed peak levels associated with Capitol Metals Company operations resulted from the movement of individual trucks, such noise events would be expected to last less than five minutes in any given hour. With the 10 dBA reduction allowed under the City Noise Ordinance for noise of such short duration, even peak levels would be less than presumed ambient level of 70 dBA for the project site. Therefore, no significant impacts related to the operation of office or industrial uses within Area 2 adjacent to the Capitol Metals Company property would be expected to occur.

(3) Rail Noise

The proposed project is not anticipated to generate any new rail traffic on the Southern Pacific rail line that parallels Normandie Avenue at the eastern edge of the project site. The retail and office/industrial park uses proposed for the site, particularly those at the eastern edge of the site, would be exposed to noise from existing rail operations. However, the 58.7 dBA CNEL level from existing operations is within the clearly acceptable range for both retail and office/industrial park uses. It is also less than the ambient noise conditions along Normandie Avenue. Therefore, although noise from individual train operations may cause periodic annoyance to project site employees and visitors, impacts to proposed on-site uses would be less than significant.

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3. MITIGATION MEASURES

a. Construction Noise

Because noise associated with on-site construction activity would have the potential to exceed the level normally allowed under the City Noise Ordinance, the following measures are recommended to minimize construction-related noise:

1. On-site construction activity that generates noise in excess of 75 dBA at a distance of 50 feet shall be limited to between 7:00 A.M. and 6:00 P.M. Monday through Friday and 8:00 A.M. and 6:00 P.M. on Saturdays.
2. All construction equipment shall be in proper operating condition and fitted with standard factory silencing features.
3. Sound blankets shall be used on all construction equipment for which use of sound blankets is technically feasible.
4. A construction relations officer shall be established by the applicant to act as a liaison with neighbors and residents concerning on-site construction activity. If noise levels from construction activity are found to exceed 75 dBA at the property line and construction equipment is left stationary and operating for more than one day, a temporary noise barrier shall be erected between the noise source and receptor.
5. Any other noise reduction measures deemed technically feasible by the City of Los Angeles at the time of any specific construction project shall be implemented.
6. During construction, the project shall comply with applicable Sections 112.03 of City Noise Ordinance Nos. 144,331 and 161,574 and subsequent ordinances.

b. Operational Noise

7. In order to ensure a suitable interior noise environment in all on-site uses, appropriate sound attenuation features shall be incorporated into the design of any retail uses proposed within 200 feet of 190th Street, any industrial park uses proposed within 100 feet of either Western Avenue or Normandie Avenue, and any office uses proposed within 400 feet of either Western Avenue or Normandie Avenue. Such features as closed windows and fresh air supply systems or air conditioning will normally suffice.

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8. A minimum 8-foot high thematic wall shall be constructed between the southern boundary of Area 2 and adjacent residential properties as individual lots in this area are developed. Graffiti resident paint shall be utilized in both sides of the wall.

9. Buildings within lots located adjacent to the residential area south of the project site shall be set back a minimum of 25 feet from the southerly property boundary of the project site.

4. ADVERSE EFFECTS

With the recommended mitigation measures, noise associated with construction activity would be reduced to the degree technically feasible. Although occasional exceedances of the 75 dBA level allowed under the City Noise Ordinance would be possible even with these measures, construction-related noise would generally be expected to be less than 75 dBA. Because all technically feasible mitigation measures would be implemented, on-site construction activity would comply with the City Noise Ordinance. Impacts after mitigation are therefore considered adverse, but less than significant.

Impacts related to stationary source noise would be potentially adverse, but less than significant without mitigation. The 8-foot sound wall at the southern property line would minimize impacts to nearby residences. Although noise increases from project operation would be less than 3 dBA in all cases, impacts related to project traffic are considered adverse because of the already high traffic noise levels on major roadways in the area. However, with implementation of the recommended mitigation measures, the project's impact on traffic noise would be less than significant.

5. CUMULATIVE IMPACTS

a. Construction Noise

Construction noise events associated with individual development projects in the area would each occur over a period of several months or more, with noise levels reaching up to a peak of about 89 dBA at a distance of 50 feet from construction equipment without mitigation. Although noise from construction activity would increase community noise levels in the immediate vicinity of each individual development site, construction-related noise would be localized in nature. Consequently, it would not contribute to cumulative impacts at more distant locales. In addition, all construction activity would be expected to be reduced to the extent

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feasible through compliance with locally adopted and enforced noise ordinances. Cumulative impacts related to construction noise are therefore considered less than significant.

b. Operational Noise

The proposed project would not include any major stationary noise sources. Therefore, on-site operations would not contribute to any cumulatively significant stationary source impacts. Project-generated traffic would contribute to increased noise levels along several roadways in the vicinity of the project site, including 190th Street, Normandie Avenue, and Torrance Boulevard. However, in no case would the noise level increase associated cumulative traffic increases cause the noise level along a roadway to increase by more than an estimated 2.3 dBA, as shown in Table 20 on page 165. This maximum increase is less than the 3 dBA change that is normally required to be audible. Cumulative traffic-related noise impacts are therefore considered less than significant. However, because traffic on area roadways already exceeds normally acceptable levels for some adjacent uses, cumulative traffic noise impacts are considered adverse.

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IV. ENVIRONMENTAL IMPACT ANALYSIS
F. LIGHT AND GLARE

1. ENVIRONMENTAL SETTING

An analysis of existing light and glare conditions associated with the McDonnell Douglas Harbor Gateway property was performed and included observations during daylight hours as well as after dark. The purpose of the survey was to determine existing sources of nighttime artificial lighting and daytime and nighttime direct or reflected glare, the potential for modifications to existing ambient lighting conditions and glare generation related to redevelopment of the site and the identification of sensitive receptors to light exposure in the vicinity of the project area. General light and glare conditions along arterial roadways surrounding the property and within adjacent residential neighborhoods were investigated in the field (i.e., through a windshield survey).

Evaluation of nighttime artificial illumination includes assessment of ambient lighting conditions within the project area, as well as the degree of exposure to light intensities as experienced by surrounding land uses. Artificial lighting may be generated from point sources, focused points of origin representing unshielded light sources, as well as from indirectly illuminated sources of reflected light. The effects of proposed modifications of nighttime lighting conditions are contextual and depend upon the existing lighting environment, light intensity and proximity to light sources. Adverse lighting impacts may occur when project-related lighting is visually prominent, decreasing available views or altering the nature of community or neighborhood character, or illuminates a sensitive land use. Nighttime illumination of sensitive properties may adversely affect certain land use functions, such as those of a residential or institutional nature; such uses are typically occupied during evening hours and are subject to disturbance by bright light sources.

Daytime glare is typically caused by the reflection of sunlight by highly reflective surfaces at or above eye level, relative to surrounding activities. Reflective surfaces are generally associated with buildings constructed with broad expanses of highly polished surfaces or broad, light-colored areas of paving. Daytime glare is generally present during early morning and late afternoon hours when the sun is at a low angle and the potential exists for intense reflected light to interfere with vision and driving conditions. Daytime glare may also hinder outdoor activities conducted within surrounding land uses. Nighttime glare includes direct, intense, focused light as well as reflected light. Glare caused by direct sources of light generally originates from mobile and therefore transitory sources, such as automobiles. Less

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frequently, glare may also originate from particularly intense stationary sources, such as floodlights or stadium lights. As with daytime sunglare, such intense light may cause undesirable interference with driving or other activities.

a. Ambient Lighting Conditions

(1) Project Vicinity

The project site is located within a relatively densely developed urban area of the City of Los Angeles and is predominantly surrounded by industrial and commercial land uses, some of which entail nighttime operations (refer to Figure 1 in Section IV.G., Land Use, for a depiction in surrounding land uses). A variety of nighttime lighting conditions exist in the vicinity of the project site. Light levels are related to land uses and increase with proximity to commercial areas along major arterials and intersections bounding the project site, including 190th Street to the north of the project site, Normandie Avenue to the east and Western Avenue to the west. Relative light levels decrease within single and multi-family residential areas to the south and with distance from dense commercial concentrations.

(a) 190th Street

Nighttime lighting conditions along 190th Street, north of the project site, represent the highest ambient light levels within the immediate project vicinity, with the greatest intensity of lighting concentrated at the Normandie Avenue and Western Avenue intersections. Primary sources of light at the intersections of 190th Street with Normandie and Western Avenues include streetlights, traffic signals, illuminated billboards and signage associated with gas stations and other commercial facilities, light standards within surface parking lots associated with commercial frontage and automobile headlights. Illuminated Southern Pacific railroad crossing signals are also present at the Normandie Avenue intersection. Along 190th Street, light sources include continuous streetlights along the northern and southern sides of the street, light standards within parking lots, and security lighting along facades and rooflines of multiple-story buildings and a multi-level parking structure directly north of the project site. In addition, illuminated commercial signage and random lighting from within buildings along the north side of the street contribute to the overall existing illumination level. Indirect lighting sources include illuminated building facades within the Toyota Motor Sales, U.S.A., Inc. corporate office campus, on the southwest corner of the intersection with Western Avenue, as well as reflected light from tree canopies along the north and south sides of 190th Street. As 190th Street includes predominantly commercial land uses within the vicinity of the project site, no sensitive receptors to light exposure were identified along this corridor.

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(b) Normandie Avenue

Ambient light levels along Normandie Avenue are substantially lower than along 190th Street and decrease with distance to the south. The highest light levels are present adjacent to the 190th Street intersection and originate from the sources previously mentioned. Fewer and more widely spaced streetlights line Normandie Avenue, ending several hundred feet south of the 190th Street intersection on the west side of the street and beginning farther south of 190th Street on the east side of the street. The Southern Pacific railroad line parallels Normandie Avenue along the western margin, adjacent to the project site, and several spur lines access the project site and additional industrial properties to the east. A railroad crossing is located at the southern end of the project site and is periodically illuminated when a train passes through the area (i.e., by the train itself). Additional crossings are located to the south. Other light sources include multiple illuminated billboards, infrequent signage associated with primarily single-story commercial facilities and storage yards on the east side of the street, and security lighting along building facades and rooflines. Few nighttime operations exist along this corridor in the vicinity of the project site. Automobile and train engine headlights represent transient, or periodic, light sources. No residences are located along this portion of Normandie Avenue and no additional sensitive receptors were identified.

(c) Western Avenue

Western Avenue exhibits the lowest ambient nighttime light levels of the three commercial corridors surrounding the site. Diminished light levels are attributed to the reduced number of streetlights, the lack of commercial facilities, the presence of vacant land on the southeast corner of the 190th Street intersection, and the vacant land and broad building setbacks typical along the western frontage, farther to the south. Similar to Normandie Avenue, light levels reach greatest intensities adjacent to 190th Street and decrease dramatically to the south. Lighting sources include streetlights along the western side of Western Avenue and lighting associated with the Toyota office campus, industrial property and industrial and business parks to the south. Lighting within the Toyota campus includes shielded, inward-directed security lighting and parking lot standards, which shed relatively little light on the street. The Capitol Metals, Inc. industrial property on the east side of Western Avenue involves nighttime operations. Associated light sources include an illuminated entry, roofline security lighting and indirect lighting emanating from building interiors. No other nighttime operations exist in this portion of Western Avenue. Additional indirect light sources include distant illumination from the Mobil refinery, approximately 1 mile to the west. Automobiles represent transient light sources along Western Avenue. No sensitive receptors exist along Western Avenue in the vicinity of the project site.

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(d) 203rd Street

Ambient light levels within the 203rd Street residential neighborhood are substantially lower than those of nearby commercial corridors. As expected, light levels along 203rd Street reach greatest intensities adjacent to the intersection with Western Avenue and decrease rapidly to the east, adjacent to a Department of Water and Power substation and abandoned industrial operations on and off the project site. Light sources at the intersection include streetlights, traffic signals, illuminated billboards and commercial signage at the intersection with Western Avenue. Within the residential neighborhood, light sources are limited to a single streetlight and typical light sources associated with residential uses, including security lighting from houses, garages and carports and interior lighting. Periodic train engine headlights from rail lines serving industrial properties to the north, as well as limited automobile traffic along 203rd Street, represent transient light sources, which may occasionally be perceptible within this area. Indirect lighting sources include distant, faint illumination from industrial properties and refineries to the southeast. The residential properties in this neighborhood would be considered sensitive receptors to light originating from surrounding areas.

(2) Project Site

Ambient light associated with the project site represents relatively low levels of illumination relative to surrounding areas. The project site is comprised of 170.2 acres and occupies the majority of the block bounded by 190th Street, Normandie Avenue, Western Avenue and 203rd Street. The property has served as the site of Douglas Aircraft Company aircraft parts manufacturing, warehousing and distribution center operations. Although the company has ceased manufacturing operations and is relocating personnel and functions to other facilities, the property supports limited, ongoing warehousing and distribution activities and contains approximately 46 separate structures. In addition to the structures, the site contains employee parking lots, paved storage and salvage yards and a vacant field. Existing structures are predominantly located in the property's northeast sector and along Normandie Avenue to the east. Existing lighting on-site, therefore, is concentrated in those areas, largely confined to the site's interior, and does not illuminate off-site areas. As the site supports reduced operations, not all buildings and associated areas are fully lighted and present lighting conditions which presumably represent substantially reduced light levels as compared to former conditions when the facility was fully operational.

The majority of on-site light sources are located toward the interior of the site and include high-pressure sodium floodlights along building rooflines, illuminated storage yards and fluorescent light spilling from building interiors. The western side of the property contains employee parking lots and former administration buildings; minimal security lighting

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surrounding the administration buildings and four 75-foot light standards within the parking lots represent the sole sources of illumination along this side of the property. At the time of observation, several light standards were not in operation.

The perimeter of the property exhibits minimal lighting. Major entries from 190th Street and Western Avenue (currently gated) are illuminated; as previously mentioned, illuminated railroad crossing signals are located at an unused (i.e., also gated) point of entry to the site along Normandie Avenue. Additional light sources along the property's 190th Street and Normandie Avenue frontages are limited to security lighting along the rooflines of existing structures. In addition, non-operational light standards are present within the storage yards adjacent to the rail line along Normandie Avenue. No currently illuminated light sources exist in the southern portion of the property, adjacent to the 203rd Street residential neighborhood.

b. Existing Glare Conditions

(1) Project Vicinity

(a) 190th Street

Due to the presence of multi-story office buildings and commercial facilities along this corridor, greater potential for the generation or reflection of daytime or nighttime glare would be expected along 190th Street than along adjacent commercial corridors. Several office buildings, such as the nine-story building opposite the project site and the Gateway Towers development to the east, include broad expanses of reflective glass surfaces above street level. However, the typical incorporation of limited reflectivity glass into building construction minimizes the risk of glare. In addition, sufficiently deep, landscaped building setbacks generally accompany buildings along 190th Street and reduce or eliminate opportunities for reflected glare. Automobiles constitute the only sensitive receptors to glare generation identified on this corridor.

(b) Normandie Avenue

No sources of daytime glare were identified along Normandie Avenue; potential for glare generation is very low, due to the lack of reflective surfaces at or above eye level. Automobiles and trains constitute mobile sources capable of generating nighttime glare. Automobiles further represent the only potential sensitive receptors of glare along this corridor.

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(c) Western Avenue

No sources capable of generating daytime glare were identified along Western Avenue. Although the Toyota office campus incorporates expanses of glass windows into building exteriors, landscaped berms and setbacks on this site and the use of limited reflectivity glass work to minimize or reduce glare. Additional structures along Western Avenue are sufficiently set back from the street frontage to eliminate the possibility of glare generation or are constructed of non-reflective materials. Automobiles represent the only source of, and sensitive receptors to, nighttime glare.

(d) 203rd Street

No stationary sources capable of generating daytime glare were identified within the residential neighborhood along 203rd Street. Residential structures are typically one or two stories in height and include minimal reflective surfaces. However, automobile headlights represent sources of nighttime glare, predominantly limited to local traffic and some through-traffic. Periodic glare may also originate from oncoming train headlights from spur rail lines to the north. The residential properties in this neighborhood constitute sensitive receptors of glare; local automobile traffic, in contrast to higher-speed through-traffic carried by the major arterial roadways in the project vicinity, represents a less sensitive receptor.

(2) Project Site

Potential sources of daytime or nighttime glare generation within the project site are limited. The majority of on-site structures are warehouse-type structures and other low-rise buildings constructed of nonreflective materials which contain few or no windows. The broad employee parking lots along the western side of the site represent a large, flat paved area; however, these parking lots are paved with asphalt and thus generate minimal glare as perceived from off-site. Light standards within the parking lot are sufficiently distant from surrounding roadways and neighborhoods to preclude glare impacts to off-site areas. Nighttime on-site automobile traffic is minimal.

Powerful roofline security lighting along the northern perimeter of the property is directed off-site and is highly visible from 190th Street; the intense, unshielded lights attract motorist attention and could be considered sources of glare. Light exposure as perceived from the roadway is partially mitigated by building setbacks, the sidewalk right-of-way and street trees. Aside from automobiles, no sensitive receptors exist in proximity to the potential sources of glare along the edges of the property.

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c. Light and Glare Policy Analysis

The City of Los Angeles General Plan Framework contains policies relating to street lighting within the Infrastructure and Public Services Element. The following policies are applicable to development within the project area:

- Policy 9.40.1: Require lighting on private streets, pedestrian-oriented areas and pedestrian walks to meet minimum City standards for street and sidewalk lighting.
- Policy 9.40.2: Require parking lot lighting and related pedestrian lighting to meet recognized national standards.
- Policy 9.40.3: Develop regulations to ensure quality lighting to minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare for facade lighting, security lighting, and advertising lighting including billboards.
- Policy 9.40.4: Establish regulations and standards which eliminate adverse impacts due to light pollution, light trespass and glare for the area lighting of rail yards, transit yards, trucking facilities and similar facilities.
- Policy 9.40.6: Placement of street trees shall be coordinated with the placement of street lights.

The Los Angeles Municipal Code contains a list of lighting-related zoning requirements applicable to the project site, as follows:

- Section 93.0107 (a): No person shall construct, establish or maintain any stationary exterior lighting or illumination system or any interior system which is visible from a public street, highway or other public thoroughfare used for vehicular traffic, that contains or uses a continuous or sequential flashing operation in which one-third or more of the lights are turned on or off at the same time, or an illuminating device or devices which produce illumination in excess of what is permitted in Section 21466.5 of the State of California Vehicle Code.
- Section 93.0117: Illumination of adjacent residential properties by exterior light sources shall not exceed two footcandles[21] and shall not be a source of direct glare on said uses.
- Section 12.21 A 5(k): All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and adjacent premises.

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[21] *A unit of measurement of luminous intensity, expressed as the concentration of light output falling on a surface.*

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- Section 17.08 (c): Plans for street lighting shall be submitted to and approved by the Bureau of Street Lighting for subdivision maps.
- Section 91.6205 (a): A building permit shall be obtained from the department in accordance with the provisions of Division 2 of Article 1 of Chapter IX of this code for any signs that are regulated by this chapter. Where illuminated, an electrical permit shall also be obtained as required by Article 3 of Chapter IX of this code.
- Section 91.6205 (k)4: Signs are prohibited if they contain flashing, mechanical and strobe lights in conflict with the provisions of Section 80.08.4 and 93.6215 of this code.
- Section 91.6205 (m): No sign shall be illuminated in such a manner as to produce a light intensity of greater than three footcandles above ambient lighting, as measured at the property line of the nearest residentially zoned property.
- Section 91.6210 (a): The area of illuminated architectural canopy signs shall not exceed 2 square feet for each foot of street frontage, plus 1 square foot for each foot of building frontage. The signs shall be internally illuminated so as to illuminate the canopy and exterior wall below.

2. PROJECT IMPACTS

The determination of significance for lighting impacts is dependent upon the following variables:

- Changes to the existing ambient light conditions on the project site
- Potential sensitive receptors in the vicinity of the project site
- The potential for lighting to illuminate light-sensitive receptors
- The size of the light source as seen from the light sensitive receptor
- The anticipated intensity of illumination

A significant impact would result if: (1) the proposed project introduced high-intensity, prominent lighting sources into the field of view of sensitive receptors, affecting existing available views; or (2) the proposed project illuminated areas not currently illuminated or intensified existing levels of illumination in proximity to sensitive receptors. As the project is located in an urban area, it is reasonable to expect incremental increases in light levels over time. Significance, therefore, is dependent upon substantial lighting modifications which are inconsistent with existing or reasonably anticipated increases in light levels in the surrounding area.

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A project would normally have a significant glare-related impact if it resulted in new sources of glare which represented a safety hazard or otherwise interfered with activities in the vicinity of the project site, on a regular basis and for substantial periods of time.

Specific lighting specifications, such as location, height, lighting type and illumination intensities, have not been established for the project. Therefore, assessment of potential light and glare impacts is based upon evaluation of the project's program of urban design standards affecting light and glare conditions, together with assumptions of typically utilized lighting amenities for similar developments.

The proposed project consists of demolition of existing facilities, subdivision of the site into up to 45 lots and development of retail, office and industrial facilities. Project buildout is to be accomplished in two distinct areas of the project site, with development of the Area 1, the northern portion of the site, to be completed by 1998, and development of Area 2 to be completed by 2006.

a. Area 1 Development

Development of Area 1 would encompass the northern 40 acres of the project site, along 190th Street. Proposed development includes restaurant facilities along the northernmost portion of Area 1, on separate pads, together with a movie theater complex, and large-scale retail facilities along the southern border of Area 1. Buildings would not exceed 45 feet in height within Area 1. Surface parking for approximately 2,200 cars would occupy the center of Area 1, to the rear of any commercial street frontage. The proposed project includes development of an internal road system providing access to the entire site. Development of Area 1 includes the northernmost segment of "A" Street, the primary north-south internal roadway through the site. Figure 7 in Section II.D, Project Characteristics, depicts the Area 1 site plan.

(1) Light

Development of the proposed facilities in Area 1 would likely necessitate the introduction of illuminated commercial signage associated with individual facilities as well as site identification signage, including two proposed 120-foot tall signs which would represent significant modifications to the City's signage regulations (see discussion in Section IV.L, Aesthetics). This area is currently characterized by security lighting located on the exterior of existing warehouse buildings. Interior light issuing from individual facilities would also be visible from off-site. In addition, surface parking lot light standards, internal walkway lighting and low-level security lighting associated with individual structures would likely be incorporated into the development of Area 1. The nature of the proposed uses in Area 1 denote substantial

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nighttime uses by patrons, suggesting relatively high levels of lighting for safety and security purposes and a substantial increase in ambient lighting from current conditions on this portion of the site. However, lighting would generally be directed toward the interior of the project site and off-site effects would be substantially reduced by minimum landscape parkway setbacks along 190th Street of 30 feet in width. Therefore, while these light sources would be perceptible from off-site and would increase ambient light levels in the project area, they would not represent the introduction of high-intensity, prominent lighting sources into the field of view of sensitive receptors, nor would they illuminate areas not presently illuminated. Moreover, no sensitive receptors to lighting impacts are present along the 190th Street or Normandie Avenue corridors. Therefore, no significant lighting impacts are anticipated.

(2) Glare

Potential daytime glare-generating elements of the proposed project would be related to building materials used in construction of individual facilities and surrounding paved areas. Although specific building designs and materials for use in Area 1 have not yet been established, site-wide urban design standards have been developed which identify potential building materials as concrete, metal panels and limited reflectivity glass. Landscaped setbacks from the roadway would further reduce the likelihood of potential glare impacts upon automobiles. No significant daytime glare-related impact is therefore anticipated from the development of Area 1.

Potential nighttime glare impacts would be related to project-related, high-intensity, direct illumination perceived as prominent and distracting from off-site vantages, or the reflection of automobile headlights or stationary light sources by structures on-site in a manner that causes safety hazards to off-site activities. While on-site lighting plans have not been established, it can be assumed that lighting sources would be directed toward the interior of the site. In addition, proposed landscape setbacks would block or filter effects of on-site lighting from motorists. Additional automobile traffic would be generated by proposed development, resulting in additional mobile sources of potential glare. However, since no sensitive receptors exist along these corridors, aside from automobiles, and the impact of automobile headlights on other automobiles is transitory, additional automobile traffic would not represent significant impact with respect to nighttime glare.

b. Area 2 Development

Area 2 is comprised of 115.6 developable acres in the central and southern portions of the site. Proposed development includes slightly over 2 million square feet of industrial park uses and approximately 500,000 square feet of freestanding office uses. Maximum building

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heights within Area 2 would not exceed 150 feet, or approximately 12 stories; buildings along the southern portion of Area 2, within 300 feet of the 203rd Street residential neighborhood, would not exceed 45 feet in height. Area 2 includes the completion of the internal road network, including the remainder of "A" Street, "B" Street, providing primary east-west access to the project site from Western Avenue and Normandie Avenue, and "C" Street, providing internal circulation and access from Normandie Avenue. Figure 6 in Section II.D., Project Characteristics, shows the illustrative site plan for Area 2.

(1) Light

While specific lighting amenity locations and types have not been established for the entire project site, development of Area 2 would likely include the introduction of illuminated commercial signage for individual facilities, as well as overall site identity signage at primary entries along Western Avenue and Normandie Avenue. Low-level security lighting, internal walkway lighting and surface parking lot lighting, associated with individual facilities, would also be introduced. Additional light sources would include internal site-wide street lighting and directional signage. In addition, interior lighting within proposed buildings of up to 12 stories in height would provide sources of light which could be perceptible from substantial distances off-site, up to and including vantages along the San Diego and Harbor Freeways to the north and northeast of the project site, respectively.

The majority of light sources associated with development of Area 2 would be contained within and directed toward the interior of the site, as most buildings would be oriented toward internal street frontages. Potential light sources visible from surrounding roadways would be screened by setbacks and architectural screen walls. Proposed visual screens along Normandie Avenue would consist of a project theme wall or landscaped setbacks, with widths determined by the side or rear yard setbacks of individual project sites; off-site effects of lighting would therefore be substantially reduced. Although the southwestern portion of the site would entail building frontage and associated lighting along Western Avenue, visible light sources would be mitigated by proposed setbacks averaging 30 feet in width, identical to setbacks along 190th Street. Moreover, the overall levels of lighting within Area 2 would be consistent with the development of the surrounding area (e.g., office campuses, commercial buildings, etc.). In addition, no sensitive receptors with respect to lighting impacts are present along the Normandie Avenue or Western Avenue. Therefore, no significant lighting impacts are anticipated.

Within 300 feet of the light-sensitive uses represented by the 203rd Street residential neighborhood to the south, off-site lighting effects would be lessened by reduced building heights, together with an eight-foot project theme wall to be constructed along the residential area boundary as individual sites are developed. Some light sources associated with

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development of Area 2 would likely be perceptible from off-site and would contribute to increased ambient light levels in the project area. Depending on building locations, interior building lighting could be visible from adjacent residences. This would represent a potentially adverse impact to 203rd Street residences, particularly those on the north side of the street. However, the proposed site layout (45-foot building height limit within 300 feet of adjacent residential properties) and architectural screening measures between the commercial corridors and residential areas (including an 8-foot high thematic wall) would reduce off-site effects of site lighting to non-significant levels. Proposed site lighting would not represent the introduction of high-intensity, prominent lighting sources into the field of view of sensitive receptors, nor would it illuminate areas not presently illuminated. No significant impacts with respect to nighttime lighting are therefore expected within the 203rd Street neighborhood.

(2) Glare

Building materials used in construction of Area 2 buildings represent primary daytime glare-generating features of proposed development. Urban design standards established for the entire site propose the use of concrete, metal panels and limited reflectivity glass in building construction, thereby reducing the potential for glare effects upon adjacent roadways or freeways. However, depending upon building location, glare reflecting from buildings within the southern portion of Area 2 could impact adjacent residences. Reduced building heights along residential areas and landscaped setbacks along the entire perimeter of the property also greatly reduce the potential for off-site lighting impacts upon sensitive residential or traffic areas. No significant daytime glare impact is anticipated.

As previously mentioned, light sources on-site would be concentrated within the interior of the site. Proposed landscape setbacks along the commercial corridors reduces potential prominence of light sources from off-site. As with Area 1, increased automobile traffic associated with development of Area 2 would represent additional potential mobile sources of glare. However, automobiles are the only sensitive receptors identified along Normandie Avenue and Western Avenue. Since the impact of automobile headlights on other automobiles is transitory, additional project-related automobile traffic would represent a less than significant impact. Proposed theme walls would reduce or eliminate the potential for nighttime glare impacts to the 203rd Street residential area. No significant nighttime glare impacts are anticipated.

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3. MITIGATION MEASURES

The project is not expected to result in significant impacts with respect to light and glare. However, the following measures shall be included as conditions of approval in order to reduce or minimize potential effects of project lighting upon adjacent sensitive receptors.

1. The project applicant shall comply with all applicable exterior lighting limitations of the City of Los Municipal Code.
2. All outdoor lighting shall be shielded and directed downward to the greatest extent possible taking into account the function of the proposed lighting.
3. Mercury-vapor street light fixtures shall not be utilized on any public or private streets included within the project.
4. Mercury-vapor exterior light fixtures shall not be utilized for outdoor lighting, unless substantial evidence supporting the need for mercury-vapor is presented to the Department of Building and Safety.
5. Effective structural and/or vegetative screening shall be provided between sensitive land uses (i.e., the 203rd Street residential area) and all parking lot/ structure lighting or other large area, high-intensity broadcast lighting sources.
6. Exterior lighting shall be designed such that illumination is confined to the project site or confined to areas which do not include sensitive uses.
7. Exterior windows shall be tinted or contain a light-reflective film to reduce visible illumination levels from the building. Windows facing residential areas shall be constructed such that they are not allowed to be opened. Developers of future projects within the proposed subdivision shall consult with the Department of Water and Power regarding light-reflective film which would not interfere with energy conservation goals.
8. Within 300 feet of the property lines of adjacent residences on the north side of 203rd Street, on-site building height shall be limited to 45 feet.
9. A minimum 8-foot high thematic wall shall be constructed between the project site and adjacent residential properties to the south. Graffiti resistant paint shall be used on both sides of the wall.
10. Buildings shall be set back a minimum of 25 feet from the southerly property line of the project site.

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4. ADVERSE EFFECTS

With implementation of the urban design standards specified in the project development program and the measures identified above, no significant light and glare impacts would result from implementation of the proposed project.

5. CUMULATIVE IMPACTS

The proposed project, together with related projects located within the Harbor Gateway district area, create the potential for cumulative light and glare impacts upon surrounding areas. In particular, the proposed project, in conjunction with the project currently proposed on the adjacent International Light Metals site (775,000 square-foot shopping center and 3,500-seat theater), has the potential to substantially increase ambient light levels in the immediate vicinity of the project site along 190th Street. However, since no sensitive receptors are located in this area, no significant cumulative impact would be indicated. The extent of remaining cumulative lighting impacts cannot be fully determined at this time, as project-specific lighting specifications have not been established for all related projects. Furthermore, such increases to existing lighting and glare conditions would occur within the context of a highly urbanized environment and would represent incremental additions to existing ambient lighting conditions. Moreover, individual projects will be subject to mitigation requirements on a project-by-project basis.

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1. ENVIRONMENTAL SETTING

This section addresses: (1) existing land uses on and around the project site; and (2) land use policies relevant to the proposed project.

a. Current Land Use

Currently occupied by 46 individual manufacturing and warehouse structures, the project site was formerly an aircraft parts manufacturing facility. Today, however, manufacturing activities have either been discontinued or moved to other McDonnell Douglas facilities. Structures on-site are now used primarily for the storage and distribution of aircraft parts and miscellaneous items such as furniture and company files. Much of the exterior space on-site is also used for the storage of parts and equipment. From a high of about 5,500 on-site employees around 1990, an estimated 380 employees remain at the project site, all of whom are anticipated to be relocated to other McDonnell Douglas facilities or to a new facility on the project site at some point in the future.

Surrounding properties are occupied by a mix of heavy and light industrial uses, office buildings, miscellaneous commercial facilities, and residential uses. Many of the non-residential districts in the project area, particularly along 190th Street, transitioned from heavy industrial uses to high end office and business park uses between the mid 1970s and early 1980s. Land uses on and around the project site are illustrated on Figure 23 on page 186.

Immediately to the west on the same block as the project site are the former International Light Metals site, owned by the Lockheed Martin Corporation, and the Capitol Metals Company. The former International Light Metals site is nearly completely vacant as the property owner is currently in the process of removing former manufacturing facilities to accommodate potential future retail development. The Capitol Metals Company is an operating wholesale metals distribution facility.

Further west across Western Avenue in the City of Torrance is the national headquarters of Toyota Motor Sales U.S.A. This campus office complex is typical of the newer development in the area and is notable for its substantial setbacks from 190th Street and Western Avenue,

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Figure 23
Current Area Land Uses

and heavily landscaped grounds. Also across Western Avenue is the Allied Signal Corporation property, which is planned to be another business park development.

To the north across 190th Street is a mix of newer office buildings of varying heights and both newer and older warehousing centers. Most office buildings are in the two- to five-story range, although an approximately 9-story office tower immediately across 190th Street from the project site is a notable exception. Warehousing operations include such retailers as PC Warehouse, Plummer's Furniture, Ricoh, and Toshiba. Further west on 190th Street is additional new development, including a Courtyard by Marriott hotel and the Torrance Business Center, a newer commercial office center.

Properties directly east across Normandie Avenue in unincorporated Los Angeles County are primarily occupied by older industrial buildings. Uses include automobile repair, equipment and appliance manufacturing, a book bindery, a bakery, and a cement plant. Farther east are newer corporate office buildings, notably the Gateway Towers development, which consists of twin 12-story office towers located just west of Vermont Avenue.

Immediately south of the project site is a rail right-of-way, an approximately 20-foot wide strip that separates the project site from the single family residential neighborhood and other industrial uses further south. The residences south of the southwest portion of the site were built after 1945, subsequent to the initial development of the project site as a government-owned metal works. South of the southeast portion of the site are the Jones Chemical Company and the site of the now-removed Montrose Chemical Company, the former manufacturer of dichlorodiphenyltrichloroethane (DDT). Closed in 1982, the Montrose facility is currently the subject of a Remedial Investigation being conducted at the direction of the U.S. Environmental Protection Agency (see Section IV.J, Human Health, for further discussion of this issue). A Farmer Brothers Coffee distribution facility and various other industrial uses are located south of the Montrose Chemical site.

b. Relevant Land Use Policies

The project site is located within the Harbor Gateway District of the City of Los Angeles. It is also located within the jurisdiction of the Southern California Association of Governments (SCAG), the Southern California region's federally-designated metropolitan planning organization. All development activity on-site is subject to the land use regulations of the City of Los Angeles Harbor Gateway District Plan, which serves as the General Plan Land Use Element for the Harbor Gateway community, and the City of Los Angeles Zoning Code. Although not yet formally adopted by the City, the proposed General Plan Framework also provides additional guidance on land use issues against which on-site development must be

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considered. Finally, all on-site development should consider the policies contained in SCAG's Regional Comprehensive Plan and Guide (RCPG). The policies contained in each of these plans that pertain to the proposed project are described below.

(1) Harbor Gateway District Plan

The Harbor Gateway District Plan provides specific guidance for land use decisions in the Harbor Gateway District of the City of Los Angeles. The District, shown on Figure 24 on page 189, primarily encompasses two narrow north-south running strips of land between the unincorporated Los Angeles County community of Athens and the cities of Gardena and Torrance to the west, and unincorporated Los Angeles County and the City of Carson to the east. The northern strip follows the route of the Harbor Freeway and is roughly bounded by 120th Street on the north, Vermont Avenue on the west, and Figueroa Street on the east. The southern strip is roughly bounded by 182nd Street on the north, Western Avenue on the west, Normandie Avenue on the east, and Sepulveda Boulevard on the south. A wider "transitional zone" between the northern and southern strips is bounded roughly by 182nd Street on the north, Western Avenue on the west, the Harbor Freeway on the east, and Del Amo Boulevard on the south. The project site is located within this transitional zone. The current General Plan also classifies this area as a Center,[22] which is designed to be a regional employment and transportation hub.

The Harbor Gateway District Plan is intended to promote a land use pattern that will "encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the Harbor Gateway District." To implement these goals, the Plan sets forth a range of policies to guide land use decisions within the Harbor Gateway District. According to the Plan, the District is to generally remain an area of Low to Medium density residential development, with a substantial amount of industrial development allowed as well. The District Plan includes two policy statements related to industrially-designated lands. First, industrial lands are allocated in accordance with the general principle that jobs should be available within a reasonable commuting distance from employees' homes. Second, wherever possible, industrial uses should be concentrated in industrial parks.

The entire project site is currently designated "Heavy Industrial" in the District Plan. Areas surrounding the site are designated for a variety of uses. Properties to the north across 190th Street are designated "Light Industrial". Immediately east on the west side of Normandie

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22 *The currently adopted City of Los Angeles General Plan, adopted in 1974, included the "Centers Concept", which envisioned the development of a series of activity centers connected by a regional mass transit system within the City.*

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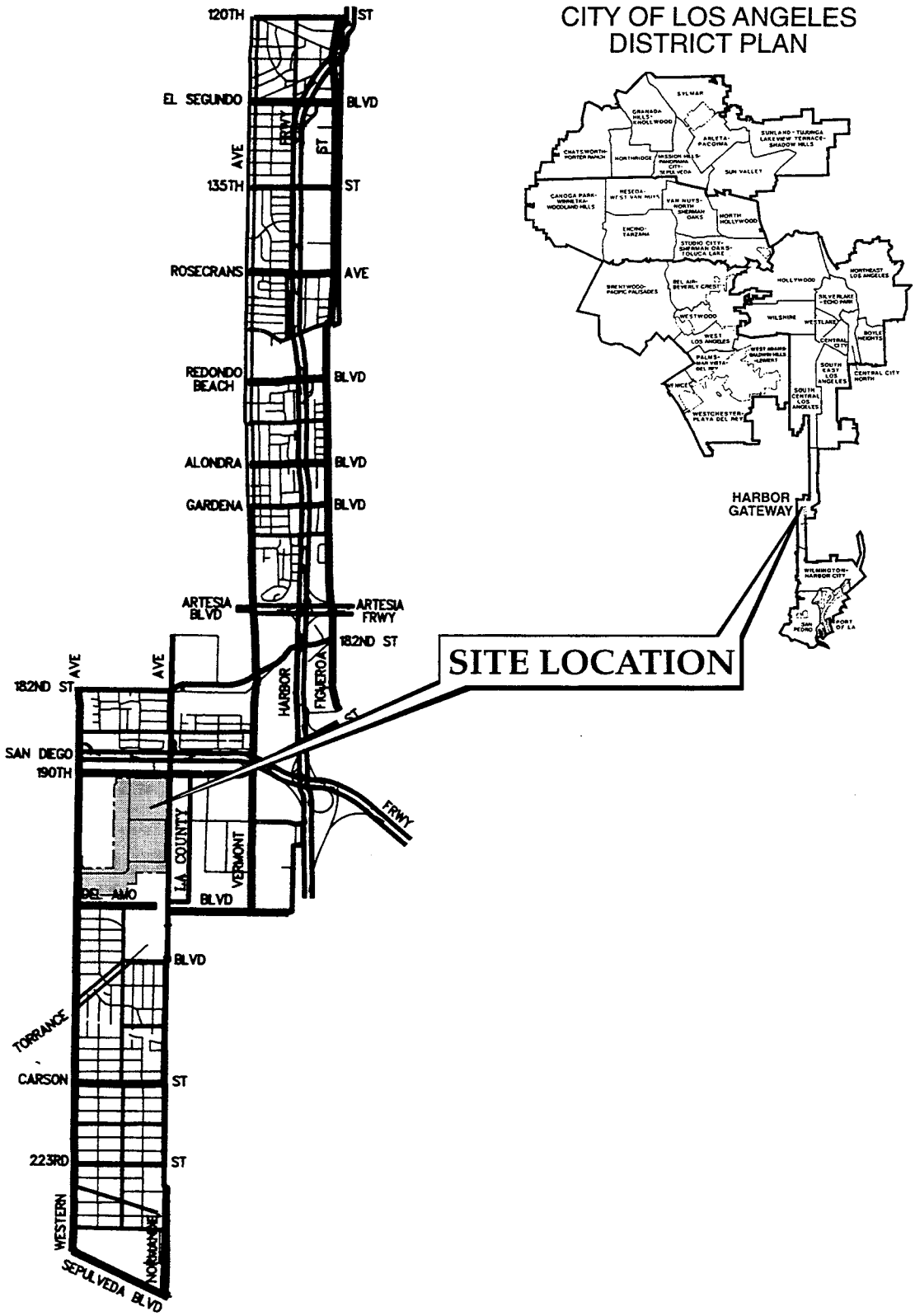

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Figure 24
Harbor Gateway District
City of Los Angeles

Source: Los Angeles City Planning Department, March, 1987

Avenue is a Southern Pacific rail line, which is designated "Open Space". The adjacent properties on the east side of Normandie Avenue are within unincorporated Los Angeles County and are designated "Industrial".[23] Properties south of the site are designated "Heavy Industrial", "Light Industrial" and "Low Medium I", a residential designation that allows densities of 7 to 12 units per acre. Immediately west of the project site are the Industrial Light Metals and Capitol Metals Company properties, both of which are designated "Heavy Industrial". Properties directly across Western Avenue in the City of Torrance are within the Business Park designation.[24] Land use designations for the project site and surrounding properties are shown on Figure 25 on page 191.

An NOP response from the Los Angeles City Planning Department suggested that the project site might be designated as Height District 1VL, which would limit on-site building height to 45 feet. However, subsequent communication from the Planning Department[25] indicated that the Harbor Gateway Community Plan shows that industrial areas not within the area bounded by the San Diego Freeway to the north, Del Amo Boulevard to the south, Western Avenue to the west, and the Harbor Freeway to the east are subject to the Height District 1VL limitation. Because the project site is within this area, Height District 1VL does not apply and the project site designation of Height District 1 is correct.

(2) City of Los Angeles Zoning Code

The project site is currently zoned M3, height district 1 (M3-1), an industrial zone and associated height district that allows a maximum floor-to-area ratio (FAR) of 1.5:1. Under the City of Los Angeles Zoning Code, commercial uses allowed in several specific commercial zones, including the CR, C1, and C1.5 zones, are also allowed on properties zoned M3. Various provisions of Zoning Code Sections 12.1.2.2 (CR Limited Commercial Zone), 12.13 (C1 Limited Commercial Zone), and 12.1.3.5 (C1.5 Limited Commercial Zone) allow such specific uses as grocery stores, appliance stores, mini-shopping centers, theaters, and offices.

Surrounding properties are zoned for a variety of uses, as shown on Figure 26 on page 192. The immediately adjacent International Light Metals and Capitol Metals Company properties are also zoned M3-1, as are the Montrose Chemical Company and Jones Chemical Company properties immediately to the south. The Farmer Brothers Coffee distribution facility property immediately south of the Montrose site is zoned M2-1VL. The residential properties

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23 *Wayne Zimmer, County of Los Angeles Department of Regional Planning, personal communication, February 27, 1996.*

24 *Jill Crump, Planner, City of Torrance, personal communication, April 9, 1996.*

25 *Ras Cannady Planner, City of Los Angeles, personal communication, July 16, 1996.*

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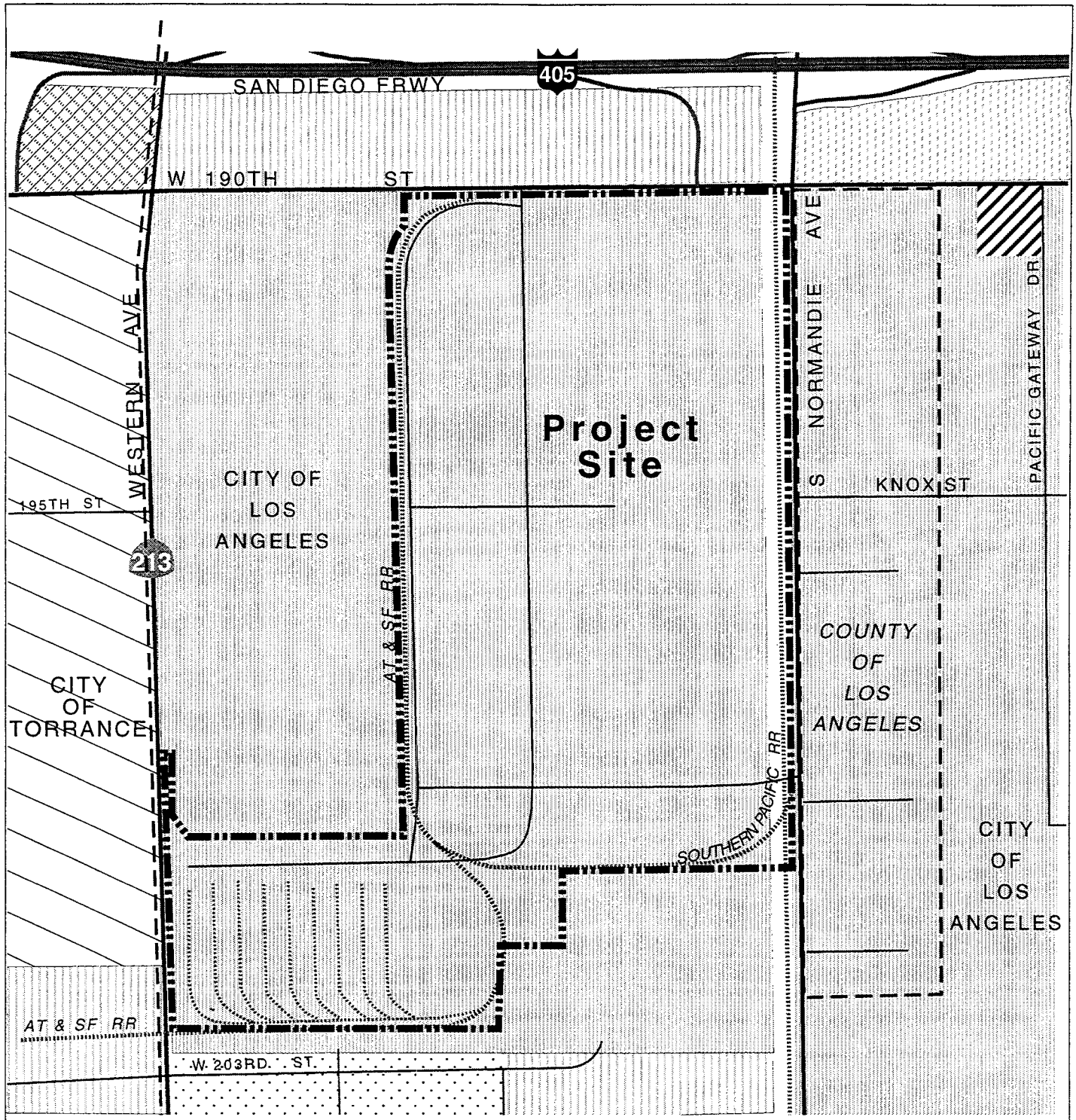

LAND USE LEGEND

COMMERCIAL	INDUSTRIAL	RESIDENTIAL	
Neighborhood & Office	Limited	Low Medium II	Project Site Boundary
General (Torrance)	Light	OPEN SPACE	Corporate Boundary
Business Park (Torrance)	Heavy		

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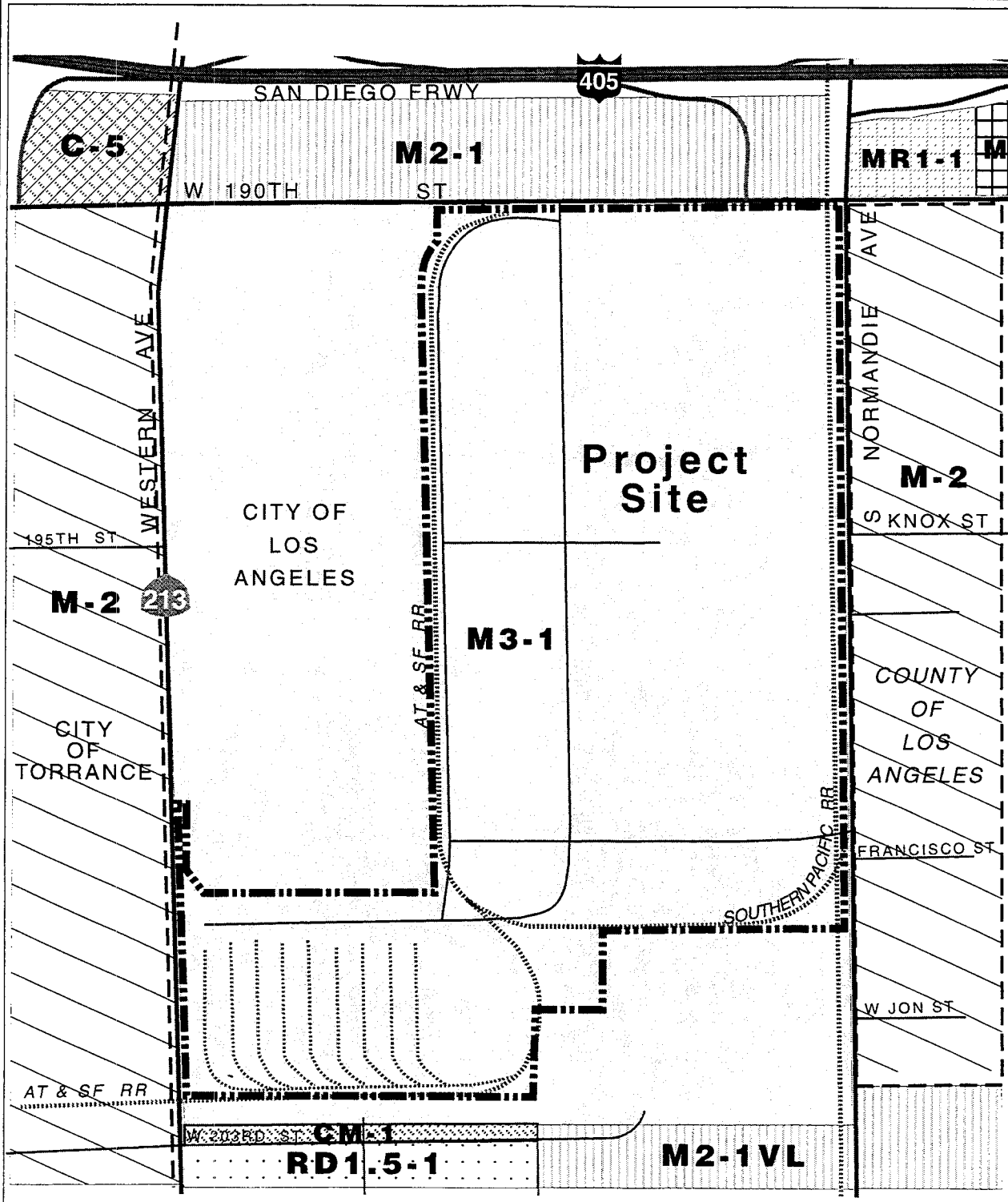
0 .25 .5 Mile

Figure 25
Area Land Use Designations

Source: Los Angeles City Planning Department, March, 1987



ZONING LEGEND

CITY OF LOS ANGELES CLASSIFICATIONS

- Limited Industrial (**M1**)
- Light Industrial (**M2**)
- Heavy Industrial (**M3**)
- Restricted Industrial (**MR1**)
- Commercial Manufacturing (**CM**)
- Restricted Density Multiple Dwelling (**RD1.5**)

OTHER JURISDICTIONAL CLASSIFICATIONS

- Conditional Commercial (**C-5**)
- Heavy Manufacturing (**M-2**)

- Project Site Boundary
- Corporate Boundary

Planning Consultants Research

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0 .25 .5 Mile

Source: Los Angeles City Planning Department, March, 1987

Figure 26
Area Zoning Classifications

immediately south of the southwest corner of the site are zoned CM-1. Properties further south across Del Amo Boulevard are zoned RD1.5-1. The adjacent properties east of Normandie Avenue in the County of Los Angeles are currently zoned M-2, a heavy manufacturing zone.[26] The properties directly west across Western Avenue in the City of Torrance have the same M-2 zoning.[27] Properties to the north across 190th Street are zoned M2-1.

(3) General Plan Framework

Although not yet officially adopted, the proposed City of Los Angeles General Plan Framework provides current general guidance on land use issues for the entire City. On the Long Range Land Use Diagram for West/Coastal Los Angeles, the project site is within an area designated as a Regional Center, which is similar in concept to the "Center" designation under the current General Plan. Uses encouraged on Regional Center-designated properties include:

- Corporate and professional offices, retail commercial (including malls), offices, personal services, eating and drinking establishments, telecommunications centers, entertainment, major cultural facilities (libraries, museums, etc.), commercial overnight accommodations, and similar uses.
- Mixed use structures integrating housing with commercial uses.
- Multi-family housing (independent of commercial).
- Major transit facilities.
- Inclusion of small parks and other community-oriented activity facilities.

General (highway-oriented) commercial uses such as gasoline and automotive service, lumber and building supplies, nurseries, and similar uses are discouraged in regional centers.

As defined in the General Plan Framework, regional centers are "intended to serve as the focal points of regional commerce, identity, and activity. They cater to many neighborhoods and communities and serve a population of 250,000 to 500,000 residents." These centers are intended to provide a significant number of jobs and non-work destinations that generate a high volume of vehicle trips. Consequently, they are to function as hubs of regional bus lines or rail transit. Typically, regional centers are high density places with physical form substantially differentiated from that of the lower density neighborhoods of the city. The maximum FAR for the regional center in which the project site is located is 1.5:1.

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26 *Wayne Zimmer, Los Angeles County Department of Regional Planning, personal communication, February 27, 1996.*

27 *Jill Crump, Planner, City of Torrance, personal communication, April 9, 1996.*

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Specific policies relevant to the proposed Harbor Gateway Center that are designed to achieve the objective of reinforcing existing regional centers and creating new ones include the following:

- Accommodate land uses that serve a regional market in areas designated as "Regional Center". Retail uses and services that support and are integrated with the primary uses shall be permitted.
- Accommodate and encourage the development of multi-modal transportation centers, where appropriate.
- Provide for the development of public streetscape improvements, where appropriate.
- Require that Regional Centers be lighted to standards appropriate for nighttime access and use.

(4) Regional Comprehensive Plan

SCAG's Regional Comprehensive Plan and Guide (RCPG) was adopted in 1994 as a policy document that sets broad goals for the Southern California region and identifies strategies for agencies at all levels of government to use in guiding their decision-making. It includes input from each of the 13 subregions that make up the Southern California region (which is comprised of Los Angeles, Orange, San Bernardino, Riverside, Imperial, and Ventura Counties). The project site is within the boundaries of the City of Los Angeles subregion, which encompasses the entire City of Los Angeles. However, it is within a finger of the City of Los Angeles that is completely surrounded by the South Bay Cities Association, which is comprised of 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, as well as portions of unincorporated Los Angeles County (see Figure 27 on page 195). Because the project site is geographically within the South Bay Cities Association, population, housing, and employment data for the South Bay Cities Association are considered more descriptive of conditions in the site vicinity.

Adopted RCPG policies related to land use are contained primarily in Chapter 2 of the Plan, entitled Growth Management. The primary goal of the Growth Management chapter policies is to address issues related to growth and land consumption by encouraging local land use actions that could ultimately lead to the development of an urban form that will help minimize development costs, save natural resources, and enhance the quality of life in the region.

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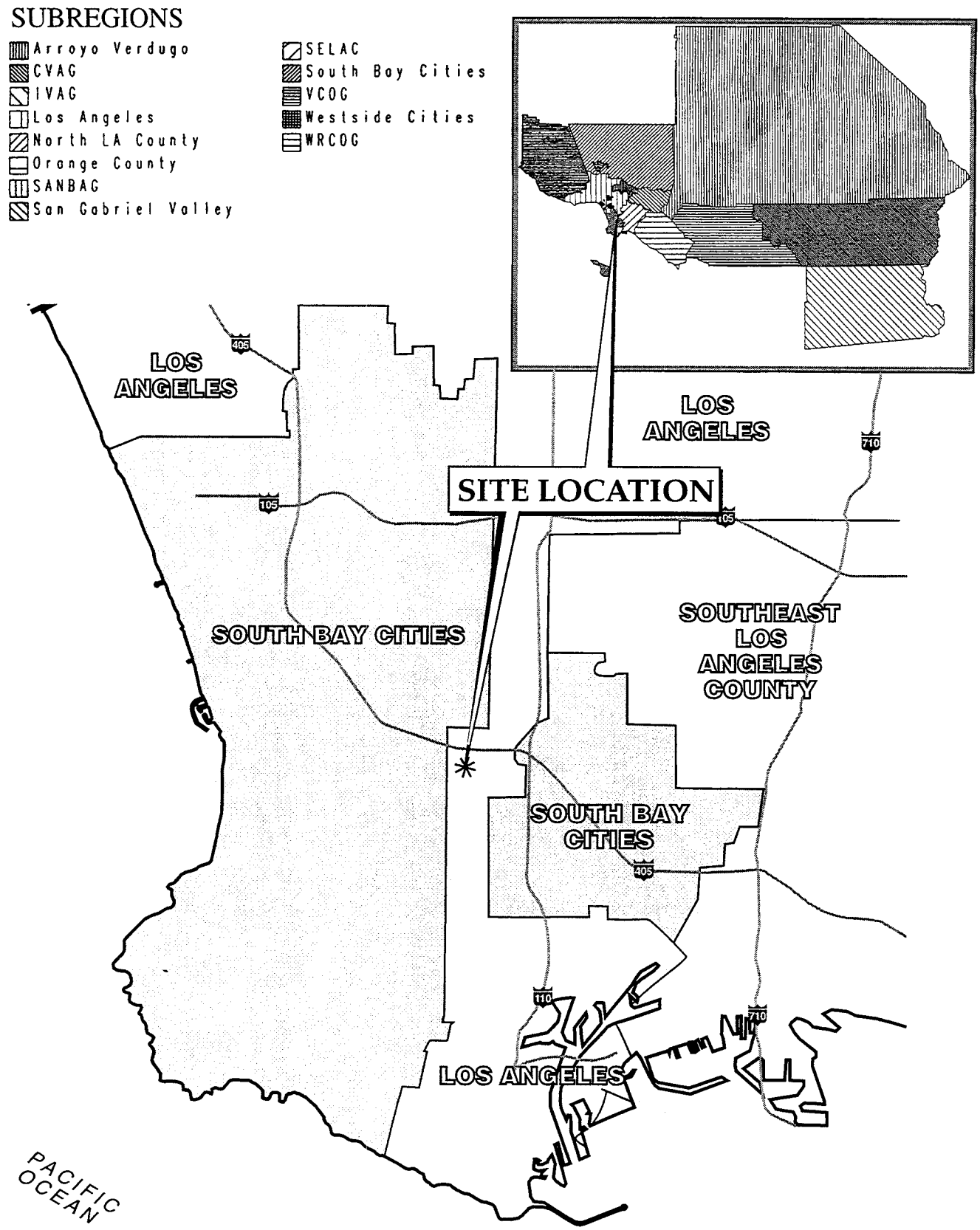

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Figure 27
SCAG Subregional Boundaries

Specific Growth Management policies are divided into four main categories: (1) policies related to growth forecasts; (2) policies related to the RCPG goal to improve the regional standard of living; (3) policies related to the RCPG goal to maintain the regional quality of life; and (4) policies related to the RCPG goal to provide social, political, and cultural equity. The policies related to growth forecasts apply to SCAG, rather than to the proposed Harbor Gateway Center project. However, several policies in the other three categories are applicable, including:

Policies Related to the RCPG Goal to Improve the Regional Standard of Living

- SCAG shall encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.
- SCAG shall support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.

Policies Related to the RCPG Goal to Maintain the Regional Quality of Life

- SCAG shall support provisions and incentives created by local jurisdictions to attract housing growth in job rich subregions and job growth in housing rich subregions.
- SCAG shall encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.
- SCAG shall encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.
- SCAG shall encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems and areas needing recycling and redevelopment.
- SCAG shall encourage planned development in locations least likely to cause adverse environmental impact.

Policies Related to the RCPG Goal to Provide Social, Political, and Cultural Equity

- SCAG shall encourage employment development in job-poor localities through support of labor force retraining programs and other economic development measures.

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In addition to the specific land use policies, the Regional Mobility Element (RME) of the RCPG, which is SCAG's principal transportation policy, strategy, and objective statement, contains two goals relevant to land use decisions:

- Encourage land use development patterns that complement transportation investments.
- Foster land use decisions that encourage alternatives to the auto.

2. ENVIRONMENTAL IMPACT

The project consists of two principal components: (1) development of a retail center in Area 1; and (2) development of office/industrial park uses in Area 2. The analysis of land use impacts considers both the compatibility of proposed uses with adjacent land uses and consistency with adopted plans and policies that govern land use on the project site. The project's land use compatibility impact is considered significant if any part of the proposed development would be incompatible with a surrounding land use. The project would be considered incompatible with a surrounding land use if it would cause a significant and unavoidable impact to local air quality, noise, light/glare, human health, or aesthetic conditions. Although inconsistencies with adopted land use plans or policies are not, in and of themselves, considered significant land use impacts, the assessment of consistency with local land use policy is included for consideration when evaluating the proposed project.

The determination of consistency with adopted land use plans and policies is based upon a review of all planning documents and policies that govern land use on the site. Primary planning documents include the Harbor Gateway District Plan and the City of Los Angeles Zoning Code. Secondary plans include the City of Los Angeles General Plan Framework, and the SCAG RCPG.

The determination of compatibility is based upon a survey of land uses in the area, in combination with the analysis of local air quality, noise, light/glare/aesthetics, human health, and aesthetic impacts discussed in Sections IV.B, IV.E, IV.F, and IV.K, respectively, of this EIR.

a. Land Use Compatibility

(1) Internal Compatibility

The retail and industrial/office park uses proposed for the 170-acre site would generally be compatible with each other. No internal compatibility conflicts are anticipated.

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(2) Compatibility with Surrounding Uses

The mix of uses adjacent to the project site includes heavy industry, light industrial/ warehouse development, office buildings, business parks, and residences, as described in Section IV.G.1.a. In addition, a large scale retail center is proposed for the adjacent International Light Metals site.

(a) Area 1

The retail center proposed along the 190th Street frontage would be compatible with the mix of uses along the 190th Street corridor. It would also be consistent with the trend on 190th Street away from the historic heavy industrial character of the area and toward a retail/office park character. As described in Section IV.L, Aesthetics, project implementation would improve visual conditions on the site and better integrate the site into the overall urban fabric along 190th Street. Although lighting associated with the proposed retail development would be substantial, it would be consistent with that of other development along 190th Street. In addition, Area 1 is not directly adjacent to any light sensitive uses such as residences. Consequently, Area 1 development would not create any land use conflicts related to aesthetics or lighting.

On-site soil contamination that has been detected in Area 1 may pose health hazards if not adequately remediated. However, as described in Section IV.K, Human Health, the project applicant is currently undertaking a remediation program designed to remove contaminants from site soils. Any additional remediation determined to be necessary will also be fully implemented. Further, as discussed in Section IV.B, Air Quality, no significant local air quality impacts are expected to result from project implementation. Therefore, Area 1 development is not expected to create any significant conflicts related to human health issues.

(b) Area 2

The office and industrial park uses proposed for Area 2 would generally be compatible with uses in the area, including the Toyota facility to the west across Western Avenue and the primarily small-scale industrial uses to the east across Normandie Avenue. The immediately adjacent Capitol Metals Company and residential uses may, however, pose certain conflicts with the proposed Area 2 development. In addition, on-site soil contamination would have the potential to pose health hazards if not appropriately remediated.

The Capitol Metals Company is an operating wholesale metal distribution facility. On-site operations involve the use of heavy machinery that may have the potential to create

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occasional noise conflicts with project site employees and visitors in the southwest corner of Area 2. Exterior noise levels in this area would be as high as about 65 dBA. Although occasional peak noise levels would be higher and may cause periodic annoyance, the noise levels that would be experienced are within that allowed for office/industrial uses in the City Noise Ordinance and the normally acceptable level for such uses contained in the California community noise compatibility guidelines (see Section IV.E, Noise). Therefore, potential conflicts related to noise are considered less than significant.

The proposed office and industrial park uses would generally be expected to be more visually compatible with adjacent residential uses than is the current manufacturing and warehousing use of the site. The addition of nighttime lighting may be annoying to some nearby residents. However, as discussed in Section IV.F, Light and Glare, impacts associated with nighttime lighting can be mitigated through the use of appropriate light types, shielding, and buffering. No significant conflicts are anticipated.

As discussed in Section IV.K, Human Health, soil contamination has been detected in portions of Area 2. However, full implementation of the measures recommended in Section IV.K would reduce contaminant levels to below levels that require further action. Full implementation of these requirements prior to development of Area 2 would reduce conflicts related to on-site contamination issues to a less than significant level.

(3) Traffic-Related Impacts

The increase in traffic to and from the site associated with the overall development program would create increases in localized noise and air pollutant levels, which is a potentially adverse impact to nearby uses, particularly those located along major roadways that serve the project site (190th Street, Western Avenue, Normandie Avenue). However, as discussed in Sections IV.B, Air Quality, and IV.E, Noise, neither air quality nor noise effects associated with the increase in motor vehicle traffic would cause an exceedance of an established air quality or noise threshold. Consequently, potential compatibility conflicts related to project traffic are considered less than significant.

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b. Land Use Policy Consistency

(1) Harbor Gateway District Plan

(a) Area 1

The retail center proposed in Area 1 of the project site would be a departure from the current heavy industrial use of the site but would be allowed under the Heavy Industrial designation included for the project site in the District Plan. Area 1 development would therefore be consistent with the General Plan land use designation for the site.

Although the proposed retail center is not an industrial use, it would provide up to between 1,000 and 1,100 jobs. Because of the relatively large labor force projected to be available in the South Bay Cities subregion (a projected population increase of 113,000 by 2015),[28] on-site jobs are anticipated to be filled largely by area residents. Consequently, Area 1 development would be expected to meet the District Plan policy objective of locating employment opportunities within a reasonable commute distance of people's homes.

(b) Area 2

The office/industrial park uses proposed in Area 2 would be a departure from the current heavy industrial use of the site but would be allowed under the existing Heavy Industrial designation. Area 2 development would therefore be consistent with the General Plan land use designation for the site.

(2) Zoning

(a) Area 1

The 450,000 square foot retail center proposed in Area 1 of the project site would include 355,000 square feet of large scale retailers, up to 30,000 square feet of restaurants, and a theater complex with up to 4,000 seats. The restaurants are specifically allowed in the C1 zone and therefore, by reference, would also be allowed in the M3-1 zone. Motion picture

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28 *SCAG projects a 2015 population of 940,000 in the South Bay Cities subregion, which represents an increase of 113,000 over the estimated 1996 population of 827,000. The 1996 population figure was derived through interpolation between SCAG's 1990 and 2000 estimates of 792,000 and 850,000, respectively. As mentioned in Section IV.G.1.b(4), the project site is actually within the Los Angeles subregion; however, because it is in a finger of the City that is geographically surrounded by the South Bay Cities subregion, demographic data for the South Bay Cities Association are considered more illustrative of conditions in the site vicinity than are data for the City of Los Angeles as a whole.*

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theaters are specifically allowed in the C1.5 zone and, therefore, by reference, in the M3-1 zone. Although the specific types of retailers that would occupy the site have not been determined, a range of retail uses, including grocery stores, appliance stores, and department stores, are allowed in the CR, C1, or C1.5 zones and, therefore, by reference, in the M3-1 zone. The retail uses that would likely be developed in the proposed retail center would likely fall into one of these categories. Consequently, all probable Area 1 uses would be consistent with the current project site zoning.

The average FAR of 0.26:1 for Area 1 is also within the 1.5 FAR allowed in the M3-1 zone. A conditional use permit (CUP) would, however, be required for the sale of alcohol in connection with the proposed restaurant and retail uses. In addition, a modification from City sign requirements would be required to allow two proposed 120-foot signs to exceed the maximum height allowed under the City sign ordinance (42 feet). Aesthetic issues related to the proposed signs are discussed in Section IV.L, Aesthetics.

(b) Area 2

The 2.5 million square feet of office/industrial park uses proposed in Area 2 of the project site would be permitted in the M3-1 zone. The average FAR for development proposed in Area 2 would be 0.5:1, substantially below the 1.5:1 FAR allowed in the M3-1 zone. Nevertheless, because certain individual parcels may be developed more intensely than others, the FAR on certain properties within Area 2 could exceed the allowable 1.5:1 FAR. Therefore, a CUP would be needed to allow averaging of the FAR for this development area. However, the average FAR over the entire site would be approximately 0.44:1 and would not exceed the 1.5:1 FAR permitted by Height District No. 1.

(3) General Plan Framework

The proposed retail and office uses are among the uses specifically encouraged within Regional Centers. The restaurants and motion picture theater complex proposed in conjunction with the Area 1 retail development are also among the uses encouraged for Regional Centers. Although industrial park uses are not specifically encouraged, such uses are consistent with the Regional Center policy objectives of accommodating uses that serve a regional market and providing a significant number of jobs. Consequently, all proposed uses would be consistent with the Framework's general land use objectives for Regional Centers.

The proposed project would serve to implement many of the specific Framework policies that the City has developed for Regional Centers. The proposed retail and office/industrial park uses would serve regional markets and would therefore be consistent with Framework policy

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regarding appropriate uses in Regional Centers. The high concentration of employment opportunities that the proposed project would accommodate would also encourage the development of alternative transportation modes in the area, thereby implementing the Framework policy relating to the development of multi-modal transportation centers. Finally, the streetscape improvements and lighting proposed for the project site would be consistent with Framework policy objectives relating to the provision of streetscape improvements and adequate nighttime lighting (see Sections IV.F, Light and Glare, and IV.L, Aesthetics, for further discussion of lighting and landscaping issues). Consequently, the proposed project is considered generally consistent with General Plan Framework Policies related to Regional Centers.

(4) Regional Comprehensive Plan

The proposed project involves the redevelopment of an aging and underutilized industrial facility with new retail and office/industrial park development. This type of infill development serves to implement several SCAG policies by: (1) encouraging urban development patterns that make use of existing facilities; (2) minimizing the need for new infrastructure; (3) potentially increasing public transit use by concentrating employment opportunities; and (4) accommodating planned development in an area where environmental impacts will be minimized. In addition, the employment opportunities that would be created by project implementation would serve to replace local jobs that have been lost over the past several years as employment in the aerospace industry in the South Bay area has declined. Consequently, the proposed project is considered generally consistent with SCAG urban development policy objectives.

3. MITIGATION MEASURES

1. The applicant shall comply with all conditions for the Conditional Use Permit for FAR averaging.

2. The applicant shall implement all mitigation measures as defined in Sections IV.A, Earth, IV.E, Noise, IV.F, Light and Glare, IV.H, Transportation/Circulation, and IV.L, Hazardous Materials.

3. The land use on-site shall be limited to that delineated in the following chart and this limitation shall be recorded in a covenant and agreement, and Development Agreement, if any.

   Although existing zoning (M3) and the general plan allow uses not listed on the chart, the development shall be limited to the uses analyzed for the environmental review. Regardless of the project size, any changes in use and scope of the development shall be subject to Department of Transportation (DOT) review and

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approval. DOT will collectively evaluate the changes as a total project, not as an individual project. If such changes result in trip generation beyond the number of trips evaluated under the project traffic study, as approved by the Department of Transportation, appropriate mitigation measures shall be required.

MAXIMUM FLOOR AREA (SQUARE FEET)

Location	Retail	Theatre	Restaurant	Office	Industrial Park	Sub-Total
Area 1[a]	355,000	65,000 (4,000 seats)	30,000			450,000
Area 2[b]				507,000	2,010,700	2,517,700
Total	**355,000**	**65,000 (4,000 seats)**	**30,000**	**507,000**	**2,010,700**	**2,967,700**

[a] *Includes Vesting Tentative Tract Unit Map No. 52172-01 (up to 12 lots, 40 acres).*

[b] *Includes Vesting Tentative Tract Unit Map Nos. 52172-02 (5 lots, 18 acres), 52172-03 (4 lots, 8.9 acres), 52172-04 (7 lots, 18.7 acres), 52172-05 (8 lots, 34.5 acres), 52172-06 (5 lots, 27.5 acres), and 52172-07 (4 lots, 8.2 acres).*

4. ADVERSE EFFECTS

The recommended measures, in combination with proposed project design features, would mitigate any potential land use compatibility conflicts to a less than significant level. The proposed project would be consistent with the General Plan land use designations and zoning for the site and would generally be consistent with relevant land use policies contained in the City's General Plan Framework and SCAG's RCPG.

5. CUMULATIVE IMPACTS

The proposed project would contribute to the ongoing trend in the area away from industrial uses and toward retail, office, and industrial park uses. Other projects proposed in the vicinity (the proposed retail center on the adjacent International Light Metals property, for example) are also consistent with this trend. By and large, the shift in use in the area would not create any significant land use compatibility conflicts. Any land use compatibility conflicts that are created by individual development projects in the area would be addressed on a case-by-case basis. Therefore, no significant cumulative land use impacts are anticipated.

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IV. ENVIRONMENTAL IMPACT ANALYSIS
H. TRANSPORTATION/CIRCULATION

This section is based upon the traffic study conducted by Crain & Associates to analyze the potential impact of the proposed project on the surrounding street and freeway system. This study, entitled Traffic Analysis for the Harbor Gateway Center Master Plan Multi-Use Community and dated October 1996, is presented in its entirety as Appendix F to this EIR.

1. ENVIRONMENTAL SETTING

a. Existing Street System

The site of the proposed Harbor Gateway Center project is located in the Harbor Gateway District of the City of Los Angeles. This area is served by three regional freeway facilities: the San Diego Freeway (Interstate 405), the Harbor Freeway (Interstate 110), and the Artesia Freeway (State Highway 91).

The existing regional freeway system provides excellent access to the project site. The project site is linked with Los Angeles International Airport (approximately six miles to the northwest) via the San Diego Freeway and with Downtown Los Angeles (approximately 15 miles to the north) via the Harbor Freeway. San Pedro and the Los Angeles Harbor, approximately seven miles to the south, are also conveniently accessible via the Harbor Freeway. The regional transportation system is illustrated on Figure 28 on page 205.

Direct ramp access to and from the San Diego Freeway is provided at the Western Avenue and Normandie Avenue interchanges. Western and Normandie Avenues provide the principal north-south access to the project site. Direct access to and from the Artesia and Harbor Freeways is provided via Artesia Boulevard to the north, 190th Street to the east and Torrance Boulevard to the south.

Two of the most important east-west highway facilities serving the project site and surrounding areas are 190th Street and Artesia Boulevard. Both streets are designated as major highways. 182nd Street is an important secondary arterial located approximately midway between 190th Street and Artesia Boulevard. Other important east-west arterials in this area

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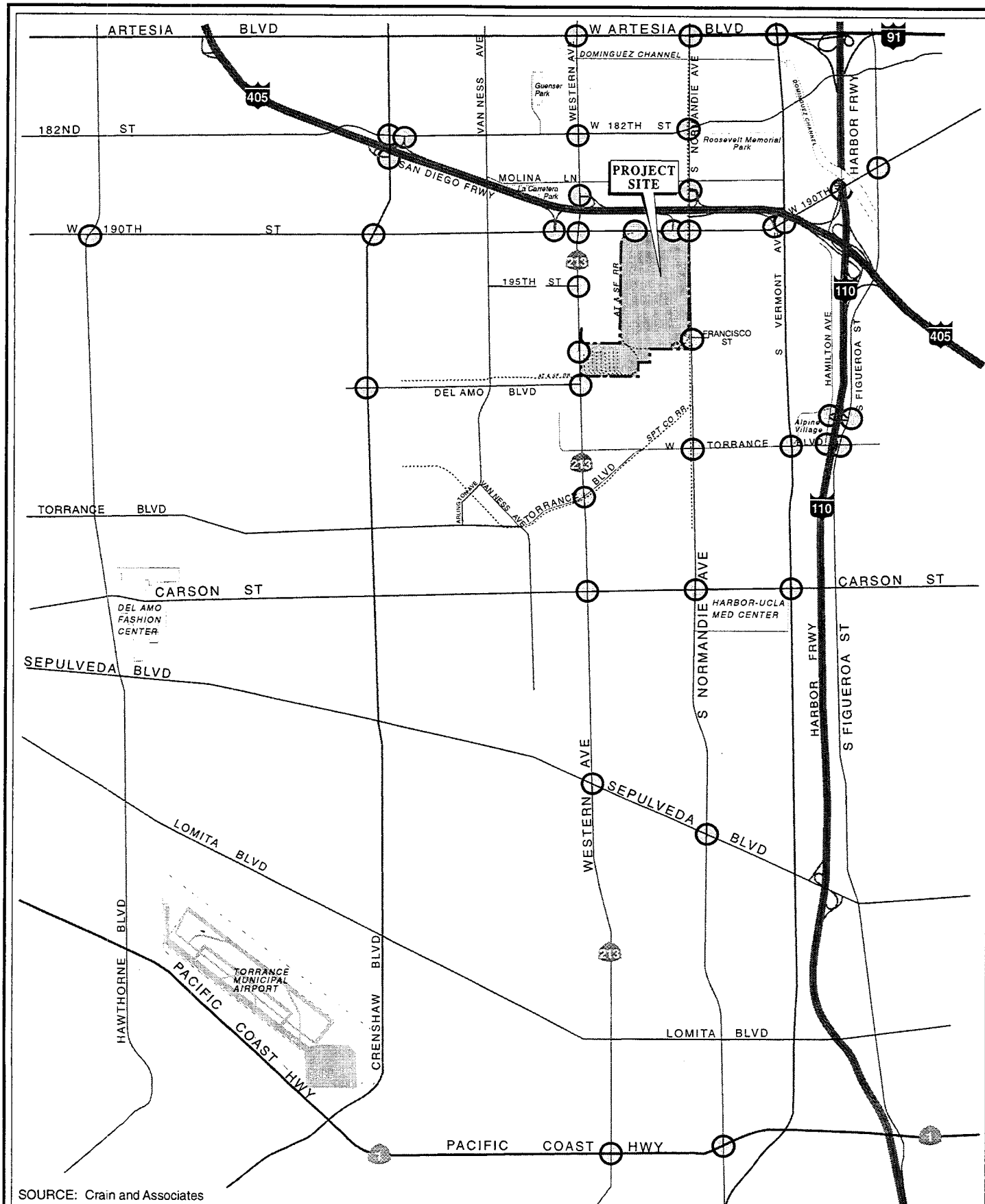

SOURCE: Crain and Associates

Planning Consultants Research

Study Intersection

Project Site Boundary

N

0 .25 .5 Mile

Figure 28

Regional Transportation System and Study Intersections

are Torrance Boulevard and Carson Street, both to the south of the project site. The major roadways in the site vicinity are described below.

190th Street is generally 85 feet wide and operates as a four-lane arterial with left-turn channelization provided at all intersections. Double left-turn lanes have been provided on the eastbound approach at Western Avenue, and right-turn-only lanes have been installed where demand is high and where sufficient room exists to accommodate the additional lane. During the morning and afternoon peak traffic periods, parking prohibitions are utilized so that 190th Street from west of Western Avenue to east of the Harbor Freeway operates as a six-lane facility. The Normandie Avenue off-ramp from the southbound San Diego Freeway intersects 190th Street opposite the project site. At this location, this ramp is 36 feet wide, providing for a two-lane approach, with one left-turn-only lane, and one right-turn-only lane. This approach is presently controlled by a stop sign.

Artesia Boulevard, from Normandie Avenue to just west of Western Avenue, is a six-lane highway that becomes a four-lane facility as it continues to the west. A typical cross-section of this highway includes two (divided) 35-foot roadways with a 14-foot wide raised median that provides for left-turn channelization at all intersections. Artesia Boulevard transitions directly into the Artesia Freeway (SR 91) immediately east of Vermont Avenue.

Del Amo Boulevard, to the west of Western Avenue, is 71 feet wide. To the east of Western Avenue, this roadway is designated as 203rd Street and is 32 feet wide. This street operates as a two-lane facility in each direction with left-turn channelization provided at major intersections. The roadway is discontinuous throughout the area to the east of Western Avenue, including the area to the south of the southern boundary of the project site.

Torrance Boulevard is a four-lane highway west of the Harbor Freeway that becomes a two-lane facility and ends to the east of Main Street. Left-turn channelization is provided at all intersections. A typical cross-section of this highway to the west of the Harbor Freeway is 60 feet in width.

The three most prominent north-south highways in the study area are Western Avenue, Vermont Avenue, and Normandie Avenue. Western and Vermont Avenues have been designated Major Highways on the City's General Plan. Normandie Avenue is designated as a Secondary Highway. Other important north-south routes in this area include Crenshaw Boulevard to the west and Figueroa Street and Normandie Avenue to the east.

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Western Avenue presently operates as a four-lane facility throughout this area, although localized improvements at 190th Street have made it possible to provide three through lanes in each direction. Double left-turn lanes for northbound traffic desiring to turn west onto 190th Street toward the southbound San Diego Freeway on-ramp are also provided. Dual southbound left-turn lanes are provided as well. North of 190th Street, Western Avenue is 110 feet wide, but tapers to an 84-foot width further to the north. South of 190th Street, Western Avenue is 98 feet wide, and provides three travel lanes in each direction. Further to the south, Western Avenue narrows to two northbound and three southbound travel lanes.

Vermont Avenue is fully developed throughout the project vicinity to a width of 80 feet, except along the east side in front of Ascot Park (between 182nd Street and the San Diego Freeway) where the shoulder area remains unimproved. This arterial provides two lanes of traffic in each direction with left-turn channelization provided at all intersections. The on-ramp to the northbound San Diego Freeway is located along Vermont Avenue approximately 380 feet north of 190th Street. This ramp is 28 feet wide at Vermont Avenue, but narrows to a single lane before it merges with the freeway. Caltrans presently meters this on-ramp during peak hours. Although the ramp queues are often substantial, they generally do not impact traffic flow on Vermont Avenue.

Normandie Avenue presently operates as a four-lane facility throughout the study area, with left-turn channelization at all intersections. Immediately north and south of 190th Street, Normandie Avenue is 72 feet wide, but narrows further to the south. A southbound on-ramp for the San Diego Freeway is provided just north of 190th Street on Normandie Avenue. Northbound on- and off-ramps to the San Diego Freeway are also provided further to the north.

A detailed evaluation of existing and future peak hour traffic conditions at 41 study intersections was conducted. These study intersections, listed below and illustrated on Figure 28 on page 205, are within the area near the project site and are the locations most likely to be directly impacted by the project's traffic generation.

1. Hawthorne Boulevard and 190th Street
2. Crenshaw Boulevard and 182nd Street
3. Crenshaw Boulevard and San Diego Freeway southbound on/off-ramps
4. Crenshaw Boulevard and 190th Street
5. Crenshaw Boulevard and Del Amo Boulevard
6. San Diego Freeway northbound on/off-ramps and 182nd Street
7. Western Avenue and Artesia Boulevard
8. Western Avenue and 182nd Street
9. Western Avenue and San Diego Freeway northbound on/off-ramps

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10. San Diego Freeway southbound on/off-ramps
11. Western Avenue and 190th Street
12. Western Avenue and 195th Street
13. Western Avenue and Project Driveway
14. Western Avenue and Del Amo Boulevard
15. Western Avenue and Torrance Boulevard
16. Western Avenue and Carson Street
17. Western Avenue and Sepulveda Boulevard
18. Western Avenue and Pacific Coast Highway
19. Project Driveway and 190th Street
20. Artesia Boulevard and Normandie Avenue
21. Normandie Avenue and 182nd Street
22. Normandie Avenue and San Diego Freeway northbound on/off-ramps
23. San Diego Freeway off-ramp and 190th Street
24. Normandie Avenue and 190th Street
25. Normandie Avenue and Project Driveway/Francisco
26. Normandie Avenue and Torrance Boulevard
27. Normandie Avenue and Carson Street
28. Normandie Avenue and Sepulveda Boulevard
29. Normandie Avenue and Pacific Coast Highway
30. Vermont Avenue and Artesia Boulevard
31. Vermont Avenue and 190th Street
32. Vermont Avenue and Torrance Boulevard
33. Vermont Avenue and Carson Street
34. Harbor Freeway southbound off-ramp and 190th Street
35. Harbor Freeway northbound on-ramp and 190th Street
36. Figueroa Street and 190th Street
37. Hamilton Avenue and Harbor Freeway southbound on/off- ramps
38. Figueroa Street and Harbor Freeway northbound on/off- ramps
39. Hamilton Avenue and Torrance Boulevard
40. Figueroa Street and Torrance Boulevard
41. Harbor Freeway southbound on/off-ramps and Carson Street

b. Existing Traffic Volumes

Traffic volume count data were obtained from the City of Los Angeles and Caltrans. New counts were conducted at all study locations where recent counts were not available. These counts were used to determine the existing traffic and turning movement volumes at each

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of the study locations during the A.M. and P.M. peak periods. Current traffic volumes are shown on Figures 3a and 3b in Appendix F.

c. Public Transportation

The project site is directly served by two bus lines operated by Gardena Transit (Line 2) and Torrance Transit (Line 6). These and other connecting bus lines offer access to adjacent South Bay communities and also provide convenient, direct access into Downtown Los Angeles. Several bus stops are located adjacent to the project site on both sides of Western and Normandie Avenues and 190th Street.

Gardena Line 2. This "rectangular" route involves primarily north-south travel on Western Avenue, Normandie Avenue, and Vermont Avenue, between Pacific Coast Highway on the south and Imperial Highway on the north. Half-hour headways are typical in both directions during all hours of operation.

Torrance Line 6. This linear route provides service between the Del Amo Fashion Square and Torrance Civic Center to the southwest and Cal State Dominguez Hills and the Metro Rail Blue Line Artesia Station to the east. In the vicinity of the project site, it operates along 190th Street. Service is provided on half-hour headways in both directions during peak periods on Mondays through Fridays. No midday, night or weekend service is provided.

The following bus lines also operate in the study area, although at a greater distance from the project site than would be considered normal walking distance for purposes of transit access.

Torrance Line 1. This bus line provides service between the Del Amo Fashion Square regional shopping center in Torrance and Union Station in Downtown Los Angeles. Buses on this route operate on a typical headway of one hour, but service with half-hour headways is provided during peak commuter periods (6:00 - 9:00 A.M. and 3:00 - 6:00 P.M.). Access for the handicapped is provided on all of the buses operated on this line.

Metropolitan Transit Authority (MTA) Line 130. This line operates east-west between King Harbor in Redondo Beach and the Fullerton Park-and-Ride Lot at Orangethorpe Avenue and Magnolia Avenue. Daylight service is provided on typical headways of one hour, seven days per week. Access for the handicapped is provided on all buses.

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MTA Line 445. This line offers peak hour commuter service between San Pedro and Alpine Village (approximately one mile southeast of the project site), and Downtown Los Angeles. Five buses each provide service Monday through Friday, into Downtown during the peak A.M. commuter period and outbound during the P.M. peak period.

d. Analysis of Existing Conditions

The Critical Movement Analysis (CMA) methodology used for the analysis and evaluation of traffic conditions at each study intersection is based on procedures outlined by the Transportation Research Board.[29] The CMA methodology includes procedures for grading the operational quality of an intersection in terms of the Level of Service (LOS), which describes different traffic flow characteristics. LOS A to C operate well. LOS D typically is the level for which a metropolitan area street system is designed. LOS E represents volumes at or near the capacity of the street that might result in stoppages of momentary duration and unstable flow. LOS F occurs when a facility is overloaded and is characterized by stop-and-go traffic with stoppages of long duration.

A determination of the LOS at an intersection, where traffic volumes are known or have been projected, can be obtained through a summation of the critical movement volumes. This consists of the highest combination of conflicting movements that must be accommodated at that intersection. Once the sum of critical movement volumes has been obtained, the values in Table 21 on page 211 can be used to determine the applicable LOS.

"Capacity" represents the maximum number of vehicles in the critical lanes that have a reasonable expectation of passing through an intersection in one hour, under prevailing roadway and traffic conditions. For planning purposes, capacity equates to the maximum value of LOS E, as indicated in Table 21 on page 211. The CMA values used in this study were calculated by dividing the sum of critical movement volumes by the appropriate capacity value for the type of signal control present or proposed at the study intersections. The LOS values, defined as a range of CMA values, are shown in Table 22 on page 211.

By applying this analysis procedure to the study intersections, the CMA value and the corresponding LOS for existing traffic conditions were calculated. Those values for existing (1996) A.M. and P.M. peak hour conditions at the 41 study intersections are shown in Table 23 on pages 212 and 213.

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[29] *Transportation Research Board, Interim Materials on Highway Capacity, Circular Number 212, 1980.*

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Table 21

CRITICAL MOVEMENT VOLUME RANGES [a]
FOR DETERMINING LEVELS OF SERVICE

Level of Service	Maximum Sum of Critical Volumes (Vehicles per Hour) Two Phase	Three Phase	Four or More Phases
A	900	855	825
B	1,050	1,000	965
C	1,200	1,140	1,100
D	1,350	1,275	1,225
E	1,500	1,425	1,375
F	---------- Not Applicable ----------		

[a] *For planning applications only, i.e., not appropriate for operations and design applications. Also, a computerized traffic signal coordination system, such as the Automated Traffic Surveillance and Control (ATSAC), increase these values by approximately seven percent.*

Table 22

LEVEL OF SERVICE
AS A FUNCTION OF CMA VALUES

Level of Service	Interpretation	Range of CMA Values
A	Uncongested operations; all vehicles clear in a single cycle.	≤ 0.60
B	Same as above.	$> 0.60 \leq 0.70$
C	Light congestion; occasional backups on critical approaches.	$>0.70 \leq 0.80$
D	Congestion on critical approaches, but intersection functional vehicles required to wait through more than one cycle during short peaks. No long-standing lines formed. Used as the desirable level for design in many cities.	$>0.80 \leq 0.90$
E	Severe congestion with some long-standing lines on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protected turning movements.	$>0.90 \leq 1.00$
F	Forced flow with stoppages of long duration.	> 1.00

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Table 23

CRITICAL MOVEMENT ANALYSIS SUMMARY
EXISTING TRAFFIC CONDITIONS

Intersection	A.M. Peak Hour CMA	A.M. Peak Hour LOS	P.M. Peak Hour CMA	P.M. Peak Hour LOS
1. Hawthorne Boulevard and 190th Street	1.010	F	1.033	F
2. Crenshaw Boulevard and 182nd Street	0.909	E	1.065	F
3. Crenshaw Boulevard and San Diego Freeway S/B on/ off-ramps	0.997	E	0.910	E
4. Crenshaw Boulevard and 190th Street	1.237	F	1.240	F
5. Crenshaw Boulevard and Del Amo Boulevard	0.807	D	0.868	D
6. San Diego Freeway N/B on/off-ramps and 182nd Street	0.880	D	0.877	D
7. Western Avenue and Artesia Boulevard	0.982	E	0.988	E
8. Western Avenue and 182nd Street	0.418	A	0.605	B
9. Western Avenue and San Diego Freeway N/B on/off-ramps	0.607	B	0.735	C
10. San Diego Freeway S/B on/off-ramps and 190th Street	1.063	F	0.975	E
11. Western Avenue and 190th Street	0.712	C	0.915	E
12. Western Avenue and 195th Street	0.481	A	0.391	A
13. Western Avenue and Project Dwy.	0.354	A	0.410	A
14. Western Avenue and Del Amo Boulevard	0.707	C	0.747	C
15. Western Avenue and Torrance Boulevard	0.625	B	0.716	C
16. Western Avenue and Carson Street	0.777	C	1.023	F
17. Western Avenue and Sepulveda Boulevard	0.991	E	1.080	F
18. Western Avenue and Pacific Coast Hwy.	0.964	E	0.997	E
19. Project Dwy. and 190th Street	0.428	A	0.729	C
20. Normandie Avenue and Artesia Boulevard	0.874	D	1.002	F
21. Normandie Avenue and 182nd Street	0.311	A	0.513	A
22. Normandie Avenue and San Diego Freeway N/B on/ off-ramps	0.519	A	0.561	A
23. San Diego Freeway S/B off-ramp and 190th Street	0.470	A	0.839	D
24. Normandie Avenue and 190th Street	0.665	B	0.930	E
25. Normandie Avenue and Project Dwy. / Francisco Street	0.329	A	0.341	A
26. Normandie Avenue and Torrance Boulevard	0.617	B	0.619	B
27. Normandie Avenue and Carson Street	0.600	A	0.811	D

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Table 23 (continued)

CRITICAL MOVEMENT ANALYSIS SUMMARY
EXISTING TRAFFIC CONDITIONS

	A.M. Peak Hour		P.M. Peak Hour	
Intersection	**CMA**	**LOS**	**CMA**	**LOS**
28. Normandie Avenue and Sepulveda Boulevard	0.708	C	0.770	C
29. Normandie Avenue and Pacific Coast Hwy.	0.502	A	0.561	A
30. Vermont Avenue and Artesia Boulevard	0.913	E	0.883	D
31. Vermont Avenue and 190th Street	0.716	C	1.013	F
32. Vermont Avenue and Torrance Boulevard	0.673	B	0.740	C
33. Vermont Avenue and Carson Street	0.747	C	0.853	D
34. Harbor Freeway S/B off-ramp and 190th Street	0.429	A	0.759	C
35. Harbor Freeway N/B on-ramp and 190th Street	0.446	A	0.895	D
36. Figueroa Street and 190th Street	0.486	A	0.737	C
37. Hamilton Avenue and Harbor Freeway S/B on/off-ramps	0.423	A	0.423	A
38. Figueroa Street and Harbor Freeway N/B on/off-ramps	0.694	B	0.786	C
39. Hamilton Avenue and Torrance Boulevard	0.743	C	0.673	B
40. Figueroa Street and Torrance Boulevard	0.667	B	0.768	C
41. Harbor Freeway S/B on/off-ramps and Carson Street	0.850	D	0.738	C

Source: Crain & Associates, October 1996.

2. ENVIRONMENTAL IMPACT

The City of Los Angeles Department of Transportation (LADOT) has established the following criteria for determining the significance of a transportation impact. The criteria are based on a sliding scale depending upon the LOS. As shown in the following text table on page 214, as congestion increases, a smaller project-related increase in the volume to capacity (V/C) ratio constitutes a significant impact. Conversely, at less congested intersections, a larger project-related increase in V/C can be accommodated without triggering a significant impact.

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Level of Service	Final V/C Ratio	Project-Related Increase in V/C
C	>0.700 - 0.800	Equal to or greater than 0.040
D	>0.800 - 0.900	Equal to or greater than 0.020
E,F	>0.900	Equal to or greater than 0.010

Criteria set forth in the 1993 Congestion Management Program for Los Angeles County (Los Angeles County Metropolitan Transportation Authority, November 1993) are also used to perform the transportation impact assessment analysis at Congestion Management Program (CMP) arterial monitoring locations. The Los Angeles County CMP considers a project impact significant if the proposed project increases traffic demand by 2% of capacity (V/C increase $\geq$0.02), causing or worsening LOS F conditions (V/C >1.00).

The traffic analysis was performed through the use of established traffic engineering techniques. The existing traffic counts described earlier were used to reflect the most current information available regarding traffic demand patterns. Other data pertaining to intersection geometrics, transit stop locations, parking related curb restrictions, pedestrian facilities, and signal operations were obtained through field surveys of the study area street system.

A number of other projects, either under construction or planned for development will add new traffic volumes to the study area. For this reason, the analysis of future traffic conditions includes potential traffic volumes expected to be generated by projects that have not yet been developed but are planned within the study area in the near future. Related projects used in the analysis are shown in Table 5 on pages 83 through 86 and Figure 11 on page 87 in Section III.B, Environmental Setting.

The transportation network used in the model to project future traffic conditions was based on the City of Los Angeles General Plan Framework traffic forecasting model (Framework model), which was developed using the regional model developed by the Southern California Association of Governments (SCAG) and the Los Angeles Regional Transportation Study (LARTS) section of Caltrans. The SCAG/LARTS model is the primary long-range transportation planning tool for the Los Angeles region. Of particular note, this model includes provisions of an expanded High- Occupancy Vehicle (HOV) lane network, such as the recently completed or currently under construction HOV lanes on the Harbor, San Diego, Ventura, Hollywood and Simi Valley Freeways, as well as those programmed for the Antelope Valley Freeway. This model also considers the impacts of the expanding transit network, including extension of the Metro Blue Line. However, it does not include other improvements considered less assured. Examples include trip reduction measures required by the South Coast Air Quality

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Management District (SCAQMD) and the Los Angeles County Congestion Management Program (CMP).

While the Framework model provides an overall view of the transportation patterns and characteristics within the Los Angeles area, its emphasis on subregional planning does not provide the level of detail necessary to forecast individual turning movements at specific intersections with acceptable precision. As part of this study, the roadway network contained within the Framework model was refined to better reflect the capacities and constraints of the transportation system within the study area and, specifically, those of the study intersections and freeway interchanges.

To determine 2006 baseline traffic conditions, the greater of: (1) the trip generation for each traffic analysis zone, based on a comparison of the City of Los Angeles land-use growth projections data; or (2) the sum of the new related projects proposed for each traffic analysis zone, was used as the basis for projecting incremental growth for that zone. The resulting 2006 A.M. and P.M. peak hour traffic volume estimates form the basis for determining project traffic impacts on the street system.

The next step in the process was to determine the geographic distribution of project trips. A primary factor affecting trip direction is the relative distribution of the housing from which employees of the proposed office/industrial park and employees and patrons of the proposed retail center would be drawn. Each trip to and from the project site would be linked to another site somewhere in the region. These trip linkages are analyzed by the Framework model. This model considers the land use patterns throughout the Southern California area to estimate current trip-making patterns. It also considers future land use growth patterns to determine how trip linkages and travel patterns may change over time, due to shifts in housing and/or employment base locations. In particular, the model considers the amount of housing and employment growth or decline within each subarea comprising the modeled area to determine changes in the distance each area's residents must travel to find adequate employment opportunities. The estimated directional trip distribution resulting from this analysis is shown in Table 24 on page 216.

The Framework model was used to assign project-related traffic to individual roadways within the study area. In doing so, the model accounted for the level of congestion on each roadway and determined which travel path produced the shortest travel time for each trip. The results of this computerized assignment were carefully examined for "reasonableness", but no adjustments were determined to be necessary to reflect likely travel paths.

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Table 24
DIRECTIONAL REGIONAL TRIP DISTRIBUTION

Direction	Percentage of Trips
North	30
South	30
East	25
West	15
	100 %

Source: Crain & Associates, October 1996.

The Master Plan of Streets and Highways for the City of Los Angeles, and the similar plans for the surrounding jurisdictions, contain a number of roadway improvements. Of particular relevance to this project would be the extension of Del Amo Boulevard along an east-west alignment passing to the south of the project site. This extension was not assumed in the Transportation Model. Further, the CMA calculations conducted for this study do not assume any improvements which are not under construction or fully funded. Improvements, such as the extension of Del Amo Boulevard, are not considered reasonably assured until they are funded, especially when they would require additional right-of-way to be acquired. It is unlikely that any such improvements will be completed by the study year of 2006. It should be noted, however, that the development of the project site would not conflict with the future construction of any Master Plan of Streets and Highway element.

a. Project Traffic Generation

Traffic-generating characteristics of land uses similar to the proposed project have been surveyed and documented by the Institute of Transportation Engineers. Those studies have indicated that land uses of the size associated with the proposed project generally exhibit some common trip-making characteristics. Traffic generation formulas incorporating these common characteristics, along with standard internal trip generation and pass-by trip adjustments, were used to calculate project generated traffic. The projected traffic volumes also reflect that many of the trips to and from the site would include a stop at more than one facility and/or will be made as part of a larger trip which would have traveled past the site whether or not the center was present. These formulas can be found in Appendix F. The traffic volumes projected to be generated by the proposed project are shown in Table 25 on page 217.

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Table 25

PROJECT TRAFFIC GENERATION

Land Use Category	Size (sq.ft.)	Daily Traffic	A.M. Peak Hour In	A.M. Peak Hour Out	A.M. Peak Hour Total	P.M. Peak Hour In	P.M. Peak Hour Out	P.M. Peak Hour Total
Retail Center Gross Generation								
Retail/Restaurant	385,000	15,010	212	125	337	712	711	1,423
Theater - 4,000 seats	65,000	1,930	76	44	120	154	86	240
Subtotal	450,000	16,940	288	169	457	866	797	1,663
Less Retail Center Internal/ Pass-By Trips								
Retail (1%/20%)		(3,000)	(42)	(25)	(67)	(142)	(142)	(284)
Theater (10%/10%)		(390)	(15)	(9)	(24)	(31)	(17)	(48)
Subtotal		(3,390)	(57)	(34)	(91)	(173)	(159)	(332)
Net Retail Center Generation	450,000	13,550	231	135	366	693	638	1,331
Office Park	507,000	5,630	779	96	875	106	598	704
Industrial Park	2,010,700	10,720	1,105	150	1,255	131	741	872
Site Generation	2,967,700	29,900	2,115	381	2,496	930	1,977	2,907
Project Site Generation (Warehouse) Expected without the Proposed Project	(2,419,000)	(8,560)	(608)	(237)	(845)	(387)	(718)	(1,105)
Net Site Generation	**548,700**	**21,340**	**1,507**	**144**	**1,651**	**543**	**1,259**	**1,802**

Source: Crain & Associates, October, 1996

The Harbor Gateway Center site is currently used by the Douglas Aircraft Company as a storage and distribution facility. It also leases out portions of the site for a movie production. These uses, while in themselves generating considerable activity, are much less intense than the prior industrial uses which employed over 5,000 persons at the site. To be consistent with Department of Transportation policy, the existing warehousing uses were considered in determining the trip generation increase due to the project.

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To establish the Without Project conditions for the site, the generation formulas from the standard reference (Trip Generation, Fifth Edition, Institute of Transportation Engineers (ITE), Washington D.C.) were utilized. This same reference was used to establish the With Project site traffic generation, including the generation from the proposed site industrial park uses. To ensure that these formulas did not overstate the site generation for existing uses, a comparison was made of the trip generation estimates developed using the ITE formulas to the observed traffic entering and exiting the site on the days when traffic counts were conducted at area intersections. The background traffic for the Without Project scenario at these intersections was then increased, where necessary, to reflect the full ITE estimate of traffic expected to occur in the absence of the project at all intersections in all future year scenarios. This approach also assured that the With Project scenario fully accounted for all trips which are expected to enter or exit the site following completion of the project.

b. Analysis of Future Traffic Conditions (With and Without Project)

The analysis of future conditions in the study area was performed using the CMA procedures described previously in this report. The results of the CMA of future traffic conditions at the study intersections are summarized in Table 26 on pages 219 through 223. As indicated, according to the significance criteria discussed above and prior to inclusion of any mitigation measures, the proposed project could have significant traffic impacts at 30 of the 41 intersections during the morning and/or evening peak hours (six intersections during the morning peak hour, ten intersections during the evening peak hour, and 14 intersections during both morning and evening peak hours).

c. Impacts On Regional Transportation System

The Congestion Management Program (CMP) was enacted by the California legislature to provide the analytical basis for transportation decisions made through the State Transportation Improvement Program (STIP) process. A countywide approach has been established by the local CMP agency (the Los Angeles Metropolitan Transportation Authority) to implement the statutory requirements of the CMP. The Countywide approach entails designating a highway network that includes all state highways and principal arterials within the County and monitoring the network's standards. Monitoring of the CMP network is the responsibility of local jurisdictions. If level of service standards on CMP-monitored roadways are found to deteriorate, local jurisdictions must prepare a deficiency plan to be in conformance with the Countywide plan.

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Table 26

CRITICAL MOVEMENT ANALYSIS SUMMARY
FUTURE (YEAR 2006) TRAFFIC CONDITIONS

No. Intersection	Peak Period	Without Project		With Project/Without Mitigation			With Project/With Mitigation[a]		
		CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact
1. Hawthorne Blvd. and 190th St.	A.M.	1.100	F	1.120	F	+0.020*	1.074	F	-0.026
	P.M.	1.120	F	1.137	F	+0.017*	1.071	F	-0.049
2. Crenshaw Blvd. and 182nd St.	A.M.	1.018	F	1.018	F	+0.000			
	P.M.	1.186	F	1.190	F	+0.004			
3. Crenshaw Blvd. and San Diego Fwy. S/B on/off-ramps	A.M.	1.083	F	1.089	F	+0.006			
	P.M.	1.017	F	1.022	F	+0.005			
4. Crenshaw Blvd. and 190th St.	A.M.	1.348	F	1.369	F	+0.021*	1.171	F	-0.177
	P.M.	1.375	F	1.399	F	+0.024*	1.265	F	-0.110
5. Crenshaw Blvd. and Del Amo Blvd.	A.M.	0.939	E	0.959	E	+0.020*	0.921	E	-0.018
	P.M.	1.002	F	1.020	F	+0.018*	0.971	E	-0.031
6. San Diego Fwy. N/B on/off-ramps and 182nd St.	A.M.	0.998	E	1.000	E	+0.002			
	P.M.	0.955	E	0.957	E	+0.002			
7. Western Ave. and Artesia Blvd.	A.M.	1.120	F	1.128	F	+0.008	1.087	F	-0.033
	P.M.	1.102	F	1.115	F	+0.013*	1.095	F	-0.007
8. Western Ave. and 182nd St.	A.M.	0.503	A	0.539	A	+0.036			
	P.M.	0.663	B	0.681	B	+0.018			
9. Western Ave. and San Diego N/B on/off-ramps	A.M.	0.701	C	0.722	C	+0.021	0.710	C	+0.009
	P.M.	0.855	D	0.875	D	+0.020*	0.798	C	-0.057

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Table 26 (continued)

CRITICAL MOVEMENT ANALYSIS SUMMARY
FUTURE (YEAR 2006) TRAFFIC CONDITIONS

No.	Intersection	Peak Period	Without Project CMA	Without Project LOS	With Project/Without Mitigation CMA	With Project/Without Mitigation LOS	With Project/Without Mitigation Impact	With Project/With Mitigation[a] CMA	With Project/With Mitigation[a] LOS	With Project/With Mitigation[a] Impact
10.	San Diego Fwy. S/B on/off-ramps	A.M.	1.178	F	1.275	F	+0.097*	1.116	F	-0.062
		P.M.	1.169	F	1.213	F	+0.044*	1.064	F	-0.105
11.	Western Ave. and 190th St.	A.M.	0.877	D	0.945	E	+0.068*	0.945	E	+0.068*
		P.M.	1.128	F	1.265	F	+0.137*	1.265	F	+0.137*
12.	Western Ave. and 195th St.	A.M.	0.939	E	1.009	F	+0.070*	0.939	E	+0.000
		P.M.	0.820	D	0.825	D	+0.005	0.755	C	-0.065
13.	Western Ave. and Project Dwy.	A.M.	0.463	A	0.608	B	+0.145			
		P.M.	0.516	A	0.594	A	+0.078			
14.	Western Ave. and Del Amo Blvd.	A.M.	0.821	D	0.954	E	+0.133*	0.774	C	-0.047
		P.M.	0.863	D	0.902	E	+0.039*	0.721	C	-0.142
15.	Western Ave. and Torrance Blvd.	A.M.	0.851	D	0.936	E	+0.085*	0.936	E	+0.085*
		P.M.	0.821	D	0.842	E	+0.021*	0.842	D	+0.021*
16.	Western Ave. and Carson St.	A.M.	0.817	D	0.865	D	+0.048*	0.865	D	+0.048*
		P.M.	1.035	F	1.043	F	+0.008	1.043	F	+0.008
17.	Western Ave. and Sepulveda Blvd.	A.M.	1.050	F	1.077	F	+0.027*	0.963	E	-0.087
		P.M.	1.100	F	1.107	F	+0.007	1.029	F	-0.071

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Table 26 (continued)

CRITICAL MOVEMENT ANALYSIS SUMMARY
FUTURE (YEAR 2006) TRAFFIC CONDITIONS

No.	Intersection	Peak Period	Without Project CMA	Without Project LOS	With Project/Without Mitigation CMA	With Project/Without Mitigation LOS	With Project/Without Mitigation Impact	With Project/With Mitigation[a] CMA	With Project/With Mitigation[a] LOS	With Project/With Mitigation[a] Impact
18.	Western Ave. and Pacific Coast Hwy.	A.M.	0.992	E	1.002	F	+0.010*	1.002	F	+0.010*
		P.M.	1.017	F	1.020	F	+0.003	1.020	F	+0.003
19.	Project Dwy. and 190th St.	A.M.	0.692	B	0.831	D	+0.139*	0.543	A	-0.149
		P.M.	1.023	F	1.164	F	+0.141*	0.760	C	-0.263
20.	Artesia Blvd. and Normandie Ave.	A.M.	0.937	E	0.940	E	+0.003	0.895	D	-0.042
		P.M.	1.065	F	1.081	F	+0.016*	0.983	E	-0.082
21.	Normandie Ave. and 182nd St.	A.M.	0.463	A	0.476	A	+0.013			
		P.M.	0.602	B	0.629	B	+0.027			
22.	Normandie Ave. and San Diego Fwy. N/B on/off-ramps	A.M.	0.694	B	0.762	C	+0.068*	0.601	B	-0.093
		P.M.	0.747	C	0.832	D	+0.085*	0.671	B	-0.076
23.	San Diego Fwy. off- ramp 190th St.	A.M.	0.820	D	0.778	C	-0.042	0.485	A	-0.335
		P.M.	1.064	F	1.007	F	-0.057	0.673	B	-0.391
24.	Normandie Ave. and 190th St.	A.M.	0.969	E	1.141	F	+0.172*	0.955	E	-0.014
		P.M.	1.246	F	1.431	F	+0.185*	1.133	F	-0.113
25.	Normandie Ave. and Project Dwy. Francisco St.	A.M.	0.493	A	0.560	A	+0.067	0.570	A	+0.077
		P.M.	0.552	A	0.779	C	+0.227*	0.608	B	+0.056
26.	Normandie Ave. and Torrance Blvd.	A.M.	0.811	D	0.867	D	+0.056*	0.797	C	-0.014
		P.M.	0.823	D	0.884	D	+0.061*	0.814	D	-0.009

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Table 26 (continued)

CRITICAL MOVEMENT ANALYSIS SUMMARY
FUTURE (YEAR 2006) TRAFFIC CONDITIONS

No.	Intersection	Peak Period	Without Project CMA	Without Project LOS	With Project/Without Mitigation CMA	With Project/Without Mitigation LOS	With Project/Without Mitigation Impact	With Project/With Mitigation[a] CMA	With Project/With Mitigation[a] LOS	With Project/With Mitigation[a] Impact
27.	Normandie Ave. and Carson St.	A.M.	0.716	C	0.732	C	+0.016	0.662	B	-0.054
		P.M.	0.896	D	0.923	E	+0.027*	0.853	D	-0.043
28.	Normandie Ave. and Sepulveda Blvd.	A.M.	0.782	C	0.788	C	+0.006			
		P.M.	0.888	D	0.896	D	+0.008			
29.	Normandie Ave. and Pacific Coast Hwy.	A.M.	0.564	A	0.566	A	+0.002			
		P.M.	0.644	B	0.651	B	+0.007			
30.	Vermont Ave. and Artesia Blvd.	A.M.	0.969	E	0.979	E	+0.010*	0.943	E	-0.026
		P.M.	0.930	E	0.937	E	+0.007	0.902	E	-0.028
31.	Vermont Ave. and 190th St.	A.M.	0.886	D	0.942	E	+0.056*	0.717	C	-0.169
		P.M.	1.189	F	1.246	F	+0.057*	0.939	E	-0.250
32.	Vermont Ave. and Torrance Blvd.	A.M.	0.841	D	0.875	D	+0.034*	0.821	D	-0.020
		P.M.	0.886	D	0.896	D	+0.010	0.855	D	-0.031
33.	Vermont Ave. and Carson St.	A.M.	0.847	D	0.847	D	+0.000	0.847	D	0.000
		P.M.	0.933	E	0.946	E	+0.013*	0.816	D	-0.117
34.	Harbor Fwy. S/B off- ramp and 190th St.	A.M.	0.703	C	0.803	D	+0.100*	0.641	B	-0.062
		P.M.	0.822	D	0.875	D	+0.053*	0.805	D	-0.017

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Table 26 (continued)

CRITICAL MOVEMENT ANALYSIS SUMMARY
FUTURE (YEAR 2006) TRAFFIC CONDITIONS

No.	Intersection	Peak Period	Without Project		With Project/Without Mitigation			With Project/With Mitigation[a]		
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact
35.	Harbor Fwy. N/B on- ramp and 190th St.	A.M.	0.487	A	0.566	A	+0.079	0.366	A	-0.121
		P.M.	0.983	E	1.030	F	+0.047*	0.575	A	-0.408
36.	Figueroa St. and 190th St.	A.M.	0.551	A	0.613	B	+0.062	0.595	A	+0.044
		P.M.	0.826	D	0.869	D	+0.043*	0.815	D	-0.011
37.	Hamilton Ave. and Harbor Fwy. S/B on/ off-ramps	A.M.	0.735	C	0.735	C	+0.000			
		P.M.	0.765	C	0.765	C	+0.000			
38.	Figueroa St. and Harbor Fwy. N/B on/ off-ramps	A.M.	0.779	C	0.794	C	+0.015			
		P.M.	0.855	D	0.856	D	+0.001			
39.	Hamilton Ave. and Torrance Blvd.	A.M.	0.917	E	0.983	E	+0.066*	0.806	D	-0.111
		P.M.	1.055	F	1.074	F	+0.019*	0.940	E	-0.115
40.	Figueroa St. and Torrance Blvd.	A.M.	0.851	D	0.866	D	+0.015	0.785	C	-0.066
		P.M.	1.013	F	1.041	F	+0.028*	0.858	D	-0.155
41.	Harbor Fwy. S/B on/off-ramps Carson St.	A.M.	1.168	F	1.170	F	+0.002	1.170	F	+0.002
		P.M.	0.964	E	0.975	E	+0.011*	0.878	D	-0.086

** Indicates significant impact*

[a] *No entry in the With Project/With Mitigation column means that no mitigation is recommended at that intersection.*

Source: Crain & Associates, August 1996.

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All development projects requiring preparation of an EIR are subject to the Land Use Analysis program of the CMP. This requirement provides decision-makers with the project-specific traffic impacts created by large projects on the CMP highway network. This methodology allows for both an assessment of overall future freeway conditions and a determination of project impacts on these regional transportation facilities.

In order to analyze the impact of the proposed project on the regional transportation system (freeway network), the results of the computerized transportation model were utilized. Future year 2006 freeway volumes, including project traffic, were forecast in the same manner as for the surface street intersections. The LOS values used for freeway segment analyses were estimated by calculating the demand-to-capacity (D/C) ratio and using the LOS definitions shown in Table 27 on page 225. Peak hour existing and future freeway volumes are shown in Table 28 on pages 226 and 228. These were compared to freeway capacities, based on 2,000 vehicles per hour per lane (VPHPL) and 1,500 VPHPL for HOV lanes, in order to determine the D/C ratio and corresponding LOS. The resulting V/C ratios and LOS are shown in Table 29 on pages 229 and 230.

As Table 29 shows, the area freeway system will be heavily congested with or without the project. The project would add incrementally to these significant cumulative impacts. Without considering potential mitigation, the project would have significant impacts at up to three locations during the morning peak hour and in the opposite direction at two of these locations in the P.M. peak hour. Significantly impacted locations include the following: (1) San Diego Freeway north of Carson Street (northbound in A.M. and southbound in P.M. peak hours); (2) San Diego Freeway at Marine Avenue (southbound in A.M. and northbound P.M. peak hours); and (3) SR 91 Freeway east of Alameda Street (westbound A.M. peak hour only).

It should be noted that congestion on the mainline will affect conditions on area on-ramps. Unmetered ramps form inefficient merge or weave sections when the mainline speeds drop below the point where the on-ramp traffic can easily find gaps. Ramp metering, by spreading out the "pulses" from adjacent signals, can improve the capacity of the ramp to a limited degree. However, if the mainline of the freeway is operating under forced flow conditions, back-ups from the mainline will extend onto ramps. While these adverse impacts occur on the ramp, they are the result of mainline congestion. Thus, separate ramp capacity analysis would not be meaningful.

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Table 27

FREEWAY MAINLINE LEVEL OF SERVICE DEFINITIONS

D/C Ratio	LOS	D/C Ratio	LOS*
0.00 - 0.35	A	>1.00 - 1.25	F(0)
>0.35 - 0.54	B	>1.25 - 1.35	F(1)
>0.54 - 0.77	C	>1.35 - 1.45	F(2)
>0.77 - 0.93	D	>1.45	F(3)
>0.93 - 1.00	E		

* *LOS F(1) through F(3) represent severe congestion (travel speeds less than 25 MPH) for more than one hour.*

Source: Los Angeles County Metropolitan Transportation Authority, Congestion Management Program, 1993.

d. Parking and Access

Parking lots/structures supporting the individual uses would be constructed as build out of the multi-use development is completed. For the proposed retail development in Area 1, this may include consideration of shared parking between the theater, restaurant and retail uses. The highest demand for parking at the retail center would be just under 1,800 spaces (see Appendix F). This maximum demand would occur on weekend afternoons in December. Based upon this peak demand, the proposed 2,200 space surface parking lot that would be constructed in Area 1 would be adequate to serve proposed Area 1 development, although it would be less than the 2,380 spaces which would be required by code.

Access to the site would be provided from 190th Street, Normandie Avenue, and Western Avenue. As shown in Figure 11 on page 87, Section II.D, Project Characteristics, an internal roadway system would intersect each of these roadways.

The traffic analysis for the proposed project utilized the project description as shown in Section II.B of this EIR as the basis for analysis of internal circulation for the project. A principal assumption of this analysis is that traffic is routed between the project site and Normandie Avenue via one existing and two proposed new railroad crossings. The two new crossings, one of which will directly serve the proposed retail development in Area 1 and the other of which will indirectly serve the Area 1 retail area via a frontage road, will require approval of the California Public Utilities Commission (CPUC). These proposed new railroad

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Table 28

EXISTING AND FUTURE PEAK HOUR FREEWAY TRAFFIC VOLUMES

CMP Station Station	Direction	Peak Hour	Existing Volume	Future (Year 2006) Without Project Volume	Change in Volume (2006 without Project Less Existing)	With Project Volume	Project Contribution
San Diego Freeway:							
Santa Fe Avenue (1064)	N/B	A.M.	7,386	7,571	185	7,810	239
		P.M.	6,003	6,397	394	6,475	78
	S/B	A.M.	7,866	8,063	197	8,092	29
		P.M.	10,475	10,737	262	10,888	151
North of Carson Street (1065)	N/B	A.M.	8,093	8,295	202	8,556	261
		P.M.	7,792	8,362	570	8,461	99
	S/B	A.M.	7,055	7,564	509	7,616	52
		P.M.	11,174	11,453	279	11,687	234
Marine Avenue (1066)	N/B	A.M.	9,024	9,331	307	9,371	40
		P.M.	10,352	11,033	681	11,233	200
	S/B	A.M.	7,638	7,829	191	8,044	215
		P.M.	11,995	12,295	300	12,365	70

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Table 28 (continued)

EXISTING AND FUTURE PEAK HOUR FREEWAY TRAFFIC VOLUMES

CMP Station Station	Direction	Peak Hour	Existing Volume	Future (Year 2006) Without Project Volume	Change in Volume (2006 without Project Less Existing)	With Project Volume	Project Contribution
Harbor Freeway:							
South of "C" Street (1044)	N/B	A.M.	4,293	4,576	283	4,627	51
		P.M.	2,710	2,998	288	3,017	19
	S/B	A.M.	2,786	3,097	311	3,108	11
		P.M.	4,258	4,723	465	4,776	53
North of Manchester Blvd. (1045)	N/B	A.M.	11,995	13,076	1,081	13,065	-11
		P.M.	8,262	9,322	1,060	9,408	86
	S/B	A.M.	7,820	9,926	2,106	10,026	100
		P.M.	7,886	10,232	2,346	10,270	38
SR-91 Freeway:							
East of Alameda Street (1035)	E/B	A.M.	8,824	10,301	1,477	10,339	38
		P.M.	16,761	18,346	1,585	18,546	200
	W/B	A.M.	15,528	16,924	1,396	17,176	252
		P.M.	8,839	10,151	1,312	10,221	70

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Table 28 (continued)

EXISTING AND FUTURE PEAK HOUR FREEWAY TRAFFIC VOLUMES

				Future (Year 2006)			
CMP Station Station	**Direction**	**Peak Hour**	**Existing Volume**	**Without Project Volume**	**Change in Volume (2006 without Project Less Existing)**	**With Project Volume**	**Project Contribution**
East of Cherry Ave. (1036)	E/B	A.M.	8,899	9,121	222	9,139	18
		P.M.	14,070	14,422	352	14,518	96
	W/B	A.M.	12,940	13,263	323	13,390	127
		P.M.	9,114	9,342	228	9,370	28

Source: Crain & Associates, April 1996

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Table 29

PROJECT FREEWAY IMPACTS
EXISTING AND FUTURE LEVELS OF SERVICE

					Future (Year 2006)				
			Existing		Without Project		With Project		
CMP Station	Direction	Peak Hour	V/C	LOS	V/C	LOS	V/C	LOS	Impact
San Diego Freeway:									
Santa Fe Ave. (1064)	N/B	A.M.	0.923	D	0.946	E	0.976	E	0.030
		P.M.	0.750	C	0.800	D	0.809	D	0.009
	S/B	A.M.	0.983	E	1.008	F(0)	1.011	F(0)	0.003
		P.M.	1.309	F(1)	1.342	F(1)	1.361	F(2)	0.019
North of Carson St. (1065)	N/B	A.M.	1.012	F(0)	1.037	F(0)	1.070	F(0)	0.033*
		P.M.	0.974	E	1.045	F(0)	1.058	F(0)	0.013
	S/B	A.M.	0.882	D	0.946	E	0.952	E	0.006
		P.M.	1.397	F(2)	1.432	F(2)	1.461	F(3)	0.029*
Marine Ave. (1066)	N/B	A.M.	1.128	F(0)	1.166	F(0)	1.171	F(0)	0.005
		P.M.	1.294	F(1)	1.379	F(2)	1.404	F(2)	0.025*
	S/B	A.M.	0.955	E	0.979	E	1.005	F(0)	0.026*
		P.M.	1.499	F(3)	1.537	F(3)	1.546	F(3)	0.009
Harbor Freeway:									
South of "C" St. (1044)	N/B	A.M.	0.537	B	0.572	C	0.578	C	0.006
		P.M.	0.339	A	0.375	B	0.377	B	0.002
	S/B	A.M.	0.348	A	0.387	B	0.388	B	0.001
		P.M.	0.532	B	0.590	C	0.597	C	0.007
South of Manchester Blvd. (1045)	N/B	A.M.	1.499	F(3)	1.631	F(3)	1.633	F(3)	0.002
		P.M.	1.033	F(0)	1.165	F(0)	1.176	F(0)	0.011
	S/B	A.M.	0.978	E	1.241	F(0)	1.253	F(1)	0.012
		P.M.	0.986	E	1.279	F(1)	1.284	F(1)	0.005

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Table 29 (continued)

PROJECT FREEWAY IMPACTS
EXISTING AND FUTURE LEVELS OF SERVICE

					Future (Year 2006)				
			Existing		Without Project		With Project		
CMP Station	Direction	Peak Hour	V/C	LOS	V/C	LOS	V/C	LOS	Impact
SR-91 Freeway:									
East of Alameda St. (1035)	E/B	A.M.	0.735	C	0.858	D	0.862	D	0.004
		P.M.	1.397	F(2)	1.529	F(3)	1.546	F(3)	0.017
	W/B	A.M.	1.294	F(1)	1.410	F(2)	1.431	F(2)	0.021*
		P.M.	0.737	C	0.846	D	0.852	D	0.006
East of Cherry Ave. (1036)	E/B	A.M.	0.890	D	0.912	D	0.914	D	0.002
		P.M.	1.407	F(2)	1.442	F(2)	1.452	F(3)	0.010
	W/B	A.M.	1.294	F(1)	1.326	F(1)	1.339	F(1)	0.013
		P.M.	0.911	D	0.934	E	0.937	E	0.003

* *Indicates significant project impact without considering potential mitigation.*

Source: Crain & Associates, April 1996.

crossings are considered the most effective and efficient method of providing access to the proposed retail development.

Should either of the proposed rail crossings not be approved, modification of the project's site plan and internal circulation system to provide an alternative access to the proposed retail development from Normandie Avenue will be required in order to avoid additional impacts at the 190th/Normandie intersection. This alternative internal circulation system could include varying alignments of internal roadways which would connect Area 1 to the existing railroad crossing located at the southeastern corner of the site. As long as one rail crossing (either existing or new) is provided from Normandie Avenue, adequate signage and rail/roadway signal coordination systems are installed and internal roadways are aligned so as to provide direct access to Area 1 without utilizing the 190th/Normandie intersection, the traffic assignments assumed for the project's traffic study would remain valid and no additional impacts

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would be expected in the event that the internal roadway system provided for the project is modified from that shown in the Project Description included in this EIR.

Individual office and industrial park parcels on-site would, in general, be provided access from this internal roadway system. Up to three industrial/office parcels would also receive direct access from the surrounding street system. These parcels, located in the southwest corner of the project site, would receive direct access from Western Avenue.

The project's retail center would receive direct access from 190th Street and Normandie Avenue in addition to driveways to be located along the main north-south internal roadway. The 190th Street driveways would include a major driveway to be located opposite the southbound San Diego Freeway off-ramp. The Normandie Avenue access would be provided via up to two crossings of the Southern Pacific Railroad tracks. In addition to the retail center driveways, one other railroad crossing, an upgrade of the existing driveway accessing the site opposite Francisco Street, would be used to access the project site. Because the Southern Pacific Railroad track involved in all of these crossings is a lightly used rail line (two daily trains), this crossing is not expected to affect rail service or create any significant safety hazards. Crossing gates and signals will be installed at this railroad crossing in accordance with California Public Utilities Commission standards.

The intersections of the major project access roads and driveways with the public street system would be signalized. A total of six locations are proposed to be signalized, including:

- Western Avenue and Project Roadway (existing signal)
- 190th Street and Project Roadway (relocated signal)
- 190th Street and San Diego Freeway Southbound Off-Ramp/Retail Center Drive (new signal)
- Normandie Avenue and Retail Center Driveway (new railroad crossing/signal)
- Normandie Avenue and Project Roadway/Knox Street (new railroad crossing/signal)
- Normandie Avenue and Project Roadway/Francisco Street (existing signal)

The signals at Normandie Avenue Retail Center Driveway and Normandie Avenue/Knox Street would be needed to allow a full four-way driveway across the railroad tracks paralleling Normandie Avenue.

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e. Pedestrian Safety

An NOP response from the Los Angeles Unified School District raised a concern about the possible effects of the project on student safety. The school nearest the project site is the 186th Street School, which is located about 1,500 yards to the north on the other side of the San Diego Freeway. At such a distance, activities on the project site would not be expected to affect activities at the school site or interfere with pedestrian routes for students walking to or from the school. Consequently, no safety impacts to student safety are anticipated.

3. MITIGATION MEASURES

As required by the LADOT, the project must submit a Traffic Mitigation Plan (TMP) to reduce the project's significant traffic impacts. In selecting the project's traffic mitigation measures, the City's top priority is to reduce trip demand by single occupancy vehicles and promote transit use. To achieve this trip reduction goal, the City has prioritized mitigation measures by category, as listed below:

1. Transportation Demand Management (TDM) Programs;
2. Transit Capacity and Access Improvements;
3. Traffic Signal Operation Improvements (ATSAC);
4. Street Widening and Other Physical Improvements; and
5. Street Restriping and Parking Prohibitions.

The project's proposed TMP includes mitigation measures in several of the categories listed above. The following mitigation measures are anticipated to reduce project impacts:

a. TDM Programs

1. Compliance with Ordinance No. 168,700 (Transportation Demand Management and Trip Reduction Measures). This ordinance focuses on incorporating TDM facilities into the design of new buildings to promote alternative modes of transportation (see Appendix F). It should be followed in the design and construction of the project site and buildings.

2. Compliance with SCAQMD Rule 2202. The South Coast Air Quality Management District (SCAQMD) has adopted a rule designed to reduce the air pollution impacts of commute trips. This rule, unlike the rules it replaces, does

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not mandate trip reduction programs but allows individual employers to select from a variety of options. Most employers have, however, continued to select ridesharing programs as the most cost- effective method of reducing air quality impacts. If site employers implement these trip reduction measures, 15 percent or more of the peak hour traffic generation from the office/industrial park component of the project could be eliminated.

b. Transit Improvements

3. Bus Transit Improvements. The applicant should work with the appropriate transit districts (i.e., Gardena Transit, Torrance Transit and MTA) to improve transit service to the site. Further, sidewalks throughout the site should be designed to provide attractive pedestrian routes to and from transit stops.

c. Signal System Improvements, Street Widenings and Restriping, and Parking Restrictions

4. Hawthorne Boulevard and 190th Street -- Restripe 190th Street and restrict parking to convert the existing eastbound and westbound right-turn-only lanes to through/right optional lanes. Modify the signal to remove the existing eastbound right-turn phase.

5. Crenshaw Boulevard and 190th Street -- Remove median islands, restripe and restrict parking along 190th Street to convert the existing eastbound and westbound right-turn-only lanes to through/right optional lanes.

6. Crenshaw Boulevard and Del Amo Boulevard-- Restripe Del Amo Boulevard and modify the traffic signal to provide two left-turn-only lanes, a through/left optional lane and a right-turn-only lane in the westbound direction.

7. Western Avenue and Artesia Boulevard-- Restripe Western Avenue and restrict parking to convert the existing northbound and southbound right-turn-only lanes to through/right optional lanes.

8. Western Avenue and San Diego Freeway Northbound On/Off- Ramps -- Widen and restripe the off-ramp from two lanes to three lanes to provide two left-turn lanes and a right-turn lane satisfactory to LADOT, Caltrans and the City of Torrance.

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9. San Diego Freeway Southbound On/Off-Ramps and 190th Street -- Flare the west leg of the intersection, restripe 190th Street, restrict parking and modify the signal to provide dual left-turn lanes in the eastbound direction.

10. Western Avenue and 190th Street -- Any mitigation would require a reduction below 11 foot interior lane widths on a high speed state facility and/or acquisition of right-of-way. Therefore, no feasible mitigation is available.

11. Western Avenue and 195th Street -- The applicant shall fund the installation of the Automated Traffic Surveillance and Control (ATSAC) System at this location satisfactory to LADOT.

12. Western Avenue and Del Amo Boulevard -- Restripe the eastbound approach for dual left-turn lanes and modify the signal to provide east-west opposed phasing, satisfactory to LADOT, Caltrans and the City of Torrance. The proposed mitigation should also include removal of the north crosswalk. The applicant shall also fund ATSAC installation at this location. This mitigation measure shall be implemented satisfactory to LADOT.

13. Western Avenue and Torrance Boulevard -- Any mitigation would require removal of parking, narrowing of the median containing the railroad tracks or acquisition of additional right-of-way, none of which is considered feasible. Therefore, no feasible mitigation is available.

14. Western Avenue and Carson Street -- Mitigation of this impact would require removal of parking on Carson Street, for which there is a heavy demand. Therefore, no feasible mitigation is available.

15. Western Avenue and Sepulveda Boulevard -- Prohibit parking to add northbound and southbound right-turn lanes satisfactory to LADOT, Caltrans and the City of Torrance. The mitigation shall not include modification of the median islands on Western Avenue. The northbound right-turn lane can be installed utilizing existing red curb along the frontage of a mini-shopping center.

16. Western Avenue and Pacific Coast Highway -- Installation of mitigation would require interior lane width of less than 11 feet on a high speed state facility or an offsetting of lanes across the intersection. Therefore, no feasible mitigation is available.

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17. Project Roadway and 190th Street -- Remove the existing traffic signal on 190th Street and the McDonnell Douglas driveway approximately 1,300 feet west of Normandie Avenue and construct a new driveway and traffic signal at this location to serve the major north-south internal road, satisfactory to LADOT. Mitigation shall also include restriping 190th Street for three through lanes in both directions and a left-turn lane in the westbound direction.

18. Normandie Avenue and Artesia Boulevard -- Provide dual left-turn lanes in the southbound direction by restriping Normandie Avenue and modifying the signal.

19. Normandie Avenue and San Diego Freeway Northbound On/Off-Ramps -- Widen and restripe the northbound approach to provide two through lanes and an exclusive right-turn-only lane to facilitate freeway access. Fund ATSAC installation at this location.

20. San Diego Freeway Southbound Off-Ramp/Project Driveway and 190th Street -- Flare and restripe 190th Street to provide three travel lanes and dual left-turn lanes in the westbound direction and three travel lanes and a "pre-left-turn lane" for Normandie Avenue in the eastbound direction. Construct the project driveway to provide dual left-turn lanes and a right-turn-only lane in the northbound direction. Install a signal with opposed northbound and southbound phasing. Fund ATSAC installation at this location. If a review of operations shows interference with operation of the signal at 190th Street and Normandie Avenue, LADOT shall restrict turn movements into and/or out of the project driveway.

21. Normandie Avenue and 190th Street -- Relocate the railroad gates and remove the raised median island from the west leg of 190th Street, subject to approval by the California Public Utilities Commission (PUC). Without PUC approval there is insufficient roadway width to restripe 190th Street for dual left-turn lanes and three through lanes in both directions. Modify the signal to provide east-west left-turn signal phasing with a southbound right-turn overlap phase and fund the installation of ATSAC at this location. Install east-west left-turn signal phasing contingent on PUC approval to relocate the railroad gates so that 190th Street can be restriped for dual left-turn lanes and three through lanes in each direction. Install a southbound right-turn overlap signal and provide ATSAC funding at this location. This intersection is also under the jurisdiction of the Los Angeles County Department of Public Works.

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22. Normandie Avenue and Project Roadway/Francisco Street -- Construct the project roadway and restripe the eastbound approach for a left-turn lane, a through/left lane and a right-turn lane and modify the signal to provide opposed east-west phasing satisfactory to LADOT and the Los Angeles County Department of Public Works.

23. Normandie Avenue and Torrance Boulevard -- Fund the installation of ATSAC at this intersection satisfactory to LADOT. The South Bay Phase II ATSAC system is proposed for this location.

24. Normandie Avenue and Carson Street -- Fund the installation of ATSAC at this intersection satisfactory to LADOT. The South Bay Phase II ATSAC system is proposed for this location.

25. Vermont Avenue and Artesia Boulevard -- Widen and restripe the northbound approach to Vermont Avenue for dual left-turn lanes. The additional left-turn lane can be installed within the existing 80 foot roadway width without any additional widening on Vermont Avenue. Provide a northbound right-turn phase overlapping the existing westbound left-turn phase. Install a northbound right-turn lane. This mitigation measure shall be implemented satisfactory to LADOT, Caltrans and the City of Gardena.

26. Vermont Avenue and 190th Street -- Restripe 190th Street to provide three lanes in each direction and fund the installation of ATSAC at this intersection, satisfactory to LADOT.

27. Vermont Avenue and Torrance Boulevard -- Restrict parking and restripe Vermont Avenue to provide a right-turn-only lane in the northbound and southbound directions, satisfactory to the Los Angeles County Department of Public Works.

28. Vermont Avenue and Carson Street -- Restrict parking and restripe Vermont Avenue to convert the existing eastbound right-turn-only lane into a through/right optional lane, satisfactory to the Los Angeles County Department of Public Works.

29. Harbor Freeway Southbound Off-Ramp and 190th Street -- Restripe 190th Street to provide three travel lanes in the westbound direction, satisfactory to LADOT.

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Modify the signal to provide a southbound right-turn phase extension concurrent with the initiation of the eastbound through phase, satisfactory to LADOT and Caltrans. Fund the installation of ATSAC at this intersection.

30. Harbor Freeway Northbound On-Ramp and 190th Street -- Install a traffic signal at this location. Modify the median island, prohibit parking on the south side of 190th Street and restripe 190th Street to provide dual eastbound left-turn lanes, including an HOV lane in the inside left-turn lane and two through lanes, satisfactory to LADOT and Caltrans. The on-ramp shall be striped for two lanes and the inside lane on the on-ramp shall be designated as an HOV lane.

31. Figueroa Street and 190th Street -- Prohibit parking and add a right-turn lane on the southbound approach of Figueroa Street, satisfactory to LADOT and the City of Carson.

32. Hamilton Avenue and Torrance Boulevard -- Restripe Hamilton Avenue to provide a left/right optional lane and a right-turn-only lane.

33. Figueroa Street and Torrance Boulevard -- Remove the sidewalk along the south curb, restrict parking and restripe Torrance Boulevard to provide a left-turn-only lane, a through/left optional lane, and through/right optional lane in the eastbound direction. Modify the signal to provide opposed east-west phasing.

34. Harbor Freeway Southbound On-Off Ramps and Carson Street -- Restripe Carson Street to provide a right-turn-only lane in the eastbound direction.

35. Crossing gates and signals will be installed or upgraded, as appropriate, at the two proposed new retail center driveways off of Normandie Avenue that cross the Southern Pacific Railroad tracks in accordance with State of California Public Utilities Commission standards.

36. The design of all internal roadways on the project site, off-site roadway improvements, sidewalks and associated improvements will be subject to the approval of the City of Los Angeles Bureau of Engineering.

37. A detailed site plan for the retail center shall be submitted to LADOT for approval, indicating the number of parking spaces to be provided and shared.

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4. ADVERSE EFFECTS

Table 26 on pages 219 through 223, summarizes the CMA values at the significantly impacted intersections after implementation of the physical mitigation measures (signal system improvements, street widenings and restriping, and parking restrictions) listed above. It does not, however, consider the trip reduction benefits of TDM programs and transit improvements, also listed above.

Project impacts upon traffic conditions would be reduced to less than significant levels at all but four of the potentially impacted intersections with implementation of the recommended mitigation measures. Significant traffic impacts would remain at the following intersections: (1) Western Avenue and 190th Street during the A.M. and P.M. peak periods; (2) Western Avenue and Torrance Boulevard during the A.M. and P.M. peak periods; (3) Western Avenue and Carson Street during the A.M. peak period; and (4) Western Avenue and Pacific Coast Highway during the A.M. peak period. Significant impacts could also remain on area freeways. Cumulative programs, such as regional transit system improvements, ridesharing requirements, and regional roadway capacity enhancements would further reduce, but not eliminate, these remaining impacts. The project would add incrementally to these significant cumulative impacts. The project would have significant impacts at up to three locations during the morning peak hour and in the opposite direction at two of these same freeway locations in the P.M. peak hour. Significantly impacted locations include the following: (1) San Diego Freeway north of Carson Street; (2) San Diego Freeway at Marine Avenue; and (3) SR 91 Freeway east of Alameda Street.

5. CUMULATIVE IMPACT

The analysis of project impacts considers the effects of both background growth in the region and the related projects listed in Table 5 on pages 83 through 86, Section III.B, Environmental Setting. Consequently, impacts of cumulative growth are equivalent to those indicated for the Without Project condition in Table 26 on pages 219 through 223 and Table 29 on pages 229 and 230. The addition of project traffic to this cumulative base provides the With Project, Without Mitigation condition shown in Table 26. The With Project, With Mitigation condition is also shown in Table 26. With implementation of the mitigation measures recommended in this section, the project, in combination with cumulative development, would contribute to significant impacts at the intersections of Western Avenue/ 190th Street and Western Avenue/Torrance Boulevard during both A.M. and P.M. peak hours, and Western Avenue/Carson Street and Western Avenue/Pacific Coast Highway during the A.M. peak hour, as well as on area freeways.

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IV. ENVIRONMENTAL IMPACT ANALYSIS
I. PUBLIC SERVICES
1. FIRE PROTECTION

1. ENVIRONMENTAL SETTING

Fire prevention, fire suppression, and life safety services are provided in the Harbor Gateway community by the Los Angeles City Fire Department (LAFD), as mandated by the Fire Protection and Prevention Plan (Plan), an element of the City of Los Angeles (City) General Plan, as well as the Fire Code section of the Los Angeles Municipal Code. The Plan and the Fire Code serve as guides to City departments, government offices, developers, and the public for the construction, maintenance, and operation of fire protection facilities located within the City of Los Angeles. Policies and programs addressed in these documents include the following: fire station distribution and location, required fire flow (i.e., water supply), fire hydrant standards and locations, access provisions, and emergency ambulance service.[30] These issues, as they pertain to the Harbor Gateway Center, are discussed below.

The LAFD operates three fire stations in the vicinity of the Harbor Gateway Center which have initial response duties for the project locale. These facilities, Station Numbers 64, 79, and 85, are identified in Figure 29 on page 240. In addition, backup support is provided through mutual aid agreements between the LAFD and jurisdictions that neighbor the McDonnell Douglas site, including the County of Los Angeles and the Cities of Gardena, Carson, and Torrance.

Fire Station Number 64 is situated approximately 6.8 miles from the project site, at 118 West 108th Street in Los Angeles. The largest of the three stations in terms of equipment and personnel, this facility is a Task Force Station furnished with an engine company, a truck company, a paramedic rescue ambulance, an emergency medical team (EMT) rescue ambulance, and a staff of 14 LAFD personnel. In 1995, the average response time from Station 64 was 6.5 minutes.[31] The Citywide average, by comparison, during the same time period was 5.68 minutes.[32]

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30 *Fire Protection and Prevention Plan, a part of the General Plan of the City of Los Angeles, adopted January 1979.*

31 *Battalion Chief Dennis Keane, Commander, Planning Section, Los Angeles Fire Department, May 17, 1996.*

32 *Citywide average response time for 1994.*

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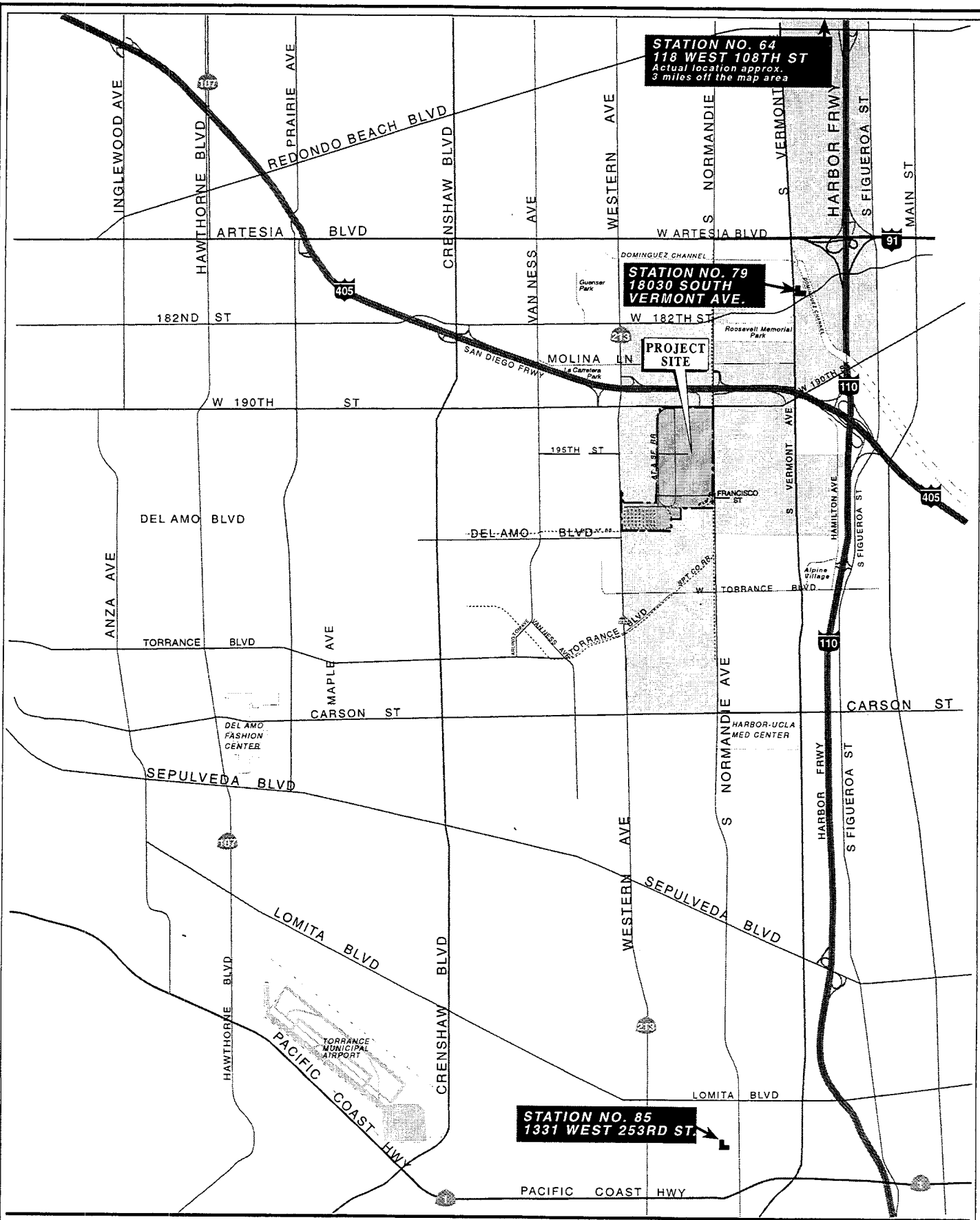

Planning Consultants Research

Figure 29
City of Los Angeles Fire Stations

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Located at 18030 South Vermont Avenue in Los Angeles, Station Number 79 is approximately 1.6 miles from the project site. This paramedic engine company is staffed by four personnel. It is the designated first-in engine company serving the project site. In 1995, the average response time from Station 79 was 7.9 minutes,[33] compared to the Citywide average of 5.68 minutes.

Station 85 is located approximately 4.5 miles from the project site,[34] at 1331 West 253rd Street in Harbor City. The facility is comprised of a task force, an engine company, a paramedic rescue ambulance, and a staff of 12 LAFD personnel. It is the designated first-in truck company serving the project site. In 1995, the average response time from Station 85 was 7.2 minutes.[35] For all the above stations, longer response times may be attributed to the fact that geographically, within the Harbor Gateway community, the City of Los Angeles consists of a long and narrow strip; thus, fire stations tend to be located further from specific sites than in many other areas of the City.

The City of Los Angeles Fire Code specifies maximum response distances allowed between specific sites and engine and truck companies, based upon land use and fire flow requirements (discussed below). Based upon the designation of the entire project locale as a Regional Center,[36] the site is considered a high density industrial land use. Consequently, the Fire Code indicates a maximum response distance of 0.75 miles to the nearest engine company and 1.0 miles to the nearest truck company. Where response distances exceed these requirements, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief.

In addition to facility equipment, personnel, and location, fire flow is an important factor in fire suppression activities. Fire flow is defined as the quantity of water available or needed for fire protection in a given area and is normally measured in gallons per minute (GPM), as well as duration of flow. The quantity of water necessary for fire protection varies by land use type, life hazard, occupancy, and the degree of fire hazard. Based on these factors, the LAFD requires flows ranging from 2,000 GPM from three adjacent fire hydrants flowing simultaneously in low density residential areas, to 12,000 GPM available to any city block in high density commercial or industrial areas. High density areas in which simultaneous fires

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33 *Battalion Chief Dennis Keane, Commander, Planning Section, Los Angeles Fire Department, May 17, 1996.*

34 *Distance computed to Western Avenue and 190th Street.*

35 *Battalion Chief Dennis Keane, Commander, Planning Section, Los Angeles Fire Department, May 17, 1996.*

36 *Los Angeles Citywide General Plan Framework, City of Los Angeles Department of City Planning, approved July 27, 1995.*

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might occur, such as high occupancy mixed use districts, may require fire flows above these standards. A minimum residual water pressure of 20 pounds per square inch (psi) is required to remain in the water system, while the necessary GPM is flowing, in order to be considered adequate by Fire Code standards.[37]

Fire hydrant type and spacing is also dependent upon land use. In low density residential areas, the LAFD requires double hydrants measuring 2.5 inches by 4 inches, located 600 feet apart, whereas high density industrial use fire service systems must be connected to double hydrants measuring 4 inches by 4 inches, located a maximum distance of 300 feet apart. The net land area served by each hydrant similarly ranges from 150,000 square feet down to 40,000 square feet for low density residential areas and high density industrial uses, respectively.[38]

Fire flow for the McDonnell Douglas property is currently provided by the City of Los Angeles Department of Water and Power (DWP) via a fire service system that is separate from the domestic water system serving the site. The main DWP lines which feed into the fire service system include a 16-inch line located on-site stemming from a 31-inch line in Normandie Avenue and a 6-inch line on-site stemming from a DWP line located in 190th Street. The 190th Street line ranges in size from 8 to 12 inches, however the fire water system ties into it at a 12-inch location. Both fire system feeder lines pass through pressure reducing valves that reduce water pressure to 85 pounds per square inch (psi).[39] Fire flows are only required intermittently, and usage is therefore not monitored. The existing system, however, was originally designed to provide service to a large scale heavy manufacturing use and is presently adequate to meet insurance requirements. Figure 30 in Section IV.J, Utilities, provides an illustration of existing local water infrastructure.

Since DWP service was first established at the McDonnell Douglas property, water service jurisdictional boundaries have changed. The site now falls within the Certificated Service Area of the Dominguez Water Company, who will supply water to a portion of the proposed project. The Dominguez Water Company currently maintains a 20-inch water line along the southern boundary of the property, just north of 203rd Street. A 16-inch line along Western Avenue and an 8-inch line in Normandie Avenue extends from the 20-inch line.[40] Figure 30 in Section IV.J, Utilities, provides an illustration of existing local infrastructure.

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37 *Fire Code of the Los Angeles Municipal Code, Section 57.09.06.*

38 *Fire Code of the Los Angeles Municipal Code, Section 57.09.06.*

39 *Tait & Associates, Inc., May 20, 1996.*

40 *Tait & Associates, Inc., May 20, 1996.*

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External access to the project site for the use of fire suppression and emergency medical service (EMS) vehicles is currently permitted via private ingresses, including a signalized driveway on 190th Street, a signalized and gated entrance on Western Avenue, and gated entrances with rail crossings on Normandie Avenue. Once on-site, emergency vehicles responding from outside areas are able to access the entire property via a private internal circulation system.

2. PROJECT IMPACTS

The assessment of project impacts upon the LAFD is based on information specific to the proposed Harbor Gateway Center which was supplied by the LAFD. Fire stations serving the McDonnell Douglas site were identified and inventoried, and project compliance with all applicable regulations was analyzed.

Assessments regarding the adequacy of fire protection services are made by the Los Angeles City Fire Department. A significant impact to LAFD fire prevention and suppression services and/or emergency medical services would occur if the proposed project: (1) exceeds the staff and equipment capabilities of any of the LAFD stations serving the property; (2) exceeds the maximum response distances specified in the Fire Code without implementing appropriate fire safety features; or (3) does not comply with all applicable LAFD code and ordinance requirements for construction, fire flow, water mains, fire hydrants, and access. A significant impact could also occur if construction activity would substantially increase emergency response time to the project site.

The proposed project is estimated to accommodate a daytime population of 6,250 to 6,550 persons, including from 4,900 to 5,200 employees and 1,350 patrons.[41] This represents an increase in daytime population estimated at between 5,870 and 6,170 persons. This increase in population could increase on-site demand for fire protection and emergency medical service.

The Harbor Gateway Center is located 1.6 miles from the nearest engine company (Station 79) and 4.5 miles from the nearest truck company (Station 85). As these response

[41] *Employment figures provided by McDonnell Douglas Realty Company and are based upon the following employment generation factors: theater, 1.5 employees per 1,000 sq.ft. (1.5/1,000); restaurant, 3/1,000; retail and office 2.5/1,000; manufacturing, 1.3/1,000. Patronage figures estimated using the following formula developed by Michael Brandman Associates for the Los Angeles Police Department: 3 persons per 1,000 square foot of retail space.*

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distances exceed Fire Code requirements, impacts would be considered potentially significant without installation of automatic fire sprinklers in all structures, in addition to any supplemental fire protection devices specified by the Fire Chief. These features would compensate for the exceedance of maximum response distances.[42]

The proposed water system, which would serve both domestic and fire water needs, is expected to more than meet fire flow requirements for the site. Section IV.J.1, Water provides a more detailed discussion regarding the proposed water system and water use. The new fire water system would be comprised of two main components, one served by the Department of Water and Power and the other served by the Dominguez Water Company.

DWP would supply Area 1 and most of Area 2. A new water line would connect to both the 8-inch DWP line in 190th Street and the existing 16-inch line located on-site which ties to the 31-inch DWP line in Normandie Avenue (see Figure 30 in Section IV.J, Utilities, for an illustration of proposed water infrastructure). The new line would form a loop system, located in "A", "B", and "C" Streets (discussed below) and on-site easements. DWP would service these new facilities with adequate flows and pressures to meet Fire Code requirements.[43] Hydrants will be installed per Fire Code requirements based on the specific projects which will occupy Areas 1 and 2. Given the DWP's ability to serve the site at buildout, development of the Harbor Gateway Center is not expected to result in significant impacts to fire water service.

Dominguez Water Company would supply water to a portion of Area 2, specifically lots 23 through 29 in the southwest corner of the project site.[44] A loop system would be created by a new line connecting at one end to the 16-inch Dominguez Water Company line in Western Avenue and at the other end to the 20-inch Dominguez Water Company line along the site's southern boundary (see Figure 30 in Section IV.J, Utilities, for an illustration of proposed water infrastructure). This new line would be located in "B" Street and on-site easements. The system would supply both domestic water and fire water for this portion of the site, with flows and pressures adequate for the latter.[45] Hydrants will be installed per Fire Code requirements based on the specific projects which will occupy this portion of Area 2. Given the Dominguez Water Company's ability to serve the site at buildout, development of the proposed project is not expected to result in significant impacts to fire service.

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42 *Battalion Chief Dennis Keane, op.cit., May 17, 1996.*

43 *Tait & Associates, Inc., May 20, 1996.*

44 *Lot 22 is located adjacent to both DWP and Dominguez Water Company service areas and could be served by either supplier.*

45 *Tait & Associates, Inc., May 20, 1996.*

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Emergency vehicle access to the proposed Harbor Gateway Center project would be enhanced under the proposed project. As discussed in Section II.2, Internal Circulation and Parking, an internal circulation system comprised of three roadways, "A", "B", and "C" Streets, is proposed. Figure 10 in Section II.D, Project Description provides an illustration of the road network. The circulation system would provide seven public entrances. These would include three entrances on 190th Street, three on Normandie Avenue, and one on Western Avenue. Two of the public entrances on 190th Street would consist of driveways leading to the Area 1 parking lot; the third would consist of a signalized intersection at "A" Street, providing direct access to Area 2, as well as indirect access to the retail area. The three public entrances on Normandie Avenue would include a driveway providing access to the Area 1 parking lot, with signal timing improvements and a new rail crossing at the existing Southern Pacific rail line; and signalized intersections at "B" and "C" Streets. The Western Avenue public entrance would also consist of a signalized intersection at "B" Street, providing direct access to Area 2. Responding emergency vehicles would be able to access the property through each of these entrances.

Vehicle trips generated by construction of the Harbor Gateway Center (an average of 15 daily truck trips plus employee trips)[46] would result in a slight increase in traffic on roadways surrounding the project site. Section IV.G., Transportation/Circulation provides a detailed discussion of the project's impact on traffic levels. Delays due to construction traffic would be minor, infrequent, and temporary. Although project occupancy could potentially cause significant impacts upon traffic conditions, these would be reduced at most locations once the proposed traffic mitigation measures are implemented. Significant traffic impacts are projected to remain at four intersections and on area freeways. Neither project construction nor project operation is anticipated to cause significant impacts to LAFD emergency response times. However, because of the distance from the nearest fire station, the project would be considered to be inadequately protected. Therefore, increase in on-site population associated with the project would have an adverse effect on fire protection and emergency medical service. The project's impact on fire protection and emergency medical service would be reduced to less than significant after implementation of mitigation measures, but not eliminated.

[46] *Truck and employee trips would vary over the 9-year construction period. The maximum number of construction-related trips would be expected to occur during construction of the Area 1 retail center.*

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3. MITIGATION MEASURES

To address the potential impacts to fire protection services associated with development of the Harbor Gateway Center, the following mitigation measures are recommended:

1. On-site development at the Harbor Gateway Center shall comply with all applicable State and local codes and ordinances, and all relevant guidelines found within the City Fire Protection and Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles.

2. Plot Definitive plans and specifications shall be submitted to the Los Angeles Fire Department for approval of and requirements regarding fire flow, hydrants, and access, and shall indicate access roads and turning areas. for necessary permits shall be satisfied prior to commencement of any portion of the proposed project.

3. In order to mitigate the inadequacy of fire protection in travel distance, sprinkler systems shall be required throughout any structure to be built, in accordance with the Los Angeles Municipal Code, Section 57.09.07.

4. The applicant shall submit plans that show the access road and the turning area for Fire Department approval.

5. On-site development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan D-22549.

6. Standard cut-corners will be used on all turns.

7. During demolition, the Fire Department access will remain clear and unobstructed.

8. The width of private roadways for general access use and fire lanes shall not be less than 20 feet clear to the sky.

9. Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

10. Where access for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface of the roadway.

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11. No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

12. Adequate off-site public and on-site private fire hydrants may be required. Their number and location are to be determined after the Fire Department's review of the plot plan.

13. The on-site water delivery system shall be improved to the satisfaction of the Fire Department prior to occupancy.

14. All first-story portions of any commercial building shall be within 300 feet of an approved fire hydrant.

15. Fire lanes and dead-ending streets shall terminate in a cul-de-sac or other approved turning area. No dead-ending street or fire lane shall be greater than 700 feet in length without a secondary access being provided.

16. All access roads, including fire lanes, shall be maintained in an unobstructed manner. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.

4. ADVERSE EFFECTS

Implementation of the mitigation measures described above would ensure project compliance with all applicable guidelines, codes, and ordinances set forth by the LAFD, the City, and the State. With mitigation, impacts to fire protection service would not be eliminated, but would be reduced to a less than significant level.

5. CUMULATIVE IMPACTS

The Los Angeles Fire Department regularly evaluates fire station placement and overall LAFD capability for the entire City, as well as for specific locations where demand for fire services is significant. Consideration of the proposed project in conjunction with related projects in the area could potentially result in the determination that one or more of the following needs exists: (1) increased staffing for existing and/or proposed facilities; (2) additional fire protection facilities; or (3) relocation of present fire stations. Cumulative impacts are assessed for the fire station that would have first-in response duties for the proposed project

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and related projects located within the service area boundaries of LAFD Fire Station Number 79.

The Station No. 79 service area forms an irregularly shaped narrow strip, following Vermont Avenue and Figueroa Street in the northern portion up to West 135th Street and roughly following Western and Normandie Avenues in the southern portion down to Carson Street. Please refer to Figure 29 on page 240, which illustrates Station No. 79's service area. The irregular boundaries coincide with those of the City of Los Angeles (refer to Figure 24 on page 189). Only Related Projects LA3 and LA33 are within the Station No. 79 service area. A complete description of these projects can be found in Table 5 on pages 83 through 86.

As shown on Table 30 below, a cumulative population increase of 7,223 persons is estimated as a result of buildout of the Harbor Gateway Center and the related projects located within the Fire Station Number 79 service area. This growth would be expected to collectively increase demand for fire protection services, which would be addressed through the City's overall planning and budgeting process. In addition, related projects would be reviewed by the Fire Department to comply with the Department's requirements. With mitigation and Department review, the cumulative impacts of the proposed project and related projects are not expected to be significant.

Table 30

CUMULATIVE POPULATION IN LAFD STATION NUMBER 79 SERVICE AREA DUE TO RELATED PROJECTS

Use	Square Footage	Factor	Persons
Retail	809,000	1 employee per 400 square feet	2,023
Related Projects Total Employees:			2,023
Proposed Project Maximum Employees:			5,200
Cumulative Total Employees:			**7,223**

Source: Planning Consultants Research.

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IV. ENVIRONMENTAL IMPACT ANALYSIS
I. PUBLIC SERVICES
2. POLICE PROTECTION

1. ENVIRONMENTAL SETTING

Police protection services for the Harbor Gateway community are provided by the Los Angeles Police Department (LAPD), which operates 18 service areas Citywide. The project site is located within the LAPD's Harbor Area, a 25.7 square mile area bounded roughly by the 405 Freeway to the north, the Pacific Ocean to the south, the boundary between the Cities of Los Angeles and Carson to the east and Western Avenue to the west. The Harbor Area is further subdivided into 38 reporting districts (RDs), which are small geographic units used for resource deployment purposes and statistical analysis. The project site is located within RD 504, defined by the 405 Freeway, the storm drain channel between 212th and 213th Streets, and Normandie and Western Avenues. The project site is served by the Harbor Area Community Police Station (Harbor Area Station), located at 2175 John S. Gibson Boulevard in San Pedro, approximately 7.2 miles south of the site.[47]

The LAPD bases determinations of the adequacy of police protection for a given area on a number of factors, including population size, officer deployment, average crime rate, and average response time to emergency calls. The Harbor Area has a population of 166,011 persons and is served by 247 sworn officers and 31 civilian support staff.[48] Reporting District 504, with a service population of 5,931 persons, reported a 1995 crime rate of 83 per 1,000 population, as compared to the Citywide average of 76 per 1,000. The most frequently reported crimes in RD 504 were aggravated assault, burglary from residence, and burglary from vehicles. In 1995, the average response time to emergency calls in the Harbor Area was 7.7 minutes, slightly greater than the Citywide average of 7.6 minutes.[49]

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47 *James T. McBride, Commander, Los Angeles Police Department, July 3, 1996. Harbor Area reporting districts changed in 1996. The crime statistics provided by LAPD for use in this EIR were taken from what was formerly RD 501.*

48 *James T. McBride, Commander, Los Angeles Police Department NOP response letter, July 3, 1996.*

49 *Ibid.*

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2. PROJECT IMPACTS

Project impacts upon the LAPD are evaluated based on information specific to the Harbor Area and Reporting District 504 supplied by the LAPD. Since service capacity is directly related to the size of the population served, impacts to LAPD services were determined by evaluating the demand for police protection to be generated by employee and resident population growth introduced by the proposed project.

The LAPD makes determinations regarding the adequacy of law enforcement services for each service area and the City as a whole, based on evaluation of area conditions. The proposed project would result in a significant impact to police protection services if it: (1) increases the daytime population to a degree that necessitates additional sworn officers or facilities in order to maintain existing levels of service, without providing the means to fund these additional needs; or (2) causes an increase in emergency response time as a result of increased traffic congestion, during either project construction or operation.

The Harbor Gateway Center is estimated to accommodate a daytime population of 6,250 to 6,550 persons at any given time, including from 4,900 to 5,200 employees and 1,350 patrons.[50] Because the 380 employees currently working at McDonnell Douglas are anticipated to be relocated, the net increase in daytime population is estimated at 5,870 to 6,170 persons. A population of this size could potentially generate a demand for additional police officers in order to maintain existing service levels within the area, thereby constituting a potentially significant impact.

Security features included in the project development plans would serve to minimize demand for additional police officers and would reduce potentially significant impacts to police protection services to less than significant. Night lighting consisting of security and parking lot lighting would facilitate crime prevention. Appropriate on-site security would be provided by the retail center operator as well.

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50 *Employment figures provided by McDonnell Douglas Realty Company and are based upon the following employment generation factors: theater, 1.5 employees per 1,000 sq.ft. (1.5/1,000); restaurant, 3/1,000; retail and office, 2.5/1,000; manufacturing, 1.3/1,000. . Patronage figures estimated using the following formula developed by Michael Brandman Associates for the Los Angeles Police Department: 3 persons per 1,000 square feet of retail space.*

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Vehicle trips generated by construction of the Harbor Gateway Center (an average of 15 daily truck trips plus employee trips)[51] would result in a slight increase in traffic on roadways immediately surrounding the project site. Section IV.G., Transportation/Circulation provides a more detailed discussion of the project's impact on traffic levels. Delays due to construction traffic would be minor, infrequent, and temporary, and thus would be considered less than significant. Project occupancy, however, would introduce a daytime population that could cause considerable increases in traffic levels. Significant impacts upon traffic conditions at most locations would be reduced once the proposed traffic mitigation measures are implemented. Significant traffic impacts could remain at two intersections and on area freeways; however, cumulative programs such as regional transit system improvements, ridesharing requirements, and regional roadway capacity enhancements would mitigate these remaining impacts to a degree. Therefore, impacts to LAPD response times would be considered adverse, but less than significant.

3. MITIGATION MEASURES

To address potential police protection impacts associated with development of the Harbor Gateway Center, the following mitigation measures are recommended:

1. Plot plans for all proposed commercial, office, and industrial development shall be submitted to the Los Angeles Police Department's Crime Prevention section for review and comment. Security features subsequently recommended by the LAPD, possibly including the provision of on-site security, shall be implemented to the extent feasible.

2. Building plans shall be filed with the LAPD Harbor Area Commanding Officer. Plans shall include access routes, building numbers, and any additional information that might facilitate prompt and efficient police response. Project developers within the project subdivision shall also consult with the LAPD with respect to other on-site security measures which will minimize demand for LAPD services.

3. Parking areas, entryways, lobbies, and elevators shall be well illuminated and designed with minimum dead space to eliminate areas of concealment.

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51 *Truck and employee trips would vary over the 9-year construction period. The maximum number of construction-related trips would be expected to occur during construction of the Area 1 retail center.*

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4. Alarms and/or locked gates shall be installed on doorways providing public access.

5. Landscaping shall not be planted in a way that could provide cover for persons tampering with doors or windows.

6. Additional lighting shall be installed where appropriate.

4. ADVERSE EFFECTS

Implementation of the recommended mitigation measures would ensure compliance with all applicable LAPD, City, and State guidelines, codes, and ordinances. Implementation of the recommended mitigation measures would not eliminate impacts to police protection service but would reduce impacts to a less than significant level.

5. CUMULATIVE IMPACTS

Development of the Harbor Gateway Center, in combination with the related projects and natural Citywide population growth, would generate demand for additional Los Angeles Police Department services. Cumulative impacts are assessed for the police station that would serve the proposed project and related projects located within the service area boundaries of the Harbor Area Community Police Station.

The Harbor Area is irregularly shaped, with a long and narrow panhandle generally extending northward along Western and Normandie Avenues and terminating at West 190th Street (see Figure 24 on page 189). The proposed project is located at the extreme northern boundary of the Harbor Area panhandle. Only Related Project LA33 (the adjacent International Light Metals site) is within the area served by the Harbor Area Community Police Station. A complete description of this project can be found in Table 5 on pages 83 through 86.

As shown on Table 31 on page 253, a cumulative population increase of 7,088 persons is estimated as a result of buildout of the Harbor Gateway Center and the related project located within the Harbor Area.

The cumulative impact of the estimated population increase would collectively increase demand for police protection services, which would be addressed through the City's overall

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Table 31

CUMULATIVE POPULATION IN LAPD HARBOR AREA DUE TO RELATED PROJECTS

Use	Square Footage	Factor	Persons
Retail	755,000	1 employee per 400 square feet	1,888
Related Projects Total Employees:			1,888
Proposed Project Maximum Employees:			5,200
Cumulative Total Employees:			**7,088**

Source: Planning Consultants Research.

planning and budgeting process. As with the project, related projects would be expected to be reviewed by the Police Department to develop measures which minimize demand for police services. With mitigation and Department review, the cumulative impacts of the proposed project and related projects are not expected to be significant.

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1. ENVIRONMENTAL SETTING

Electric power is provided to the McDonnell Douglas property by the City of Los Angeles (City) Department of Water and Power (DWP). The DWP maintains extensive electricity transmission and distribution facilities in the project site vicinity. The Halldale receiving station, a 138 kilovolt (kV) facility located at the southern edge of the project site at 203rd Street and Denker Avenue, is supplied by a 138 kV transmission line along 203rd Street. The Halldale substation currently serves the site via multiple underground 13.8 kV distribution circuits, which are expected to be abandoned as part of site demolition. A twin circuit 34.5 kV pole line which parallels Western Avenue and extends to 190th Street also originates from the Halldale station. Additional components of the area's distribution system include 34.5 kV and 4.8 kV pole lines located along 190th Street, twin circuit 34.5 kV and 4.8 kV pole lines along Normandie Avenue, and a 4.8 kV pole line along 203rd Street.[52]

Existing development consists of approximately 2.4 million square feet of industrial uses, utilized predominantly for warehouse purposes. Current on-site electricity demand is substantially lower than previous levels (i.e., in 1990 when employment and manufacturing activities peaked). Current annual electric consumption by existing uses is estimated to be 18.74 million kilowatt-hours (kWh).[53]

In addition to the DWP, the Southern California Edison Company (SCE) provides electric service to properties in the vicinity of the project site and is a potential supplier to the proposed project. A brief description of existing SCE facilities located in the project site vicinity is therefore provided. SCE maintains a 66 kV transmission line and a 15 kV distribution pole line along Western Avenue. Additional SCE lines are located along 190th Street.[54]

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52 *Utility Specialists, May 17, 1996.*

53 *Actual electricity consumption for 1995; Source: McDonnell Douglas Realty Company.*

54 *Utility Specialists, May 17, 1996.*

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2. PROJECT IMPACTS

Electric power consumption for the proposed Harbor Gateway Center project was estimated using average consumption rates based on land use and building square footage, as provided by the South Coast Air Quality Management District (SCAQMD).[55] The net increase in demand over current levels was then determined and evaluated relative to the ability of the DWP and SCE to serve the project.

The proposed Harbor Gateway Center project would result in a significant impact on electric power service if project-related demand exceeds the capacity of existing or planned distribution systems, resulting in an unmet need for additional infrastructure in order to provide adequate levels of service.

Long-term consumption would occur during project operation for the lighting, heating, cooling, and other electricity needs associated with retail, office, and industrial park uses. Table 32 on page 256 indicates estimated electric consumption for the project. With nearly three million square feet of retail, office, and industrial uses, the Harbor Gateway Center is estimated to consume 39.71 million kWh per year at buildout. Given the site's usage of 18.74 million kWh in 1995, the project would result in a net increase of approximately 20.97 million kWh of electricity annually.

Electricity for the project could continue to be provided by the DWP. By filed tariff, rule, or custom, the serving utility company is responsible for the adequacy of electric capacity to the project site.[56] Existing local DWP infrastructure would, however, be able to accommodate the energy needs associated with the Harbor Gateway Center. The Halldale receiving station has sufficient excess capacity to meet the net increase in demand predicted at project buildout. Furthermore, connections to any of the existing distribution lines, with the exception of the 203rd Street line, could be established. On site lines are expected to be installed underground, within the project street rights-of-way. Because the DWP is not regulated by the California Public Utilities Commission (CPUC), the project would not necessitate CPUC review and approval (discussed below) if the DWP were to continue service to the site.[57] Since adequate infrastructure would be provided, development of the proposed project is not expected to result in significant impacts to electric power.

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55 *South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993.*

56 *Utility Specialists, May 17, 1996.*

57 *Utility Specialists, May 17, 1996.*

BOE-C6-0115395

Table 32

PROJECTED ELECTRICITY CONSUMPTION FOR HARBOR GATEWAY CENTER

Site Use	Square Footage	Consumption Factor[a] (kWh/sq.ft./yr)	Annual Consumption (million kWh/yr)
Area 1			
Restaurant	30,000	47.45	1.42
Retail[b]	420,000	13.55	5.69
Total	450,000	N/A	7.11
Area 2			
Office/ Industrial Park[c]	2,517,700	12.95	32.60
Project Total	**2,967,700**	**N/A**	**39.71**
Existing Uses	2,418,938	N/A	18.74[d]
Net Increase	**548,762**	**N/A**	**20.97**

[a] *Consumption factor source: South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993.*

[b] *Retail use includes 65,000 square foot motion picture theater complex.*

[c] *Consumption factor for industrial park use not provided in above source; thus, the office factor was used for all office/industrial park development.*

[d] *Actual electricity consumption for 1995.*

Source: McDonnell Douglas Realty Company.

Alternatively, SCE could provide electric power to the Harbor Gateway Center project. In this case, connections to SCE facilities adjacent to the site would need to be established. Extensions of service would be made under CPUC Extension Rule 15 for mains and Rule 16 for service. Initiation of SCE service at the project site would require approval by the CPUC, as outlined in its General Order 131D (G.O.131D) in the event that transmission facilities greater than 50 kV are installed to serve the project. This Order calls for formal environmental review by the CPUC for projects served by utility facilities of 50 to 200 kV, in order that related utility construction achieve CEQA compliance. G.0.131D also requires public notice of facilities requiring CEQA review (i.e., greater the 50 kV). It is the intent of this document to serve as compliance with the public notice provision of G.0.131D in the event that construction of electric transmission lines of 50 kV or greater is required in order to serve the proposed project. Development of the proposed project with electricity supplied by SCE is not,

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however, expected to result in significant impacts to electric power, since adequate infrastructure would be provided under the utility's CPUC filed and approved Rules for the Extension of Electric Mains (Rule 15) and Service (Rule 16), June 1996.[58]

3. MITIGATION MEASURES

While development of the Harbor Gateway Center is not expected to produce significant impacts to electric power service, energy conservation techniques can effectively reduce the amount of electricity needed by the project. The following measures are recommended as conditions of project approval to ensure that electric power will be conserved to the maximum extent feasible:

1. The proposed project shall adhere to all applicable Los Angeles Department of Water and Power (DWP) rules and regulations. All necessary infrastructure improvements shall be constructed to meet the requirements of the DWP.

2. Should SCE supply the site at buildout, the proposed project shall adhere to all applicable SCE rules and regulations. SCE shall take the necessary measures to ensure CPUC approval and CEQA compliance, for construction of any new facilities over 50 kV. It is the intent of this EIR to provide compliance with the public notice provision of CPUC General Order 131D for these facilities.

3. The proposed project shall comply with and implement all energy conservation measures required by Title 24 of the California Administrative Code, and, whenever feasible, exceed them.

During the design process, the applicant should consult with the Los Angeles Department of Water and Power, Energy Services Subsection, regarding possible energy conservation measures. The applicant shall incorporate measures which will exceed minimum efficiency standards for Title XXIV of the California Code of Regulations. The following is a list of possible options for achieving minimum efficiency standards. Not all options listed below would be applicable to every future project within the proposed subdivision. Actual measures utilized will be dependent upon the characteristics of the individual development.

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58 *Utility Specialists, May 17, 1996.*

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4. Built-in appliances, refrigerators, and space-conditioning equipment should exceed the minimum efficiency levels mandated in the California Code of Regulations.

5. Install high-efficiency air conditioning controlled by a computerized energy-management system in the office and retail spaces which provides the following:

   - A variable air-volume system which results in minimum energy consumption and avoid hot water energy consumption for terminal reheat;

   - A 100 percent outdoor air-economizer cycle to obtain free cooling in appropriate climate zones during dry climatic periods;

   - Sequentially staged operation of air-conditioning equipment in accordance with building demands; and

   - The isolation of air-conditioning to any selected floor or floors.

   - Consider the applicability of the use of thermal energy storage to handle cooling loads.

6. Cascade ventilation air from high-priority areas before being exhausted, thereby, decreasing the volume of ventilation air required. For example, air could be cascaded from occupied space to corridors and then to mechanical spaces before being exhausted.

7. Recycle lighting-system heat for space heating during cool weather. Exhaust lighting-system heat from the buildings, via ceiling plenums, to reduce cooling loads in warm weather.

8. Install low and medium static-pressure terminal units and ductwork to reduce energy consumption by air-distribution systems.

9. Ensure that buildings are well-sealed to prevent outside air from infiltrating and increasing interior space-conditioning loads. Where applicable, design building entrances with vestibules to restrict infiltration of unconditioned air and exhausting of conditioned air.

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10. A performance check of the installed space-conditioning system should be completed by the developer/installer prior to issuance of the certificate of occupancy to ensure that energy-efficiency measures incorporated into the project operate as designed.

11. Finish exterior walls with light-colored materials and high-emissivity characteristics to reduce cooling loads. Finish interior walls with light-colored materials to reflect more light and, thus, increase lighting efficiency.

12. Install thermal insulation in walls and ceilings which exceeds requirements established by the California Code of Regulations.

13. Design window systems to reduce thermal gain and loss, thus, reducing cooling loads during warm weather and heating loads during cool weather.

14. Install heat-reflective draperies on appropriate exposures.

15. Install fluorescent and high-intensity-discharge (HID) lamps, which give the highest light output per watt of electricity consumed, wherever possible including all street and parking lot lighting to reduce electricity consumption.

16. Install occupant-controlled light switches and thermostats to permit individual adjustment of lighting, heating, and cooling to avoid unnecessary energy consumption.

17. Install time-controlled interior and exterior public area lighting limited to that necessary for safety and security.

18. Control mechanical systems (HVAC and lighting) in the building with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied space.

19. Incorporate windowless walls or passive solar inset of windows into the project for appropriate exposures.

20. Design project to focus pedestrian activity within sheltered outdoor areas.

BOE-C6-0115399

4. ADVERSE EFFECTS

The project would generate consume an estimated 39.71 million kWh of electricity per year, resulting in an annual net increase of 20.97 million kWh. No adverse effects with respect to electric power service are anticipated to result from development of the proposed Harbor Gateway Center project.

5. CUMULATIVE IMPACTS

Planned development in the area (see Table 5 on pages 83 through 86), in combination with the proposed project, would consume an estimated 117 million kWh of electricity annually (see Appendix E G for calculations). Significant impacts could occur if the future cumulative level of development results in a demand for electricity that exceeds capacity. However, the City of Los Angeles Department of Water and Power is expected to have sufficient generating capacity to meet the projected energy needs of the region in future years. SCE also expects to have adequate capacity to meet the needs of its service areas. In addition, cumulative development could place increased demands upon local infrastructure (e.g., electric receiving stations, substations, transformers), thereby requiring expansion or construction of new facilities. In the event such facilities exceed 50 kV, CEQA review shall be undertaken by SCE as required by CPUC G.O.131D. These improvements are not considered significant as they are anticipated and planned for by the respective agencies in order to continue to meet customer needs.

BOE-C6-0115400

1. ENVIRONMENTAL SETTING

Natural gas service is supplied to the project site by the Southern California Gas Company (SCGC). The site is currently served by a 6-inch main with "medium" pressure (60 psi or less) located in Normandie Avenue. Additional SCGC infrastructure located near the site includes local distribution lines in 203rd Street as well as 16-inch 220 psi and 36-inch 400 psi transmission mains along 190th Street. Annual natural gas consumption associated with the land uses currently located on-site is estimated to be 13.3 million cubic feet (mcf).[59]

2. PROJECT IMPACTS

A significant impact on natural gas service would occur if development of the proposed Harbor Gateway Center project results in a project-related demand exceeding the capacity of existing or planned distribution systems, resulting in an unmet need for additional infrastructure in order to provide adequate levels of service.

Estimated natural gas usage for the proposed project was calculated using SCAQMD consumption factors based on land use and building square footage.[60] The net increase in demand for natural gas was then evaluated relative to the ability of SCGC to serve the project.

Long-term consumption would occur during project operation for the heating, cooling, and other natural gas needs associated with retail, office, and industrial park uses. Table 33 on page 262, indicates estimated consumption levels for the project. At buildout, the proposed Harbor Gateway Center project is estimated to consume 76.1 mcf of natural gas per year. Given the on-site usage of approximately 13.3 mcf in 1995, the proposed project would result in a net increase of 62.8 mcf of natural gas annually.

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59 *Actual natural gas consumption for 1995; Source: McDonnell Douglas Realty Company.*

60 *South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993.*

BOE-C6-0115401

Table 33

PROJECTED NATURAL GAS CONSUMPTION FOR HARBOR GATEWAY CENTER

Site Use	Square Footage	Consumption Factor[a] (cf/sq.ft./mo)	Monthly Consumption (cf/mo)	Annual Consumption (mcf/yr)
Area 1				
Retail/Restaurant[b]	450,000	2.9	1,305,000	15.7
Area 2				
Office/Industrial Park[c]	2,517,700	2.0	5,035,400	60.4
Project Total	**2,967,700**	**N/A**	**6,340,400**	**76.1**
Existing Uses	2,418,938	N/A	N/A	13.3[d]
Net Increase	**548,762**	**N/A**	**N/A**	**62.8**

[a] *Consumption factor source: South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993.*

[b] *Retail use includes 65,000 square foot motion picture theater complex. Consumption factor for restaurant use not provided in above source, thus estimated as retail use.*

[c] *Consumption factor for industrial park use not provided in same units; thus, the office factor was used for all office/industrial park development.*

[d] *Actual natural gas consumption for 1995; Source: McDonnell Douglas Realty Company.*

The proposed project's natural gas supply would continue to be provided by SCGC's 6-inch main line in Normandie Avenue. This line has sufficient capacity to accommodate the energy needs associated with the Harbor Gateway Center. New services would be extended under CPUC Extension Rule 15 for mains and Rule 16 for services. The transmission mains located in 190th Street would not be available for alternative or additional natural gas service.[61] Given SCGC's ability to serve the site at buildout with additional infrastructure provided as needed, development of the Harbor Gateway Center is not expected to result in significant impacts to natural gas service.

[61] *Utility Specialists, May 19, 1996.*

BOE-C6-0115402

3. MITIGATION MEASURES

The Harbor Gateway Center is not expected to produce significant impacts to natural gas service; however, the following measures are recommended as conditions of project approval to ensure that natural gas resources will be conserved to the maximum extent feasible:

1. The proposed project shall adhere to all applicable Southern California Gas Company (SCGC) rules and regulations. All necessary infrastructure improvements shall be constructed to meet the requirements of the SCGC.

2. The proposed project shall comply with and implement all energy conservation measures required by Title 24 of the California Administrative Code, and, whenever feasible, exceed them.

4. ADVERSE EFFECTS

The project would generate consume an estimated 76.1 million cubic feet of natural gas per year, resulting in an annual net increase of 62.8 million cubic feet. No adverse effects with respect to natural gas service are expected to result from development of the proposed Harbor Gateway Center project.

5. CUMULATIVE IMPACTS

Currently planned development in the area (see Table 5 on pages 83 through 86), in combination with the proposed project, would consume an estimated 23.2 million cubic feet of natural gas per month (see Appendix E G for calculations). Significant impacts could occur if the future cumulative level of development results in a demand for natural gas that exceeds capacity. However, the Southern California Gas Company is expected to have sufficient supplies to meet the projected energy needs of the region in future years. Cumulative development could also place increased demands upon local infrastructure (e.g., gas lines), thereby requiring expansion or construction of new facilities. However, such improvements are not considered significant as they are anticipated and planned for by the SCGC in order to continue to meet customer needs.

BOE-C6-0115403

1. ENVIRONMENTAL SETTING

Construction activity typically takes place in five fairly distinct phases: (1) ground clearing; (2) excavation; (3) foundation construction; (4) building erection; and (5) finishing and cleanup. Each phase involves the use of construction equipment that consumes diesel fuel and/ or electricity. Clearing and excavation typically involve the use of earth moving equipment such as heavy duty trucks, scrapers, backhoes, front-end loaders, and a rock crusher. Foundation construction generally entails the use of heavy concrete trucks and mixers, cranes, and pneumatic tools. Building erection typically involves the use of hammers, generators, compressors, and light trucks, while finishing and site cleanup generally require the use of trucks, landscape rollers, and compactors.

Area 1 construction would occur over an approximately 15-month period from mid-1997 to late 1998. Construction in Area 2 would occur intermittently in various locations on-site over a 9-year period between 1997 and 2006.

2. PROJECT IMPACTS

Project construction would require both direct and indirect expenditures of energy. Direct energy is directly consumed by an activity. The petroleum combustion needed to operate construction equipment is an example of direct energy expenditure. Indirect energy is consumed through sectors that provide inputs to construction activity. The use of a steel beam in construction, for example, represents energy consumed in all of the industries that contributed to the production of the beam (energy consumed through mining and extraction of raw materials, manufacturing, and transportation). Indirect energy typically represents about three-quarters of total construction energy, while direct energy represents about one-quarter of total construction energy.[62]

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62 *B. Hannon, et al. "Energy and Labor in the Construction Sector."* Science. *1978.202: 837-847*

BOE-C6-0115404

The use of heavy equipment would consume energy during site preparation for grading operations and material transfer. These vehicles are usually diesel-powered and may be used during both site preparation and construction phases. Energy would also be consumed by the operation of haul trucks used to transport fill materials to the project site and construction debris to the designated landfill.

Construction of the proposed project would require an estimated 2.79 quadrillion British thermal units (BTUs) of direct energy.[63] One BTU is the quantity of heat required to raise the temperature of one pound of water one degree Fahrenheit. All forms of energy can be converted to heat energy. BTU values used in this analysis are "at-source" values, which means that energy used in producing and transporting the various types of energy is included, as is the actual energy content. The at-source energy value of electricity, for example, includes losses in energy that occur during the generation and transmission of electricity, as well as the at-source energy value of gasoline includes energy consumed through extraction, refining and transportation of the fuel. Because project construction would not utilize energy in a wasteful manner, construction-related impacts are considered less than significant.

3. MITIGATION MEASURES

No significant energy impacts related to construction activity have been identified. Therefore, no mitigation is required.

4. ADVERSE EFFECTS

Project construction would consume an estimated 2.79 quadrillion BTUs of energy. Such consumption would not adversely affect available energy supplies.

5. CUMULATIVE IMPACTS

Construction related to cumulative development in the region would consume additional energy supplies. However, because all construction would be short-term and generally would not use energy resources in a wasteful manner, the cumulative impacts of construction activity are considered less than significant.

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63 *Based on energy consumption factor of 940,000 BTU/square foot of construction from Hannon B. et al. This factor was generated from the model developed by the Energy Research Group at the University of Illinois. The breakdown of this factor by energy type is not available.*

BOE-C6-0115405

IV. ENVIRONMENTAL IMPACT ANALYSIS
K. UTILITIES
1. COMMUNICATIONS

1. ENVIRONMENTAL SETTING

Telephone and cable television services are provided in the area by the Pacific Bell Company (Pacific Bell) and Continental Cablevision (Continental), respectively. Pacific Bell maintains multiple conduit telephone lines along 190th Street, Normandie Avenue, and 203rd Street. These local distribution facilities are capable of providing fiber optic service. While Pacific Bell currently operates in the project locale, other telephone companies may expand into the area during the course of project development.[64]

Continental Cablevision currently provides broadband communications and video service in the Harbor Gateway area. In the event that Continental is unable to serve the project site, Time Warner Communications, who currently operates a cable television company in the adjacent City of Torrance, has indicated an interest in doing so. In addition, Pacific Bell is in the process of developing broadband distribution systems and new wireless personal communications services (PCS) in the area.[65]

2. PROJECT IMPACTS

The proposed Harbor Gateway Center project would result in a significant impact on communications systems if project-related demand results in an unmet need for additional infrastructure in order to provide adequate levels of service.

Determination of the potential significance of the proposed Harbor Gateway Center project on communications systems was based upon the ability of communications service providers to serve the project.

Telephone service to the Harbor Gateway Center could be provided by the existing provider (Pacific Bell) or other carriers serving the area. By filed tariff, rule, or custom, it is

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64 *Utility Specialists, May 19, 1996.*

65 *Utility Specialists, May 19, 1996.*

BOE-C6-0115406

the responsibility of the telephone service company to provide adequate service capacity to a specific site. The service provider would therefore be expected to meet the anticipated need of the project with existing and/or planned local infrastructure. On-site facilities would also be developed as part of the proposed project; however, specific plans have not yet been defined. In the event that on-site construction requires cabling by the service provider, CPUC extension tariffs would need to be filed. The definition of proposed on-site streets as public or private would determine whether or not the service provider would need to equip project site conduits and vaults/manholes with cable lines, or whether cables with a single point of entry to each development parcel would be provided. The proposed Harbor Gateway Center project is not anticipated to result in significant impacts with respect to telephone service.

It is unknown at this time whether Continental Cablevision would provide broadband communications and video service to the Harbor Gateway Center. Other communications companies, however, have expressed interest in doing so or are in the process of developing the necessary infrastructure. Furthermore, wireless telephone integrated with satellite video services and other new forms of advanced technology can be expected to evolve and reach market viability during the development of the proposed project. To the extent practical, site infrastructure planning and advanced facility installations will be beneficial to this project.[66] Thus, the proposed project is not expected to cause significant impacts to non-telephone communication services.

3. MITIGATION MEASURES

Development of the Harbor Gateway Center is not expected to produce significant impacts to communications service; however, the following measures are recommended as conditions of project approval to ensure that communications infrastructure will be provided in the most effective manner:

1. The proposed project shall adhere to all applicable rules and regulations of the telecommunications service provider and the serving cable television company. All necessary infrastructure improvements shall be constructed to meet the requirements of Pacific Bell and the serving cable television company.

[66] *Utility Specialists, May 19, 1996.*

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4. ADVERSE EFFECTS

No adverse effects with respect to communications service are anticipated to result from development of the proposed Harbor Gateway Center project.

5. CUMULATIVE IMPACTS

Significant impacts could occur if the future cumulative level of development results in a demand for communications services that exceeds utility capacity. However, the communications companies are responsible for the provision of adequate service capacity. Regardless, infrastructure in the project locale has been estimated to be able to accommodate the demand generated by the related projects. Therefore, no significant impacts to communications services resulting from cumulative development are expected.

BOE-C6-0115408

1. ENVIRONMENTAL SETTING

Water is currently supplied to the McDonnell Douglas property by the Los Angeles Department of Water and Power (DWP). The DWP is responsible for ensuring that water demand is met by available water supplies and that State and Federal water quality standards are achieved. Water supplies are derived from the following sources: (1) the Los Angeles Aqueduct -- approximately 30 percent; (2) local wells -- approximately 13 percent; (3) purchases from the Metropolitan Water District (MWD) -- approximately 57 percent; and (4) use of reclaimed wastewater.[67] The amount of water obtained from these sources varies from year to year and is primarily dependent on weather conditions and demand. Given the instability of some of these sources, the City is currently pursuing policies to increase water conservation efforts and the use of reclaimed wastewater.[68]

The McDonnell Douglas property is currently served by a 31-inch water line in Normandie Avenue which supplies a 16-inch line on-site and connects to an on-site water meter station. An internal domestic water system extends from the meter station.[69] Domestic water consumption is currently estimated at 6.0 million gallons per year.[70] Although specific data are not available, it is likely that current consumption levels represent a substantial reduction from past levels (i.e., in 1990 when employment and manufacturing activities peaked). Reclaimed water is not currently available to the project site; preliminary plans for the introduction of reclaimed water supplies in the area have been developed but not finalized.[71] A target date for installation of reclaimed water infrastructure has not yet been established. Additional DWP infrastructure located adjacent to the project site includes a line in 190th Street

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67 *Estimated water supply for 1989-1990; Source: Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, page 2.6-2.*

68 *City of Los Angeles General Plan Framework Draft Environmental Impact Report, page 2.6-21.*

69 *Tait & Associates, Inc., May 20, 1996.*

70 *Actual water consumption for 1995; Source: McDonnell Douglas Realty Company.*

71 *Tait & Associates, Inc., May 20, 1996.*

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which ranges from 8 to 12 inches in size.[72] Please refer to Figure 30 on page 271, for an illustration of existing local water lines.

The existing fire water service system for the project site is separate from the domestic water system. The fire water system does not connect to the on-site water meter station, although one of its main feeder lines is the 16-inch line on-site which supplies domestic water.[73] Fire flows represent an infrequent use and therefore are not monitored. Please refer to Section IV.I, Public Services, for a complete discussion of the existing fire water service system.

Since DWP service was first established at the McDonnell Douglas property, water service jurisdictional boundaries have changed. The project site now falls within the Certificated Service Area of the Dominguez Water Company. Dominguez Water Company obtains water from the following sources: (1) local wells -- approximately 45 percent; and (2) purchases from the MWD -- approximately 55 percent. The amount of water drawn from these sources varies each year depending on weather conditions and demand. Dominguez Water Company currently maintains a 20-inch water line along the southern boundary of the property, just north of 203rd Street. A 16-inch line along Western Avenue and an 8-inch line in Normandie Avenue extend from the 20-inch line.[74] Please refer to Figure 30 on page 271, for an illustration of existing (and proposed) local infrastructure.

2. PROJECT IMPACTS

Development of the proposed Harbor Gateway Center project would result in a significant impact on water service if either of the following occurs: (1) project-related water demand exceeds the capacity of existing or planned water distribution systems, resulting in an unmet need for additional infrastructure in order to provide adequate levels of service; or (2) project-related demand exceeds the ability of the DWP and/or Dominguez Water Company to service the site based on anticipated water supplies.

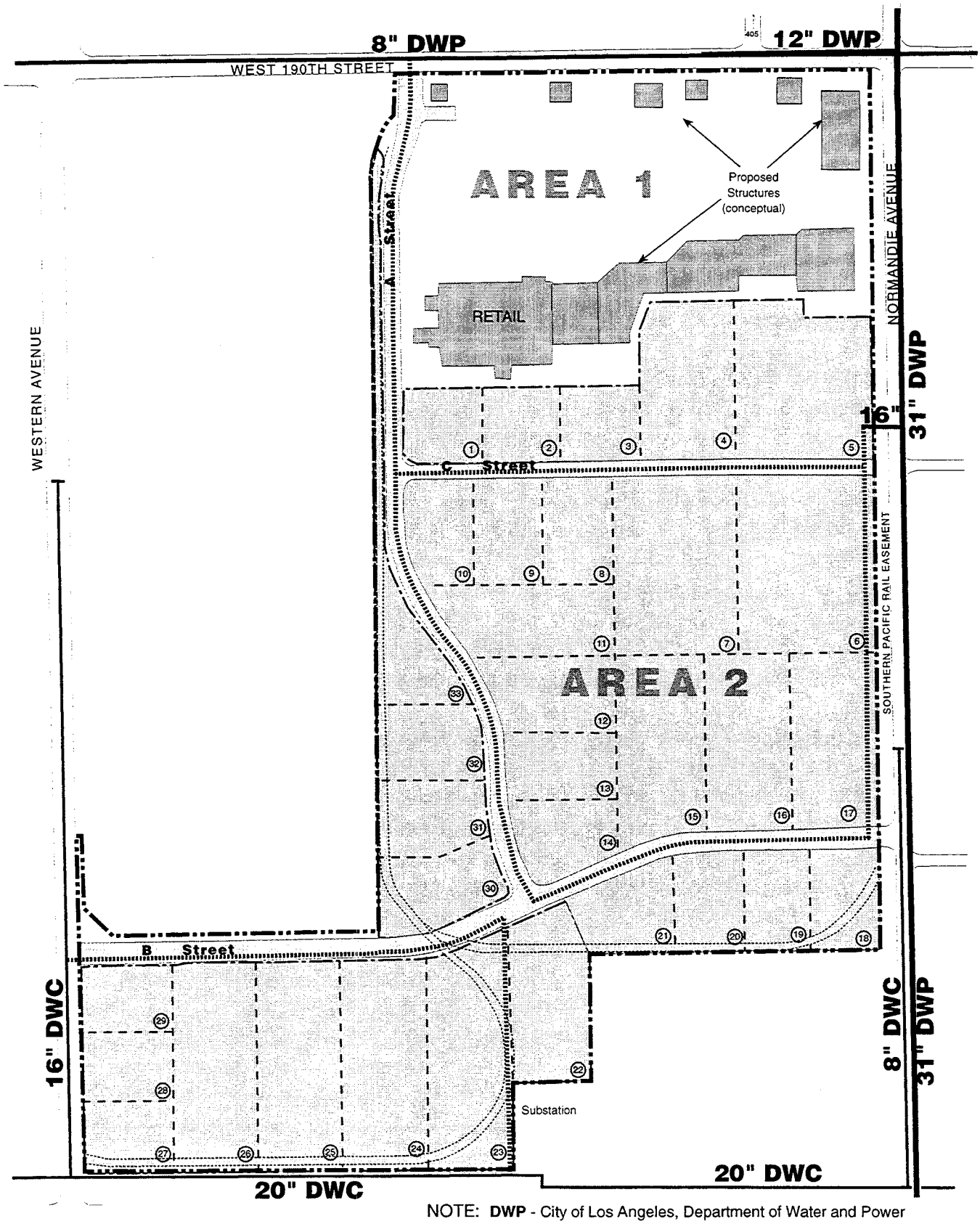
Water consumption for the proposed Harbor Gateway Center project was estimated based on the assumption that water consumption equals 110 percent of wastewater generation, using wastewater generation factors supplied by the Sanitation Districts of Los Angeles County

72 *Tait & Associates, Inc., May 20, 1996.*

73 *Tait & Associates, Inc., May 20, 1996.*

74 *Tait & Associates, Inc., May 20, 1996.*

BOE-C6-0115410



NOTE: **DWP** - City of Los Angeles, Department of Water and Power
DWC - Dominguez Water Corporation

SOURCE: Tait & Associates, Inc.

Planning Consultants Research

N

0 200 400 feet

Existing Water Lines
Proposed Water Lines
Site Boundary
Parcel Number

Figure 30
Existing and Proposed Water System

(SDLAC). The net increase in demand relative to current water consumption levels was evaluated with respect to DWP and Dominguez Water Company infrastructure and capacity, as well as improvements in water infrastructure proposed as part of the project.

As shown on Table 34 on page 273, the proposed Harbor Gateway Center project as a whole is expected to consume approximately 269.4 million gallons of water per year. Given the annual on-site water usage of 6.0 million gallons in 1995, the net increase in on-site demand for water would be approximately 263.4 million gallons per year.

A new water system, illustrated in Figure 30 on page 271, is proposed to meet the increased water requirement. This system would be comprised of two main components, one served by the City of Los Angeles Department of Water and Power and the other served by the Dominguez Water Company. The DWP would supply Area 1 and most of Area 2. New water lines would connect to both the 8-inch DWP line in 190th Street and the existing 16-inch line located on-site which ties to the 31-inch DWP line in Normandie Avenue. These new lines would form a loop system, located in "A", "B", and "C" Streets and off-site easements. The DWP system would supply both domestic water and fire water, with flows and pressures adequate for both.[75] Given the DWP's ability to serve the site at buildout, in conjunction with programmed infrastructure improvements, development of the Harbor Gateway Center is not expected to result in significant impacts to water service.

Dominguez Water Company would supply water to a portion of Area 2, specifically lots 23 through 29 (see Figure 30 on page 271).[76] A loop system would be created by a new line connecting at one end to the 16-inch Dominguez Water Company line in Western Avenue and at the other end to the 20-inch Dominguez Water Company line along the site's southern boundary. This new line would be located in "B" Street and off-site easements. The system would supply both domestic water and fire water for this portion of the site, with flows and pressures adequate for both.[77] Given the Dominguez Water Company's ability to serve the site at buildout, in conjunction with programmed infrastructure improvements, development of the proposed project is not expected to result in significant impacts to water service.

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75 *Tait & Associates, Inc., May 20, 1996.*

76 *Lot No. 22 is located adjacent to both DWP and Dominguez Water Company service areas and could therefore be served by either supplier. (Source: Tait & Associates, Inc., August 1996).*

77 *Tait & Associates, Inc., May 20, 1996.*

BOE-C6-0115412

Table 34

PROJECTED WATER CONSUMPTION FOR HARBOR GATEWAY CENTER

Site Use	Square Footage	Consumption Factor[a] (gpd/1,000 sq.ft.)	Daily Consumption (gpd)	Annual Consumption (million gal/yr)
Area 1				
Restaurant	30,000	1,100	33,000	12.0
Retail[b]	420,000	360	151,200	55.2
Total	450,000	N/A	184,200	67.2
Area 2				
Office	507,000	220	111,540	40.7
Industrial Park[c]	2,010,700	220	442,354	161.5
Total	2,517,700	N/A	553,894	202.2
Project Total	**2,967,700**	**N/A**	**738,094**	**269.4**
Existing Uses	2,418,938	N/A	N/A	6.0[d]
Net Increase	**548,762**	**N/A**	**N/A**	**263.4**

[a] *Water consumption factors obtained by applying approximately 110% to wastewater generation rates provided by Sanitation Districts of Los Angeles County, 1994-1995.*

[b] *Retail use includes 65,000 square foot motion picture theater complex. Consumption factor for shopping center use.*

[c] *Consumption factor for manufacturing use.*

[d] *Actual water consumption for 1995; Source: McDonnell Douglas Realty Company.*

In addition, should reclaimed water infrastructure be extended into the project area, the project is expected to develop internal infrastructure which would allow use of reclaimed water for landscape irrigation. In this case, the estimates of water consumption indicated above would be reduced and a beneficial impact with respect to water consumption would result.

BOE-C6-0115413

3. MITIGATION MEASURES

Although development of the Harbor Gateway Center is not expected to produce significant impacts to water supply services, the following measures will ensure that water resources will be conserved to the extent feasible:

1. The proposed project users and occupants shall adhere to all applicable Los Angeles Department of Water and Power (DWP) and Dominguez Water Company rules and regulations. All necessary infrastructure improvements shall be constructed to meet the requirements of the DWP and the Dominguez Water Company.

2. Proposed projects shall comply with all applicable sections of the City of Los Angeles Water Conservation Ordinance (Ordinance No. 166,080). Specifically, no hose washing of roadways, paved parking areas, and walkways shall be allowed.

3. The proposed project shall comply with the City's Water Conservation Regulations defined in Ordinance No. 165,004, including installation of low-flow toilets and plumbing fixtures that prevent water loss. Also, plants selected for landscaping shall comply with xeriscape (low maintenance, drought-resistant) requirements.

4. Users shall be responsible for obtaining any required Industrial Wastewater Discharge permits required by Sanitation Districts of Los Angeles County (SDLAC).

5. The project shall comply with the provisions contained in City Landscape Ordinance No. 170,978, including water conservation measures for landscaping.

The following specific measures are recommended by the DWP to minimize on-site water consumption:

6. Automatic sprinklers should be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. However, care must be taken to reset sprinklers to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.

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7. Reclaimed water should be investigated as a source to irrigate large landscaped areas.

8. Selection of drought-tolerant, low water consuming plant varieties should be used to reduce irrigation water consumption. For a list of these plant varieties, refer to Sunset Magazine, October 1976, "Good Looking - Unthirsty," pp. 78-85, or consult a landscape architect.

9. Recirculating hot water systems can reduce water waste in long piping systems where water must be run for considerable periods before hot water is received at the outlet.

10. Lower-volume water closets and water-saving shower heads must be installed in new construction and when remodeling.

11. Plumbing fixtures should be selected which reduce potential water loss from leakage due to excessive wear of washers.

4. ADVERSE EFFECTS

The project would consume an estimated 269.4 million gallons of water per year, resulting in an annual net increase of 263.4 million gallons. No adverse effects with respect to water service are anticipated to result from development of the proposed Harbor Gateway Center project.

5. CUMULATIVE IMPACTS

Currently planned development in the area (see Table 5 on pages 83 through 86), in combination with the proposed project, would consume an estimated 2.99 million gallons of water per day (see Appendix E for calculations). The ability of the DWP and the Dominguez Water Company to meet future demand will depend in part upon future water supplies and the implementation of water conservation and reclamation efforts. Based on its current projections through the year 2015, the DWP expects to be able to meet future needs.[78] In addition,

[78] *City of Los Angeles Department of Water and Power, Urban Water Management Plan for the City of Los Angeles, November 1995.*

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existing redundancy within the DWP water service system, the oversizing of many supply lines,[79] and project-by-project mitigation to provide improvements where necessary would limit impacts to infrastructure. The Dominguez Water Company also anticipates meeting future demand, particularly with the introduction of reclaimed water in parts of its service area. It is likely that additional Dominguez Water Company infrastructure will eventually be necessary, however this is the responsibility of the Dominguez Water Company and is planned for in future projections.[80] Thus, cumulative demand resulting from development of the related projects would not be expected to exceed water service capabilities. No significant impacts to DWP or Dominguez Water Company water supplies or conveyance infrastructure are anticipated.

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79 *Information derived from the City of Los Angeles General Plan Framework Environmental Impact Report, page 2.6-23.*

80 *Telephone conversation with John Foth, Manager of Construction, Dominguez Water Corporation, May 24, 1996.*

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1. ENVIRONMENTAL SETTING

Wastewater generated at the McDonnell Douglas property is treated by the Sanitation Districts of Los Angeles County (SDLAC).[81] The main sewer lines that serve the project site vicinity include the District No. 5 Interceptor Trunk Sewer, which ranges in diameter from 63 to 66 inches, and an adjacent 57-inch line, both located in a 15-foot wide easement in Normandie Avenue. Please refer to Figure 31 on page 278, for an illustration of existing (and proposed) local sewer lines. The SDLAC plans to close both the District No. 5 Interceptor Trunk Sewer and the 57-inch line in 1997; no new connections are allowed, however existing connections can be used by new developments. Plans for existing connections have not yet been determined. In addition, the SDLAC is not permitting any new connections to a 90-inch line in Western Avenue.[82]

The 21-inch 203rd Street Trunk Sewer is located in a 20-foot easement on the westerly and southerly edges of the project site. One on-site and three off-site lines connect to this trunk sewer line. As measured in July 1994, this line operates with a peak flow of 0.9 million gallons per day and has a peak capacity of 3.2 mgd. Additional existing sewer lines in the project site vicinity include an 8-inch line located on-site, just south of 190th Street. This line is privately owned and serves the McDonnell Douglas property.[83]

Discharge of wastewater to the conveyance and treatment system operated by the SDLAC is regulated by a permitting system operated by the SDLAC. Sewer discharge at the McDonnell Douglas site is currently entitled by Industrial Wastewater Discharge Permit Nos. 799 and 800, issued in 1975 and 1976, respectively, by the SDLAC. Permit No. 800 was reapproved in 1991. These permits authorize a combined discharge of 1896.44 sewer capacity units per day, roughly equivalent to the site's baseline flow of 660,285 gpd, as redefined in 1991. This translates to approximately 241.0 million gallons annually. Sewage flows recorded

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81 *The City of Los Angeles contracts with the County of Los Angeles to service areas of the City not covered by the City's wastewater conveyance and treatment systems.*

82 *Tait & Associates, Inc., May 20, 1996.*

83 *Tait & Associates, Inc., May 20, 1996.*

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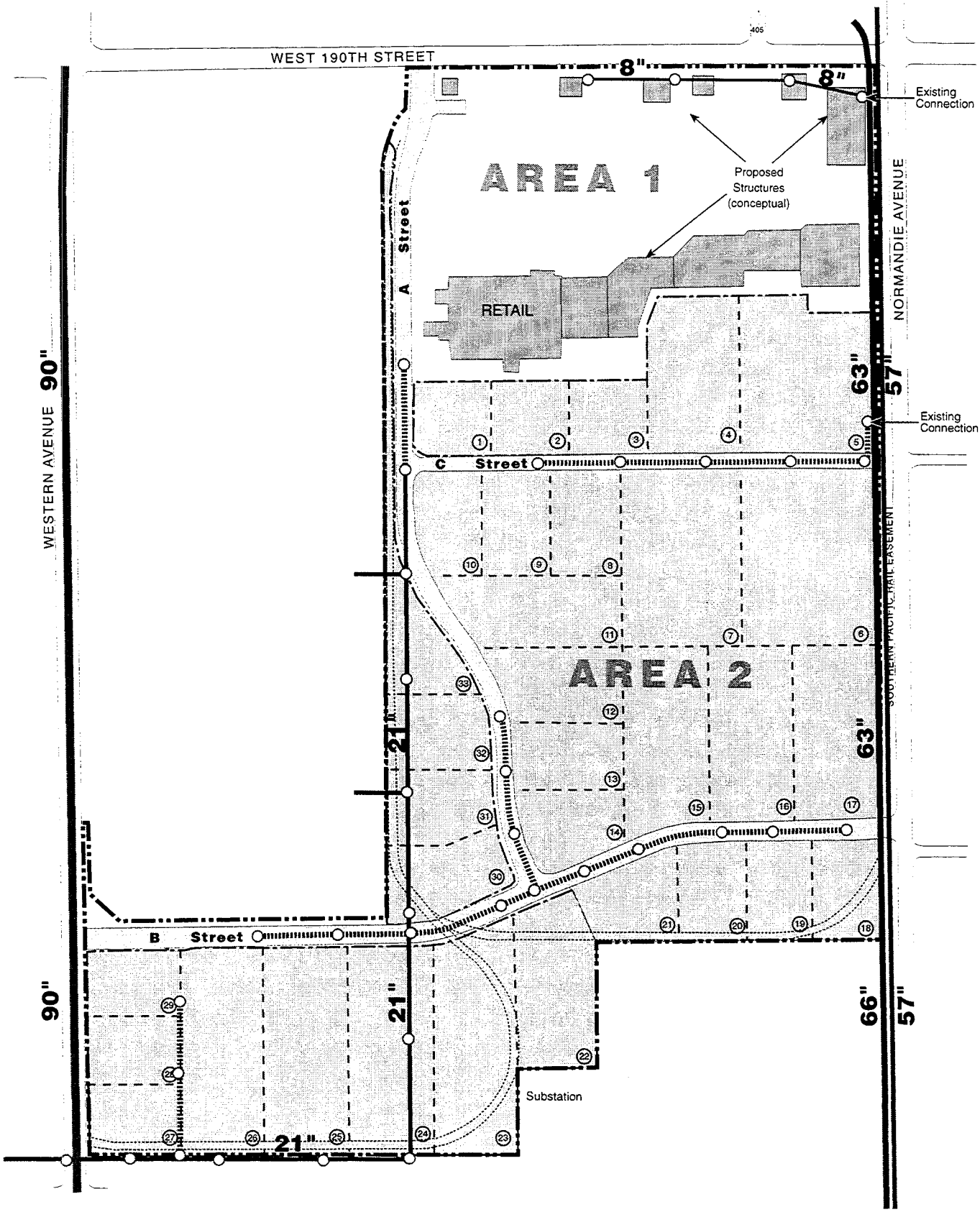

SOURCE: Tait & Associates, Inc.

Planning Consultants Research

Site Boundary
Parcel Number
Existing Sewer Lines
Proposed Sewer Lines
Manhole

N

0 200 400 feet

Figure 31
Existing and Proposed Sewer System

in 1993 and 1994, however, decreased to approximately 100 million gallons and 30 million gallons, respectively.[84] Current wastewater generation at the McDonnell Douglas property is estimated at 6.6 million gallons per year.[85]

Wastewater generated on-site is conveyed to the Joint Water Pollution Control Plant (JWPCP), located in the City of Carson and operated by the SDLAC. The JWPCP currently treats an average flow of 331 mgd and has a design capacity of 385 mgd, of which 64.6 mgd are allotted for wastewater generated by the City of Los Angeles. City flows treated at this facility receive only primary treatment, whereas 200 mgd of County flows undergo primary and secondary treatment processes.[86]

2. PROJECT IMPACTS

A significant impact on sanitary sewer systems would occur if development of the proposed Harbor Gateway Center project results in wastewater generation that exceeds the capacity of existing or planned wastewater conveyance systems or wastewater treatment facilities that serve the site, resulting in an unmet need for additional facilities in order to provide adequate levels of service.

Project-related wastewater generation was calculated using generation factors based on land use and building square footage, as provided by the SDLAC. The estimated net increase in generation was analyzed relative to infrastructure and treatment plant capacity, as well as improvements in sewer infrastructure proposed as part of the project.

The proposed project is anticipated to generate approximately 670,040 gpd of wastewater, or 244.6 million gallons annually. As shown on Table 35 on page 280, annual on-site generation in 1995 was estimated at 5.5 million gallons. Thus, the net increase in wastewater generation would be approximately 239.1 million gallons per year. However, given the site's existing entitlement from the SDLAC to discharge approximately 241.0 million gallons of wastewater per year to the SDLAC's system, as discussed above, estimated project flows represent only a slight increase. The discharge entitlement is held by the project owner (the

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84 *Telephone conversation with Alicia Jauregui, Permit Engineer, Industrial Waste Section, Sanitation Districts of Los Angeles County, June 5, 1996.*

85 *Estimated wastewater generation determined by dividing actual water consumption for 1995 by 110%; McDonnell Douglas Realty Company.*

86 *Los Angeles Citywide General Plan Framework Environmental Impact Report, page 2.5-15.*

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Table 35

PROJECTED WASTEWATER GENERATION FOR HARBOR GATEWAY CENTER

Site Use	Square Footage	Generation Factor[a] (gpd/1,000 sq.ft.)	Daily Generation (gpd)	Annual Generation (million gal/yr)
Area 1				
Restaurant	30,000	1,000	30,000	11.0
Retail[b]	450,000	325	136,500	49.8
Total	480,000	N/A	166,500	60.8
Area 2				
Office	507,000	200	101,400	37.0
Industrial Park[c]	2,010,700	200	402,140	146.8
Total	2,517,000	N/A	503,540	183.8
Project Total	**2,967,700**	**N/A**	**679,790**	**244.6**
Existing Uses	2,418,938	N/A	N/A	5.5[d]
Net Increase	**548,762**	**N/A**	**N/A**	**239.1**

[a] *Generation factor source: Sanitation Districts of Los Angeles County, 1994-1995.*

[b] *Retail use includes 65,000 square foot motion picture theater complex. Generation factor for shopping center use.*

[c] *Generation factor for manufacturing use.*

[d] *Wastewater generation estimated by dividing actual water consumption for 1995 by 110%. The retail generation factor was rounded to 325 gpd/1,000 sq.ft.*

Applicant) and can be transferred to other users at the holder's discretion. Under SDLAC procedures, discharge can exceed entitlement by up to 25% before additional units must be purchased. Furthermore, the existing Industrial Wastewater Discharge Permits would not apply to the commercial uses proposed as part of the Harbor Gateway Center. Proposed industrial park uses on-site are expected to generate wastewater flows within the amounts set in the existing permits.

On-site sewer system improvements are proposed for the Harbor Gateway Center. Please refer to Figure 31 on page 278. An existing line, currently connecting to the 203rd

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Street Trunk Sewer and partially located in the roadway that will become "A" Street, would be extended, and new sewer lines in "B" Street and along lot 26 would connect to the 203rd Street line. A new line in "C" Street would use an existing connection to the 63/66-inch Normandie Avenue sewer line. The 8-inch sewer line located on-site just south of 190th Street would serve Area 1, also utilizing an existing connection to the Normandie Avenue line. Project sewage would continue to flow to the Joint Water Pollution Control Plant for treatment, which has adequate capacity to accommodate the increased wastewater flows.[87] Thus, development of the proposed project is not expected to result in significant impacts with respect to sewer service.

3. MITIGATION MEASURES

The Harbor Gateway Center is not expected to produce significant impacts to sewer service; however, the following measures will ensure that wastewater generation will be reduced to the maximum extent feasible:

1. Individual projects proposed as part of the Harbor Gateway Center shall apply for all required Sanitation Districts of Los Angeles County (SDLAC) permits, including Industrial Wastewater Discharge Permits.
2. All necessary infrastructure improvements shall be constructed to meet the requirements of the SDLAC.
3. The proposed project shall comply with all provisions of Ordinance No. 162,532, which reduces water consumption levels, thereby restricting wastewater flows. Water saving devices to be installed shall include low-flow toilets and plumbing fixtures that prevent water loss.

4. ADVERSE EFFECTS

The project would generate an estimated 680,000 gallons of sewage per day, or 244.6 million gallons of sewage per year, resulting in an annual net increase of 239.1 million gallons. This would incrementally add to the sewage generated by development in the project area, and create additional impact to the existing wastewater treatment plants.

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87 *Tait & Associates, Inc., April 29, 1996, and telephone conversation May 23, 1996.*

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5. CUMULATIVE IMPACTS

Currently planned development in the area (see Table 5 on pages 83 through 86), in combination with the proposed project, would generate an estimated 2.72 million gallons of wastewater per day (see Appendix G for calculations). This would incrementally increase the amount of sewage generated by existing development in the project area and increase impacts to existing wastewater treatment plants. Significant impacts could occur if the future cumulative level of development results in wastewater generation that exceeds system capacity. However, conveyance infrastructure in the project locale has been estimated to be able to accommodate the sewage generated by the related projects. The Joint Water Pollution Control Plant also has the capacity to serve projected future needs. Therefore, no significant impacts to sewer services resulting from cumulative development are expected.

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1. ENVIRONMENTAL SETTING

Within the City of Los Angeles, solid waste generated by commercial and industrial sources is collected by private contractors; residential refuse is generally collected by the City's Bureau of Sanitation. Waste disposal sites are operated by the City and County, as well as by private hauling companies; however, landfill capacity in the County is extremely limited. To address solid waste disposal solutions, the City of Los Angeles, the Los Angeles County Department of Public Works, and the Sanitation Districts of Los Angeles County jointly developed the County Solid Waste Management Action Plan (MAP), which was adopted in April 1988. As an integrated regional approach to managing solid waste, the MAP incorporates source reduction, recycling, and composting programs, along with public education awareness programs, in order to meet the requirements of the California Integrated Waste Management Act of 1989 (AB 939). AB 939 mandated 25% diversion of all solid waste from landfill disposal by 1995 through the implementation of waste reduction, reuse, and recycling programs, and requires 50% diversion by the year 2000.

As part of the effort to attain the AB 939 mandated and MAP goal of a County-wide 15-year disposal capacity, the SDLAC is currently examining the feasibility of a new landfill site and the implementation of a waste-by-rail system. The proposed disposal site, the Elsmere Canyon Landfill, will potentially cover 1,500 acres, with a total fill capacity of 190 million tons.[88] In addition, the SDLAC is proposing expansion of the Chiquita Canyon, Sunshine Canyon, and Puente Hills Landfills. The SDLAC is also examining a waste-by-rail system which would transport residual waste from the Puente Hills Landfill to remote landfills in and outside of the State.[89]

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88 *Source: Sanitation Districts of Los Angeles County Ad Hoc Committee on Waste-By-Rail, Report on Waste-By-Rail, December 1991.*

89 *Source: Sanitation District No. 2 of Los Angeles County, Notice of Preparation on the Draft EIR for an Intermodal Facility and a Waste-By-Rail Disposal System originating from the Puente Hills Materials Recovery Facility.*

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Solid waste generated at the McDonnell Douglas property is currently estimated at 2,207.3 tons per year. The site's solid waste is collected by Western Waste, a private contractor, and is generally disposed of at the Bradley West Landfill, a Class III landfill located in Sun Valley and privately operated by Waste Management, Inc. Bradley West currently operates at an annual capacity of approximately 2.19 million tons. The facility has a remaining capacity of approximately 7.5 million tons and an estimated remaining useful life of 11 years. Other landfills used by the City of Los Angeles, listed on Table 36 below, are also available to the site.[90]

Table 36

EXISTING LANDFILLS AVAILABLE TO NON-RESIDENTIAL FACILITIES IN THE CITY OF LOS ANGELES
(millions of tons)

Site	Location	Annual Capacity[a]	Annual Disposal[b]	Remaining Capacity	Permit Exp. Date
Azusa Land Reclamation	Azusa	1.88	0.41	3.09	1997[c]
BKK	West Covina	3.76	3.03	2.65	1996[d]
Bradley West[e]	Sun Valley	2.19	1.40	7.51	2007
Chiquita Canyon	Val Verde	1.83	0.46	1.85	1997

[a] *Annual capacity as of January 1996.*

[b] *Annual disposal of municipal solid waste in 1995.*

[c] *Landfill scheduled to close pending legal settlement.*

[d] *Landfill scheduled to close per legal settlement.*

[e] *Landfill site presently being used by Western Waste, which serves the project site.*

Source: Los Angeles County Department of Public Works, Environmental Programs Division, Preliminary Draft Los Angeles County Countywide Siting Element, January 1996.

[90] *Los Angeles County Department of Public Works, Environmental Programs Division, Preliminary Draft Los Angeles County Countywide Siting Element, January 1996.*

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2. PROJECT IMPACTS

Solid waste to be generated by the Harbor Gateway Center was estimated using generation rates based on land use and building square footage, as provided by the SDLAC. Consideration was given to the waste diversion measures to be included in the project design in order to establish a net waste figure. Project-related waste generation was evaluated relative to the capacity of landfill(s) serving the site in order to determine whether the proposed project's needs could be adequately met.

The proposed Harbor Gateway Center project would result in a significant impact on solid waste disposal facilities if, in conjunction with other projects served by regional landfills, waste generation (after implementation of diversion methods) would reduce the lifespan of existing or proposed landfills serving the site.

Construction of the proposed project would involve the demolition of approximately 2.4 million square feet of existing buildings located on-site. One-time hauling and disposal of demolition debris would therefore be required during construction, pursuant to an approved haul route and dump site. In addition, any earth moved off-site during grading would require one-time hauling and disposal, pursuant to an approved haul route and dump site. However, as discussed in Section IV.A., Earth, over 400,000 cubic yards of earth materials would be imported on-site during grading.

Operation of the Harbor Gateway Center is estimated to generate an estimated 132,311 pounds of refuse per day, as shown in Table 37 on page 286. This translates to approximately 24,146.9 tons per year. The net increase in annual waste generation is estimated at 21,939.6 tons per year.

The estimated net increase in on-site waste generation would constitute approximately 0.5 percent of the 4.7 million tons of total solid waste (before diversion) generated within the City of Los Àngeles annually and disposed of daily at major landfills in the region. Any reduction in the lifespan of landfills serving the region is considered significant because of the ongoing shortage of regional landfill capacity. Project impacts are therefore considered significant. Solid waste generated by the proposed project would continue to be collected by Western Waste or another private hauler.

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Table 37

PROJECTED SOLID WASTE GENERATION FOR HARBOR GATEWAY CENTER

Site Use	Square Footage	Generation Factor[a] (lbs/1,000 sq.ft./day)	Daily Generation (lbs/day)	Annual Generation (tons/yr)
Area 1				
Restaurant	30,000	50.0	1,500	273.8
Retail[b]	420,000	5.0	2,100	383.3
Total	450,000	N/A	3,600	657.1
Area 2				
Office	507,000	6.0	3,042	555.2
Industrial Park	2,010,700	62.5	125,669	22,934.6
Total	2,517,000	N/A	128,711	23,489.8
Project Total	**2,967,700**	**N/A**	**132,311**	**24,146.9**
Existing Uses	2,418,938	5.0[c]	12,095	2,207.3[d]
Net Increase	**548,762**	**N/A**	**N/A**	**21,939.6**

[a] *Generation factor source: City of Los Angeles Bureau of Sanitation, "Solid Waste Generation," 1981.*

[b] *Retail use includes 65,000 square foot motion picture theater complex.*

[c] *Generation factor for storage (manufacturing) use.*

[d] *Estimated solid waste generation based on existing uses.*

3. MITIGATION MEASURES

Waste management practices conducted by the project occupants can effectively reduce the quantity of solid waste that needs to be collected and disposed of at area landfills. The following measures have been established to achieve waste reduction goals:

1. Trash compaction facilities shall be provided in all occupied structures, where deemed necessary and feasible.

2. To the extent feasible, one or more of the following yard waste management techniques shall be incorporated into the maintenance of the project:

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- Planting drought tolerant plants so as to minimize yard waste.
- Mulching and grass recycling.
- Composting of regular landscape maintenance waste where appropriate.

3. Prior to approval of demolition permits, the project sponsor shall be required to demonstrate how demolition debris will be salvaged and recycled in a manner that is practical, available, and assessable during the demolition phase. The project sponsor shall develop explicit language that clearly sets the requirements for a demolition debris recycling plan. The Integrated Solid Waste Management Office (ISWMO) will provide model specification language for project sponsor's use, which includes a format for developing a Solid Waste and Resources Action Plan.

4. Prior to approval of building permits, the project sponsor shall be required to demonstrate how construction debris will be recycled in a manner that is practical, available, and accessible during the construction phase. The project sponsor shall develop explicit language in the contractor proposal that clearly spells out the requirements for implementing a construction debris recycling plan. ISWMO shall provide model specification language for project sponsor's use, which includes a format for developing a Solid Waste and Resources Action Plan.

5. Prior to approval of building permits, the project sponsor shall submit to the ISWMO a statement detailing the use of recycled materials in building materials, furnishing, operations, and maintenance of the project complex including grounds. The project developer shall maximize the employment of recycled content materials though construction and landscaping application that meet all approved local codes. ISWMO shall provide a summary format for the materials usage statement.

4. ADVERSE EFFECTS

The project would generate an estimated 24,000 tons of solid waste per year, resulting in an annual net increase of 22,000 tons. No adverse effects with respect to solid waste disposal service are anticipated to result from development of the proposed Harbor Gateway Center project. The recommended mitigation measures would reduce on-site waste generation to the extent feasible. However, because of the current shortage of available landfill capacity in the Southern California region, the project's impact to regional landfills is considered significant.

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5. CUMULATIVE IMPACTS

Currently planned development in the area (see Table 5 on pages 83 through 86), in combination with the proposed project, would generate an estimated 167 tons of solid waste per day (see Appendix G for calculations). Los Angeles County has projected that, due to the implementation of AB 939 (requiring a 50 percent diversion of solid waste by the year 2000), the levels of solid waste to be generated in the first few years after 2000 will increase only slightly over those levels currently produced. By then it is expected that most of the existing landfills will be at capacity and that some additional local and regional landfills will have been developed to meet the increased demand. The need to identify future disposal areas is a Citywide and County-wide problem. Because of the limited capacity of area landfills, any project which generates additional solid waste would create a significant cumulative impact. Waste diversion requirements will therefore be strictly enforced, and projects will be evaluated on a case-by-case basis.

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The discussion contained in this section is based upon the findings of a series of environmental investigations that have been conducted on the project site. The investigations that form the basis for the analysis of impacts related to existing on-site contamination issues include the following:

- Report of Technical Documents Review and Groundwater Sampling, prepared by Kennedy/Jenks/Chilton, dated June 12, 1991.
- Phase I Environmental Assessment: Parcel A, prepared by Kennedy/Jenks Consultants, June 1996.
- Phase I Environmental Assessment: Parcel B, prepared by Kennedy/Jenks Consultants, June 1996.
- Phase I Environmental Assessment: Parcel C, prepared by Kennedy/Jenks Consultants, June 1996.
- Executive Summary, Phase II Subsurface Investigation: Parcel A, prepared by Kennedy/Jenks Consultants, June 1996.
- Prioritization Asbestos Assessment Study, prepared by Hall-Kimbrell Environmental Services, Inc., February 9, 1990.

The text of each of these reports is included in Appendix H.

1. ENVIRONMENTAL SETTING

a. Soil and Groundwater Contamination

(1) Phase 1 and 2 Environmental Site Assessments

(a) Area 1

Kennedy/Jenks Consultants prepared two separate Phase 1 environmental assessments covering all of Area 1. The first, completed in June 1996, covered the majority of Area 1 (an area referred to as Parcel A in the Kennedy/Jenks study). The second, also completed in June

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1996, covered the remainder of Area 1 (which includes a portion of an area referred to as Parcel B), including part of the surface parking lot at the western end of the project site and the area around Building 32. The purpose of the studies was to identify operations and activities which present the potential for releases of chemicals to soil or groundwater in Area 1 through the review of the history of the project site and available public records and a walk-through tour of the property. The approximate boundaries of the two Kennedy/Jenks studies within Area 1 are shown on Figure 32 on page 291.

The two evaluations identified portions of Area 1 that could have experienced releases with the potential to impact surrounding soils. The areas of interest in Parcel A included: (1) a three-stage clarifier in Building 29 and three underground storage tanks (USTs) noted in historical drawings as being in operation around Building 29 in 1945 (no record of removal of the tanks exists); (2) cyanide storage in Building 33; (3) a concrete patch on the north side of Building 34 that represents the former location of clarifiers; (4) machine pits, coolant collection sumps, a solvent tank, and a butylene line noted on historical facility drawings in Building 37; (5) two hydraulically-powered elevators and a collection sump noted on historical drawings in Building 61; (6) a machine pit, a clarifier, a process line room, sewer lines, and oil stained floors and floor drains in Building 67; and (7) clarifiers, existing above ground storage tanks (ASTs), underground fuel lines, and a former rail car transfer station observed during the site walk-throughs or found on McDonnell Douglas inventories. Within these seven areas, 17 specific locations were identified for further investigation. Areas of interest in Parcel B included a three stage clarifier and hydraulic lifts in Building 20.

A Phase II investigation of Parcel A was conducted to further evaluate the areas of environmental interest suggested during the Parcel A Phase I investigation. This investigation included subsurface soil sampling, monitoring for soil vapors during sampling, logging of soil types, and laboratory analysis for potential chemicals of interest.

The Phase II investigation examined in detail each of the 17 locations in Parcels A and B that were identified in the Phase I Environmental Site Assessment as being of potential environmental interest. Of the 17 locations studied, 13 were found to have no contamination exceeding regulatory action levels. Four locations were identified as warranting further monitoring, including:

- **Building 29.** Volatile organic compounds (VOCs) were detected at the former waste accumulation area north of Building 29 to a depth of 25 feet below ground surface (bgs). The highest concentrations of individual VOCs, including 1,1-dichloroethane, 1,1-dichloroethylene, 1,1,1-trichloroethane, 1,1,2-trichloroethane, and trichloroethylene, were all found at a depth of 25 feet below ground surface (bgs).

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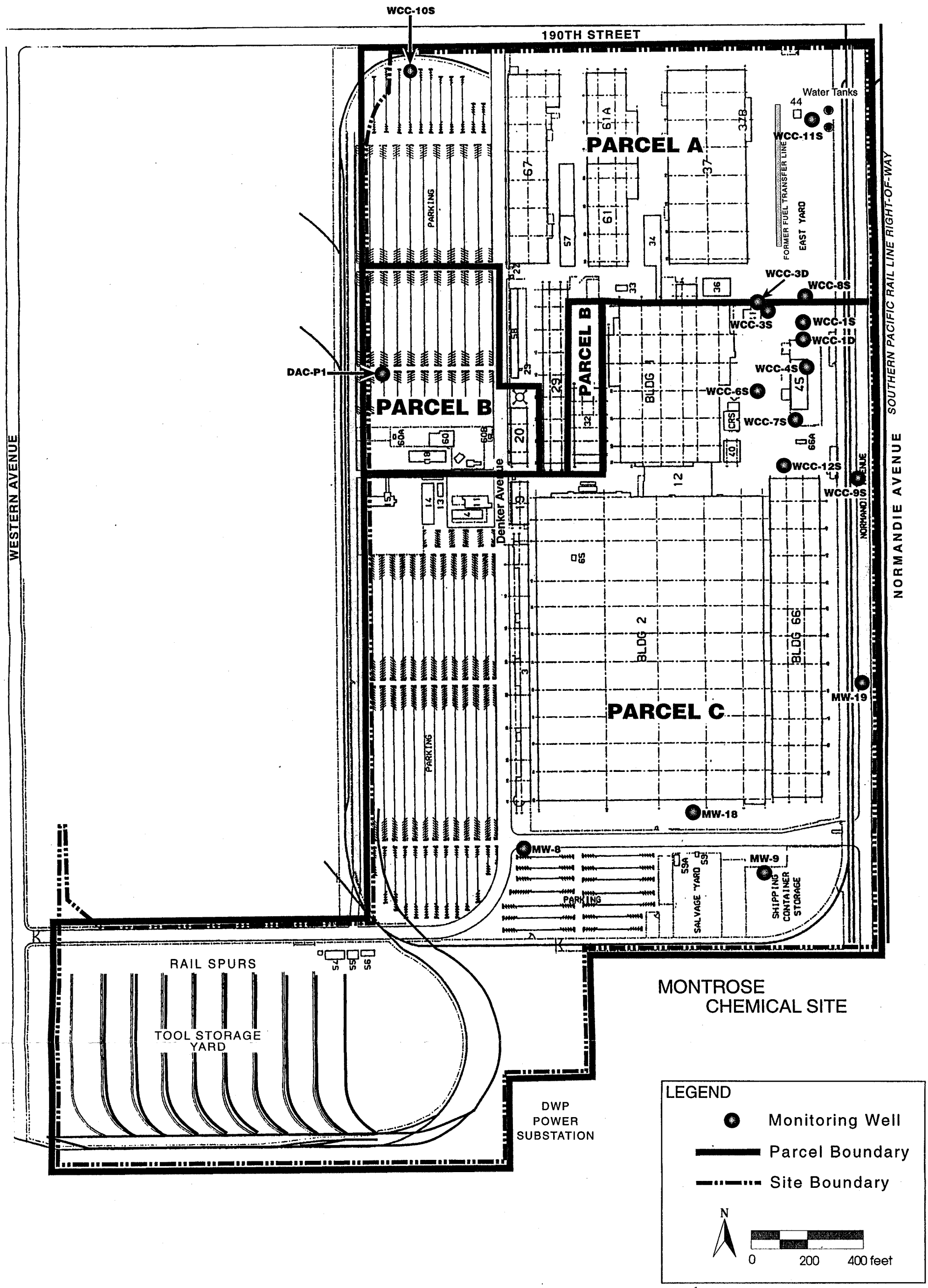

Planning
Consultants
Research

Figure 32
Environmental Site Assessment Boundaries and On-Site Well Monitoring Locations

BOE-C6-0115431

This area was recommended for continued monitoring during demolition activities and possible segregation of soils if removed.

- **Building 36.** VOCs were detected at the clarifier adjacent to Building 36 at 25 feet bgs. The highest concentrations of individual VOCs, including 1,1-dichloroethylene, 1,2-dichloroethylene, and trichlorethylene, were primarily found at 25 feet bgs. Of these compounds, only TCE was detected at shallower sampling levels, although 1,2-dichloroethane was found at 30 ug/Kg in the 10 foot sample. This area is immediately north of an area of previously detected VOCs and may reflect the northwestern extent of an area that originates outside of Parcel A (discussed below).
- **Building 37.** Petroleum hydrocarbons and volatile organic compounds of varying depths and concentrations were found adjacent to several machine pits in Building 37. At machine pit F, concentrations of benzene, ethylbenzene, toluene, and xylenes (BTEX) were found in a 5 foot bgs sample, but not in a 10 foot bgs sample, suggesting that the impact by BTEX does not extend to 10 feet bgs. At machine pit G in the north end of the building, data suggest a small area of limited lateral and vertical petroleum hydrocarbon contamination that the contractor should be aware of during demolition. At machine pit J, data suggest an area of limited vertical and lateral PCB contamination that should be monitored during demolition activities. The area around the southernmost machine pits in the building (O and K) may be impacted with VOCs and should be monitored during demolition activities. Soils may need to be segregated if removed.
- **Building 44.** Petroleum hydrocarbons were detected at a maximum concentration of 200 mg/Kg at 15 feet bgs north of Building 44, near the location of the former fuel transfer line. Hydrocarbons were not detected in the samples from 5, 10, 20 or 25 feet bgs at this location, suggesting a limited vertical extent of impacted soils.

Groundwater samples collected from a network of monitoring wells on the project site, including three in Area 1 (see Figure 32 on page 291), indicate that the shallow zone aquifer at about 60 to 90 feet bgs has been impacted by chlorinated and non-chlorinated volatile organic compounds (VOCs). Concentrations of trichloroethene (TCE) and 1,1-dichloroethene (1,1-DCE) detected in the wells under Area 1 ranged from 35 micrograms per liter (ug/L) to 210 ug/L. Contaminant concentrations in the central portion of Area 1 suggests that groundwater in this area has been impacted by solvent releases from former USTs located between Buildings 1 and 36. Historical data indicate that chloroform is occasionally detected in Well WCC-10S (in the parking lot near the western edge of Area 1) at concentrations slightly above the detection limit of 2 ug/L. Previous subsurface investigations in the employee parking lot at the west end of the Kennedy/Jenks study area suggest that VOCs are migrating onto the property from an off-site source to the west. Data also indicate that 1,1-DCE is periodically detected at Well WCC-11S (near the eastern edge of Area 1) at concentrations ranging from 2 to 5 ug/L.

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The Regional Water Quality Control Board (RWQCB) is expected to be the lead agency for oversight of groundwater remediation on the project site.

(b) Area 2

A Phase I Environmental Site Assessment was also conducted for all of Area 2 (including portions of Parcel B and all of Parcel C in the Kennedy/Jenks studies). This study, completed in June 1996, included a review of historic land uses on-site, review of regulatory databases, and a walk-through inspection of the site. Several areas of environmental interest were identified which relate to past manufacturing processes, hazardous materials use, clarifiers, USTs, ASTs, areas identified on facility drawings, and impacts from adjacent properties.

Based upon this review, the following portions of Area 2 were identified as potentially impacted by releases of hazardous substances: (1) several areas in and around Building 1, including the former location of the chrome recovery system, and the locations of the coolant recovery system, oil filtration system, chemical etching operations, several pits and sumps, a process line consisting of 12 dip tanks, empty process tanks in the eastern portion of the building, a process line in an closed area between Buildings 1 and 2; (2) several areas in and around Building 2, including a degreasing area, the locations of clarifiers, machine pits, former metal treating tanks and chemical storage areas, numerous pits and sumps noted on floor plans for a 1953 building renovation, approximately 43 empty dip and plating tanks, the sites of former USTs located between Buildings 2 and 29, fuel transfer lines between Buildings 2 and 20; (3) locations in and near Buildings 3, 15, 41, 45, and 66-1, including the sites of a maintenance building, floor drains, clarifiers, a cyanide storage building, and an area of dark-stained concrete; and (4) areas of dark stained asphalt in the storage area near the southern boundary of the project site.

As with Area 1, the network of monitoring wells in Area 2 indicates that the shallow zone aquifer at approximately 60 to 90 feet bgs has been impacted by chlorinated and non-chlorinated VOCs. Particularly affected are wells WCC-6S near the central western exterior of Building 1 and WCC-3S near the northeast corner of Building 1. The source of this contamination is believed to be the underground storage tanks that were previously located between Buildings 1 and 36 discussed earlier (see page 292).

The project site is located within one-quarter mile of two EPA Superfund sites, one of which is the former Montrose Chemical Company property immediately south of the southwest corner of Area 2. Elevated concentrations of chloroform and chlorobenzene have been detected

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in a monitoring well (MW-9) installed near the southern boundary of Area 2. These chemicals are believed to have originated on the Montrose property, as discussed below.

(2) Contamination from Montrose Chemical Company Site

The project site is located immediately north of the Montrose Chemical Company property, which is the subject of a Remedial Investigation (RI) being conducted at the direction of the U.S. Environmental Protection Agency (EPA) under Order on Consent, EPA Docket Number 85-04. The Montrose property is the former site of a dichlorodiphenyltrichloroethane (DDT) manufacturing plant that was operated by Montrose from approximately 1947 to 1982.

As part of the Montrose RI, several shallow groundwater monitoring wells were constructed on the McDonnell Douglas property, samples from some of which indicated the presence of appreciable concentrations of chloroform and chlorobenzene. Because the source of these contaminants was called into question, McDonnell Douglas retained Kennedy/Jenks/ Chilton to undertake a study to determine the source of contamination on the McDonnell Douglas property in 1991. The findings of that study, entitled *Report of Technical Documents Review and Groundwater Sampling*, are summarized below.

According to the Kennedy/Jenks/Chilton report, possible sources for the chloroform and chlorobenzene found in monitoring wells in the southeast portion of the McDonnell Douglas site include: (1) the former railroad tank car off-loading areas in the northeastern and southeastern portions of the Montrose property; and (2) the wastewater settling pond formerly located in the north-central portion of the Montrose property.

In the former railroad tank car off-loading area, tank cars containing the raw materials for DDT production were spotted and their contents were transferred to on-site above-ground tanks. Such operations often result in some spillage of the liquids being transferred, particularly during the disconnection of hoses and manipulation of tank car valves. The principal raw material for DDT production, a mixture of chlorobenzene and chloral, was received at the Montrose site in bulk deliveries for many years. This mixture also contained about 0.1 to 0.2 percent chloroform by weight. Historical aerial photographs of the Montrose site confirm that the area where tank car bulk transfer operations occurred was unpaved for much of the operational life of the Montrose facility. Thus, that area is regarded as a location where substantial quantities of chlorobenzene and chloroform could have been co-released into the subsurface environment.

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The second potential source area, the wastewater settling pond on the Montrose site, is important both as a location of possible chemical discharge and as a potential influence of chemical transport in the subsurface environment. During its years of operation as a DDT production facility, Montrose maintained a runoff and wastewater settling pond in the north-central portion of its property. The pond, which measured about 75 feet by 50 feet by 15 feet deep, received wastewater from Montrose operations and runoff from the central processing area. Prior to 1970, the pond was unlined and served as a settling basin along the main wastewater discharge line from the Montrose plant.

The flow of runoff water into the pond was largely unregulated. Monitoring of the water in the pond was limited to general water quality indicators such as pH and total dissolved solids. Consequently, the types, concentrations, and quantities of organic chemicals discharged into the settling pond were not documented. However, the operational history of the pond suggests that virtually any of the chemicals used in the DDT production process could have entered the water received by the pond.

Because the potential for low pH water to enter nearby sewer lines was of concern to regulatory agencies, the pH of the water discharged from the Montrose facility through the pond was reportedly checked and neutralized or raised above 7.0. Particularly under alkaline conditions, chloral, a major raw material used by Montrose, can transform to chloroform, a reaction called chloral hydrolysis. Such a reaction could have occurred at the Montrose facility either during the caustic DDT wash or, if chloral was released at or near the storage areas, in the subsurface environment. Even at near neutral conditions, chloral hydrolysis could occur in a time frame encompassing decades (the Montrose facility was in operation for about 35 years).

Monitoring Well MW-09 (the well on the McDonnell Douglas property found to have the highest concentrations of chlorobenzene and chloroform) lies hydraulically upgradient from both the tank car off-loading area and the wastewater settling pond on the Montrose site. Because this raises questions regarding the subsurface chemical transport mechanisms that might account for the presence of chlorobenzene and chloroform in groundwater some 230 feet upgradient from the Montrose property line, a model that would explain the upgradient movement of groundwater was developed by Kennedy/Jenks/Chilton. Consideration of various site-specific factors provided a reasonable and logical transport model that would account for the presence of chemical contaminants upgradient from the discharge areas. In such a model,

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chemicals would migrate upgradient through either: (1) spreading and structural north (upgradient) flowing groundwater conditions; or (2) a combination of these phenomena.[91]

In order to test this chemical transport model, Kennedy/Jenks/Chilton sampled 15 monitoring wells at and near the Montrose site and analyzed groundwater samples for the presence of, among other things, para-chlorobenzenesulfonic acid (p-CBSA), a synthesis by-product unique to DDT production. The chemical was detected in the groundwater sample from Monitoring Well MW-09 on the McDonnell Douglas site, thereby indicating that wastes associated with DDT production on the Montrose site have migrated upgradient. In addition, chloroform was detected in a sample from Monitoring Well MW-2, which is located on the Montrose property at the approximate location of the wastewater settling pond. This finding provides further evidence that the Montrose site is the source of chloroform in shallow groundwater underneath the McDonnell Douglas property. The analysis summarized above was submitted to and accepted by the EPA in June 1991.

b. Asbestos Issues

(1) On-Site Asbestos

Once referred to as the miracle mineral, asbestos has been used as a reinforcement fiber for more than 3,000 years. Because of its acoustical and tensile qualities, resistance to fire and chemicals, and relative abundance, the fiber has been used extensively in building materials since the 19th century.

Inhalation of asbestos has, however, been found to pose a health hazard for humans. For this reason, many building owners are currently attempting to identify any asbestos containing materials (ACMs) in their buildings. In 1990, McDonnell Douglas retained Hall-Kimbrell Environmental Services, Inc. to conduct a survey of on-site structures to determine whether ACMs were present. Overall, 26 of the 36 existing buildings on the project site that were surveyed have some ACMs.[92]

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91 *A detailed description of local hydrogeologic conditions that explains how chemicals from the Montrose site could have migrated northward is included in the "Report of Technical Documents Review and Groundwater Sampling," prepared for the McDonnell Douglas Corporation by Kennedy/Jenks/Chilton and included in Appendix F.*

92 *Structures containing ACMs include Buildings 1, 2, 3, 4, 11, 13, 14, 15, 19, 20, 23, 27, 29, 34, 36, 37, 37A, 37B, 40, 41, 54, 57, 58, 60, 60B, 61, 66A, and 67.*

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(2) Regulation of ACM Removal

South Coast Air Quality Management District (SCAQMD) Rule 1403 specifies work practice requirements to limit asbestos emissions associated with building demolition and renovation. Emissions of asbestos to outside air are to be prevented through several requirements, as summarized below:

- Implementation of a thorough survey of the affected facility prior to any demolition or renovation activity, including inspection, identification, and quantification of all friable and certain non-friable ACMs;
- Notification of the SCAQMD of the intent to demolish or renovate any facility at least 10 days prior to commencing with the activity;
- Removal of all ACMs prior to any demolition or renovation activity that would break up, dislodge, or similarly disturb the material;
- Use of prescribed procedures when removing or stripping ACMs; and
- Placement of all collected ACM waste materials in leak-tight containers or wrapping.

At least one on-site representative of the contractor removing the ACMs who has successfully completed the Asbestos Abatement Contractor/Supervisor course pursuant to the Asbestos Hazard Emergency Response Act must be present during any stripping, removing, handling, or disturbing of ACMs. In addition, Rule 1403 requires the use of warning labels, signs, and markings to identify any asbestos-related health hazards created by demolition or renovation activity.

2. PROJECT IMPACTS

The analysis of potential health hazards related to on-site soil contamination is based upon the findings of several environmental studies that document current on-site conditions and provide recommendations for further on-site monitoring and/or remediation. These studies are listed at the beginning of this section.

The analysis of hazards related to the removal of ACMs in conjunction with on-site demolition activity is based upon the "Prioritization Asbestos Assessment Study" prepared for the site by Hall-Kimbrell Environmental Services, Inc., dated February 9, 1990.

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Health-related impacts associated with on-site soil contamination are considered significant if any contamination would not be remediated to the satisfaction of regulatory authorities prior to commencing with construction activity on any affected portion of the project site or if on-site construction would preclude or otherwise inhibit ongoing remediation of existing contamination.

Health-related impacts associated with asbestos in on-site buildings are considered significant if demolition activity would not comply with applicable regulations pertaining to the removal of ACMs.

a. Soil and Groundwater Contamination

(1) Area 1

Commencement of grading and construction activity that results in soil disturbance prior to remediation of soil contamination exceeding regulatory action levels would have the potential to cause a release of soil contaminants into the atmosphere. This would pose potential health hazards to current residents, employees, and visitors in the area, as well as to future employees and visitors on the project site. However, no construction activity resulting in soil disturbance would occur on any portion of the site that has not received environmental clearance from the appropriate regulatory agency.

McDonnell Douglas has retained an environmental engineering consultant to investigate potential remediation options for on-site soil contamination. Assessment of conditions in the vicinity of the four buildings within Area 1 found to be of potential concern (Buildings 29, 36, 37, and 44) will be conducted either prior to or in conjunction with construction activity that results in soil disturbance. Data generated by additional assessment may form the basis for a Remediation Plan, if any such Plan is required. Any on-site Remediation Plan would be subject to appropriate regulatory review, approval, and oversight until completed. This activity is outside the scope of the proposed project. The Regional Water Quality Control Board (RWQCB) is expected to be the lead agency with respect to this activity.

Excavation that would be conducted in conjunction with Area 1 construction would not be deep enough to affect groundwater beneath the site. Therefore, no disturbance of existing contaminants in on-site groundwater is anticipated. Remediation of existing conditions of groundwater contamination is outside the scope of the proposed project. However, building locations within Area 1 are not expected to interfere with any future groundwater treatment.

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The remedial action will be undertaken under the guidance of the appropriate regulatory agency (most likely the RWQCB).

Because appropriate remediation of on-site contamination would be undertaken prior to project construction activity resulting in soil disturbance, if such action is found to be necessary, project implementation is not expected to result in any significant health hazards. Assuming that all required remediation programs are implemented to address conditions of on-site contamination, the potential for health hazards related to site soil and groundwater contamination would be substantially reduced as compared to current conditions. Therefore, a long-term benefit to the condition of on-site soils and groundwater would occur and no significant impact to human health is anticipated.

(2) Area 2

As with Area 1, grading and construction activity resulting in soil disturbance prior to proper remediation of soil contamination exceeding regulatory action levels would have the potential to cause a release of soil contaminants into the atmosphere, thereby posing potential health hazards to current and future residents, employees, and visitors in the area. However, no construction activity resulting in soil disturbance would occur on any portion of the site that has not received environmental clearance from the appropriate regulatory agency.

The applicant is currently developing a Phase II work program to further investigate the areas of environmental interest identified in the Phase I Environmental Site Assessment for Area 2 (Parcels B and C). The Phase II study will include subsurface soil sampling, monitoring for soil vapors during sampling, logging of soil types, and laboratory analysis for potential chemicals of interest. Because the Phase II work program will require subsurface sampling in building which are presently occupied, it is not feasible to undertake this activity at this time. If levels of chemicals of concern exceeding regulatory action levels are detected at any locations, appropriate recommendations for monitoring and/or remediation shall be developed. The applicant will fully comply with such recommendations, to be carried out under the cognizance of the appropriate regulatory agency. Remediation activity would be outside the scope of the proposed project.

As with Area 1, excavation that would be conducted in conjunction with Area 2 construction would not be deep enough to affect groundwater beneath the site. Therefore, existing contaminants in groundwater underneath Area 2 would not be disturbed. Remediation of existing groundwater contamination conditions is outside the scope of the proposed project. Building locations within Area 2 are not expected to interfere with any future groundwater

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treatment. Remedial action will be undertaken under the guidance of the appropriate regulatory agency.

Because appropriate remediation programs would be implemented to the satisfaction of the lead agency (most likely the RWQCB) to address on-site contamination prior to undertaking any construction activity resulting in soil disturbance, the potential for health hazards related to contamination of site soils and groundwater would be substantially reduced as compared to current conditions. Therefore, a long-term benefit to the condition of on-site soils and groundwater in Area 2 would occur and no significant impact to human health is anticipated.

b. Asbestos Issues

As discussed in Section IV.K.1.b.(1), 26 buildings on the project site have been found to contain ACMs. Demolition of these structures without first removing friable or potentially friable ACMs could result in the uncontrolled release of asbestos into the air. This would constitute a potentially significant health hazard to on-site employees and visitors, as well as adjacent employees and residents. All ACMs would, however, be removed from each on-site building containing ACMs prior to any demolition activity with the potential to break up, dislodge, or disturb the material, in accordance with the requirements of SCAQMD Rule 1403. In addition, all demolition activity would be conducted in full compliance with all other Rule 1403 requirements related to notification, waste disposal, and training (see Section K.1.b.(2) for a description of Rule 1403 requirements). Full compliance with these regulatory requirements would minimize the potential for an accidental release of asbestos, thereby reducing the potential health hazards associated with demolition activity to a less than significant level.

3. MITIGATION MEASURES

a. Soil and Groundwater Contamination

Appropriate studies, monitoring, and, if necessary, remediation would be expected to be conducted separately from the proposed project, but prior to or in conjunction with construction activity that results in soil disturbance, as discussed above. Nevertheless, the following mitigation measures are included to ensure that all appropriate remediation is fully implemented, prior to or in conjunction with construction activity that results in soil disturbance.

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1. Prior to issuance of grading permits, the applicant shall assess, as appropriate, the areas of continued environmental interest identified in the Subsurface Investigation prepared by Kennedy/Jenks Consultants for the area proposed for retail, restaurant, and theater uses (Parcel A in Appendix H of EIR No. 96-0060), and shall implement to the satisfaction of the appropriate regulatory agency any remediation plan that may be required as a result of the data generated by such assessment.

2. A Phase II subsurface investigation shall be conducted for the area proposed for office and industrial park uses (those portions of Parcels B and C in Appendix H of EIR No. 96-0060, for which areas of environmental interest were identified in the June 1996 Phase I Environmental Assessment). The applicant shall fully implement any recommendations for further assessment and/or remediation activity contained in the Phase II investigation, to the satisfaction of the appropriate regulatory agency.

3. No building permits shall be issued for construction of new structures on any portion of the project site in which soil contamination exceeding regulatory action levels exists until contamination on that portion of the project site affected by such activity is remediated to the satisfaction of the appropriate regulatory agency.

4. Remediation of groundwater contamination having its source in the vicinity of Building 36 shall be undertaken by the applicant separately from the proposed project in coordination with the appropriate regulatory agency. However, on-site development shall be designed and sited so as not to interfere with future groundwater treatment.

5. All underground storage tanks on the project site shall be removed in conformance with State and City of Los Angeles Fire Department regulations.

b. Asbestos Issues

6. All contractors involved in demolition and/or renovation activity on the project site will fully comply with the requirements of SCAQMD Rule 1403, pertaining to the removal of ACMs.

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4. ADVERSE EFFECTS

Full implementation of an appropriate remediation program, as recommended above, is expected to mitigate human health impacts related to soil and groundwater contamination to a less than significant level. With implementation of SCAQMD Rule 1403 requirements, health hazards related to the removal of asbestos from on-site buildings would be reduced to the extent required by existing regulations, which by definition is considered less than significant.

5. CUMULATIVE IMPACTS

Remediation of any significant soil or groundwater contamination on previously or currently developed sites in the area would generally be required prior to redevelopment of the sites. This remediation activity would be expected to result in a long-term improvement in the condition of soils and groundwater in the area, with a consequent reduction in potential human health hazards. Cumulative development would therefore be expected to have an overall positive effect on human health conditions.

Asbestos may be present in buildings targeted for demolition in conjunction with some cumulative development in the area. Unless ACMs are removed prior to demolition, potentially significant cumulative health hazards related to the accidental release of asbestos could occur. However, as with the proposed project, all demolition and renovation activity associated with cumulative development is assumed to be conducted in full compliance with the requirements of SCAQMD Rule 1403. Consequently, the potential for an accidental release would be minimal and cumulative impacts are considered less than significant.

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IV. ENVIRONMENTAL IMPACT ANALYSIS
M. AESTHETICS

1. ENVIRONMENTAL SETTING

a. Project Vicinity

The project site is centrally located within the urbanized Harbor Gateway district of the City of Los Angeles. The Harbor Gateway district encompasses a linear, north-south aligned band of intermixed industrial, commercial and residential land uses linking South Bay communities to downtown Los Angeles. Portions of unincorporated Los Angeles County and the cities of Gardena and Torrance bound the district to the northwest and west. To the east, the northern portion of the district follows the Harbor Freeway; the southern portion is approximately bounded by Normandie Avenue.

The area surrounding the project site supports a variety of land uses, with a concentration of professional and corporate offices generally located to the north, business and industrial parks and vacant land located to the west along Western Avenue, industrial properties located in unincorporated Los Angeles County land to the east and mixed residential and industrial properties to the south. Typically, commercial and industrial properties in proximity to the project site are distributed along the major highways which provide freeway access or exits, including 190th Street, Normandie Avenue and Western Avenue. Residential properties to the south of the project site are located along collector streets, removed from major arterial frontages.

b. Land Use Setting

The Harbor Gateway District Plan, an element of the City of Los Angeles General Plan, designates the area containing the project site as one of substantial industrial development and low to medium residential development. Relative to the city-wide distribution of industrial lands, the area is identified as one of four small industrial clusters located outside the primary regional industrial centers in downtown Los Angeles, the Port of Los Angeles, Los Angeles International Airport and Sun Valley.

The area to the north and west of the project site, particularly along the 190th Street corridor, underwent substantial redevelopment in the 1970s and 1980s and currently supports

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a concentration of corporate office parks, professional buildings and retail development. Properties located north of the project site, along 190th Street, are designated as "Light Industrial" by the District Plan and contain retail and commercial offices. The project site and contiguous properties to the west are designated "Heavy Industrial;" these properties include the former International Light Metals facility, currently undergoing redevelopment, and the operational Capitol Metals Company facility. Properties across Western Avenue are designated "Business Park" by the City of Torrance and contain the National Headquarters of the Toyota Motor Sales, U.S.A., Inc., a prominent corporate office campus reaching to 190th Street, and Allied Signal Aerospace professional buildings. Redevelopment and associated improvements along the 190th Street corridor contribute to increased sensitivities regarding aesthetic and viewshed issues associated with proposed development along this alignment; however, no scenic highways or associated corridors are designated within the vicinity of the project site.

East of the project site, across Normandie Avenue, unincorporated Los Angeles County lands are designated "Industrial" and support a nearly continuous linear corridor of industrial development. Lands south of the project site are designated "Low-Medium I" residential uses, "Light Industrial" and "Heavy Industrial." Multiple-family residential neighborhoods lie southwest of the project site; the vacant Montrose Chemical Company property and the Jones Chemical Company property are adjacent to the project site to the southeast.

The Harbor Gateway area is further designated as a "Regional Center" within the General Plan Framework, in acknowledgment of the area's proximity to the confluence of numerous cities and communities, the San Diego, Harbor and Artesia freeways, major and secondary highways and a major railroad right-of-way. Centers are defined as distinct focal points of regional commerce, activity and identity, developed to relatively high densities within concentrated areas. Regional centers are intended to provide a broad range of goods and services with a variety of land uses, including corporate and professional offices, industrial parks, entertainment facilities, retail commercial centers and other supporting services to multiple communities.

The City has developed policies intended to promote distinct neighborhood and community identities and increase overall "liveability" for City residents through the development of attractive commercial corridors and visual amenities. These policies, contained within the Urban Form and Neighborhood Design Element of the General Plan Framework, address patterns of development intensity, building height and other structural elements that determine the city's physical character and visually differentiate centers or districts, such as open space, transportation corridors, public facilities, activity centers and focal centers. The primary aesthetic policy applicable to the project site acknowledges that the built form of

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regional centers will vary by location and specifies that regional centers should contain pedestrian-oriented areas and incorporate pedestrian-oriented design elements.

c. Sign Regulations

The City of Los Angeles regulates the placement, construction and modification of all exterior signs and sign support structures through the Department of Building and Safety. Signs located within the City must conform to provisions in Division 62 (Building Code) of the City of Los Angeles Building Code. Although specific Municipal Code requirements and restrictions are dependent upon signage type, general constraints on design, construction, materials, potential for hazard to traffic and determination of such hazard are applicable. Building permits must be obtained for proposed signs; in addition, electrical permits must be obtained for signs illuminated by electrical lighting. The project site is subject to specific signage regulations due to its location in proximity to roadways and the San Diego Freeway. General requirements are as follows:

- A building permit shall be obtained from the department in accordance with the provisions of Division 2 of Article 1 of Chapter IX of the Municipal Code for any signs that are regulated by this chapter. Where illuminated, an electrical permit shall also be obtained as required by Article 3 of Chapter IX of the Municipal Code.
- Plans and specifications must be submitted with the application for permit for each sign and must include complete details, method of attachment and support, location and materials to be used. Plans for signs and support structures shall be accompanied by structural plans and computations.
- Sign frames and sign support structures shall be designed and constructed in conformity with other applicable provisions of the Municipal Code.
- Signs and support structures may be constructed of any materials allowed in Division 62 of the Municipal Code for the classification of the sign to be installed. Any materials used shall be of the same quality and grade as those specified in the Municipal Code for use in buildings.
- No sign or support structure shall be constructed, erected, painted or maintained, and no permit shall be issued, if such sign or sign support structure, because of its location, size, nature or type, constitutes a hazard to the safe and efficient operation of vehicles upon a street or a freeway, or which creates a condition which endangers the safety of persons or property thereon.
- The Department of Building and Safety shall refer all permit applications for signs that will be visible from, and are located within 500 feet of, the main traveled

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roadway of a freeway to the Department of Transportation for hazard evaluation and determination, prior to issuance of a building permit.

- The Department of Transportation shall return to the Department of Building and Safety each application so referred to it together with a statement of its determination. If the Department of Transportation determines that the sign or support structure will constitute a hazard, the Department of Building and Safety shall deny the application for permit.
- No person shall erect, construct, install, paint, or maintain, and no electrical or building permit shall be issued for, any sign or support structure within 2,000 feet of a freeway unless the Department of Building and Safety shall have first determined that the sign will not be viewed primarily from the main traveled roadway of a freeway or an on-ramp/off-ramp. The phrase "viewed primarily from" shall mean that the message may be seen with reasonable clarity for a greater distance by a person traveling on the main traveled roadway of a freeway or an on-ramp/off-ramp than by a person traveling on the street adjacent to a sign.
- Signs are prohibited if they contain or consist of posters, pennants, banners, ribbons, streamers or spinners, except as permitted in Section 6215 of the Municipal Code; contain flashing, mechanical or strobe lights in conflict with the provisions of Section 80.08.4 and 93.0607 of the Municipal Code; or are revolving and where all or any portion rotate at greater than six revolutions per minute.
- No sign shall be arranged or illuminated in such a manner as to produce a light intensity of greater than three footcandles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

d. Project Site

The project site consists of an irregular, L-shaped parcel of 170.2 acres southwest of the interchange of the Harbor and San Diego Freeways. As shown in Figure 2 in Section II.B, Project Location, the site occupies the majority of an entire city block, bounded by 190th Street to the north, a Department of Water and Power (DWP) substation and adjacent industrial property to the south and southeast, and residential properties along 203rd Street to the southwest. Normandie Avenue forms the eastern boundary of the project site; an operating Southern Pacific railway easement is located along the margin of the project site between the fenceline and Normandie Avenue. A rail spur, industrial properties and Western Avenue bound the site to the west.

The project site has served as an industrial manufacturing site since 1941, when it was purchased by the United States government and converted from farmland for use as an

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aluminum casting plant. Since its purchase by the McDonnell Douglas Corporation in 1970, the site has been utilized as an aircraft parts manufacturing, warehousing and distribution center; the company has ceased manufacturing activity on the site and is currently using the site for warehousing and distribution activities.

The site contains approximately 2.4 million square feet of aging industrial and warehouse buildings. As manufacturing operations ceased, buildings were converted to storage or other non-manufacturing uses. Buildings range from one to five stories in height and include massive, prefabricated metal manufacturing and warehouse buildings, a brick masonry administration and furniture storage building, and a cluster of wooden buildings that formerly housed administrative functions. Additional conspicuous structures include an approximately 150-foot water tower, high-pressure water storage tanks and light standards. The remainder of the site is comprised of broad concrete and asphalt paved areas used for storage and salvage yards and employee parking. Additional storage and salvage yards, abandoned rail spurs and a supplementary parking area are located in the southern portion of the site. Storage and salvage yards across the site are currently used for outdoor storage of haphazardly organized assorted parts and equipment, containers, shipping pallets, rail cars and additional assorted items. Several storage areas are in full view of Normandie Avenue and the residential neighborhood to the south, creating an unsightly prospect and conveying a general impression of disuse.

The majority of uses are concentrated in the central and eastern portions of the project site. Other than the former administrative buildings along the central-western property line, all major structures are located adjacent to 190th Street and Normandie Avenue. Employee parking lots occupy the western length of the project site. Access to the site is afforded by an on-site north-south access road from 190th Street. A secondary east-west street provides access from Western and Normandie Avenues (although these entrances are currently closed). An interior roadway parallels the western property line. Figure 33 on page 308 shows existing structures and areas on-site.

The project site exhibits little topographic relief; elevation is 50 feet above mean sea level (MSL), similar to the surrounding area. Existing landscaping on-site is limited to ornamental landscaping adjacent to the former and present administration buildings. A small lawn, low shrubs and scattered sycamore and alder trees surround the former administrative buildings within the employee parking lot, adjacent to the western property line. The western facade of Building 3 is similarly landscaped, with a strip of lawn, low shrubs and clusters of mature palm, olive, and eucalyptus trees extending the length of the building. In addition to

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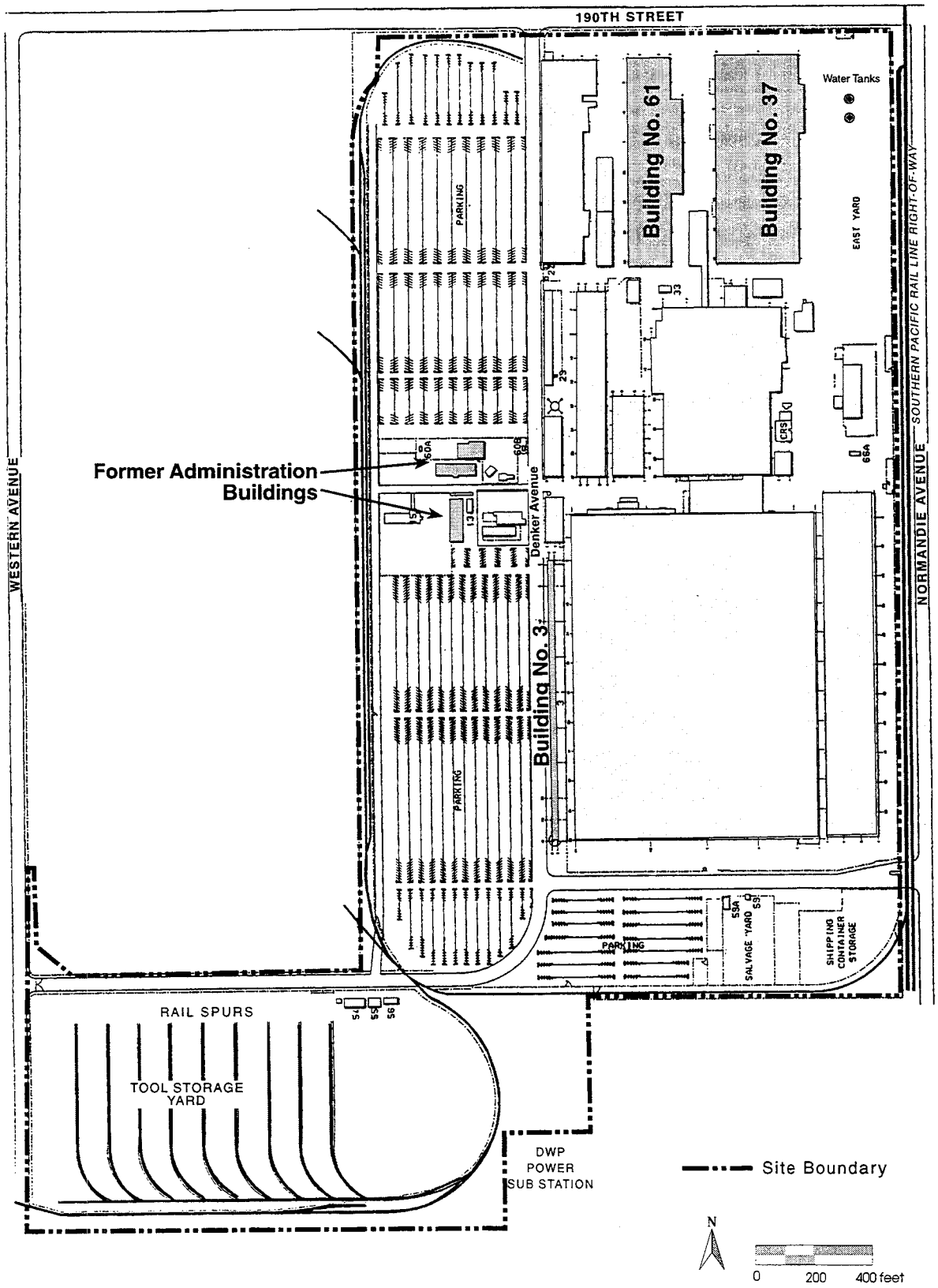

Planning
Consultants
Research

Figure 33
Existing On-Site Structures

landscaped areas, a vacant, unpaved area in the southern-central portion of the site supports grasses and weeds.

e. Aesthetic Resources

Aesthetics, in the context of environmental assessment, refers to the general perception of the visual environment. Aesthetic resource evaluation encompasses the identification of resources in relation to the surrounding environment, as well as visual access to those resources. Aesthetic resource impact assessment measures the visual effects of proposed development through the evaluation of potential contrast, or the degree to which proposed elements of the landscape differ visually. Although the concept of aesthetics is contextual, certain resources are generally perceived to possess valuable attributes. Consequently, the presence and degree of visual access to those resources are considered valuable as well.

(1) Public Vantages

Public vantages, defined as publicly accessible views, of the McDonnell Douglas property are generally associated with public street and freeway corridors approaching or adjacent to the project site. Publicly accessible vantages of the project site are available from the San Diego Freeway and 190th Street to the north, the Harbor Freeway to the northeast, Normandie Avenue to the east and Western Avenue to the west.

Harbor Freeway

Due to the speed of automobile travel and the presence of intervening urban development, freeway vantages of focal points such as the project site may be generally characterized as intermittent and of short duration. The Harbor Freeway passes approximately three-quarters of a mile east of the project site. Views of the site are available to northbound and southbound traffic for short distances north and south of the San Diego Freeway, as well as from the elevated interchange of the Harbor and San Diego freeways. Taller structures within the site, including the 150-foot water tower, a 75-foot smokestack and rooflines of four and five-story buildings, can be distinguished. However, the site is sufficiently distant to constitute a minor element within the larger viewshed that encompasses the surrounding urban area. Figure 34 on page 310 shows a view of the site from the Harbor Freeway.

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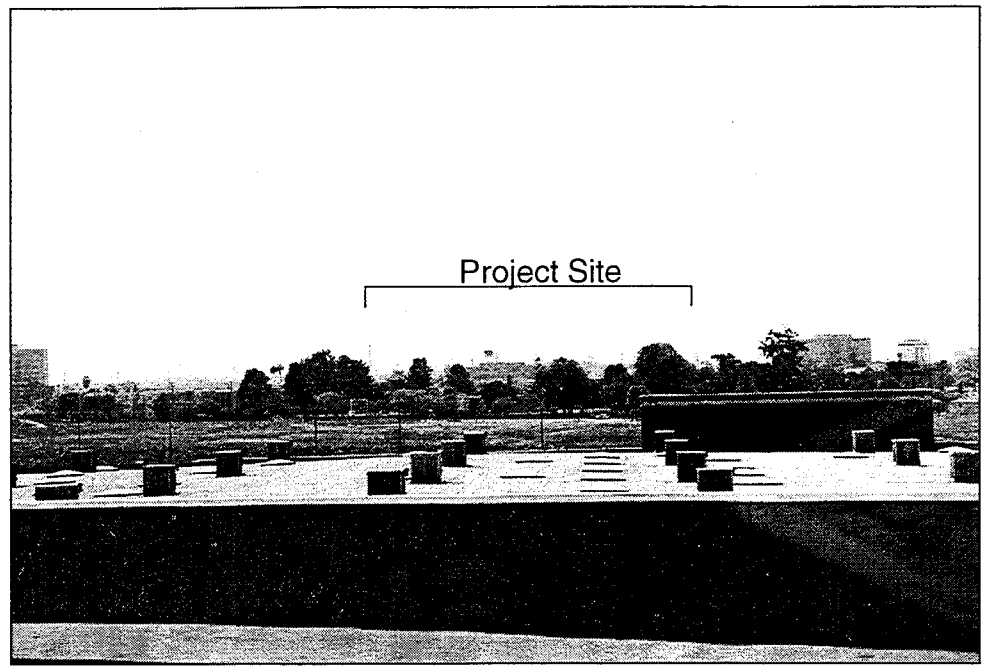
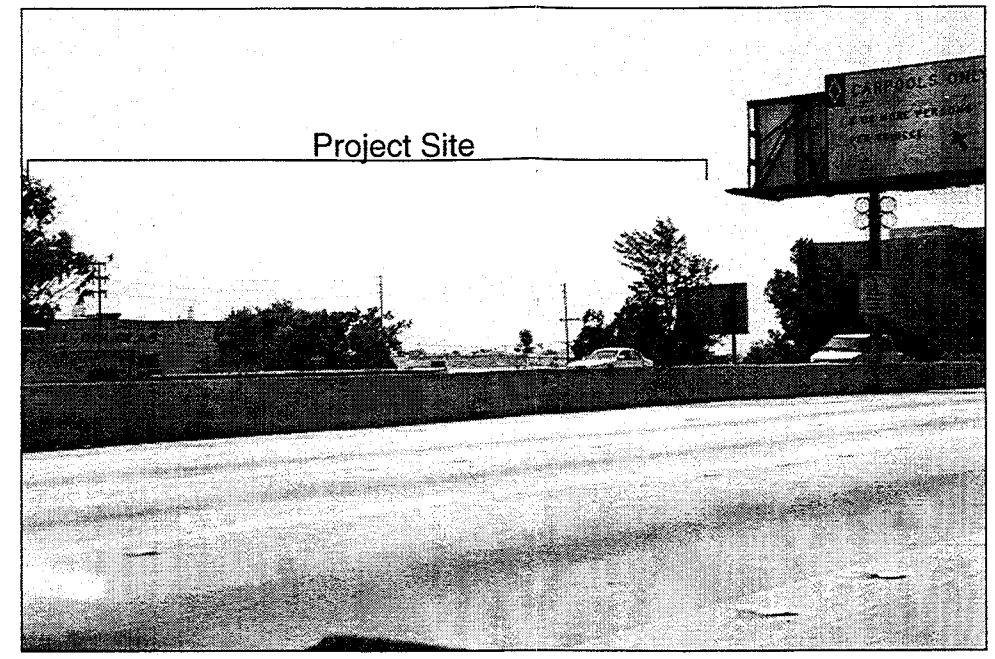
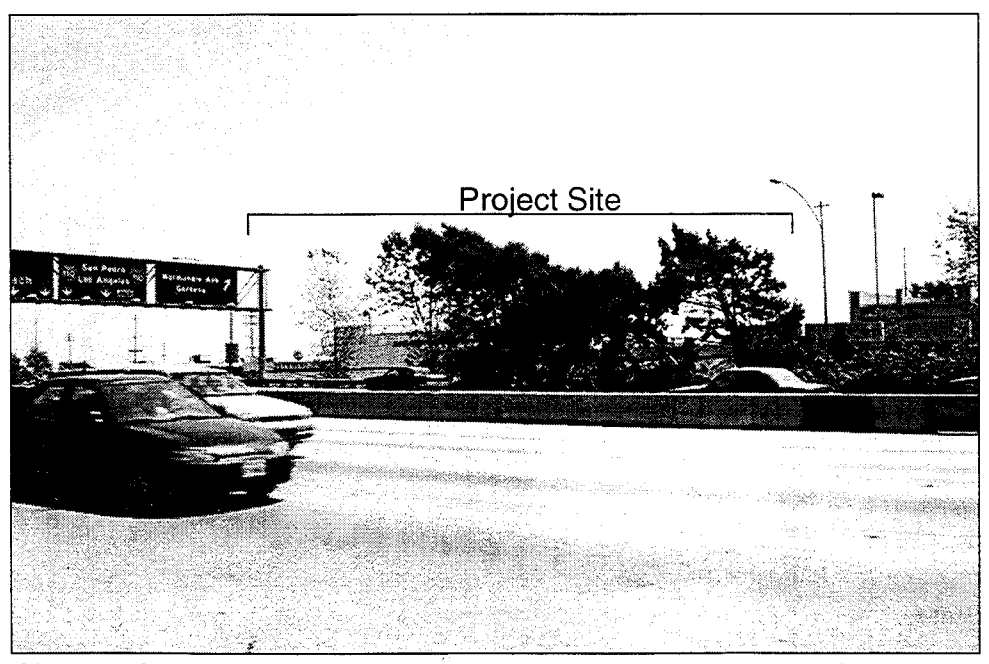


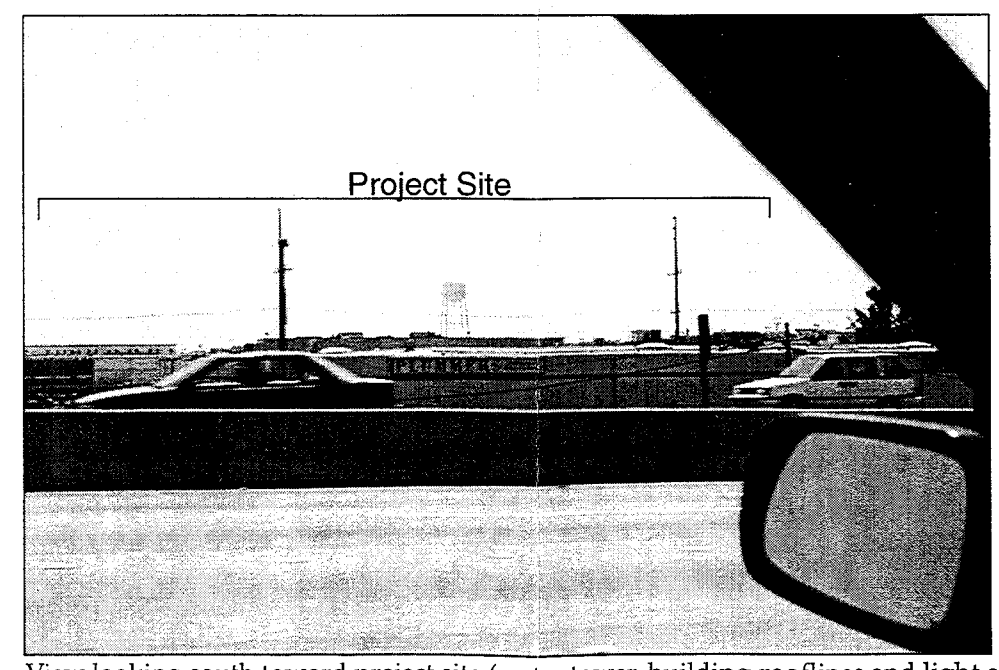
View looking southwest at project site from Harbor (110) Freeway.



View to southwest of the project site from San Diego (405) Freeway.



Obstructed view looking southeast at project site from San Diego (405) Freeway.



View looking south toward project site (water tower, building rooflines and light standard) across intervening buildings along West 190th Street from San Diego (405) Freeway.

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Figure 34
Ground Photographs-
Views of Project Site from Freeways

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San Diego Freeway

Views of the project site are available from northbound and southbound freeway vantages to the east and west of the site. The San Diego Freeway passes in close proximity to the project site; consequently, the view "window" containing the site is compressed and views are relatively fleeting. In addition, views of the site are frequently interrupted by foreground development. Visible on-site features are limited to the warehouses along the 190th Street frontage, including identifying signage on the building exterior walls, and the taller structures on-site. Immediately adjacent to the site views are periodically blocked by dense freeway corridor plantings and multi-story buildings along 190th Street. Figure 34 shows views of the site from the San Diego Freeway.

190th Street

The majority of buildings and structures on-site are located in the project site's northeastern corner and dominate views of the project site from the adjacent intersection of 190th Street and Normandie Avenue. A paved storage yard and two water tanks in containment basins occupy the northeasternmost corner of the project site adjacent to the intersection. West of the intersection, massive four and five-story warehouses with identifying signage line the south side of 190th Street. Although the warehouses prevent views to the interior of the project site, taller structures, such as the water tower and smokestack, may be glimpsed above on-site building rooflines along 190th Street. Entry signage is located at the project roadway intersection with 190th Street. To the west, the open expanse of the employee parking lot extends to the western property line and the southern end of the project site, providing unobstructed views of the length of the site. The former administrative buildings and accompanying landscaping are visible along the western property line. The project site's street frontage is lined with chain link fencing, a screen wall between Buildings 37 and 61, partially concealing a storage yard, and off-site street trees. Figure 35 on page 312 shows views of the site from 190th Street.

Normandie Avenue

Views of the project site from Normandie Avenue encompass the entire eastern margin of the site, as shown in Figure 35. The Southern Pacific railroad right-of-way parallels the site and a spur line enters the site at its extreme southeastern corner; the site is fenced with chain-link fencing along its length. To the north, as previously mentioned, the storage yard, water tanks and warehouses border the intersection with 190th Street; to the south, warehouses, salvage and storage yards and a gated, entry to the site border Normandie Avenue. The salvage

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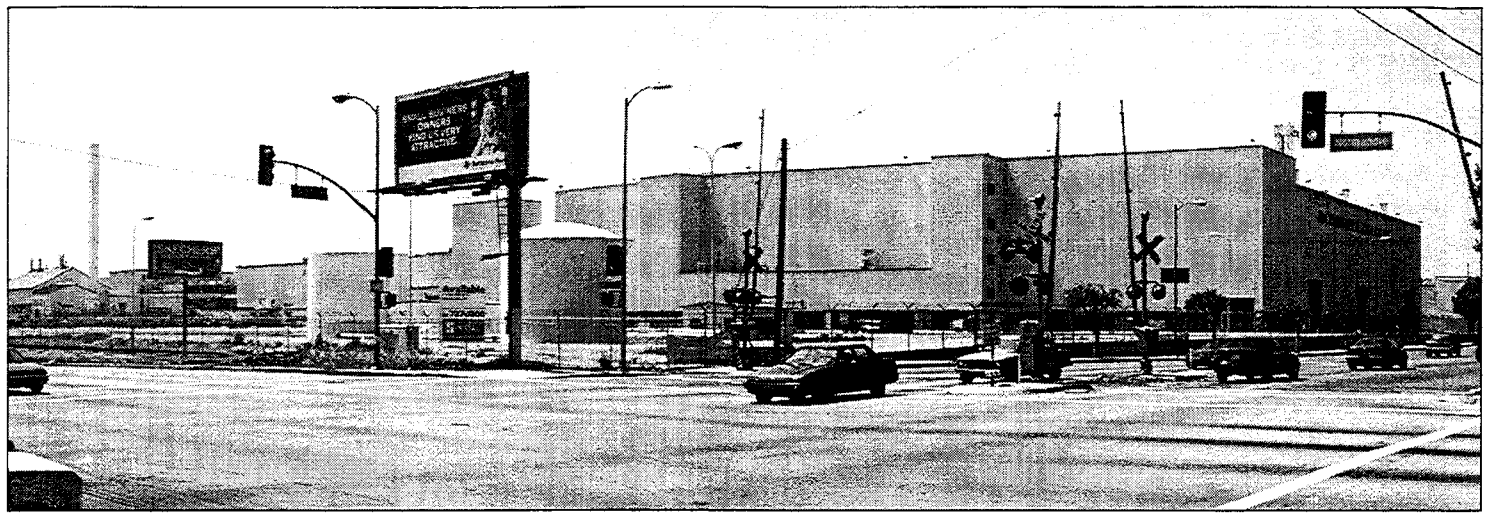
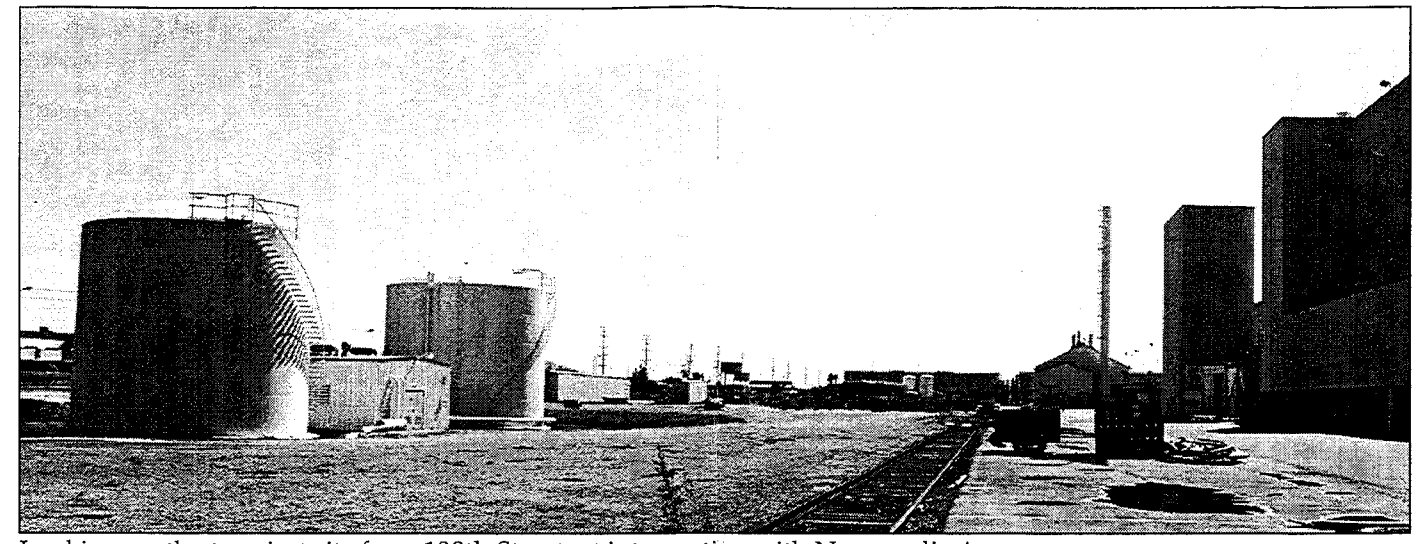
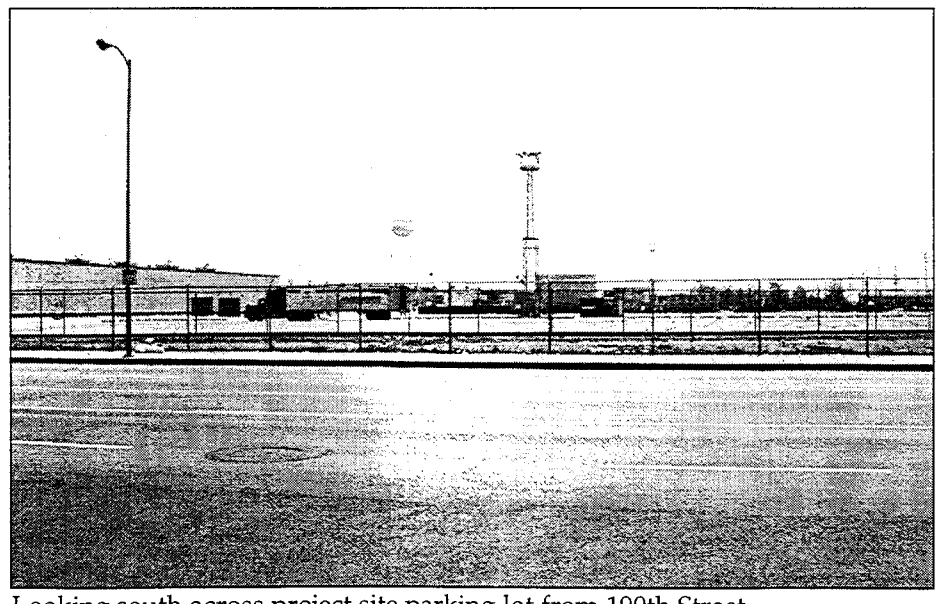


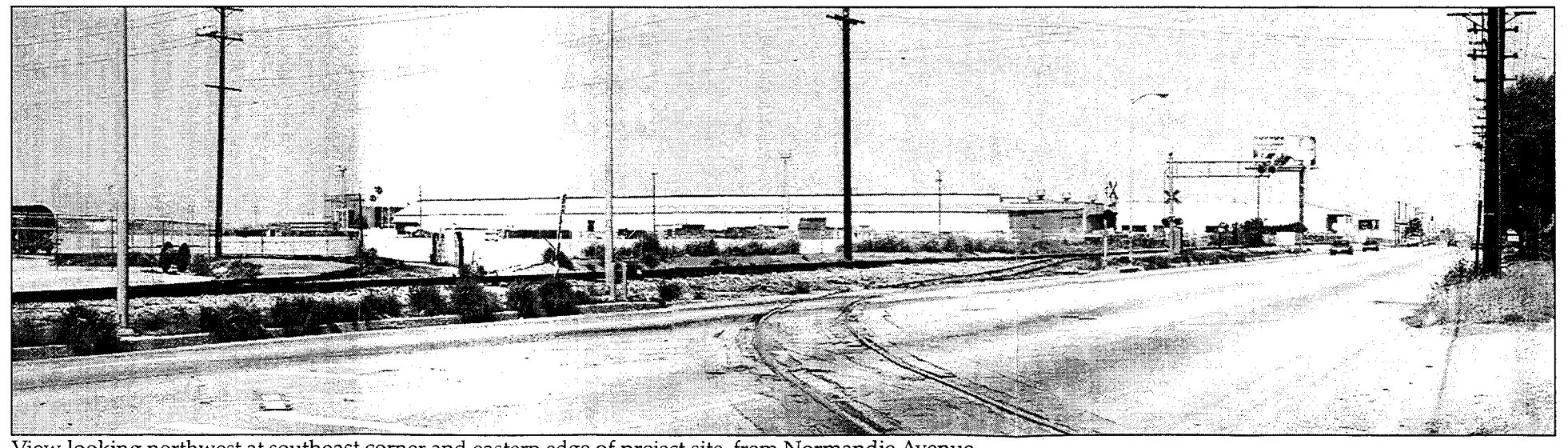
View looking southwest at project site from intersection of 190th Street and Normandie Avenue.



Looking south at project site from 190th Street, at intersection with Normandie Avenue.



Looking south across project site parking lot from 190th Street.



View looking northwest at southeast corner and eastern edge of project site, from Normandie Avenue.

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Figure 35
Ground Photographs-
Views of Project Site from
Surrounding Roadways

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and storage yards contain railroad cars, shipping containers and pallets, and additional assorted parts and equipment open to view. Buildings along the eastern margin of the project site completely block views to the interior of the site and only the water tower is visible beyond building facades. No buildings occupy the southeastern corner and the salvage and storage yards allow uninterrupted views across the project site to the western property line.

Western Avenue

Views of the project site from Western Avenue are limited to the southwestern corner of the site and encompass the access road entering the project site and a storage yard with abandoned rail spurs. The majority of the western property line abuts the former International Light Metals and currently operating Capitol Metals properties. Figure 36 on page 314 shows views of the project site from Western Avenue.

(2) Private Vantages

Private vantages are defined as those vantages located on private property. Private properties in proximity to the project site include 203rd Street residences to the south of the project site.

203rd Street

Medium density single and multi-family housing along 203rd Street are located along the project site's southern boundary. The residential properties abut the storage yard at the southern end of the project site, separated from the site by a chain link fence and rail spur. Although a portion of the employee parking lot can be seen to the northeast, views of the site from residential vantages are dominated by the storage yard and the off-site Capitol Metals property to the north. The crowded storage yard contains scattered parts, equipment and debris, in prominent view of the residences. Figure 37 on page 315 shows views of the site from this vantage point.

f. Views

View assessment refers to the evaluation of visual access to aesthetic resources *other than* the project site itself, from particular vantages. The objects of such views may be either focal points or panoramic vistas. The available viewshed, or visible landscape within a given field of view, is defined by all landscape features that determine a viewer's line-of-sight from a particular vantage. Existing views may be partially or substantially obstructed or wholly

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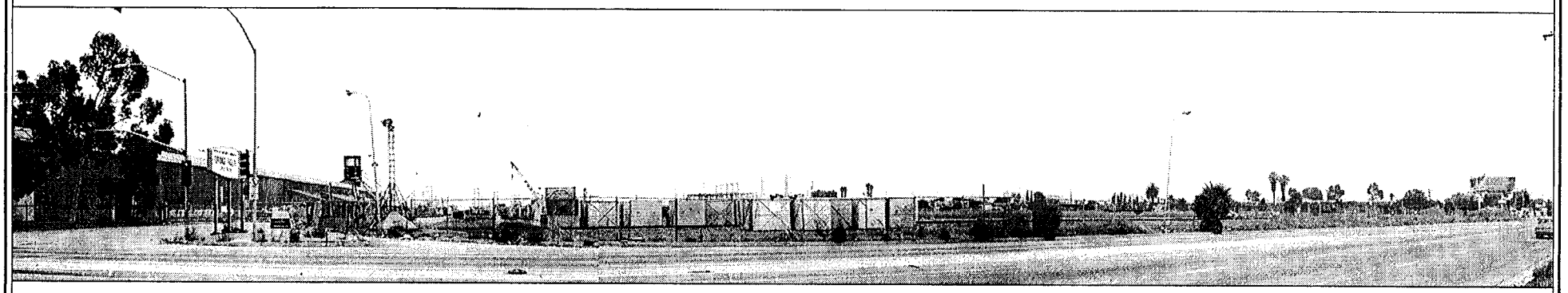

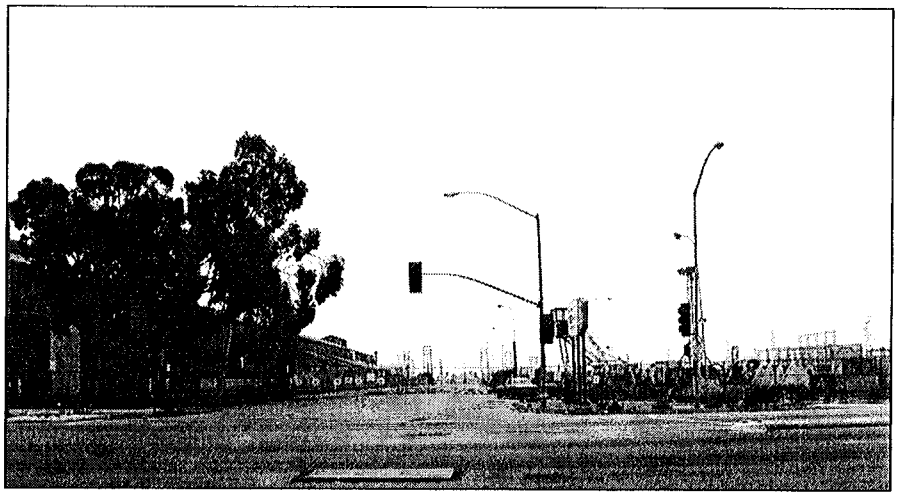

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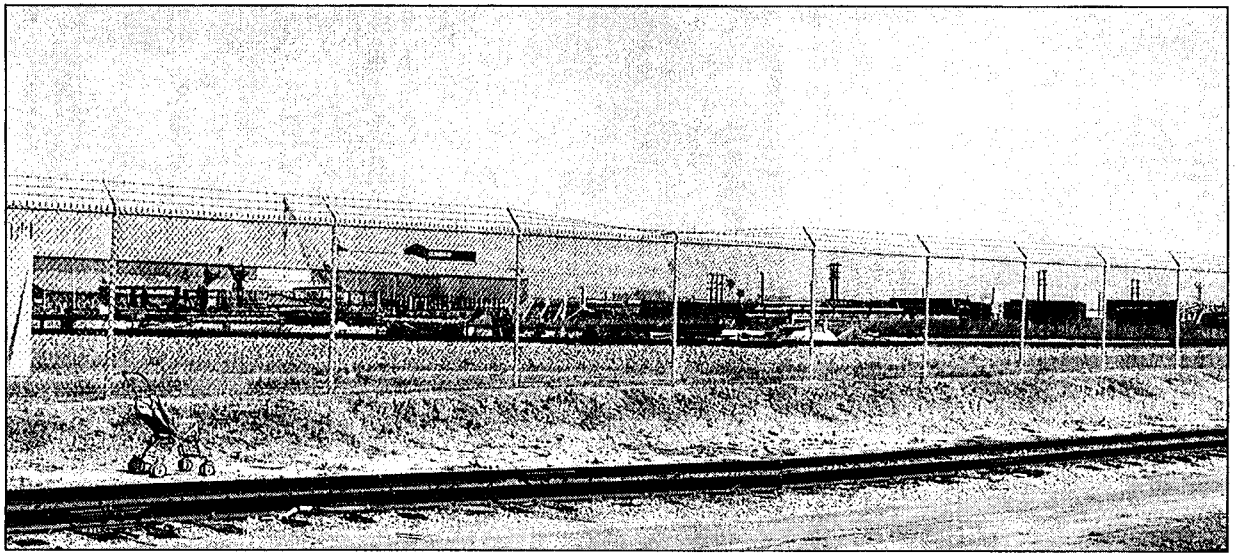
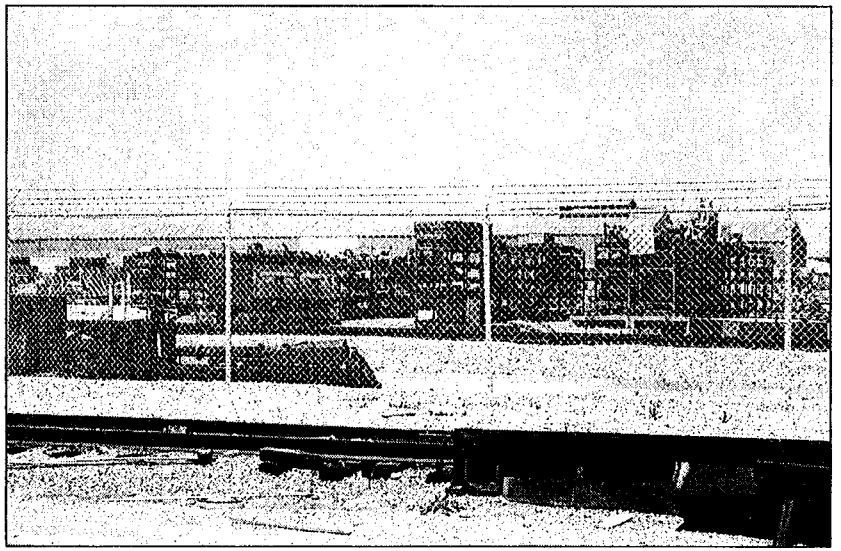
Figure 36
**Ground Photographs-
Views of Project Site from
Surrounding Roadways**

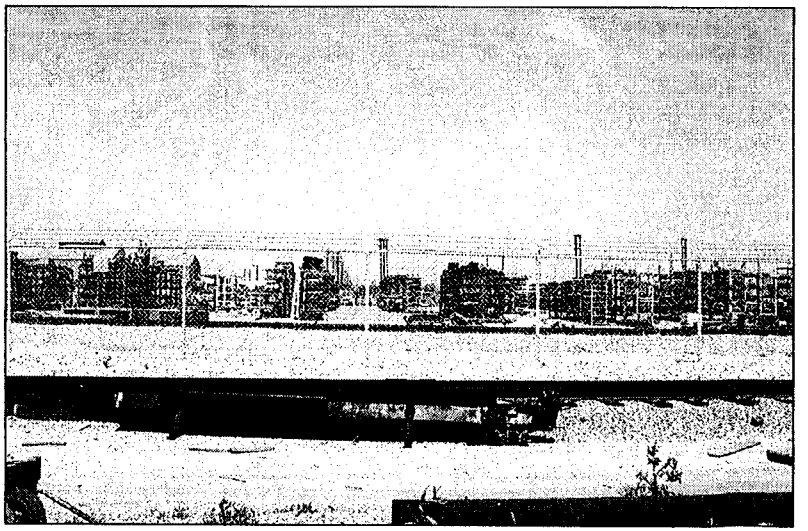
BOE-C6-0115454



View looking north toward tool storage yard in southwestern portion of the project site (off-site Capitol Metals property is visible in left side of frame). Buildings in far distance, in center of frame, are located along 190th Street.



View to north of tool storage yard.



View to north of tool storage yard.

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Figure 37
Ground Photographs-
Views of Project Site from
203rd Street Residential Neighborhood

BOE-C6-0115455

blocked by modification of the environment (e.g., grading, landscaping, etc). Conversely, landscape modifications may create or enhance view opportunities. As a general rule, visual access is closely tied to topography and distance from a given focal point, as views are usually obtained from elevated vantage points or across open expanses. Increases in elevation typically expand the field of view, affording panoramic vistas that may reach into the distance, and increase the distance from a focal point, which may diminish the influence of a focal point on the overall viewshed.

(1) Public Vantages

Harbor Freeway

The viewshed of the Harbor Freeway in the vicinity of the project site is dominated by panoramic expanses of dense industrial and residential development to the east and west. Although the Palos Verdes Peninsula (peak elevations approximately 1,500 feet above MSL) is visible three miles to the south, distant views are frequently interrupted by freeway sound walls, dense plantings and foreground structures. For these reasons, the Peninsula does not play a prominent role in the field of view available from the freeway in this area. The viewshed from this vantage is shown in Figure 34.

San Diego Freeway

The general viewshed along the San Diego Freeway is similar to that of the Harbor Freeway, enveloping a broad field of view composed of industrial and residential development, intermittently interrupted by foreground development and vegetation. To the south, the Palos Verdes Peninsula is visible in the distance. However, intervening urban development predominates from San Diego freeway vantages and the Peninsula does not constitute a prominent feature within the overall viewshed. The viewshed from this vantage is shown in Figure 34.

190th Street

From the 190th Street corridor, views of areas immediately surrounding the project site encompass urban development, including corporate business parks, office buildings, retail stores and industrial properties. Due to the flat, relatively undifferentiated topography of the project area, few long-range views are available from vantages along this corridor. In addition, development along 190th Street generally confines the viewshed to the broad thoroughfare itself and blocks views to the north, east and west. The majority of buildings in the immediate

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vicinity of the project site along 190th Street are between two and five stories tall, with the exception of a nine-story building opposite the project site. The existing buildings in the northeast corner of the project site block views to the south from 190th Street. The absence of structures on the western side of the project site allows views of industrial and residential properties to the south. The Palos Verdes Peninsula represents the most prominent feature within the distant viewshed, although it is partially obscured by intervening development. Figure 35 shows a portion of the viewshed from this vantage.

Normandie Avenue

From this vantage, off-site resources beyond the project site are entirely obscured from view by a nearly continuous wall of four and five-story warehouses along the eastern perimeter of the site, as shown in Figure 35. To the south and west, the Palos Verdes Peninsula may be glimpsed in the distance, across the southeast corner of the project site. However, industrial facilities along Western Avenue and distant lines of utility towers and telephone poles are the prominent features within long-range viewlines.

Western Avenue

Views across the project site to the east are substantially blocked by existing development on the project site as well as by the intervening Capitol Metals property, as shown in Figure 36. Beyond the project site, the Gateway Towers twelve-story office buildings on 190th Street comprise the dominant elements of the skyline to the east. To the north, office and retail buildings along 190th Street are visible.

(2) Private Vantages

203rd Street

Buildings on the Capitol Metals property and the project site block most views to the north; buildings along 190th Street form the northern limit of available views from these vantages. No long-range views exist from the residential properties south of the project site along 203rd Street, as shown in Figure 37.

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2. ENVIRONMENTAL IMPACTS

The proposed project includes the demolition of existing structures and construction of retail and office/industrial park uses over a 10-year period. As described in Section II, Project Description, implementation would take place in two areas (retail and industrial/office park), with demolition/construction phases located in separate portions of the site. Figure 7 of Section II.D.1.a, Area 1 Development, depicts the illustrative plan for Area 1. Figure 38 on page 319 represents a key map for elevations referenced throughout the following discussion. Figure 39 on page 320 represents a key map for site sections.

The project site and project area were surveyed in April and May, 1996. Aesthetic resources, including natural and built features in the project area and surrounding viewshed, were recorded. Aesthetic resources were identified through field surveys, photographic interpretation, topographic analysis and analysis of historic patterns of development. Aesthetic resource impact assessment evaluated potential changes to on-site land uses and effects to the character of the surrounding area, as well as the changes in the degree of visual access to and across the site itself.

With regard to view impacts, the potential for creation or obstruction of views of off-site resources, as caused by the proposed project, was evaluated. Identification of short- and long-range views from public and private vantages in the project area was assisted through the review of U.S.G.S. topographic mapping (Torrance Quadrangle, 1981), detailed field surveys and views recorded through photographic documentation.

The project would have a significant impact upon aesthetic resources or available views if any of the following apply:

- The project introduces elements which would substantially detract from the existing valued aesthetic character of the area.
- Grading or development of large amounts of natural or semi-natural open space is inconsistent with zoning requirements and/or design guidelines for the area or does not effectively integrate the project into the natural aesthetics of the site;
- The height or bulk of structural elements proposed by the project is not compatible with existing development in the vicinity of the project site.
- Significant existing visual features or elements (such as structures, public plazas, art, gardens, oaks or other trees) which contribute positively to the valued visual character of the area are removed or demolished.

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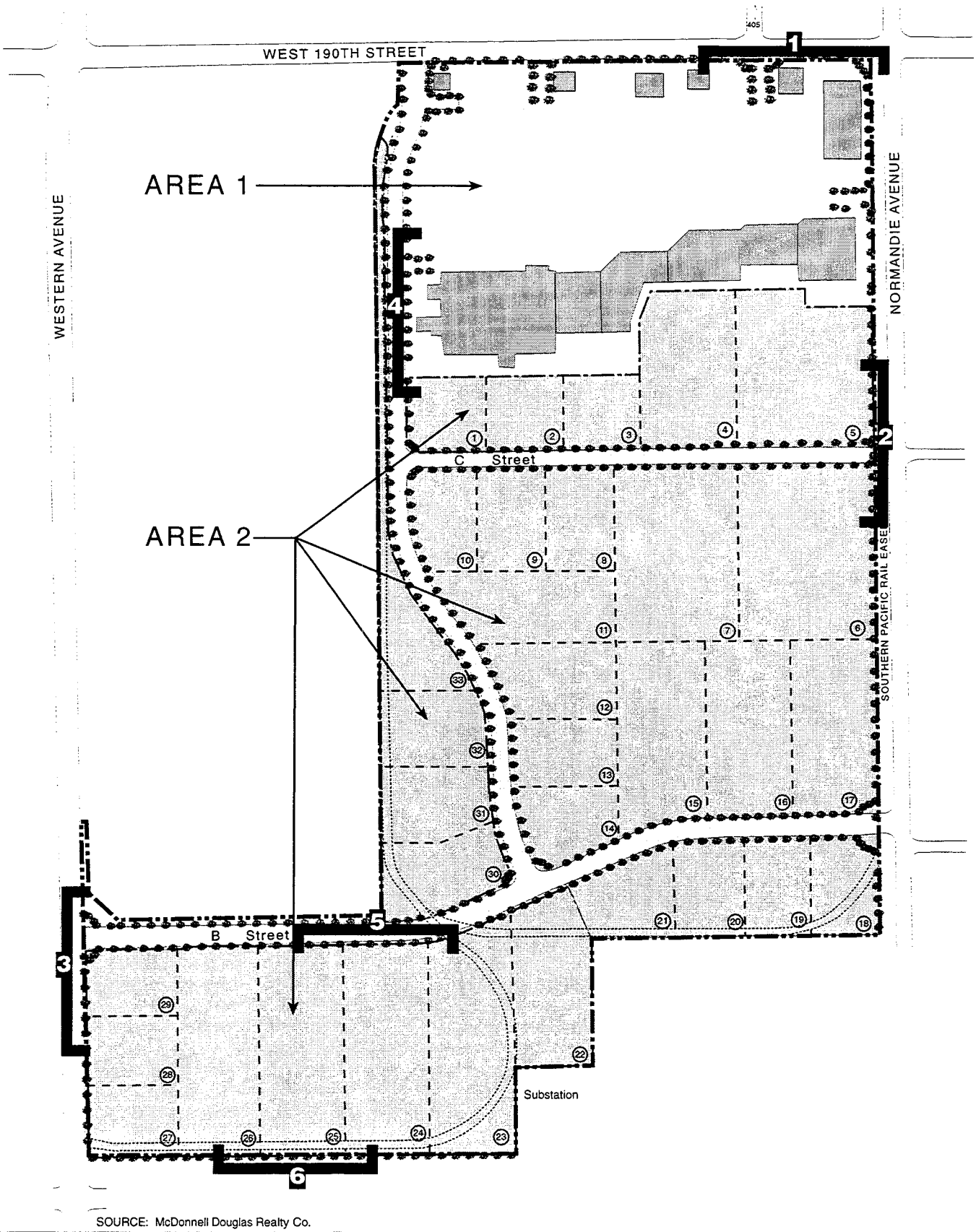

SOURCE: McDonnell Douglas Realty Co.

Planning Consultants Research

N

0 200 400 feet

Site Boundary

Parcel Number

Site Cross-Section and Reference Number

Figure 38
Site Elevations Key Map

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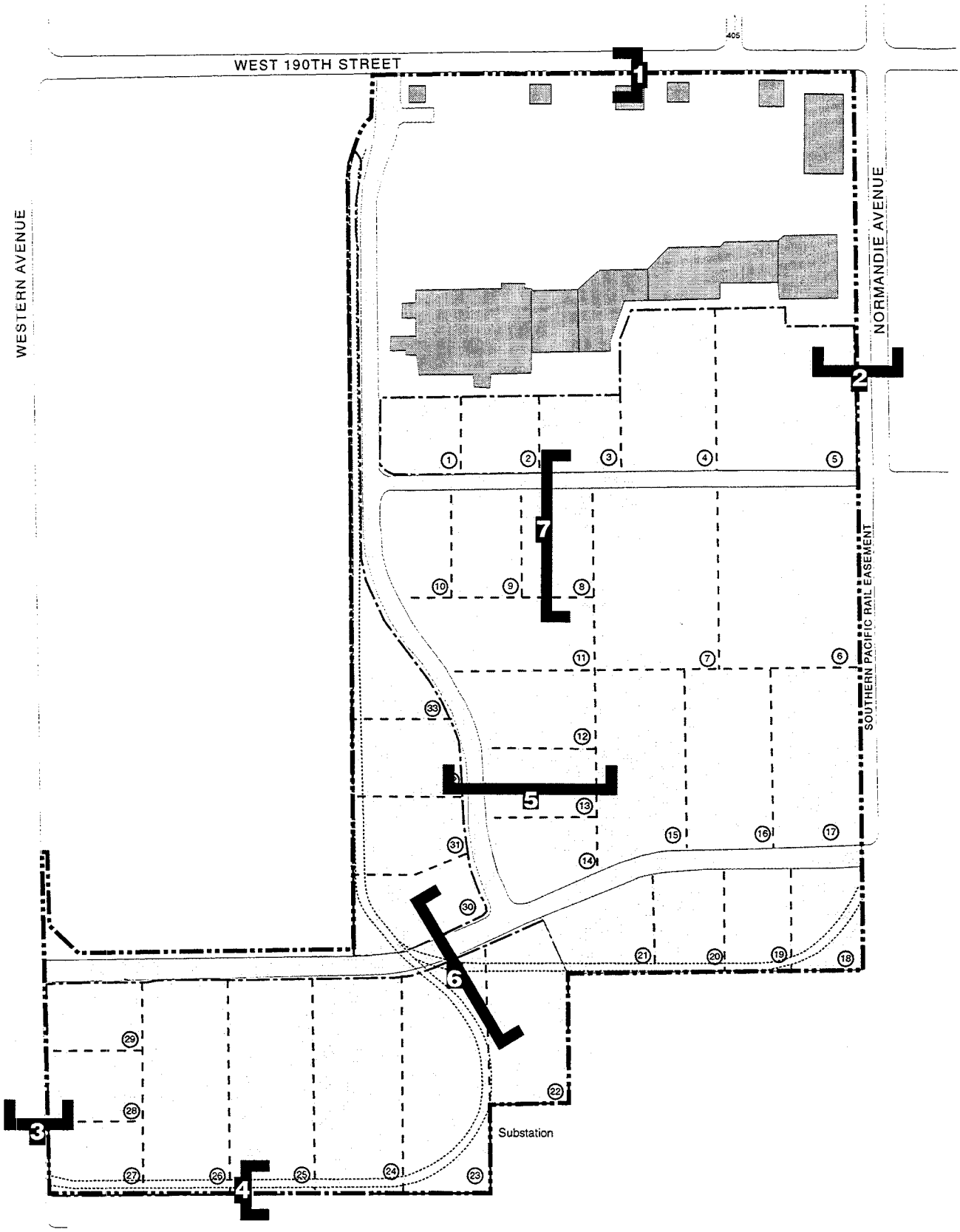

SOURCE: McDonnell Douglas Realty Co.

Planning Consultants Research

N

0 200 400 feet

Site Cross-Section and Reference Number

Figure 39
Site Cross-Sections Key Map

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- Valued views (such as natural topography or objects, scenes, settings or man-made or natural features of visual interest, vistas, mountains or the ocean) which are unique in the city are largely obstructed (i.e., total or substantial blockage as opposed to partial interruption or minor diminishment) at multiple locations.

a. Area 1 Development

(1) Aesthetic Resources

Area 1 construction and demolition encompasses 40 acres in the northern portion of the site. Development of Area 1 would necessitate the demolition of approximately 620,000 square feet of existing buildings, comprised of aging, large, visually prominent manufacturing and warehouse facilities up to five stories in height. In addition to the removal of structures, vast paved parking lots and storage yards containing water tanks, scattered parts and equipment, containers and assorted scrap would be removed. No natural or semi-natural features which contribute positively to the visual character of the area remain in Area 1 and no significant aesthetic impacts are anticipated.

Project implementation would introduce new features to the site, visually altering the character of the existing project site. Proposed construction includes a 450,000 square foot retail center. The center would contain 355,000 square feet of large-scale retail development, a 65,000 square foot (4,000-seat) motion picture theater complex and approximately 30,000 square feet of restaurant space. Retail development would be located along the southern portion of Area 1. Restaurant and theater facilities are expected to be located on separate pads. An approximately 2,200-space surface parking lot would occupy the center of Area 1, to the rear of the commercial frontage on 190th Street. The proposed project would also include the development of an internal road system providing access to the entire developed site. The northernmost segment of "A" Street, a north-south roadway along the western perimeter of the site, would be developed as part of buildout of Area 1 and would serve as the primary, signalized entry from 190th Street. Two points of ingress and egress are planned between 190th Street and the surface parking lot.

General urban design standards have been developed as part of the development program for the entire site. In addition, conceptual locations of Area 1 retail facilities have been established. Section II.D, Project Characteristics, contains a full discussion of proposed design standards for the site. Although the two areas of the proposed project site are planned to accommodate distinct functions, unifying design elements would be employed for consistency between the two areas, including architectural styles, color, signage, landscape and hardscape. Landscape setback and design elements to be incorporated within development of Area 1 are

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proposed to augment the internal and external visual appearance of the project site, enhance the pedestrian environment, identify primary entries to the retail center and individual sites and reinforce the organization of internal circulation. The restaurant facilities and theater complex would be separated from the 190th Street right-of-way by a 30-foot landscape parkway, comprised of a 10-foot sidewalk right-of-way and 20-foot landscape zone, in addition to a 10-foot walkway along the buildings for an aggregate 40-foot building setback. Area 1 development also includes a seven-foot landscaped setback and screen wall, where appropriate, along Normandie Avenue. A unified plant palette of groundcover, shrub masses and trees would be utilized within the landscape zones with accommodations for views of signage and store frontages. Within the site, parking lots would contain a minimum ratio of one tree per four stalls; service areas and mechanical equipment would be located out of view of adjacent roadways and buildings or would be screened by landscape or architectural barriers.

Proposed development is consistent with applicable General Plan Framework Policies regarding regional centers, associated visual amenities and pedestrian accommodations. Development of Area 1 would be consistent with the trend established by the existing commercial corridor along 190th Street (e.g., Ricoh Office Supplies, Plummer's Furniture, CalSpas etc.). Furthermore, proposed development would replace existing industrial facilities and vast parking lots with development to a smaller scale, lower building heights and landscaped setbacks. Therefore, a net beneficial impact with regard to the introduction of new features is anticipated.

Grading associated with Area 1 development would include cut and fill operations within areas currently developed (see Section IV.A, Earth). However, no natural or semi-natural areas would be affected. As previously mentioned, the site is topographically flat and no unique features currently exist on-site. Proposed grading would be in conformance with City of Los Angeles Building Code grading requirements and no significant aesthetic impact is anticipated.

Buildout of Area 1 would reduce existing building square footage by 175,000 square feet. Development of Area 1 would represent a Floor Area Ratio (FAR) of 0.26:1, well below the maximum allowed by the City for the site. Proposed retail operations are consistent with existing development in the area. Retail facilities would have an average setback of 700 feet from 190th Street. In addition, the restaurants and theater complex would be between one and three stories, with a maximum height of 45 feet. Therefore, proposed height and bulk standards are compatible with existing development and no significant aesthetic impact is anticipated.

Proposed Area 1 development includes two 120-foot tall pole-mounted signs for purposes of project and major tenant identity. The signs would likely be visible from the streets

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surrounding the project site as well as visible (but not intended to be viewed primarily) from the Harbor and San Diego Freeways. The height of the signs represent substantial departures from City of Los Angeles sign regulations, which specify a maximum pole sign height of 42 feet within the project site, based on the site's street frontage. The signs would be otherwise compatible with the project's architectural and design standards and the City's signage requirements. The proposed height of the signs represents the sole modification to the sign regulations which will be requested and would be subject to approval by the Department of Transportation and the Department of Building and Safety. Because the signs would be located within 2,000 feet of the San Diego Freeway, the Department of Building and Safety would have to find that the signs will not be "viewed primarily from" the freeway. Specifically, in this case, the design of the signs must be such that they are visible for a greater distance on 190th Street (i.e., the street adjacent to the sign) than the distance they are visible from the freeway. If approvals are granted, in accordance with the requirements and procedures of the City of Los Angeles, the signs would, by definition, be in conformance with sign regulations and therefore no significant impact would be anticipated. Without such approvals, the two 120-foot signs could not be constructed and no impact would therefore occur.

(a) Public Vantages

Harbor Freeway

Available views of proposed development would be limited to the two 120-foot tall signs as well as rooflines of the taller retail structures. The removal of existing aging, heavy industrial facilities and conversion to retail uses represents a beneficial change, although the site is sufficiently distant from the freeway to prevent substantial effects upon the overall visual character of the area, as perceived from Harbor Freeway vantages.

San Diego Freeway

Proposed signs, commercial frontage along 190th Street and retail structures to the south would be clearly, although intermittently, visible from the San Diego Freeway. The removal of existing structures, together with the proposed reduced building area, lower building height limits and landscaped setbacks within Area 1, would result in a more aesthetically consistent street frontage. No significant impact would be anticipated.

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190th Street

Proposed restaurants, retail uses and a movie theater complex and associated streetscape amenities would be visually consistent with the retail and office-oriented development trend along 190th Street. Development of Area 1 would create a pedestrian-oriented, landscaped frontage along 190th Street where none currently exists, as shown in Elevation 1 in Figure 40 on page 325. Section 1 in Figure 41 on page 326 depicts setbacks along 190th Street. Proposed development would not significantly affect the visual character of the area.

Normandie Avenue

Development of Area 1 would open views and pedestrian access to the interior of the site from Normandie Avenue, eliminating the present "wall" of warehouse facades and more fully integrating the site with adjacent areas. Proposed amenities along Normandie Avenue, including landscaped setbacks, screen walls and street lighting, as shown in Section 2 in Figure 41 would constitute substantial aesthetic enhancements that would improve visual prospects from Normandie Avenue. Therefore, no significant impact is anticipated upon Normandie Avenue vantages.

Western Avenue

Area 1 development would not occur in proximity to Western Avenue and would not be visually prominent from this vantage. Subsequent development of Area 2 would obscure any views of Area 1 structures. Therefore, no significant impact to the visual character of the area as perceived from Western Avenue vantages would be anticipated.

(b) Private Vantages

203rd Street

Similar to Western Avenue, 203rd Street residences are located well south of Area 1 and development would only be visible in the distance, prior to development of Area 2. Therefore, no significant impact is anticipated.

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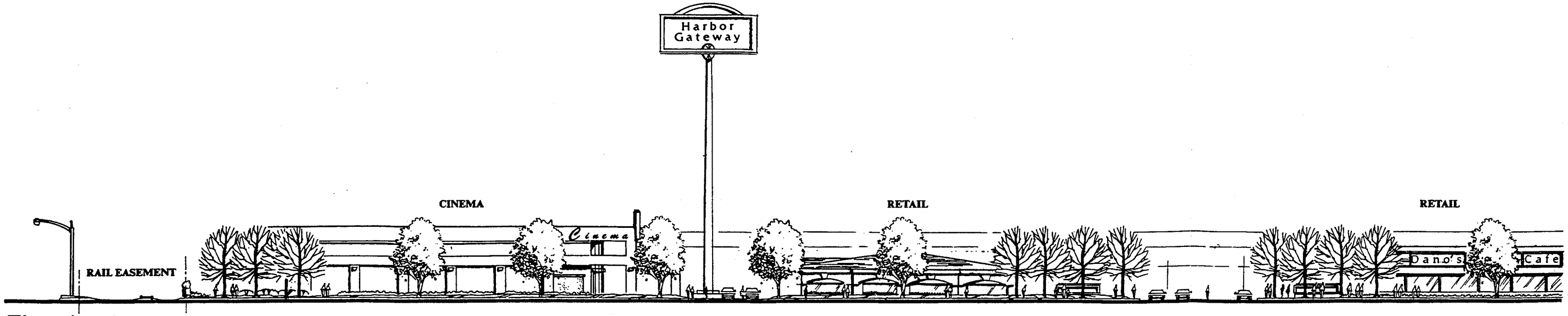
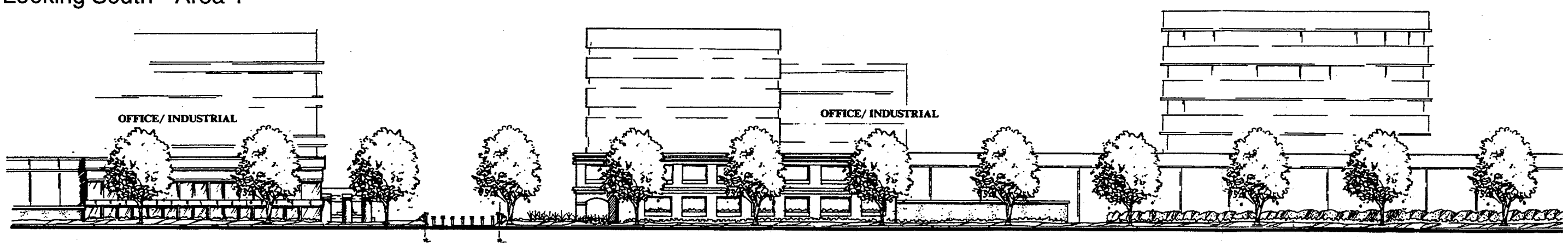
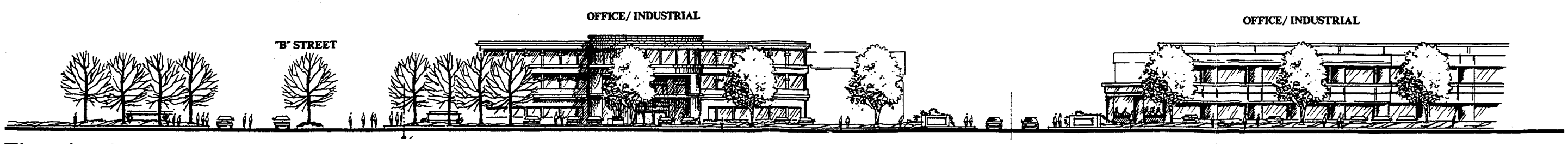


Elevation 1
From 190th Street
Looking South - Area 1



Elevation 2
From Normandie Avenue
Looking West - Area 2



Elevation 3
From Western Avenue
Looking East - Area 2

NOTE: Elevations depict possible buildings within the Harbor Gateway Center property. Architecture and site planning are preliminary and conceptual.

Planning Consultants Research

Scale: 1"=40'

SOURCE: PBR, 1996

Figure 40
Site Elevations

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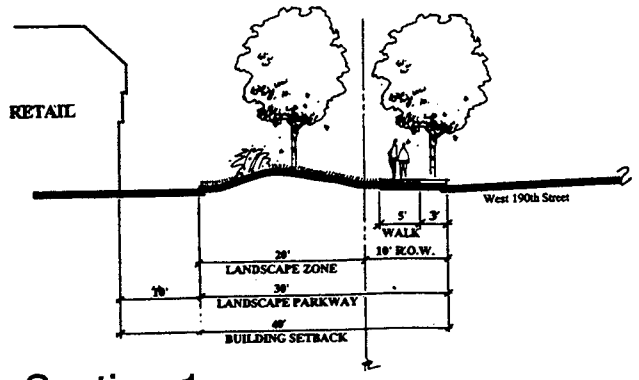
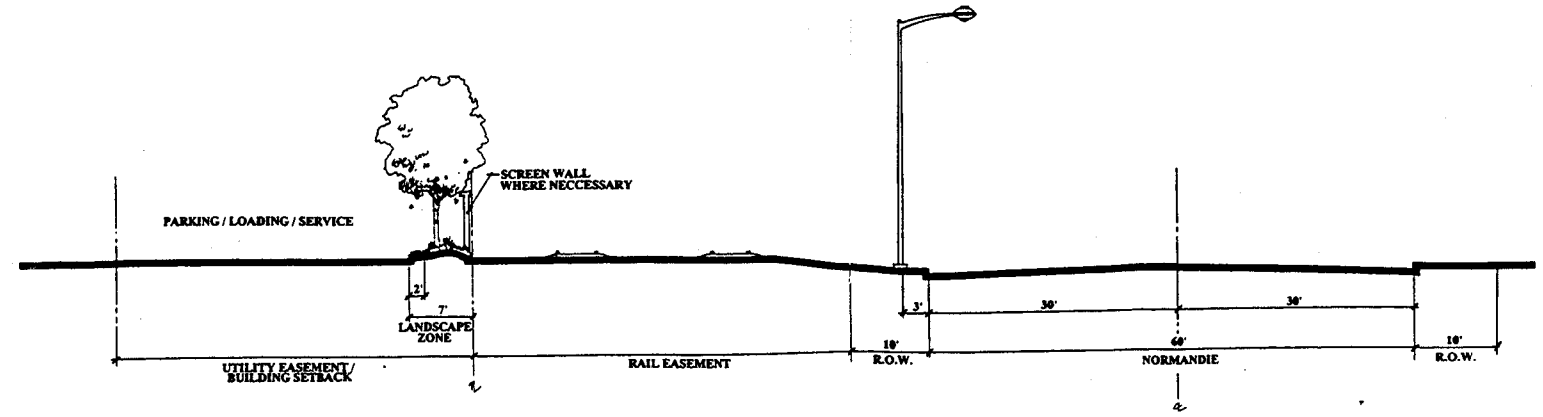
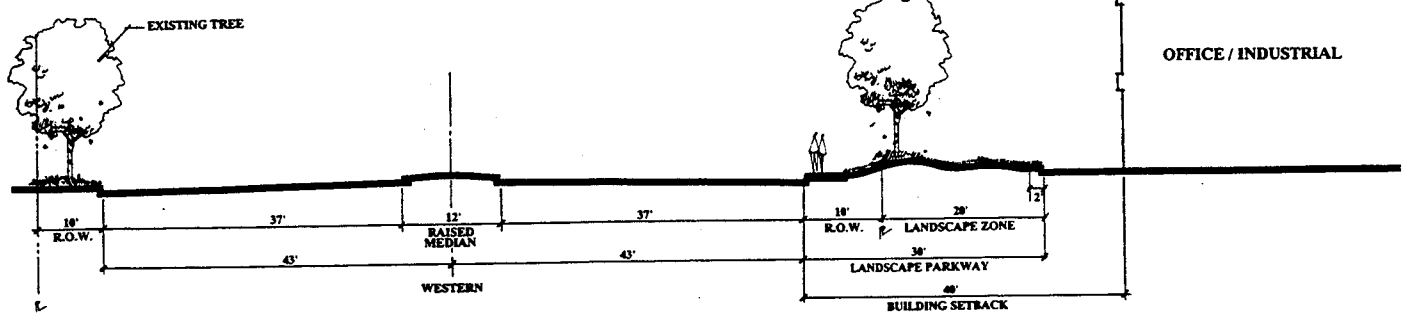


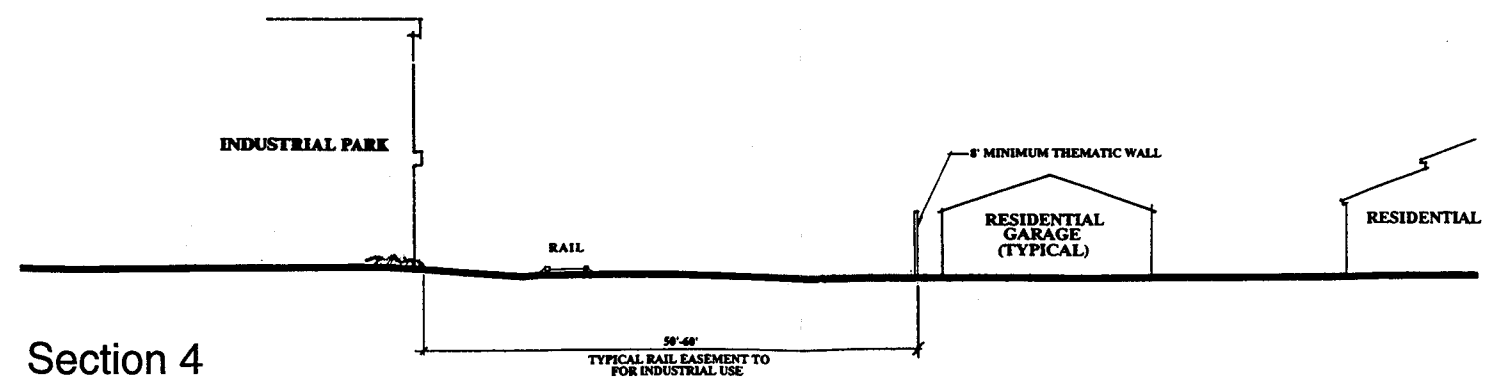
Section 1
190th Street



Section 2
Normandie Avenue



Section 3
Western Avenue



Section 4
203rd Street

Planning
Consultants
Research

Scale: 1"=24'

SOURCE: PBR, 1996

Figure 41
Site Sections

BOE-C6-0115466

(2) Views

(a) Public Vantages

Harbor Freeway

Development of Area 1 would be located within the viewshed of the Harbor Freeway. Due to the project site's distance and relative elevation with respect to the freeway, Area 1 development would constitute a minor element within the viewshed. Although the proposed 120-foot signs would be visible, neither the signs nor additional proposed structures would interrupt or obstruct distant views of Palos Verdes Peninsula or any other vistas currently available from the Harbor Freeway.

San Diego Freeway

Proposed development would not substantially alter the existing viewshed from the San Diego Freeway; proposed building heights would be substantially lower than existing warehouses and would open views to the south, beyond the project site. No significant view impact is anticipated.

190th Street

Views to the south from 190th Street are currently blocked by warehouses along the northeastern edge of the project site. Views are open and unobstructed along the western length of the project site and encompass industrial and residential properties to the south. Area 1 development would introduce lower building heights and permit views to the south from the project site's northeastern corner. Development would decrease views to the south from the site's northwestern corner through the introduction of structures where none currently exist. Existing views currently consist of industrial and residential properties and no valued views would be blocked. Palos Verdes Peninsula represents the only prominent natural feature within the viewshed. Due to proposed height limitations, proposed development would not substantially block views of the Palos Verdes Peninsula and no significant view impact would be anticipated.

Normandie Avenue

Area 1 development would demolish existing warehouses and introduce one to three-story buildings and setbacks, increasing potential for views beyond the site to the east and southeast.

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Views created by Area 1 development would include the proposed retail development on the former International Light Metals property to the east and Palos Verdes Peninsula to the southeast. Increased view opportunities would be considered a beneficial effect and no significant view impact is anticipated.

Western Avenue

Area 1 development would not be located within the portion of the project site with frontage on Western Avenue. Proposed development within the former International Light Metals property adjacent to the project site's western property line would obscure views of Area 1 development and no significant view impact would be anticipated.

(b) Private Vantages

203rd Street

Area 1 development would be located at a sufficient distance (about 3,000 feet) from the residential properties along the project site's southern property line to preclude any view obstruction as perceived from these vantages. No significant view impact is anticipated.

b. Area 2 Development

(1) Aesthetic Resources

Area 2 encompasses 115.6 developable acres within the central and southern acreage of the site. Development of Area 2 would necessitate the demolition of approximately 1.8 million square feet of existing dilapidated industrial and warehouse buildings, as well as additional structures such as the water tower and light standards. Development would also remove paved storage and salvage yards and associated, highly visible outdoor storage of parts, equipment and containers, paved parking lots and rail spurs. However, no unique features or elements which contribute to the visual character of the area exist on-site and no significant aesthetic impact from demolition is anticipated.

Construction includes just over 2 million square feet of industrial park uses and 500,000 square feet of freestanding office space, with accompanying surface parking in individual lots. Area 2 would include development of the remainder of the internal road system, including "B" Street, an east-west road traversing the center of the site, and "C" Street, an east-west access road near the southern boundary of the project site with access along Western Avenue. "A"

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Street connects the two Areas and intersects both roads. Buildout of Area 2 is planned for 2006. Although specific siting requirements and architectural design have not been developed for individual facilities, the industrial and office uses are intended to employ consistent, contemporary building styles, with no variations to be permitted. Elevations 4 and 5 in Figure 42, on page 330, depict typical office and industrial uses along interior streets. Building materials would be selected to convey the high-technology orientation of the business park and would include concrete, metal panels, limited reflectivity glass and other compatible materials. A limited, coordinated palette of exterior colors would be employed to preserve visual unity throughout the entire site.

Landscape setbacks along Western Avenue would average 30 feet between the curb and adjacent parking lots, as shown in Section 3 in Figure 41. Within the site, as shown in the sections in Figure 43 on page 331, landscape setbacks along "A" and "B" Streets would average 25 feet in width between the curb and adjacent parking lots and landscape setbacks along "C" Street would average 15 feet in width. In order to minimize potential visual impacts upon 203rd Street residences to the south, additional on-site visual buffers and landscape screening treatments would be provided. The landscape setbacks would serve to visually integrate the different uses on-site and enhance the appearance of the development from surrounding streets and neighborhoods. Proposed development would represent substantial aesthetic improvements, with increased sensitivity to, and integration with, surrounding land uses. A beneficial impact would therefore be anticipated from the introduction of new features.

Buildout of Area 2 would increase the building area in the area by 700,000 square feet. Maximum building heights to be observed within Area 2 would be approximately 12 stories, or 150 feet, consistent with recent development along the 190th Street corridor. Buildings within 300 feet of the 203rd Street residential properties would be limited to 45 feet or approximately 3 stories. The average FAR would be approximately 0.5:1, well below the maximum allowable FAR of 1.5:1 for the regional center in which the project is located. The height and bulk standards proposed for Area 2 are compatible with existing development and no significant impact is anticipated.

Grading associated with Area 2 development would include cut and fill operations within areas currently developed, as discussed in Section IV.A, Earth. The landscaped area surrounding the former administration buildings and the vacant, unpaved area adjacent to the DWP substation comprise the only semi-natural areas on-site that would be removed. No unique topographic features currently exist on-site. Proposed grading would be in conformance

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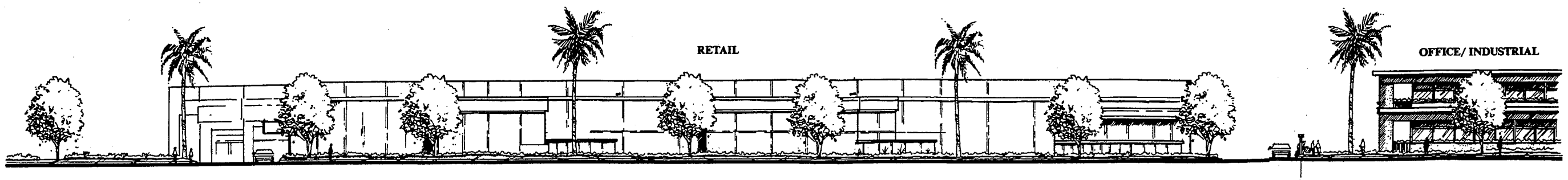
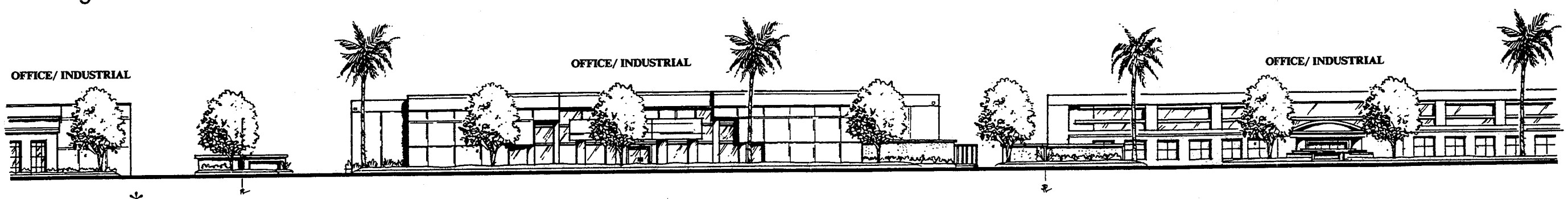
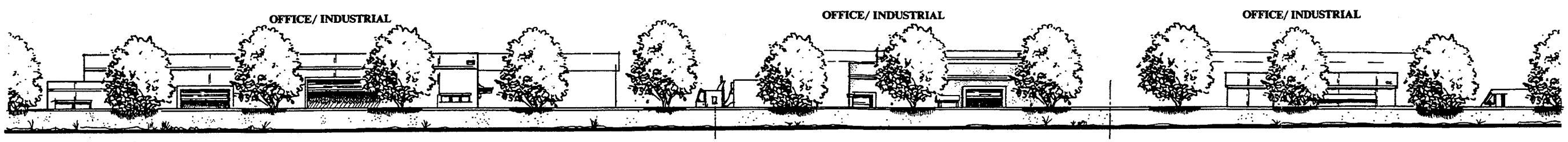


Elevation 4
From "A" Street North of "C" Street
Looking East - Areas 1 & 2



Elevation 5*
From "B" Street East of Western Avenue
Looking South - Area 2



Elevation 6*
From 203rd Street Residences
Looking North - Area 2

* Permitted building heights within Area 2 range from 45 feet to 150 feet.
Exact locations for buildings of 150 feet (12 stories) in height are not presently known.

NOTE: Elevations depict possible buildings within the Harbor Gateway Center property. Architecture and site planning are preliminary and conceptual.

Planning Consultants Research

Scale: 1"=40'

SOURCE: PBR, 1996

Figure 42
Site Elevations

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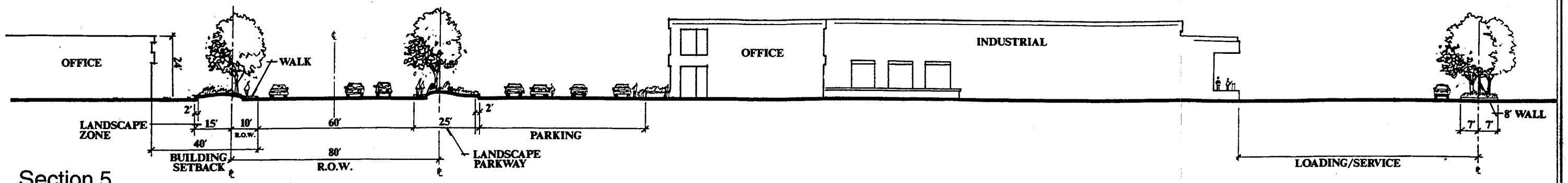
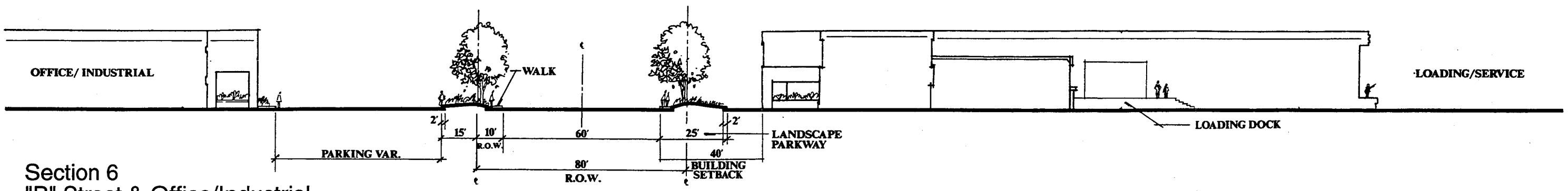
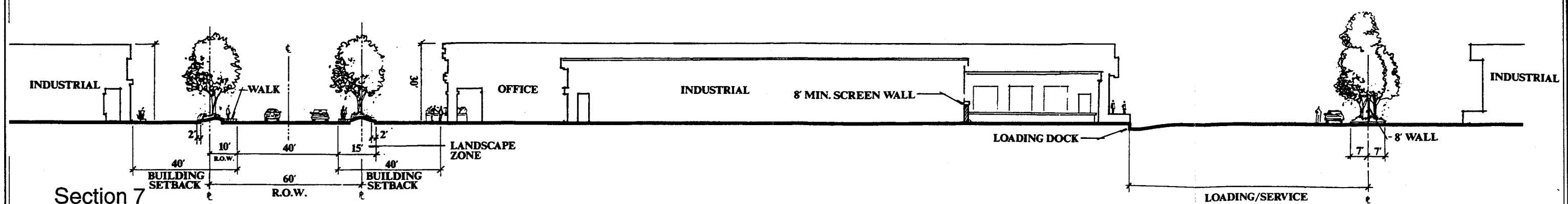


Section 5
"A" Street & Office/Industrial
Looking North - Area 2



Section 6
"B" Street & Office/Industrial
Looking East - Area 2



Section 7
"C" Street & Office/Industrial
Looking East - Area 2

Planning
Consultants
Research

Scale: 1"=40'

SOURCE: PBR, 1996

Figure 43
Site Sections

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with City of Los Angeles Building Code grading requirements and no significant aesthetic impact is anticipated.

Although exterior signage design standards have not been established for Area 2, no modifications to signage regulations are proposed. Signage is anticipated to be internally consistent and conform to all requirements of the City of Los Angeles.

(a) Public Vantages

Harbor Freeway

Because of increased building heights permitted in development of Area 2, proposed buildings would be intermittently visible, although not prominent, from this vantage. Proposed buildings would partially block distant views to the south from freeway vantages to the north, east and west of the project site. As views from the freeway are currently intermittently obstructed by intervening freeway plantings and development, proposed buildings would not substantially alter visibility to the south. Proposed development would be visually consistent with existing development in the area and no significant impact would be anticipated.

San Diego Freeway

Increased building heights would permit buildings in Area 2 to be seen from the San Diego Freeway. However, the intermittent nature of freeway views, together with view obstruction from intervening vegetation and development, would diminish the influence of proposed development from freeway vantages. Therefore, no significant impact upon the visual character of the area would be anticipated from San Diego Freeway vantages.

190th Street

Taller buildings within Area 2 would be visible from vantages along 190th Street. Proposed buildings would be substantially compatible with similar development to the east and west along 190th Street. In addition, buildings would be substantially screened by structures and landscaped setbacks included in Area 1 development as well as by landscaping incorporated in development of Area 2. No significant impact upon the visual character of the area would be perceived from this vantage.

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Normandie Avenue

Development within Area 2 would introduce buildings of up to twelve stories into portions of the site, consistent with existing development along 190th Street. A project theme wall or landscaped setbacks would partially screen proposed development from this vantage. With the inclusion of landscaped setbacks, automobile and pedestrian access to the site, development would further serve to integrate the project site with the Normandie Avenue corridor, creating opportunities for increased visual and pedestrian connections, as shown in Elevation 2 in Figure 40. Proposed improvements would therefore reinforce the perception of urban development and enhance the visual character of Normandie Avenue and no significant impact is anticipated.

Western Avenue

Development within Area 2, including buildings of up to twelve stories in height, would extend to Western Avenue and would be prominent from this vantage. Landscaped setbacks would screen views from this vantage, as shown in Elevation 3 in Figure 40. Proposed development would be visually consistent with existing office and industrial park development along Western Avenue and no significant impact would be anticipated.

(b) Private Vantages

203rd Street

Proposed development would substantially improve the existing viewshed from residential vantages along 203rd Street, with conversion of this portion of the site from heavy industrial uses to office and industrial uses, as shown in Elevation 6 in Figure 42. Development would entail the removal of the storage yard adjacent to the residences, which contains numerous abandoned rail spurs, large amounts of assorted parts, equipment and debris, and the chain link fence lining the southwestern property line. Maximum building height limits would be reduced to 45 feet within 300 feet of residences. As shown in Section 4 in Figure 41, features an 8-foot boundary wall between the building sites and the residences would provide visual screening. Proposed visual buffers would screen views of the project site as well as the off-site Capitol Metals property to the north. Proposed improvements would represent substantial enhancement of the project site adjacent to 203rd Street and no significant impact would be anticipated.

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(b) Views

(i) Public Vantages

Harbor Freeway

The project site's distance and relative elevation with respect to the Harbor Freeway would diminish the influence of proposed buildings upon the overall viewshed. In addition, the brief nature of the view window containing the site would minimize the impact of proposed development. Although proposed development would contribute to increased urbanization as seen from the Harbor Freeway, the project would not substantially alter the existing viewshed. Proposed structures would not substantially block distant views of Palos Verdes Peninsula or any other vistas currently available from the Harbor Freeway.

San Diego Freeway

Increased maximum building heights would be permitted with development of Area 2 and proposed buildings could become prominent elements within the viewshed. The buildings would partially block distant views to the south from north and south-bound lanes of the freeway, from vantages both to the east and west of the site. However, distant views to the south are currently intermittent in the vicinity of the project site due to intervening development. In addition, proposed development would not alter the urban nature of the existing viewshed. Intervening freeway plantings and buildings along 190th Street would continue to block any views to the south from freeway vantages directly to the north of the project site and increased building heights would not substantially affect existing distant views. Therefore, no significant impact is anticipated.

190th Street

Proposed structures in Area 2 of up to 12 stories in height would substantially block views to the south, including views of Palos Verdes Peninsula, from this vantage. As previously mentioned, however, existing views to the south are limited due to the lack of topographic differentiation and existing urban development, which heavily restricts long-range views of Palos Verdes Peninsula. No unique or valued views would be obstructed by Area 2 development and no significant impact is anticipated.

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Normandie Avenue

The addition of the proposed buildings would not substantially alter the highly urban nature of the existing viewshed from Normandie Avenue. Views toward the west would be substantially blocked by proposed buildings, landscaping buffers and screen walls along the Normandie Avenue frontage of the project site. Although views of Palos Verdes Peninsula would be blocked, such views are currently interrupted by intervening urban development, such as tall buildings and utility towers, and no other long range views exist from this vantage. Therefore, no significant view resource impact is anticipated.

Western Avenue

Similar to Normandie Avenue, the introduction of buildings within Area 2 would not substantially change the urban nature of the available viewshed. Proposed buildings and landscaped setbacks would substantially block views to the east; however, no unique or valued views exist in this direction. Therefore, no significant impact is anticipated.

(b) Private Vantages

203rd Street

Although development within 300 feet of residences would be limited to 45 feet, proposed buildings of up to twelve stories in height in the interior of the site would block views to the north. This could be considered an adverse impact to the residential properties south of the project site. However, because no unique or valued views exist to the north, no significant impact is anticipated.

3. MITIGATION MEASURES

a. Aesthetics

Urban design standards have been incorporated into the proposed project to ensure an appropriate aesthetic appearance. Area 1 development plans include specific siting of structures and facilities, structural design, signage design and landscaping measures. While siting of individual structures has not been developed for Area 2, development would occur in accordance with urban design standards regulating development of the entire site. No significant impact is anticipated; therefore, no mitigation measures are required.

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b. Views

1. Building height shall not exceed 45 feet within 300 feet of the residential properties south of the project site.

2. A minimum 8-foot wall shall be constructed along the southern property line between the project site and adjacent residential properties on the north side of 203rd Street. Graffiti resistant paint shall be used on both sides of the wall.

3. Buildings shall be set back a minimum of 25 feet from the southern property line adjoining residential properties along 203rd Street.

4. ADVERSE EFFECTS

No adverse aesthetic or view impacts would be expected to result from the proposed subdivision and development of the project site.

5. CUMULATIVE IMPACTS

As illustrated in the Related Projects map provided in Section III.B, Related Projects, there is a single related project in sufficiently close proximity to the project site to potentially contribute to a cumulative visual impact upon the immediate area. Related Project No. 33, redevelopment of the former International Light Metals site, is located immediately adjacent to the project site's western boundary, on the southeast corner of 190th Street and Western Avenue. Development of the site includes a 755,000 square foot shopping center and 3,500 seat movie theater. This development would be similar in nature to the proposed project and would be consistent with the existing trend of uses along 190th Street. Cumulatively, the two projects would convert the visual character of 190th Street between Western Avenue and Normandie Avenue from industrial land uses to retail, commercial and entertainment complex uses with landscaped setbacks and pedestrian accommodations, and would not eliminate existing valued view opportunities from surrounding public or private vantages. Proposed conversion of existing land uses would be consistent with General Plan Framework Policies promoting the development of attractive commercial corridors and visual amenities and would therefore constitute beneficial contributions to the community. Remaining related projects are not located in sufficient proximity to the project site to affect the local visual environment. No significant cumulative visual impact is anticipated.

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V. Long-Term Implications of the Proposed Project/Significant Irreversible Environmental Changes

V. LONG-TERM IMPLICATIONS OF THE PROPOSED PROJECT/ SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Not required per CEQA Guidelines.

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VI. Growth Inducing Impacts of the Proposed Project

VI. GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECT
A. HOW THE PROJECT COULD FOSTER GROWTH

Implementation of the proposed project would involve the redevelopment of an existing, obsolete manufacturing facility. Proposed on-site development activity includes the construction and operation of nearly three million square feet of retail and office/industrial park development. Given that about 2.4 million square feet of existing structures would be demolished as part of the project, the net increase in on-site building area would be about 550,000 square feet. Because the project site is already developed and is located in a highly urbanized setting, the proposed redevelopment of the site would not involve any substantial extension of infrastructure, such as roads and utilities. Consequently, it would not open up new areas to development.

The new employment opportunities that would be created by on-site development would have the potential to stimulate growth in the area. As compared to existing conditions at the McDonnell Douglas facility, project buildout would have the potential to add over 4,600 jobs (roughly 5,000 new jobs less 380 current on-site employees). Such an increase in on-site employment may lead some people to relocate to the area to be nearer their jobs, thereby creating some demand for additional housing in the area. At its peak around 1990, however, the McDonnell Douglas facility employed about 5,500 people. Consequently, the primary effect of adding jobs on-site would be to replace local jobs that have been lost over the past six years. Growth inducement associated with the project itself is therefore expected to be minimal.

The project would contribute to the ongoing redevelopment of the Harbor Gateway community. The change from the current heavy industrial uses to a mix of light industrial, office, and retail uses would be consistent with local land use trends. Such changes for the project site and site vicinity are also consistent with the long-term goals and vision for the area, as articulated in the City of Los Angeles General Plan and Harbor Gateway District Plan.

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In general, cumulative projects in the site vicinity involve infill development in already highly urbanized areas and/or the redevelopment of already developed sites. As such, cumulative development would generally utilize existing infrastructure (such as roads and utilities) and would not involve any substantial extension of infrastructure. Consequently, currently undeveloped areas would not be opened up to development.

The new employment opportunities that would be created by all cumulative projects would have the potential to stimulate growth in the area. These new employment opportunities may induce some people to relocate to the area to be nearer their jobs, thereby creating additional demand for housing in the area. In this way, cumulative projects would be expected to spur development that could contribute to the ongoing redevelopment of the Harbor Gateway community. In general, the types of uses proposed for the area (office, retail, residential) are consistent with local land use trends. Such changes are also consistent with the long-term goals and vision for the area, as articulated in the City of Los Angeles General Plan and Harbor Gateway District Plan.

BOE-C6-0115481

VII. Mitigation Monitoring Program

VII. MITIGATION MONITORING PROGRAM

Effective January 1, 1989, the California Environmental Quality Act (CEQA) was amended to add Section 21081.6, implementing Assembly Bill 3180 (AB3180). As part of CEQA environmental review procedures, AB3180 requires a public agency to adopt a monitoring and reporting program for assessing and ensuring efficacy of any required mitigation measures applied to proposed developments. As stated in Section 21081.6 of the Public Resources Code,

> "...the public agency shall adopt a reporting or monitoring program for the changes to the project which it has adopted, or made a condition of project approval, in order to mitigate or avoid significant effects on the environment."

AB3180 provides general guidelines for implementing monitoring and reporting programs. Specific reporting and/or monitoring requirements, to be enforced during project implementation, shall be defined prior to final approval of the project proposal by the responsible decision maker(s). In response to established CEQA requirements and those of AB 3180 (Public Resources Code Section 21000 et.seq.), the proposed mitigation monitoring program shall be submitted to the Planning Department for consideration prior to completion of the environmental review process to enable the decision maker's appropriate response to the proposals.

Although the proposed program should be included in the Draft Environmental Impact Report (DEIR) to allow public circulation of the proposal, it must be provided as part of the Final EIR. In addition, pursuant to Section 21081(a) of the Public Resources Code, findings must be adopted by the decision maker coincidental to certification of the Environmental Impact Report. The following language shall be incorporated as part of the decision maker's Findings of Fact in response to AB 3180 and in compliance with requirements of the Public Resources Code:

> In accordance with the requirements of Sections 21081(a) and 21081.6 of the Public Resources Code, the Department of Building and Safety, the City Planning Commission and/or the Los Angeles City Council has made the following additional findings:
>
> 1. A mitigation reporting and monitoring program shall be implemented as specified in the final decision relative to the subject project;

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2. Through covenant and agreement, prior to the recordation of the final map, certificate of occupancy, and/or building permit, the applicant shall identify an appropriate licensed professional to provide certification that compliance with the required mitigation measures has been effected;

3. Site plans and/or building plans, submitted for approval by the responsible monitoring agency, have included required mitigation measures/conditions; and,

4. An accountable enforcement agency and monitoring agency shall be identified for mitigation measures/conditions adopted as part of the decision maker's final determination.

This proposed Mitigation Monitoring Program is presented in text form in Appendix A: Mitigation Monitoring Program, which identifies the implementing agency, the enforcement agency, monitoring agency, and monitoring phase or time-frame for each recommended mitigation measure.

BOE-C6-0115484

VIII. Alternatives

VIII. ALTERNATIVES
A. INTRODUCTION

The City and State CEQA Guidelines require an EIR to describe a range of reasonable alternatives to the proposed 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 Guidelines direct that the selection of alternatives focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly.

The selection and discussion of the alternatives is intended to foster meaningful public participation and informed decision-making. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. If the environmentally superior alternative is the No Project alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.[93]

This section describes and evaluates the impacts of the following alternatives to the proposed Harbor Gateway Center project:

Alternative 1 - No Project Alternative
Alternative 2 - Master Planned Block Development
Alternative 3 - Alternative Land Use
Alternative 4 - Reduced Intensity
Alternative 5 - Golf Course
Alternative 6 - Large Parcelization

An alternative site for the proposed project is not evaluated in this document. The proposed project, in order to achieve its objectives of providing a master planned office/ industrial park environment that meets the need for high quality industrial land uses in the City of Los Angeles, as cited in numerous studies, would require a large site located within the City of Los Angeles. Other than the proposed project site, the Applicant does not own or control any other site of comparable size within the City of Los Angeles. In keeping with the requirements set forth in the State CEQA Guidelines, Section 15126, that alternatives analysis "describe a range of reasonable alternatives to the project, or the location of the project, which

[93] *California State Office of Planning and Research.* *Adopted Amendments to the State CEQA Guidelines. July 8, 1994, Section 15126(d).*

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could feasibly attain the objectives of the project" as well as guidance provided by the California Supreme Court in *Citizens of Goleta Valley v. Board of Supervisors ("Goleta II")* (1990) 52 Cal.3d 553 [276 Cal.Rptr.410], the lead agency concludes that development of a site outside its boundaries would not address the objectives of the project, cannot be realistically considered and successfully accomplished by the applicant and therefore would be infeasible.

In the event one of the alternatives identified in the following sections is selected for development in lieu of the proposed project, a detailed traffic study shall be prepared for the chosen alternative and approved by the Los Angeles City Department of Transportation. Any mitigation measures identified in the study which are located in neighboring jurisdictions shall be implemented to the satisfaction of the cognizant jurisdiction.

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VIII. ALTERNATIVES
B. ALTERNATIVES ANALYSIS
1. NO PROJECT

1. DESCRIPTION OF THE ALTERNATIVE

The No Project alternative assumes that no redevelopment of the site occurs and that on-site conditions remain as they are today. Approximately 2.4 million sq.ft. of existing industrial and warehouse buildings would remain, as would existing parking and other storage areas. The site would continue to be occupied by Douglas Aircraft Company warehousing and distribution operations.

2. ENVIRONMENTAL IMPACT CATEGORIES

Earth: The No Project alternative would have no additional effect on earth resources. Implementation of the proposed project, by comparison, would require the importation of approximately 450,000 cubic yards of earth and would expose additional employees and visitors to on-site seismic hazards. Although project impacts are not considered significant, the impacts of the alternative would be lower.

Air Quality: This alternative would not generate additional air emissions, although current emissions of CO (914 lbs./day), NO_x (155 lbs./day), and ROG (87 lbs./day) are above SCAQMD thresholds. Implementation of the proposed project would result in air pollutant emissions above SCAQMD thresholds, during both construction and operation. Operational emissions over threshold would be as follows: CO - 1,502 lbs./day; NO_x - 411 lbs./day; and ROG - 141 lbs./day. Air quality impacts associated with this alternative would therefore be lower than the proposed project.

Surface Water: Because most of the project site is currently covered with impervious surfaces such as pavement and structures, surface water runoff and impacts to local drainage facilities would be higher than under the proposed project, which includes increased permeable surface area and improvements to on-site drainage facilities. On the other hand, because this alternative would not include any new construction activity, it would not have short-term impacts upon surface water quality related to soil erosion.

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Plant Life: None of the existing on-site landscaping (51 trees, small area of turf) would be removed under this alternative, whereas all existing plant life would be replaced under the proposed project with coordinated, attractive landscaping. No improvement in landscaping would occur under the alternative.

Noise: This alternative would not include additional on-site noise generators, nor would it generate additional traffic on area roadways. Overall noise impacts of the alternative would therefore be lower than the proposed project.

Light and Glare: The No Project alternative would not add new light sources on-site. The proposed project would, on the other hand, add new light and glare sources, including two approximately 120-foot high lighted signs. Although light/glare impacts associated with the proposed project would not be significant, the alternative would have less impact.

Land Use: Like the proposed project, the current use is consistent with the General Plan land use designation and zoning for the site. The current use does not, however, implement the General Plan Framework objective of creating employment-generating uses in Regional Centers. In addition, the current use is inconsistent with the ongoing trend in the surrounding area toward industrial/office park and retail uses, and could be considered incompatible with adjacent residential uses. Overall land use impacts would therefore be greater under this alternative.

Transportation/Circulation: The alternative would not generate additional traffic that could impact adjacent congested intersections and freeway segments. Current on-site uses generate an estimated 8,560 daily vehicle trips, as compared to the 29,900 daily trips that would be generated by the proposed project. The impact of the alternative would be less than the project.

Public Services: The No Project alternative would not generate additional demand for fire or police protection service. Although the proposed project would include new structures with enhanced internal fire protection systems, it would increase fire and police service demand. Impacts would be lower under the alternative.

Energy Conservation: No short-term energy consumption or increase in long-term energy consumption would occur under the alternative. On-site electricity and natural gas consumption would remain at an estimated 18.7 million kWh/year and 13.3 million cubic feet/year, respectively. Under the proposed project, electricity consumption would

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increase to an estimated 39.7 million kWh/year while natural gas consumption would increase to 76.1 million cubic feet/year. Energy impacts would therefore be lower under the alternative.

Utilities: This alternative would not consume additional water, nor would it generate additional wastewater or solid waste. Current on-site water consumption is estimated at 6.0 million gallons/year, while current sewage and solid waste generation are estimated at 5.5 million gallons/year and 2,207 tons/year, respectively. By comparison, water consumption at buildout would be over 269 million gallons/year, while annual sewage and solid waste generation would be 245 million gallons and 24,000 tons, respectively. Consequently, although the proposed project would not significantly affect utility providers other than regional landfills, the impact of the alternative would be lower.

Risk of Upset: Because no demolition activity would occur under the No Project alternative, there would be no potential for the accidental release of asbestos. Remediation of on-site groundwater contamination would be expected to occur under the alternative; however, under the alternative, remediation of existing on-site soil contamination would not be expected to occur. Therefore, long-term improvements in on-site conditions with respect to hazardous materials that would occur under the proposed project would be less under the alternative.

Aesthetics: This alternative would result in no change to existing visual conditions on the project site. The proposed project, by contrast, would replace the existing deteriorating industrial/warehouse facilities with attractive new retail and office/industrial park development. The impact of the alternative upon aesthetic conditions would therefore be less beneficial than the proposed project.

3. IMPACT SUMMARY

The No Project alternative would not change existing conditions on the project site. As such, it would have none of the significant, adverse impacts with respect to traffic, air quality and solid waste, but it would also not have any of the potentially beneficial impacts of the project related to aesthetics, remediation of soil contamination, and asbestos removal.

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4. THE ALTERNATIVE'S RELATIONSHIP TO THE PROJECT OBJECTIVES

Because this alternative would not involve any redevelopment activity on the project site, it would not meet any of the objectives of the proposed project, including generation of high quality, high wage employment opportunities, provision of retail development that meets the needs of the community for goods and services and provision of opportunities to develop large scale, high technology, state-of-the-art industrial park activities, which require large sites not available in other parts of the City of Los Angeles.

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1. DESCRIPTION OF THE ALTERNATIVE

This alternative involves the development of a master planned block-wide project on the proposed project site and the adjacent International Light Metals site (currently owned by Lockheed Martin Corporation). Implementation of this alternative would combine the current development proposals by the Applicant and the adjacent property owner, who also has a development application presently pending before the City, to provide an integrated and comprehensively planned retail, service, office, and industrial park development on the two sites.

The composition of the master planned block-wide development is shown in Tables 38, 39 and 40 on pages 349 and 350. A conceptual site plan for the alternative is shown in Figure 44 on page 351. The two combined properties encompass approximately 237.6 gross acres, or 67.4 acres more than the proposed project site alone. Because the International Light Metals property is currently almost completely vacant, on-site demolition would be roughly equivalent to the proposed project. The alternative includes two primary components. On-site development under this alternative would increase the proposed project by approximately 0.8 million square feet of additional office/industrial park space, as well as including a retail/ service/hotel center component. As indicated in Table 39 on page 349, the retail/service/hotel center component would include a 350 room hotel, a sports club (open to the public) and a medical/office building, as well as incorporating the retail and theater components of the proposed project, at a slightly larger scale. The office/industrial park component of the alternative would include office park, research/development center and industrial park uses as shown in Table 40 on page 350. On-site employment at full occupancy of this alternative is estimated at about 8,300 persons.

By comparison, combination of the two pending development applications would result in the development of approximately 1.2 million square feet of retail uses, theaters totalling approximately 3,500 to 4,000 seats and approximately 2.5 million square feet of office/industrial park uses on the combined site. Thus the alternative would represent a reduction of approximately 750,000 square feet in retail uses as compared to the combined development applications.

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Table 38

MASTER PLANNED BLOCK DEVELOPMENT

Development Area/Use	Net Buildable Acreage	Approximate FAR	Approximate Building Area (sq.ft.)	Road Acres
Area 1: Retail[a]	45.0	0.25	480,000	0.0
Area 2: Office/Industrial Park[b]	113.2	0.50	2,474,000	12.1
Area 3: Hotel/Local Service[c]	20.0	0.37	320,000	0.0
Area 4: Office/Industrial Park[b]	43.8	0.46	873,000	3.5
Total	**222.0**		**4,147,000**	**15.6**
Gross Acreage (including roads)	237.6			

[a] *The composition of the retail component under this alternative includes: 390,000 square feet retail/restaurant; 80,000 square foot theater complex (5,000 seats) and 10,000 square foot medical office building.*

[b] *The composition of the office/industrial park component is shown in Table 40.*

[c] *The composition of the hotel/local service component is shown in Table 39.*

Source: Phillips Brandt Reddick (PBR), January 1997.

Table 39

MASTER PLANNED BLOCK ALTERNATIVE HOTEL/LOCAL SERVICE COMPONENT (AREA 3)

Use	Net Buildable Acreage	Approximate FAR	Approximate Building Area (sq.ft.)
Hotel (350 rooms)	8.0	0.67	240,000
Retail/Restaurant	5.3	0.15	35,000
Sports Club	6.7	0.15	45,000
Total	**20.0**	**0.37**	**320,000**

Source: PBR, January 1997.

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Table 40

MASTER PLANNED BLOCK ALTERNATIVE
OFFICE/INDUSTRIAL PARK COMPONENT
(AREAS 2 AND 4)

Use	Approximate Building Area (sq.ft.)
Office Park	798,000
Research/Development Center	291,000
Industrial Park	2,258,000
Totals	**3,347,000**

Source: PBR, January 1997.

Urban design standards for Alternative 2 would be the same as the proposed project. The specific landscape standards for the 190th Street and Western Avenue frontages (a minimum 30 foot wide landscape area, of which 20 feet would be on-site) would apply on the International Light Metals property portion of the project area for this alternative. Adequate internal circulation would be provided to serve the additional project site included under the alternative. Under this alternative, extension of 195th Street through the project site would be possible thereby providing an additional connection with the Toyota Motor Sales U.S.A. headquarters office campus and providing potential relief for 190th Street traffic conditions.

For purposes of evaluating this alternative, it is appropriate that the impacts of the alternative be compared with the combined development applications (referred to in the following analyses as the "combined projects") presently pending before the City, as well as against the proposed project alone. The amount of development projected under the alternative would not occur within the Applicant's site under the proposed project alone. Under the State CEQA Guidelines (Section 15126), the purpose in selecting alternatives is to "foster informed decision-making and informed public participation." The purpose of including this alternative is to demonstrate the potential environmental impacts should the planning and development of these two sites be coordinated, an appropriate consideration for the City since neither project has received final approval. In the absence of the alternative, both development applications would be expected to proceed independently before the City for decision and be developed in a manner consistent with the development envelopes outlined in their applications. Therefore the combined projects, as outlined in the pending development applications, would provide the

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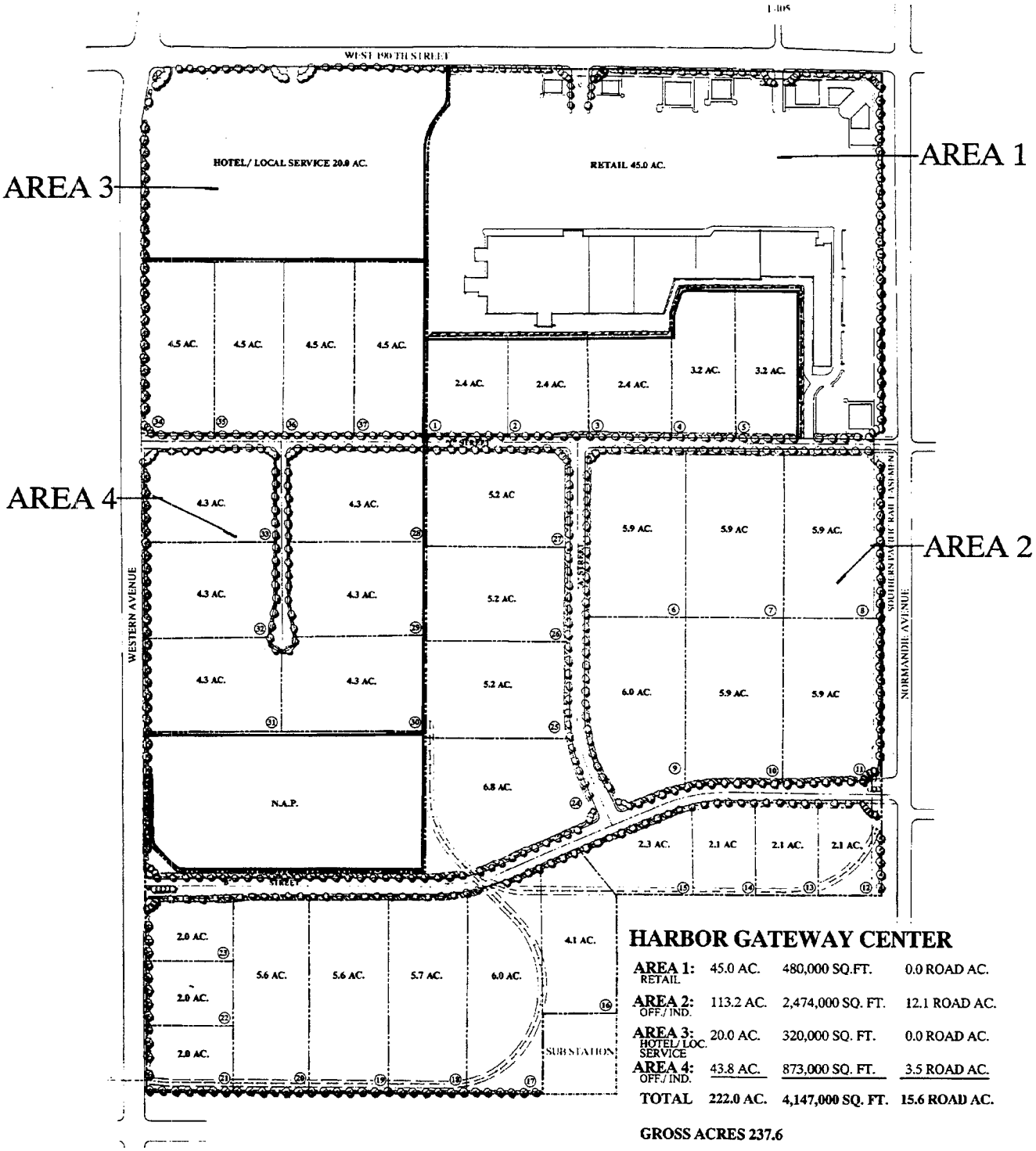

HARBOR GATEWAY CENTER

AREA 1: RETAIL	45.0 AC.	480,000 SQ.FT.	0.0 ROAD AC.
AREA 2: OFF./ IND.	113.2 AC.	2,474,000 SQ. FT.	12.1 ROAD AC.
AREA 3: HOTEL/ LOC. SERVICE	20.0 AC.	320,000 SQ. FT.	0.0 ROAD AC.
AREA 4: OFF./ IND.	43.8 AC.	873,000 SQ. FT.	3.5 ROAD AC.
TOTAL	**222.0 AC.**	**4,147,000 SQ. FT.**	**15.6 ROAD AC.**

GROSS ACRES 237.6

EXISTING DEVELOPMENT TO BE DEMOLISHED	**2,419,000 SQ. FT.**
NET NEW DEVELOPMENT	**1,728,000 SQ. FT.**

Planning Consultants Research

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SOURCE: PBR, January 1997

Figure 44
Alternative 2- Master Plan Block Development

most accurate point of comparison for this alternative. For disclosure purposes, the analysis of the alternative also addresses the potential impacts of the alternative relative to the level of impacts identified for the project as proposed. This comparison must be considered, however, with the caveat that the impacts of the alternative are greater, in most cases, than those of the proposed project simply because the alternative represents a larger project. Moreover, this alternative would not be accommodated within the proposed project site alone.

It should be noted that, because this alternative would involve development of the adjacent property as well as the project site, it would require the cooperation of the adjacent property owner in order to be feasible. In the absence of such voluntary cooperation, implementation of the alternative would not be feasible as the City has no authority to compel such cooperation.

2. ENVIRONMENTAL IMPACT CATEGORIES

Earth: As compared to the combined projects, the alternative would involve a similar amount of earth movement and importation of fill. Overall exposure to on-site seismic hazards would also be similar under this alternative. This alternative's overall earth impacts would therefore be about the same as the combined projects. The impacts of the alternative would be greater than the proposed project because grading would take place over a larger area.

Air Quality: This alternative would entail a similar amount of development and similar size of development site as under the combined projects. Air emissions related to construction activity would therefore be about the same. Overall vehicle trips would be about 57% lower than the combined projects, primarily because of the reduction in retail square footage. Consequently, overall air emissions and impacts upon local and regional air quality are considered lower under this alternative, when compared to the combined projects. When compared to the proposed project alone, the alternative would result in higher air quality emissions from construction, including potential PM_{10} concentrations in excess of the relevant standard at sensitive receptor locations in the vicinity of the project site. In addition, the alternative would generate greater operational regional mobile and stationary emissions than the proposed project alone which would likely be in excess of SCAQMD thresholds for CO, ROG and NO_x. In addition, because the project site is located in an area characterized by high ambient concentrations of CO, exceedance of the state and/or federal standards for local CO concentrations could occur under the alternative.

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Surface Water: This alternative would involve the development of a similar amount of on-site impervious surface area as would occur under the combined projects. Because overall construction activity would be about the same as would occur under the combined projects, the potential for erosion-related surface water quality impacts would be about the same as well. This alternative's overall water impacts would therefore be similar to the combined projects. The alternative would increase the total amount of runoff compared to the proposed project alone, because of the greater amount of impervious surface which would be created. Since the storm drain system in this area has been identified as inadequate, the overall impact of the alternative would be greater than for the proposed project alone, although design measures could be included in the alternative (like the proposed project) which would retain excess flows on site and thus reduce impacts on the storm drain system while sufficiently protecting persons and property on the site from flooding hazards.

Plant Life: As with the combined projects, this alternative would involve replacement of all plant life on the two development sites with a substantial increase in on-site landscaping. Impacts to plant life associated with this alternative would therefore be the same as those of the combined projects and would be less than significant. Since the International Light Metals site is currently devoid of any vegetation, the alternative would not affect plant life to any greater degree than would the project as proposed.

Noise: The alternative would accommodate about the same amount of development as would the combined projects. Overall construction noise impacts would therefore be about the same compared to the combined projects, but would be greater than the proposed project alone because of the greater amount of development which would occur under the alternative compared to the proposed project, although the exact magnitude of the impact would depend upon the phasing of development occurring under the alternative. Impacts related to potential on-site stationary sources would be increased because of increased office/industrial park development, compared to both the combined projects and the proposed project alone. However, because of reduced retail development under the alternative, overall vehicle trips and related vehicular noise impacts would be about 34% lower compared to the combined projects, but would be about 52% higher compared to the proposed project alone.

Light and Glare: As this alternative would entail similar amounts and types of development as compared to the combined projects, the number and types of new on-site light and glare sources would be similar as well. Although office/industrial park development would be greater under the alternative, any potential increase in lighting

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impacts would be offset by the reduced square footage of retail uses, which are typically brightly lit, under the alternative. This alternative's impact upon local light/glare conditions would therefore be similar to the combined projects. Compared to the proposed project alone, light and glare impacts would be greater under the alternative because of the larger area to be developed and the increased amount of development which would occur under the alternative.

Land Use: As with each of the individual development projects, the retail/restaurant, theater, service, office and industrial park uses included in the alternative would be consistent with the current General Plan land use designation and zoning for the sites. However, the proposed hotel use would be inconsistent with the designated General Plan land use and zoning (i.e., industrial). Thus, a zone change[94] would be required for this component of the alternative. This would constitute a greater land use impact under the alternative as compared to either the combined projects or the proposed project alone. Neither the alternative, the combined projects nor the proposed project alone would be expected to create any significant impacts on adjacent uses. However, the coordinated development of the two adjacent sites, as would occur under this alternative, would minimize the potential for internal compatibility conflicts. It would also better ensure consistency with City of Los Angeles General Plan Framework policies related to providing integrated development in Regional Centers. The alternative would be preferred to the proposed project alone with respect to these considerations. However, because the hotel use included in the alternative would require a zone change and conditional use permit in order to be permitted on this site, overall land use impacts are considered to be higher under this alternative compared to both the combined projects and the proposed project alone.

Transportation/Circulation: The Master Planned Block alternative would generate an estimated 32,400 additional daily vehicle trips. This is less than the 48,800 additional trips that would be generated by buildout of the two individual projects combined because of the reduction in retail development.[95] Therefore, impacts to the local circulation system would be less than the approximately 35 significantly impacted

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94 *The Harbor Gateway District Plan permits hotel uses in the M1 and M2 zones with issuance of a conditional use permit. Thus, only a zone change from the current M3 to M2 or M1 for the hotel site would be required.*

95 *Based on 21,340 additional daily trips generated by the proposed project (see Section IV.H, Transportation/ Circulation) plus the 27,480 trips generated by the project proposed at the International Light Metals site (see Harbor Gateway Retail Center Draft EIR, August 1996).*

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intersections for the combined projects[96], although significant traffic impacts would occur at 30 intersections. Application of the mitigation measures proposed for the project would reduce impacts to less than significant at all but approximately 13 intersections. Application of the same mitigation measures would result in significant impacts remaining at approximately 16 intersections for the combined projects. In both cases, impacts would be greater than the four intersections which would be significantly impacted after mitigation under the proposed project. While all feasible mitigation measures have been identified to address significant project traffic impacts, it should be noted that additional measures may be available to further reduce the number of significant impacts for the alternative and the combined projects. A traffic analysis focused on the impacts of the alternative as well as the combined projects would be required to identify such measures. The alternative would also provide improved opportunities to coordinate on-site circulation, as well as the development of alternative transportation programs. The potential benefits of these factors is not reflected in the quantified results provided above. As a result of these factors, while the transportation impacts of the alternative are considered higher than for the proposed project by itself, they are considered lower than for the combined projects.

Public Services: This alternative would entail a similar amount of development as the combined projects. Demand for police and fire protection services would therefore be about the same as that of the combined projects. However, the integration of the two projects into a coordinated overall development project would enable the applicants to address safety and fire protection concerns in a comprehensive manner. In addition, the extension of 195th Street would afford improved police and fire access to both properties. Overall public service impacts would therefore be lower under this alternative as compared to the combined projects. However, the impacts of the alternative would be greater than under the proposed project alone because of the larger overall size of the alternative.

Energy Conservation: Electricity consumption would be about 18% lower than would occur under the combined projects, while consumption of natural gas would be about 1% higher (see Appendix G for calculations). Overall energy impacts associated with the alternative would therefore be similar to the combined projects. Impacts would be higher than the proposed project by itself due to the greater development which would occur under the alternative.

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96 *The combined projects may have greater significant impacts when the impacts of the two proposals are evaluated as a single project than when the two projects are considered individually.*

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Utilities: Consumption of water would be about 12.5% higher under this alternative. Wastewater and solid waste generation would be 13% and 25% higher, respectively (see Appendix G for calculations). Although the integration of the two development projects would allow utility providers to address utility needs for the two sites in a more comprehensive and efficient manner, overall utility impacts would therefore be slightly greater under this alternative as compared to the combined projects and the proposed project alone because of greater development which would occur under the alternative (compared to the project).

Risk of Upset: Like the project site, the former International Light Metals site contains contaminated soils. However, remediation of any contamination on either site that requires corrective action would be conducted prior to site development. Consequently, overall health and safety impacts associated with this alternative are considered similar to the combined projects. Because required remediation would occur on the proposed project site prior to development as well, the impacts of the alternative would also be similar to the proposed project.

Aesthetics: The alternative would involve the coordinated development of two adjacent properties with uses similar to those proposed for the combined projects. Such coordinated development would include a uniform set of urban design guidelines that would facilitate a cohesive, integrated visual appearance for the two properties. The proposed project includes a similar set of coordinated guidelines for the project site itself; however, the proposed project's urban design guidelines would not apply to the former International Light Metals property, which could be developed with a different set of guidelines. The two sets of guidelines may or may not be consistent. Whether this would result in a lesser or a greater impact would depend solely upon the individual observer. The same assessment would hold true for the impacts of the alternative as compared to the proposed project alone.

3. IMPACT SUMMARY

The impacts of this alternative to physical resources such as earth and water would be similar to the combined projects. Traffic generation would be reduced by approximately 16,000 daily trips or 34% compared to the combined projects. The integrated, coordinated development that would be accommodated under this alternative would be expected to reduce impacts related to land use, public services, utilities, noise, and air quality. In addition, although significant traffic impacts would occur under this alternative, overall traffic impacts

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are expected to be lower because of reduced retail development. Overall, the Master Planned Block Development alternative would be superior to the combined projects, except for land use, where the alternative would have greater impacts than the proposed project because of the inclusion of a hotel component. However, for disclosure purposes, it should be noted that the alternative would result in higher impacts than the proposed project alone with respect to all impacts except for plant life, risk of upset and aesthetics, where the impacts of the alternative would be similar to those of the proposed project when considered by itself.

4. THE ALTERNATIVE'S RELATIONSHIP TO THE PROJECT OBJECTIVES

This alternative would achieve all of the objectives for the proposed project. In addition, it would better implement certain objectives than would the proposed project itself by providing for the integrated redevelopment of two adjacent properties in one consolidated retail/office/ industrial park complex. Specifically, the master planned block development would better serve the project objectives of being compatible with the mix of uses in the site vicinity, providing greater office/industrial park development that is complementary of existing office/industrial park development in the area, and enhancing the aesthetic character of the Harbor Gateway community through the use of consistent and appropriate architectural styles and landscaping. This alternative may not, however, meet all of the objectives of the International Light Metals site owner, which include converting the site to an economically viable commercial use, allowing the City of Los Angeles to become more competitive with adjoining cities for commercial development, and addressing the demand for community services in the Harbor Gateway area. In addition, because the project applicant does not control any portion of the International Light Metals site, implementation of this alternative without the cooperation of the adjacent site owner would not be feasible.

BOE-C6-0115501

1. DESCRIPTION OF THE ALTERNATIVE

The Alternative Land Use scenario involves the redevelopment of the McDonnell Douglas property with a different mix of uses along the 190th Street frontage of the project site offset by increased intensity of development within the office/industrial park component. The development that would occur under this alternative is shown in Tables 41 and 42 on page 359. All existing structures on the project site would be removed. Thus, on-site demolition would be identical to the proposed project. In place of the proposed 40 acre retail/theater/restaurant component, a 200 room hotel, a sports club, supporting limited retail and restaurant development, and a one-half acre plaza would be developed on a 12 acre site (see Table 41). While development within the office/industrial park component of the project would be of similar character to the proposed project, this component would be increased by 28 acres and developed at an FAR of 0.63:1, rather than the 0.44:1 FAR for the proposed project. This additional 28 acres, in combination with the increased in allowable development intensity, would accommodate nearly 1.7 million square feet more office/industrial park development as compared to the proposed project. Approximately 7,600 jobs would be generated under this alternative. An internal circulation system would be constructed to provide similar internal access as the proposed project. Urban design standards, including maximum building height and setbacks, would be the same as under the proposed project.

2. ENVIRONMENTAL IMPACT CATEGORIES

Earth: This alternative would require grading similar to the proposed project. Like the proposed project, it would also accommodate increased numbers of employees and visitors who would be exposed to the seismic hazards that exist in the region, although no significant seismic hazards exist on-site. Overall earth impacts associated with the Alternative Land Use alternative would be similar to the proposed project.

Air Quality: This alternative would involve a similar amount of development as would occur under the proposed project. Air quality impacts related to construction would therefore be similar, as would impacts related to energy consumption. Because overall

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Table 41

ALTERNATIVE LAND USE

Use	Net Buildable Acreage	Approximate FAR	Approximate Building Area (sq.ft.)	Roadway Acreage
Hotel/Local Service[a]	12.0	0.37	192,000	1.5
Office/Industrial Park	148.4	0.65	4,201,800	8.3
Total	**160.4**		**4,393,800[b]**	**9.8**
Gross Acreage	170.2			

[a] *The composition of the hotel/local service component is shown in Table 42.*

[b] *Represents an approximately 0.63:1 FAR over entire site.*

Source: PBR, April 1996.

Table 42

ALTERNATIVE LAND USE HOTEL/LOCAL SERVICE COMPONENT

Use	Net Buildable Acreage	Approximate FAR	Approximate Building Area (sq.ft.)
Hotel (200 rooms)	4.0	0.77	135,000
Retail	3.0	0.20	25,000
Sports Club	2.5	0.20	20,000
Restaurant	2.0	0.18	12,000
Plaza	0.5		
Total	**12.0**	**0.37**	**192,000**

Source: PBR, April 1996.

trip generation would be nearly identical under this alternative (21,270 new trips as compared to the 21,340 trip increase under the proposed project), air quality impacts related to motor vehicle activity to and from the site would be similar as well. Overall air quality impacts would therefore be similar to the proposed project.

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Surface Water: Like the proposed project, this alternative would include impervious surfaces such as pavement and buildings on the 170.2 acre site. Depending upon the height of on-site buildings, overall impervious surface area may be somewhat greater under this alternative due to the increased intensity of office/industrial park development 0.63:1 FAR versus the 0.44:1 FAR for the proposed project). Consequently, overall impacts to the local storm drain system would be greater under the alternative.

Plant Life: As with the proposed project, buildout of the alternative would entail the replacement of all existing on-site vegetation, which consists of introduced tree species, lawns, and shrubs, with coordinated on-site landscaping. Impacts to plant life would be similar to the proposed project.

Noise: Because this alternative would involve a similar amount of on-site development as would occur under the proposed project, construction noise impacts would be similar as well. The amount of industrial development would be greater under this alternative; therefore, the potential for new on-site stationary noise sources would be higher than the proposed project. Because overall trip generation would be nearly identical under this alternative, impacts to noise levels on area roadways would be similar.

Light and Glare: This alternative would introduce sources of light similar to the proposed project. However, because it would accommodate more intense office/ industrial park development in the southern portion of the project site, this alternative may have the potential to generate somewhat greater lighting impacts upon the residential neighborhood to the south of the site. This would be offset under the alternative, since it would not include the proposed 120-foot high pole signs. Overall light/glare impacts are considered similar to the proposed project.

Land Use: Like the uses proposed under the project, the uses that would be accommodated under the Alternative Land Use alternative would be allowed under the current City of Los Angeles General Plan land use designation and zoning. Uses accommodated under this alternative would also generally be compatible with surrounding uses. Overall land use impacts are therefore considered similar to those of the proposed project. The overall density would be approximately 0.63:1 under this alternative, as compared to the 0.44:1 FAR proposed for the project. However, the FARs under the alternative and the project would be permitted by both the General Plan and zoning designations currently applicable to the project site.

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Transportation/Circulation: This alternative would generate a nearly identical number of additional daily vehicle trips as would the proposed project (an estimated 21,270 daily trips, as compared to the 21,340 daily trips that would be generated by the proposed project). Impacts during the morning peak hour would be slightly greater under this alternative, but evening peak hour impacts would be slightly less. Significant impacts would occur at 29 intersections. Seven intersections are projected to remain significantly impacted after mitigation under the alternative. Overall, circulation impacts would be similar to the proposed project.

Public Services: As with the proposed project, the Alternative Land Use alternative would introduce development that would place additional demands upon police and fire protection. This alternative would accommodate more development in terms of overall building area but would include less retail development, which is typically the greatest generator of demand for police and fire services. Overall impacts would therefore be similar to or less than the proposed project.

Energy Conservation: The Alternative Land Use alternative would include more on-site development in terms of overall building area, but less retail development. Electricity and natural gas consumption would be about 40% and 47% higher, respectively, than would occur under the proposed project (see Appendix G for calculations). Overall impacts to energy resources would therefore be somewhat greater than those of the proposed project.

Utilities: Projected water consumption and wastewater generation are about 33% higher under the alternative. Solid waste generation would be about 75% higher due to the increase in industrial development (see Appendix G for calculations). Overall impacts to local utility infrastructure would therefore be somewhat greater than those of the proposed project.

Risk of Upset: This alternative would have the potential to expose site employees and visitors to hazards related to existing on-site soil and groundwater contamination in the absence of appropriate remediation. However, under both this alternative and the proposed project, on-site development would occur only after appropriate remediation activities have been undertaken. Impacts related to hazardous materials associated with this alternative would be similar to the proposed project.

Aesthetics: Like the proposed project, the Alternative Land Use alternative would have generally beneficial impacts upon aesthetic conditions on the project site. The increased

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intensity of office/industrial park uses in the southern portion of the site may, however, create a less appealing viewshed from residences south of the site due to the potential for increased building intensity and/or reduction in landscape area. Overall aesthetic impacts associated with this alternative are therefore considered slightly less beneficial than under the proposed project.

3. IMPACT SUMMARY

The more intense office/industrial park development that would be accommodated under this alternative would have somewhat greater impacts upon local drainage infrastructure, solid waste generation, water and utility consumption, as well as a greater potential to adversely affect residences immediately south of the site in terms of aesthetics and nighttime lighting. However, reduced traffic generation would result in lower impacts with respect to traffic, noise and air quality. Overall, the environmental impact of this alternative would be similar to the proposed project.

4. THE ALTERNATIVE'S RELATIONSHIP TO THE PROJECT OBJECTIVES

This alternative would generally meet the objectives of the proposed project. Project objectives that may not be met by this alternative include the provision of high quality retail development that meets community needs for goods and services as well as generation of sales tax revenues to the City due to the reduced retail component. The hotel and local service retail development that would be accommodated under this alternative may be considered less desirable in terms of meeting community need than the large scale retail development that would be accommodated under the proposed project, due both to its reduced size and likely focus on hotel and sports club patrons.

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1. DESCRIPTION OF THE ALTERNATIVE

This alternative would reduce the development intensity of the proposed project. On-site uses (retail and office/industrial park development) would be the same as those of the proposed project. However, overall building area for each project component would be reduced by approximately 25%. As shown in Table 43 below, on-site development at project buildout would total about 2.2 million square feet, as compared to the nearly 3 million square feet that would be developed under the proposed project. On-site employment at full occupancy of this alternative is estimated at about 3,900.

Table 43

REDUCED INTENSITY ALTERNATIVE

Area/Use	Net Buildable Acreage	Approximate FAR	Approximate Building Area (sq.ft.)	Road Acreage
Area 1: Retail	40.0	0.18	337,500	2.1
Area 2: Office/Industrial Park	115.6	0.38	1,888,275	12.5
Total	**155.6**		**2,225,775**	**14.6**
Gross Acreage	170.2			

Source: PBR, April 1996.

Urban design standards for this alternative would be identical to those of the proposed project. However, because of the reduction in on-site building area, average building height would likely be lower and setback distances would generally be greater. Overall landscape area on-site may therefore increase.

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2. ENVIRONMENTAL IMPACT CATEGORIES

Earth: Implementation of the Reduced Intensity alternative would involve grading of the site, similar to that which would occur under the proposed project. Import of fill would be less under the alternative. Fewer employees and visitors would be exposed to seismic hazards which could be experienced on-site. Overall earth resources impacts would be lower under this alternative.

Air Quality: Because this alternative would entail the construction of only about 75% as much overall building area as the proposed project, emissions related to construction activity would be lower. Operational stationary and mobile source emissions associated with site development would be lower because the increase in vehicle trips to and from the site would be about 30% lower. Overall air quality impacts directly related to the on-site activity would therefore be lower under this alternative, although both construction and operational emissions would remain above SCAQMD significance thresholds.

Surface Water: Because this alternative would be developed at 75% of the intensity of the proposed project, it would be expected to introduce less impervious surface area and more landscaped area than would the proposed project.[97] Consequently, overall surface water flow from the site would, and corresponding impacts to the local drainage system, would be lower. Surface runoff during construction would also be less due to the reduced site area involved in construction.

Plant Life: Like the proposed project, the Reduced Intensity alternative would involve the replacement of all on-site plant life with landscaping in accordance with coordinated landscape plan for the entire site. Impacts would be similar to the proposed project.

Noise: The Reduced Intensity alternative would introduce less overall industrial park development than would the proposed project. Therefore, it would have less potential to introduce stationary source noise generators that could adversely affect nearby sensitive receptors. In addition, because the increase in vehicle trips to and from the site would be about 30% lower than under the proposed project, noise related to motor vehicle movement would be lower on-site and on surrounding roadways. Overall noise impacts would therefore be lower under this alternative.

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97 *The amount of impervious surface area would, however, be similar if the reduction in on-site building area is reduced exclusively by lowering building heights rather than reducing building footprints.*

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Light and Glare: Because this alternative would accommodate 25% less overall development than would the proposed project, it would include fewer potential sources of light and glare. Although the proposed project's impact upon local light/glare conditions is not anticipated to be significant, this alternative would have less potential to generate light that could affect receptors such as the residential neighborhood to the south of the site. The alternative could include the 120-foot high retail signs which could be lighted. Overall light/glare impacts would therefore be considered lower under this alternative.

Land Use: Like the uses proposed under the project, the uses that would be accommodated under the Reduced Intensity alternative would be consistent with the City of Los Angeles General Plan land use designation and zoning for the site. In addition, all proposed uses would generally be compatible with the mix of uses in the site vicinity. The lower intensity development accommodated under this alternative would have slightly less potential to create conflicts with adjacent residential properties, due to the reduction in building intensity, lighting, and traffic. Consequently, land use impacts are considered slightly lower under this alternative.

Transportation/Circulation: This alternative would generate an estimated 14,920 additional daily vehicle trips. This is about 30 percent fewer trips than would be generated by operation of the proposed project. Significant impacts would occur at 24 intersections, as compared to the 30 intersections that would be significantly affected by the proposed project. Three intersections are projected to remain significantly impacted after mitigation under the alternative. Consequently, overall impacts to the area transportation system would be lower under the alternative.

Public Services: The Reduced Intensity alternative would involve 25% less building area than would the proposed project, with a corresponding reduction in on-site employment. Consequently, overall on-site demand for police and fire protection service would be lower under this alternative and, with mitigation, would be less than significant.

Energy Conservation: Because this alternative would involve 25% less overall development on-site than would the proposed project, buildout would create less demand for energy. Electricity consumption would be about 69% lower and natural gas consumption would be 30% lower (see Appendix G for calculations). Therefore, impacts to energy resources would be lower under this alternative.

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Utilities: Because this alternative would involve 25% less overall development on-site than would the proposed project, buildout would create less demand for water and would generate less wastewater and solid waste. Water consumption and wastewater generation would be about 28% lower; solid waste generation would be 26% lower (see Appendix G for calculations). Therefore, impacts to utility infrastructure would be lower under this alternative.

Risk of Upset: As with the proposed project, remediation of existing on-site contamination would occur prior to on-site construction and building occupancy under the Reduced Intensity alternative. The overall impact with respect to hazardous materials would be similar to the proposed project.

Aesthetics: Like the proposed project, this alternative would result in generally beneficial impacts to the aesthetic condition of the project site. The lower intensity of development may reduce impacts to viewsheds from surrounding roadways and properties to some degree. It may also allow for more landscaping and open space. Overall aesthetic impacts would be more beneficial than the proposed project.

3. IMPACT SUMMARY

The environmental impacts of the alternative would generally be less than the proposed project due to the reduced size of the alternative. Significant traffic impacts may occur under the alternative, although traffic impacts would generally be lower than those of the proposed project.

4. THE ALTERNATIVE'S RELATIONSHIP TO THE PROJECT OBJECTIVES

The Reduced Intensity alternative would generally meet the project objectives related to redevelopment of the project site and the provision of high quality retail and office/industrial park development, but to a lesser degree than the proposed project.

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VIII. ALTERNATIVES
B. ALTERNATIVES ANALYSIS
5. GOLF COURSE

1. DESCRIPTION OF THE ALTERNATIVE

Area 1 development under this alternative would include a 450,000 square foot retail center on 40 acres, identical to the proposed project. However, in place of the 2.4 million square feet of office/industrial park development, Area 2 would be developed with a 130.2-acre, 18-hole golf course. On-site employment at full occupancy of this alternative is estimated at about 1,200.

2. ENVIRONMENTAL IMPACT CATEGORIES

Earth: Although the amount of fill that would be needed under this alternative is not known, development of a golf course would be expected to require more overall movement of earth than would the office/industrial park development proposed as part of the project. On the other hand, a golf course would expose fewer employees and visitors to seismic hazards which might occur on-site.

Air Quality: Under the alternative, construction emissions would be higher than the proposed project because of increased grading requirements. The golf course that would be developed under this alternative would consume less energy and generate about 74% fewer new vehicle trips than the office/industrial component of the proposed project. Operational impacts would therefore be lower.

Surface Water: The Golf Course alternative would introduce less impervious surface area than would the proposed project. It would therefore generate less surface runoff and have less impact upon the local storm drain system. Although this alternative would not include industrial uses which could use hazardous materials, golf course maintenance could involve the use of pesticides and herbicides that could adversely affect surface water quality . Because of the high rate of pesticide and herbicide use on golf courses, which are pervious by nature, groundwater impacts associated with this alternative are considered potentially greater than those of the proposed project.

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Plant Life: Like the proposed project, this alternative would involve replacement of all on-site plant life with introduced landscaping and turfed areas. Impacts would be similar to those of the proposed project and would be less than significant.

Noise: Construction impacts would be similar to the proposed project, with reduced building construction effects offset by increased grading requirements. The Golf Course alternative would not include any sources of substantial on-site noise. In addition, because the golf course would generate about 74% fewer vehicle trips than would the 2.4 million square feet of industrial development that would be built under the proposed project, the increase in noise on area roadways would be less. Overall noise impacts would therefore be lower under this alternative.

Light and Glare: The golf course that would be developed in Area 2 under this alternative would include only minimal sources of light and glare. Although light and glare impacts associated with the proposed project are not anticipated to be significant, the impacts of the alternative would be lower.

Land Use: A golf course is permitted by right on the project site under existing zoning. Unlike the office/industrial park development proposed as part of the project, a golf course would not implement the General Plan Framework objective of creating employment-generating uses in Regional Centers. Although a golf course would not create any significant incompatibilities with surrounding uses, it would represent a substantial departure from land use patterns in the site vicinity. Overall land use impacts would be greater than those of the proposed project.

Transportation/Circulation: This alternative would generate an estimated 5,640 daily vehicle trips, or about 74% fewer new trips than would be generated by operation of the proposed project. Fewer trips would also be generated during both the morning and afternoon peak traffic hours. Three intersections would experience significant impacts, as compared to the 30 intersections that would be significantly impacted by the proposed project. One intersection is projected to remain significantly impacted after mitigation under this alternative. Overall impacts to the area circulation system would therefore be lower under this alternative.

Public Services: The golf course that would be developed under this alternative would introduce fewer new employees and visitors to the project site than would the office/ industrial park component of the proposed project. As such, it would be expected to

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generate less demand for police and fire protection service. Impacts to public services would therefore be lower.

Energy Conservation: Electricity consumption would be about 160% lower under this alternative and natural gas consumption would be an estimated 96% lower (see Appendix G for calculations). Overall energy resource impacts would therefore be lower under this alternative.

Utilities: Water consumption associated with this alternative is projected to be 10% higher than under the proposed project due to the proposed golf course. However, wastewater generation would be about 80% lower while solid waste generation would be about 108% lower (see Appendix G for calculations). Overall utility impacts would therefore be slightly lower under this alternative.

Risk of Upset: As with the proposed project, development of this alternative would occur only after remediation of any on-site soil or groundwater contamination exceeding remediatory action levels. Therefore, impacts with respect to hazardous materials would be similar to those of the proposed project and would be less than significant.

Aesthetics: Like the proposed project, this alternative would have generally beneficial impacts to on-site visual conditions. The open space area that would be provided under this alternative may be considered an attractive visual amenity for the project site vicinity, particularly for residents directly south of the site.

3. IMPACT SUMMARY

The Golf Course alternative would be permitted by right under existing zoning, although it would not fulfill the General Plan Framework policies objectives for areas designated as Regional Centers. Traffic and traffic-related air quality and noise impacts would be lower under this alternative, as would impacts to local drainage infrastructure, public services, and utilities.

4. THE ALTERNATIVE'S RELATIONSHIP TO THE PROJECT OBJECTIVES

The Golf Course alternative would meet the project objectives related to redeveloping the project site with uses that are compatible with the mix of uses in the area and enhancing the

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aesthetic character of the vicinity. It would not, however, meet the objectives related to the development of large scale office/industrial park development or the provision of high quality, high wage employment opportunities in a range of occupations. In addition, development of a golf course on the project site may not maximize the fiscal benefits to the City in terms of property tax revenues.

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1. DESCRIPTION OF THE ALTERNATIVE

Under this alternative, the entire 170.2-acre site would be developed with office/ industrial park uses. However, instead of being developed as a coordinated office/industrial park with an internal circulation system and other amenities, the alternative would consist of a series of large parcels designed to accommodate a small number of individual users, with principal access provided by the adjacent street system (Western Avenue, 190th Street, Normandie Avenue). As with the proposed project, the FAR for the site would be 0.5:1; therefore, overall on-site office/industrial park development at buildout would be just over 3.7 million square feet. A conceptual site plan for this alternative is shown in Figure 45 on page 372. Site landscaping would be provided at similar levels as the proposed project, but would be the responsibility of individual site developers. Therefore, a coordinated landscaping plan would not be included under this alternative. Development standards and regulations (e.g., setbacks, height limits, etc.) would be the same as the proposed project.

2. ENVIRONMENTAL IMPACT CATEGORIES

Earth: This alternative would require similar amounts of earth movement as would the proposed project. It would also expose a similar number of employees/visitors to on-site seismic hazards. Overall earth impacts would therefore be similar to those of the proposed project.

Air Quality: Construction impacts would be slightly less than the proposed project because of reduced construction area and fewer individual projects. Overall energy consumption would be similar to that of the proposed project, although daily trip generation would be about 31% lower. Overall air quality impacts would therefore be lower under the alternative.

Surface Water: Overall impervious surface area associated with this alternative may be slightly greater than under the proposed project because of the increase in overall building area (3.7 million square foot as compared to 3 million square foot under the

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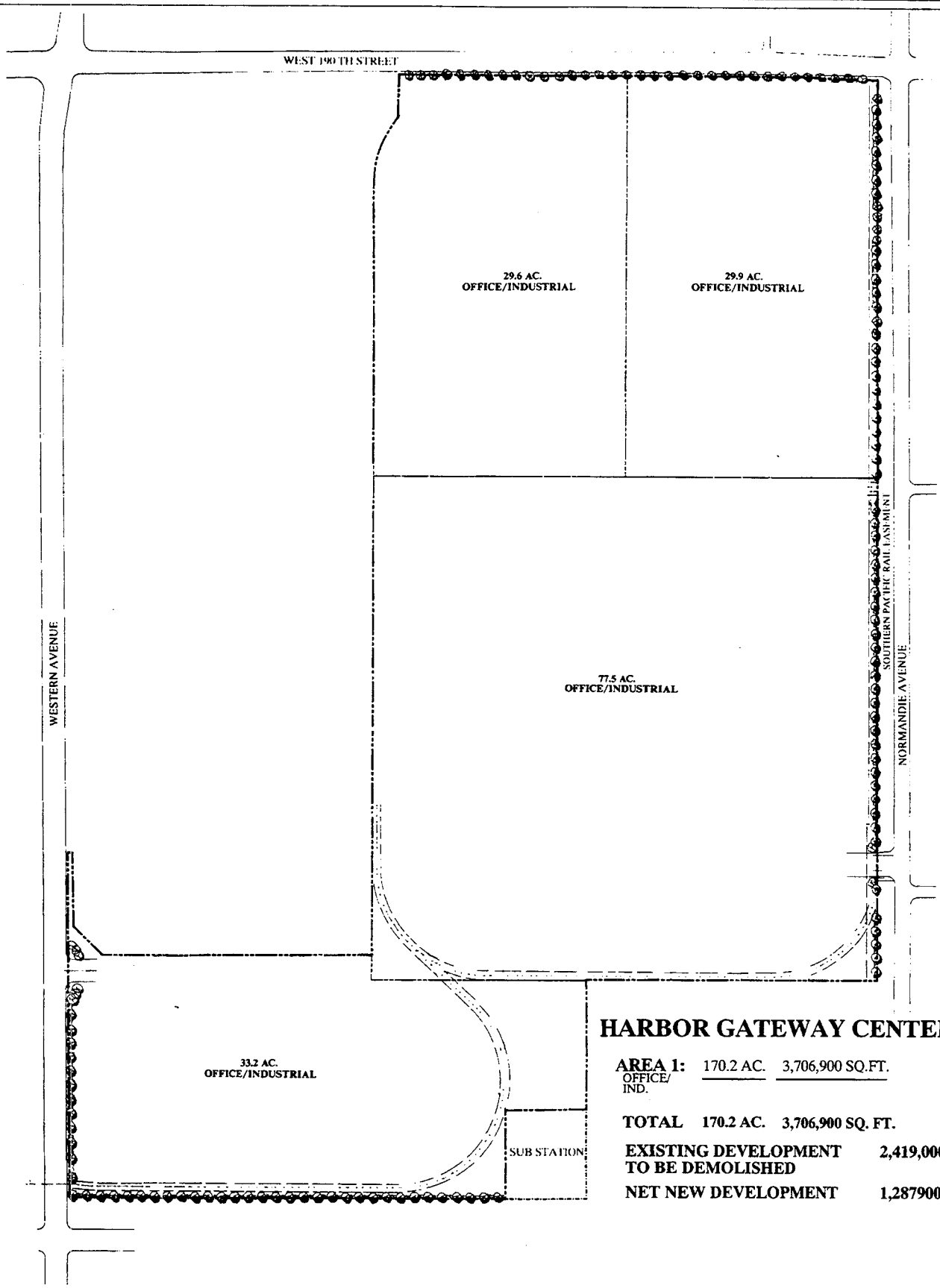

HARBOR GATEWAY CENTER

AREA 1: OFFICE/ IND.	170.2 AC.	3,706,900 SQ.FT.
TOTAL	**170.2 AC.**	**3,706,900 SQ. FT.**
EXISTING DEVELOPMENT TO BE DEMOLISHED		**2,419,000 SQ. FT.**
NET NEW DEVELOPMENT		**1,287900 SQ. FT.**

Planning Consultants Research

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Figure 45
Alternative 6-Large Parcelization

SOURCE: PBR, May 1996

project). Therefore, surface runoff from the site and impacts to area drainage facilities would be expected to be slightly greater. The potential for erosion during construction and potential impacts to surface water quality would be similar to the proposed project.

Plant Life: Like the proposed project, this alternative would involve the replacement of all on-site plant life. New landscaping would be provided, but not in accordance with a coordinated plan as would occur under the proposed project. Impacts would be similar to the proposed project and would be less than significant.

Noise: Construction noise impacts would be similar to the proposed project. This alternative's potential to include noise-generating on-site uses that would affect nearby receptors would be greater than the proposed project due to increased office/industrial park square footage. On the other hand, because overall daily trip generation would be about 31% lower than under the proposed project, noise impacts along area roadways would also be lower.

Light and Glare: In general, light and glare impacts associated with this alternative would be similar to the proposed project because overall building area, building heights, and setbacks would be similar. However, this alternative would not include the two 120 foot retail signs, which would create the greatest lighting impacts associated with the proposed project. Consequently, overall light/glare impacts would be lower under this alternative.

Land Use: As with the proposed project, this alternative's office/industrial park uses would be allowed under the current General Plan land use designation and zoning for the project site. This alternative would also serve to implement many General Plan Framework policies related to Regional Centers. Like the proposed project, this alternative would generally be compatible with the mix of uses in the area, as well as with the trend toward office and industrial park development along the 190th Street corridor.

Transportation/Circulation: This alternative would generate an estimated 14,630 new daily vehicle trips, or about 31% fewer new trips than would be generated under the proposed project. Under the alternative, 25 intersections would be significantly impacted, as compared to the 30 intersections that would be significantly impacted under the proposed project. Six intersections are projected to be significantly impacted after mitigation under the alternative. Consequently, impacts to the area transportation system would be lower.

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Public Services: Demand for fire protection services created by this alternative would be expected to be about the same as for the proposed project. However, this alternative does not include a retail component, which typically creates more demand for police protection service than does office/industrial park development. Since internal circulation roadways would not be provided and the potential to coordinate on-site security and fire protection requirements would be less under the alternative, the potential impacts to public services would be greater under the alternative.

Energy Conservation: This alternative's consumption of electricity and natural gas would be about 3% and 20% higher, respectively, than would occur under the proposed project. Overall energy impacts would therefore be higher than those of the proposed project.

Utilities: Water consumption and wastewater generation would both be about 10% higher under this alternative than under the proposed project. Solid waste generation would be an estimated 53% higher. Overall utility impacts would therefore be higher than those of the proposed project.

Risk of Upset: As with the proposed project, development of this alternative would occur only after remediation of any on-site soil or groundwater contamination exceeding remediatory action levels. Therefore, impacts with respect to hazardous materials would be similar to those of the proposed project and would be less than significant.

Aesthetics: Like the proposed project, this alternative would result in generally beneficial impacts to on-site visual conditions. The alternative would not include the 120-foot pole-mounted signs that would be part of the proposed project. On the other hand, this alternative would not include other beneficial impacts associated with a coordinated and consistent architectural style and landscape plan.

3. IMPACT SUMMARY

The environmental impacts of the Large Parcelization alternative would generally be lower than those of the proposed project with respect to traffic generation, noise and air emissions. However, this alternative would involve the development of individual properties by individual developers in place of the coordinated development of the project site and coordinated circulation system that would occur under the proposed project. Therefore, the potential for land use compatibility conflicts would be greater and the aesthetic benefits

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associated with redevelopment of the site would be fewer under the alternative. Overall, this alternative's environmental impacts would be similar to the proposed project.

4. THE ALTERNATIVE'S RELATIONSHIP TO THE PROJECT OBJECTIVES

This alternative would meet the project objectives related to redeveloping the site with a mix of large scale office and industrial park uses, conforming to the existing General Plan land use designation and zoning for the site, and providing high quality, high wage employment opportunities. However, because this alternative does not include a retail component, generation of sales tax revenues to the City would be less. In addition, because this alternative would not be a planned development for the entire 170.2 acre site, the potential to create incompatibilities with surrounding land uses would be greater under this alternative than the proposed project.

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VIII. ALTERNATIVES
C. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

A summary of the potential impacts associated with the alternatives and comparison with the project as proposed is contained in Table 44 on pages 377 through 379.

The No Project alternative, Reduced Intensity and Golf Course alternatives would have generally lower impacts than the proposed project for most environmental issue areas. Therefore, these alternatives are considered environmentally superior to the proposed project. The Reduced Intensity is considered the overall environmentally superior alternative because it would reduce adverse impacts in most issue areas while creating redevelopment benefits similar to the proposed project. It should, however, be recognized that the No Project alternative would have greater impacts than the proposed project in some issue areas, notably land use, aesthetics, and human health. Moreover, these alternatives do not meet all of the objectives of the project as proposed.

The Master Planned Block Development alternative would be environmentally superior to the combined projects on the proposed project site and the adjacent site. The impacts of this alternative with respect to physical resources such as earth and water would be similar to the combined projects. Traffic generation would be reduced by approximately 34%. However, the integrated, coordinated development that would be accommodated under this alternative would be expected to reduce impacts related to land use, traffic, public services, utilities, noise, and air quality. This alternative would meet the objectives of the proposed project and would better implement some objectives by providing for the integrated redevelopment of two adjacent properties, but is not considered to be feasible unless the adjacent property owner agrees to cooperate with the project applicant. This has not happened as of the release of this document.

This alternative may not, however, meet all of the objectives of the International Light Metal site owner, which include converting the site to an economically viable commercial use, allowing the City of Los Angeles to become more competitive with adjoining cities for commercial development, and addressing the demand for community services in the Harbor Gateway area. In addition, because the project applicant does not control any portion of the International Light Metal site, implementation of this alternative without the cooperation of the adjacent site owner would not be feasible.

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Table 44

ALTERNATIVES

Impact Area	Proposed Project	Alternative 1 No Project	Alternative 2 Master Planned Complex	Alternative 3 Alternative Land Use	Alternative 4 Reduced Intensity	Alternative 5 Golf Course	Alternative 6 Large Parcelization
A. Earth	No significant impacts; soil import would be required.	No additional impact. Grading and seismic impacts lower than proposed project.	No significant impact. Impact similar to that of the combined projects.	No significant impact. Impact similar to proposed project.	No significant impact. Overall grading and seismic impacts slightly lower than proposed project.	No significant impact. More grading than required by the proposed project but lower exposure to seismic hazards.	No significant impact. Impact similar to the proposed project.
B. Air Quality	Both construction and operational emissions would exceed SCAQMD significance thresholds. No localized CO impacts from project traffic. Proposed project would be consistent with City, SCAQMD, and SCAG land use policies.	No additional impact. Construction and operational impacts lower than proposed project.	Significant and unavoidable impacts related to construction and operation. Overall emissions less than combined projects because of reduced trip generation.	Significant and unavoidable impacts related to construction and operation. Impact similar to the proposed project due to similar traffic generation.	Significant and unavoidable construction and operational impacts. Because fewer vehicle trips would be generated, overall impacts lower than proposed project. Construction emissions less than proposed project.	Significant and unavoidable construction and operation impacts. Construction impacts higher than the proposed project, but operational impacts lower, due to reduced vehicle trip generation.	Significant and unavoidable construction and operational impacts. Overall impact lower than the proposed project due to reduced vehicle trip generation.
C. Surface Water	No significant impact; needed drainage improvements would be provided in conjunction with site buildout. Compliance with statewide NPDES permit would minimize inputs to surface water quality from construction.	No additional impact. Construction runoff impacts lower than proposed project. Drainage impact higher than project.	No significant impact. Overall impact similar to combined projects.	No significant impact because needed drainage infrastructure provided in conjunction with project buildout. Overall impact greater than the proposed project since the alternative's 0:67:1 FAR is higher than the 0.44:1 FAR of the project, thereby resulting in more impervious surface area.	No significant impact. Impact lower than proposed project because of reduced development intensity and resulting reduction in on-site impervious surface area.	No significant impact. Drainage impact lower than proposed project due to reduction in on-site impervious surface area and reduced sensitivity of proposed use to flood hazards. Surface water quality impact greater than project.	No significant impact. Overall impact slightly greater than the proposed project.
D. Plant Life	No significant impact; On-site plant life would be replaced with substantial increase in ornamental landscaping.	No additional impact to existing plant life, but no improvement in on-site landscaping as would occur under the proposed project.	No significant impact. Impact similar to the proposed project.	No significant impact. Impact similar to the proposed project.	No significant impact. Impact similar to the proposed project.	No significant impact. Impact similar to the proposed project, although substantially more plant life would be added.	No significant impact. Impact similar to proposed project, but no coordinated landscaping plan for the property.
E. Noise	Potentially significant, but mitigable construction noise impacts. No significant impact from project traffic. Potentially significant, but mitigable impacts related to the operation of on-site facilities near major roadways. Avenue).	No additional impact. Noise impact lower than proposed project.	Potentially significant, but mitigable construction and operational impacts. Stationary source noise impacts greater than combined projects. Vehicular noise would be less than combined projects due to reduced trip generation.	Potentially significant, but mitigable construction and operational impacts. Noise impacts similar to the proposed project due to nearly identical traffic generation.	Potentially significant, but mitigable construction and operational impacts. Noise impacts would be lower than proposed project due to reduced vehicle trip generation and potential for fewer stationary noise sources.	Potentially significant, but mitigable construction impacts. Vehicular noise would be lower than proposed project due to reduced trip generation. Overall noise impact lower than the proposed project.	Potentially significant, but mitigable construction and operational impacts. Overall operational impact lower than proposed project due to reduced vehicle trip generation.

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Table 44 (continued)

ALTERNATIVES

Impact Area	Proposed Project	Alternative 1 No Project	Alternative 2 Master Planned Complex	Alternative 3 Alternative Land Use	Alternative 4 Reduced Intensity	Alternative 5 Golf Course	Alternative 6 Large Parcelization
F. Light and Glare	No significant impact; recommended mitigation measures would further reduce impacts.	No additional impact. Light/ glare impact lower than proposed project.	No significant impact. Overall impact similar to combined projects.	No significant impact. Overall impact similar to proposed project.	No significant impact. Overall impact slightly lower than proposed project due to reduced intensity of development.	No significant impact. Lighting impact to residences south of the project site lower than proposed project.	No significant impact. Light/ glare impact lower than proposed project.
G. Land Use	No significant impact; Proposed project consistent with General Plan land use designation and zoning for the site and compatible with surrounding uses.	No additional impact, but existing compatibility conflicts with adjacent residential properties would remain. Overall impact greater than proposed project.	No significant impact. As compared to the combined projects, this alternative would reduce the potential for internal compatibility conflicts and improve the capability to coordinate on-site development.	No significant impact. Land use impacts similar to the proposed project. Overall density of this alternative would be approximately 0.67:1.	No significant impact. Impact similar to proposed project, although lower intensity development may reduce conflicts with adjacent residences. Lower employment generation less consistent with Framework policies regarding Regional Centers.	No significant impact. Golf course would be less consistent with adjacent industrial uses than would proposed office/industrial park uses.	No significant impact. Uses consistent with General Plan designation/zoning. Impact similar to the proposed project.
H. Transportation/Circulation	Significant impacts at 30 of 41 study intersections, as well as freeway mainline segments. After mitigation, significant impacts would remain at four intersections and three freeway mainline segments.	No additional impact. Lower than proposed project.	Significant impacts similar to combined projects. Overall transportation impact lower than combined projects due to reduced retail uses resulting in reduced trip generation and use of alternative modes.	Significant impacts similar to the proposed project. Morning peak hour impacts would be slightly greater; evening peak hour impacts slightly lower than the project.	Overall impact lower than proposed project due to reduced trip generation, although significant impacts would occur at some area intersections.	No significant impact. Less than proposed project.	Overall impact lower than proposed project due to reduced trip generation, although significant impacts would occur at some area intersections.
I. Public Services	No significant impacts to police or fire protection service. Recommended mitigation measures would further reduce impacts.	No additional impact. Demand for fire and police protection lower than under the proposed project. Overall impacts less than proposed project with respect to fire and police services.	No significant impacts. Access and potential to plan for emergencies superior to combined projects. Overall impacts lower under this alternative.	No significant impacts to police or fire protection. Impacts similar to or less than the proposed project.	No significant impacts. Lower intensity development would have less impact than proposed project.	No significant impacts. Golf course use would generate less demand for police and fire protection than proposed project office/industrial park uses.	No significant impacts. Access and potential to coordinate on-site security/fire protection inferior to the proposed project. Overall impacts greater under this alternative.
J. Energy Conservation	No significant impacts. Recommended measures would further reduce impact.	No additional impact to energy resources. Impact lower than the proposed project.	Electricity consumption lower than combined projects, but natural gas consumption higher. Overall impact similar to the proposed project.	Electricity and natural gas consumption higher than the proposed project. Impact greater than project but less than significant.	Electricity and natural gas consumption lower than proposed project. Impact lower than project and less than significant.	Electricity and natural gas consumption lower than project. No significant impacts.	Electricity and natural gas consumption slightly higher than the proposed project. Impacts slightly greater than project, but less than significant.

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Table 44 (continued)

ALTERNATIVES

Impact Area	Proposed Project	Alternative 1 No Project	Alternative 2 Master Planned Complex	Alternative 3 Alternative Land Use	Alternative 4 Reduced Intensity	Alternative 5 Golf Course	Alternative 6 Large Parcelization
K. Utilities	No significant impacts other than solid waste; minor upgrades implemented as necessary. Recommended mitigation measures would further reduce impact.	No additional impact to utility infrastructure. Impacts lower than proposed project.	No significant impact other than solid waste. Overall impacts higher than combined projects due to increased water consumption and wastewater and solid waste generation.	No significant impact other than solid waste. Impacts slightly greater than the proposed project.	No significant impact other than solid waste. Lower intensity development would generate less new demand, thereby requiring less new infrastructure. Overall impacts lower than proposed project.	No significant impacts. The golf course may consume more water than office/ industrial uses, but would consume less energy. Overall impacts lower than proposed project.	No significant impacts other than solid waste. Overall energy and utility impacts slightly greater than the proposed project.
L. Risk of Upset	Remediation of existing soil/ groundwater contamination would improve on-site conditions. Asbestos containing materials to be removed in accordance with applicable regulations.	No additional impact to human health conditions. No demolition under the alternative, therefore no potential for asbestos release. Because no remediation of existing contamination would occur, on-site conditions with respect to hazardous material would be better under the proposed project.	No significant impact. Overall human health impacts similar to the combined projects and beneficial in the long term.	No significant impact. Overall human health impacts similar to the proposed project and beneficial in the long term.	No significant impact. Overall human health impacts similar to the proposed project and beneficial in the long term.	No significant impact. Overall human health impacts similar to the proposed project and beneficial in the long term.	No significant impact. Overall human health impacts similar to the proposed project and beneficial in the long term.
M. Aesthetics	Overall beneficial aesthetic impacts. Proposed 125-foot signs would, however, require significant modification from City sign ordinance.	No change in on-site visual conditions. As no beneficial aesthetic effects would occur, the alternative would be inferior to proposed project.	Overall beneficial aesthetic impacts. Coordinated development on the combined sites and would improve the overall visual image of the properties similar to the combined projects.	Overall beneficial impact. Impacts less beneficial than proposed project.	Overall beneficial aesthetic impacts. The reduced intensity of development may reduce visual conflicts with adjacent residences and allow for more landscaping and open space.	Overall beneficial impacts. Golf course would provide potentially attractive open space. Overall improvement greater than the proposed project.	Overall beneficial impact. On-site development would not, however, be coordinated with a consistent architectural style and landscape theme. Fewer benefits than the proposed project.

Source: Planning Consultants Research.

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IX. Organizations and Persons Contacted, References

IX. ORGANIZATIONS AND PERSONS CONTACTED, REFERENCES
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XI. ESAC Action, Environmental Data Requirements, EAF

XI. ESAC ACTION, ENVIRONMENTAL DATA REQUIREMENTS, EAF

This Chapter consists of the following attachments:

- Environmental Staff Advisory Committee (ESAC) Determination Letter and Data Requirement, EAF Case No. 96-0090-SUB(ZV)(CUB)(DA), April 23,1996.
- Environmental Assessment Form.

BOE-C6-0115534

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CALIFORNIA

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DATE: April 23, 1996

EAF CASE NO.: 96-0090-SUB(ZV)(CUB)(DA)

To the Applicant or Consultant:

On 04/10/96 the Planning Department Environmental Staff Advisory Committee (ESAC) reviewed your project for an environmental clearance and made the following determination:

( ) The attached draft Negative Declaration (ND)/Mitigated Negative Declaration (MND) has been proposed for your project.

A minimum 20-day public notice, review and comment period is required by law for all proposed environmental clearances. Your document can be released on but not before _____. Upon release of the MND document, the City can continue processing your application upon payment of the required fees at Counter S, Room 460, Los Angeles City Hall (telephone (213)485-7826). By law the City is prohibited from rendering a decision on your project until a valid environmental clearance is issued.

( ) Because your case is being processed simultaneously with others, under the Periodic Plan Review Process, IT IS NECESSARY THAT YOU PAY THE REQUIRED BATCHING FEES BY _____. Failure to meet this fee deadline will delay your project for six months, that is, until the next filing window for your project's geographic area.

(X) An Environmental Impact Report will be required. A pre-draft circulation of maps to concerned persons and organizations is required. Therefore, before you prepare the environmental data base, please submit 40 copies of each of the vicinity map, radius map, tract/parcel map, plot plan, a 500-foot radius mailing list in mailing sticker (gummed label) and hard copy form: radius maps reduced to 8 1/2 X 11 inches and plot plans in a number equal the number of names on the mailing list and any supporting material with $ 4,100.00 (1/2 the required EIR filing fee). These actions are required within 6 months from the above date or your EIR file will be terminated.

Please call the Environmental Review Section (213)580-5547 if you have any questions.

CON HOWE
Director of Planning

DARRYL L. FISHER
Associate Zoning Administrator
Environmental Review Section

CP-1215 (3/96)

Recyclable and made from recycling waste.

CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING

ENVIRONMENTAL DATA REQUIREMENT

EIR NO.: 96-0090-SUB(ZV)(CUB)(DA)

PROJECT DESCRIPTION: The proposed project (Vesting Tentative Tract 52172) is a retail "power center" and office/industrial park on a 170-acre site currently occupied by approximately 2.4 million square feet (sf) of industrial warehouse buildings which will be demolished over time. The first phase consists of 450,000 sf of retail development and 2,200 parking spaces. The retail space may include up to 30,000 sf of restaurants and a theater complex with up to 4,000 seats. The second and third phases include an estimated 1.3 million and 1.2 million sf, respectively, of office/industrial park space, for a total net new development of approximately 550,000 sf. The project includes construction of internal access roads and infrastructure. Required permits may include a vesting tentative tract map, conditional use permits (CUP) for alcohol sales, on and off-site, for a major development project, and for averaging of the floor-to-area ratio (FAR) for the site, a development agreement, significant modification from sign regulations for two signs, a variance for other entitlement for shared parking in the Phase 1 area, any other approvals demand necessary or appropriate, and building permits and any other ministerial actions required.

PROJECT LOCATION/ADDRESS: 1414 West 190th Street, between Western and Normandie Avenues; Harbor Gateway

In accordance with the provisions of Article 3, Sections 65940 through 65944 of the Government Code and the California Environmental Quality Act of 1970 and adopted City guidelines, this Department has reviewed the Environmental Assessment Form (EAF) for the above-described project and hereby finds that the proposed project may have a significant effect on the environment and the following data necessary to properly evaluate said effects are required to be submitted to this Department in an acceptable form prior to the acceptance of the application as complete:

1. EARTH (GRADING, DRAINAGE, GEOLOGIC HAZARDS): The proposed project involves grading activities which may result in possible alteration of on-site drainage. Investigation should address impacts relative to proposed grading procedures, drainage plans, and construction activities (i.e. dust control, on-site watering). Mitigation measures may include:

(CONTINUED ON PAGE 2)

- adherence to applicable provisions of the Municipal Code, Flood Hazard Management Specific Plan and the recommendations of the City/ Engineer/Department of Building and Safety; and,

- use of semipermeable pavement for hardscape areas.

2. EARTH (GEOLOGIC HAZARDS): The proposed project is subject to unstable earth conditions and other seismic-related hazards. Investigation should address specific actions relative to minimizing potential hazards and risk related to future habitation of the site. Mitigation measures may include:

   - geotechnical investigation conducted prior to finalization of grading plans;

   - on-site investigation of site during construction; and,

   - conformance with City's Seismic Safety Plan, applicable portions of the Municipal Code, and seismic safety requirements of the Department of Building and Safety.

3. AIR (AIR QUALITY-STATIONARY SOURCES): Project development may result in deterioration of ambient air quality due to short-term emissions generated during construction. Additionally, future project residents may be exposed to dust and odors generated by other activities proximal to the site. Investigation should address specific actions that may potentially reduce impacts on local and regional air quality. Mitigation measures may include:

   - installation of an air filtration system to reduce adverse impacts on project residents;

   - implementation of ground wetting and temporary dust cover during construction; and,

   - restriction of grading activities on exceedingly windy days when particulates and/or fugitive dust are likely to be carried off-site.

(CONTINUED ON PAGE 3)

4. AIR (AIR QUALITY-MOBILE SOURCES): Project-generated traffic may result in quantifiable increases in air emissions, deterioration of ambient air quality, and/or exposure of project residents to severe air pollution conditions. Investigation should address specific actions that may potentially reduce impacts on local and regional air quality. Mitigation measures may include:

   - implementing an aggressive Transportation Demand Management program for employees; and,

   - providing a free or low cost Jitney service for local users.

5. WATER CONSERVATION: The California Environmental Quality Act requires that the proposed project be evaluated relative to water use and water conservation measures in accordance with State guidelines. Investigation should address potential consumption rates and adequacy of existing water supply. Mitigation measures may include:

   - compliance with the City's Water Conservation Regulations defined in Ordinance No. 163,532.

6. WATER (GROUND WATER): The project site has been used for industrial manufacturing which involves the use of various materials with possible contamination of solid and ground water. A ground water study of the site should be conducted to assess any ground water contamination.

7. WATER (SURFACE WATER): The proposed project may alter drainage patterns on and around the site. An investigation of the project's impacts upon local drainage patterns should be investigated.

8. NOISE (STATIONARY SOURCES): Project development may significantly affect noise levels, adversely impacting adjacent residential areas. Investigation should address noise impacts resulting from construction activities (short-term stationary source). Mitigation measures may include:

   - limiting hours of construction;

   - use of sound-restricted construction equipment; and,

(CONTINUED ON PAGE 4)

- compliance with applicable provisions of Noise Ordinance No. 144,331.

9. NOISE (MOBILE AND STATIONARY SOURCES): Proposed development may significantly affect ambient noise levels, adversely impacting adjacent residential areas. Investigation should address noise impacts resulting from construction activities (short-term stationary sources), land use activities (long-term stationary source), and increases in local traffic (long-term mobile source). Mitigation measures may include:

   - limiting hours of construction;
   - use of sound-restricted construction equipment;
   - compliance with applicable provisions of Noise Ordinance No. 144,331; and,
   - limiting hours of operation for project use (post construction period).

10. LIGHT/GLARE (ARTIFICIAL): Project development may result in increased ambient reflectivity and glare from the project site, adversely impacting locations proximal to the site. Investigation should address impacts related to increased reflectivity and stationary light sources. Mitigation measures may include:

   - installation of tinted windows to decrease reflectivity;
   - use of plant materials to decrease reflectivity of hardscape surface; and,
   - security lighting to be directed toward the center of the site.

11. PLANT LIFE: Investigation should address impacts resulting from removal of existing vegetation on the site. Mitigation measures may include:

   - grading plans/landscaping and construction activities in conformance with the City's Oak Tree Preservation Ordinance (Section 17.05 R, Los Angeles Municipal Code);

(CONTINUED ON PAGE 5)

- preparation of a plot plan indicating the location, size, type and condition of all existing trees on the site, as prepared by a reputable tree expert, submitted for approval by the Department of City Planning and the Street Tree Division of the Bureau of Street Maintenance;

- replacement of trees in parkways and replacement of desirable trees on-site to the satisfaction of the Street Tree Division of the Bureau of Street Maintenance and the Department of City Planning;

- preparation of landscape plans by a licensed landscape architect subject to approval by the City Planning Department and/or other city agencies; and,

- landscaping of appropriate open space areas.

12. HUMAN HEALTH: Project site has been used for aircraft manufacturing which involves the use of various materials with possible soil and ground water contamination. In addition, underground storage tanks are located on the site. Complete analysis investigation and remediation of possible soil contamination and potential exposure to health hazards should be investigated.

13. LAND USE: The proposed project site is designated as open space by the Harbor-Gateway Community Plan and accelerates the erosion of the City's Industrial Job phase.

14. RISK OF UPSET: Project area has been the site of heavy industrial uses. mitigation measures may include:

- compliance with a site remediation plan approved by California Department of Toxic Substance Control.

15. TRANSPORTATION-CIRCULATION-DRIVEWAY/ACCESS: Project generated vehicular traffic, ingress/egress locations and demand for additional parking could have significant impact on local circulation and parking availability. Completion of a Traffic Study, as required by the Department of Transportation, will be necessary to determine the impact of project generated vehicular traffic at several key intersections. Traffic

(CONTINUED ON PAGE 6)

impacts should be addressed by the Environmental Impact Report to provide comprehensive review and mitigation of impacts to an acceptable level; investigation should specifically address impacts resulting from incremental increases in traffic volumes at local intersections, availability of on- and off-street parking, potential modification of circulation patterns within the community and ingress/egress locations. Mitigation measures may include:

- initiation of a Transportation Demand Management program including, but not limited to, ridesharing programs;
- traffic control devices at key intersections; and,
- provision of driveway/access plan consistent with requirements/recommendations of Department of Transportation and/or City Engineer.

16. TRANSPORTATION-CIRCULATION-DRIVEWAY/ACCESS: Project generated vehicular traffic may contribute to cumulative impacts on local circulation. Completion of a Traffic Study, as determined by the Department of Transportation, may be necessary to define impacts of project generated vehicular traffic at several key intersections. Traffic impacts should be addressed by the Environmental Impact Report to provide comprehensive review and mitigation of impacts to an acceptable level. Mitigation measures may include:

- completion of a Traffic Study, per requirements of the Department of Transportation, assessing potential cumulative impacts resulting from project development; and,
- provision of a driveway/access plan consistent with replacements/recommendations of Department of transportation and/or City Engineer.

17. TRANSPORTATION-CIRCULATION-DRIVEWAY/ACCESS: Project generated vehicular traffic, ingress/egress locations and demand for additional parking could have significant impact on local circulation and parking availability. Completion of a Traffic Study, as required by the Department of transportation, will be necessary to determine the impact of project generated vehicular traffic at several key intersections. Traffic

(CONTINUED ON PAGE 7)

impacts should be addressed by the Environmental Impact Report to provide comprehensive review and mitigation of impacts to an acceptable level; investigation should specifically address impacts resulting from incremental increases in traffic volumes at local intersections, availability of on- and off-street parking, potential modification of circulation patterns within reasonable distance (to be determined by DOT), and ingress/egress locations. Mitigation measures may include:

- provision for additional off-street parking and guest parking (one (1) guest space per every two (2) dwelling units);
- initiation of a Transportation Demand Management program including, but not limited to, ridesharing programs;
- contributions to ATSAC program; and,
- provision of driveway/access plan consistent with requirements/recommendations of Department of Transportation and/or City Engineer.

18. TRANSPORTATION REGIONAL TRAFFIC ANALYSIS: Environmental analysis shall address the project's effect on major local arterials, public transit, freeways, highways, and rail transit service, including major local arterials and public transit within five (5) miles of the project site and freeways, highways, and rail transit service within ten (10) miles of the project site.

19. PUBLIC SERVICES: The proposed project may result in a need for additional fire protection and emergency services. Investigation should address impacts relative to adequacy of these services. Mitigation measures may include:

- compliance with federal, state, and local requirements regarding fire protection, safety, and locking standards;
- structural design, roadways, and emergency access locations developed in accordance with City requirements; and,
- implementation of recommendations or requirements of the Department of Recreation and Parks.

(CONTINUED ON PAGE 8)

20. ENERGY CONSERVATION: The California Environmental Quality Act requires that the proposed project be considered relative to potential energy impacts. Investigation should address impacts resulting from potential consumption of non-renewable resources. Mitigation measures may include:

- compliance with Title 24, California State Code, (Energy Conservation Standards);
- use of low-wattage interior and exterior fluorescent lighting;
- use of natural gas and/or solar energy; and,
- consultation with Department of Water and Power and Southern California Gas Company regarding feasible energy conservation measures.

21. AESTHETICS/VIEW: Proposed project site could effect views from adjacent residential areas. Mitigation measures may include:

- screening of rooftop structures, precluding visibility of structures from proximal locations;
- underground installation of utilities where applicable;
- preparation of landscape plans by a licensed landscape architect subject to approval by the City Planning Department and/or other City agencies;
- landscaping of parking areas and other open areas (minimum provision of one (1) tree per four (4) parking spaces and seven (7) percent of total open space area); and,
- architectural treatment of the new structure which achieves substantial aesthetic compatibility with the surrounding environment.

Pertinent data should be prepared and submitted addressing these impacts, as well as project alternatives; appropriate mitigation measures; energy conservation measures and economic data, where necessary to evaluate the feasibility

(CONTINUED ON PAGE 9)

of a mitigation measure or alternative in order that the Planning Department may prepare the necessary Environmental Impact Report (EIR) as required by the Environmental Staff Advisory Committee. Questions regarding this matter may be directed to Lateef Sholebo at (213)580-5550.

APPROVED BY: Darryl L. Fisher DATE: 4/10/96

Environmental Staff Advisory Committee

APPLICANT OR REPRESENTATIVE NOTIFIED: 4-29-96

CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING

ENVIRONMENTAL ASSESSMENT FORM

SE NO. _____ Council District _____
elated Case: _____ Atlas Pg; Bk; Ref. No. _____
PROJECT DESCRIPTION: _____

COMMUNITY PLAN: _____ DOES NOT CONFORM/QUAD: _____
Land Use indicated: _____ Vacancy Factor _____%
CLEARANCE REQUIRED:
Seismic Study Area/Hillside Grading Area/Ecologically Important Area
Archaeological/Paleontological/Historical/Coastal Zone/Sta. Monica Mtn. Zone
Air/Major Street/Housing/Flood (Map #) State Clearing House/SCAG

OFFICE USE ONLY - ABOVE DOUBLE LINE

TO BE COMPLETED BY APPLICANT - PLEASE TYPE OR PRINT

PROJECT ADDRESS: 1414 W. 190th Street Community Harbor Gateway
Between Western Avenue and Normandie Avenue
APPLICANT NAME: McDonnell Douglas Realty Company Phone (310) 627-3000
Address 4060 Lakewood Boulevard City Long Beach, CA 90808

If applicable
AGENT'S COMPANY: _____ Phone _____
NTACT PERSON: _____
dress _____ City _____

The following Exhibits are required (3 copies of each exhibit and 3 Environmental Assessment Forms for projects in Coastal & S.M. Mtn. Zones): All Exhibits should reflect entire project, not just area in need of zone change, variance, or other alteration.

A. 2 Vicinity Maps (8-1/2" x 11") showing nearby street system, public facilities and other significant physical features (similar to road maps, Thomas Brothers Maps, etc.) with project area circled.
B. 2 Radius Maps (1" = 100' scale) showing land use and zoning to 500 feet (100 feet of additional land use beyond the radius for alcoholic beverage cases); 100' radius line (excluding streets) okay for Coastal building permits 300' for site plan review applications.
C. 2 Plot Plans showing the location and layout of proposed development including dimensions; including topographic lines where grade is over 10%; tentative tract or parcel maps where division of land is involved to satisfy this requirement, and the location and diameter of all trees existing on the project site.
D. Application - a duplicate copy of application for zone change, (including Exhibit "C" justification) batch screening form periodic comprehensive general plan review and zone change map, variance, conditional use, subdivider's statement, etc.
E. Pictures - two or more pictures of the project site showing walls, trees and existing structures.

ENVIRONMENTAL ASSESSMENT
APPROVED BY: _____
DATE: _____

PLICATION ACCEPTED BY: _____
RECEIPT NO. _____ DATE: _____

EAF1

CP-1204 (02/02/93)

I. Briefly describe the project and permits necessary (i.e., Tentative Tract, Conditional Use, Zone Change, etc.) including and identification of phases and plans for future expansion:
The proposed project (Vesting Tentative Tract 52172) is a retail "power center" and office/industrial park on a 170-acre site currently occupied by approx. 2.4 million square feet (sf) of industrial warehouse buildings which will be demolished over time. The first phase consists of 450,000 sf of retail development and 2,200 parking spaces. The retail space may include up to 30,000 sf of restaurants and a theater complex with up to 4,000 seats. The second and third phases include an estimated 1.3 million and 1.2 million sf, respectively, of office/industrial park space, for a total net new development of approximately 550,000 sf. The project includes construction of internal access roads and infrastructure. Required permits may include a vesting tentative tract map, conditional use permits (CUP) for the sale of alcohol in connection with restaurant uses and the averaging of the floor-to-area ratio (FAR) for the site, a development agreement, significant modification from sign regulations for two signs, a variance or other entitlement for shared parking in the Phase 1 area, any other approvals deemed necessary or appropriate, and building permits and any other ministerial actions required.

II. Existing Conditions:

A. Project Site Area 170.2 Net and 170.8 Gross Acres
B. Existing Zoning M3-1
C. Existing Use of Land Industrial
D. Existing General Plan Designation Heavy Industrial — Requested General Plan Designation No change
E. Number 42 type Industrial/Warehouse and age ± 30-50 years 6 structures to be removed as a result of the project. If residential dwellings (apts., single-family, condos)) are being removed indicated the: number of units: N/A and average rent: N/A Is there any similar housing at this price range available in the area? N/A If Yes, where _____

F. Number 51, Trunk Diameter 4"-18" and type Typical urban plantings - Alder, Sycamore, Mexican Fan Palm, Olive, Juniper, Eucalyptus of existing trees.

G. Number All, but would be replaced with similar urban plantings as part of a coordinated landscaping plan.
Trunk Diameter same as above and type same as above of trees being removed.

H. Slope: State percent of property which is:

100 Less than 10% slope
_____ 10-15% slope
_____ over 15% slope

If slope over 10% exist, a topographic map will be required. Over 50 acres - 1" = 200' scale is okay

I. Check the applicable boxes and indicate the condition of the Plot Plan: There are (x) natural or man-made drainage channels, (x) rights-of-way and/or (x) hazardous pipelines crossing or immediately adjacent to property. ( ) None of the above.

J. Grading: (specify the total amount of dirt being moved)

_____ 0-500 cu. yds.
600,000 cu. yds. if over 500 cu. yds. indicate amount of cu. yds.

K. Import/Export: Indicate the amount of dirt being imported 0 or exported 0 (balanced cut and fill) *

Projects involving import/export of 1000 cubic yards or more are required to complete a Haul Route Form and Haul Route Map.

If project involves more than one phase or substantial expansion or change of existing uses, please document each portion separately, with the total or project details written below. Describe entire project, not just are in need of zone change, variance, or other alteration.

.... Residential project (if not residential, do not answer)\

A. Number of Dwelling Units-
Single Family N/A
Apartment N/A or Condominium N/A

B. Number of Dwelling Units with:
One bedroom _____ Two bedrooms _____
Three bedrooms _____ Four or more bedrooms _____

C. Total number of parking spaces provided _____

D. List recreational facilities of project _____

E. Approximate price range of units $ _____ to $ _____

F. Number of stories _____, height _____ ft.

G. Type of appliances and heating (gas, electric, gas/electric, solar) _____
Gas heated swimming pool? _____

H. Describe night lighting of the project _____
(Including Plan for shielding light from adjacent uses, if applicable)

I. Percent of total project proposed for: Building _____
Paving _____
Landscaping _____

IV. Commercial, Industrial or Other Project (if project is only residential do not answer this section). Describe entire project, not just area in need of zone change, variance, or other alteration.

IV.1 Phase 1

A. Type of use Retail power center

B. Total number of square feet of floor area Approximately 450,000

C. Number of units if hotel/motel N/A

D. Number of stories 2, height Maximum of 44 ft.

E. Total number of parking spaces provided: Approximately 2,200

F. Hours of operation Regular business hours Days of operation 7 days/week

G. If fixed seats or beds involved, number Up to 4,000 theater seats

H. Describe night lighting of the project Security & parking lot lighting/building signage
(Including Plan for shielding light from adjacent uses, if applicable)

I. Number of employees per shift Approximately 1,000-1,100 total

J. Number of students/patients/patrons Unknown at this time

K. Describe security provisions for project Unknown at this time

L. Percent of total project proposed for: Building 30
Paving 60
Landscaping 10

BOE-C6-0115547

IV.2 Phase 2

A. Type of use Office/industrial park
B. Total number of square feet of floor area Approximately 1.3 million
C. Number of units if hotel/motel N/A
D. Number of stories 12± , height Maximum of 150 feet; maximum of 45 feet (3 stories) within 300 feet of residential properties
E. Total number of parking spaces provided: In accordance with code requirements
F. Hours of operation Normal business hours Days of operation Monday through Friday
G. If fixed seats or beds involved, number N/A
H. Describe night lighting of the project Security and parking lot lighting
(Including Plan for shielding light from adjacent uses, if applicable)
I. Number of employees per shift Approximately 2,000 to 2,100
J. Number of students/patients/patrons N/A
K. Describe security provisions for project Unknown at this time
L. Percent of total project proposed for: Building Unknown at this time
Paving Unknown at this time
Landscaping Unknown at this time

IV.3 Phase 3

A. Type of use Industrial park
B. Total number of square feet of floor area Approximately 1.2 million
C. Number of units if hotel/motel N/A
D. Number of stories 12± , height Maximum of 150 feet
E. Total number of parking spaces provided: In accordance with code requirements
F. Hours of operation Normal business hours Days of operation Monday through Friday
G. If fixed seats or beds involved, number N/A
H. Describe night lighting of the project Security and parking lot lighting
(Including Plan for shielding light from adjacent uses, if applicable)
I. Number of employees per shift Approximately 1,900 to 2,000
J. Number of students/patients/patrons N/A
K. Describe security provisions for project Unknown at this time
L. Percent of total project proposed for: Building Unknown at this time
Paving Unknown at this time
Landscaping Unknown at this time

V. Stationary Noise Clearance - A clearance may be necessary certifying the project's equipment (i.e., air conditioning) complies with City Noise Regulations.

Some projects may require a noise study. The EIR staff will inform those affected by this requirement.

VI. Selected Information:

A) Circulation: Identify by name all major and secondary highways and freeways within 1,000 feet of the proposed project; give the approximate distance(s):
Interstate 405 (500 feet); Interstate 110 (4,300 feet); Western Avenue (adjacent); 190th Street (adjacent); Normandie Avenue (adjacent)

B) Air: All projects that are required to obtain AQMD permits (see AQMD Rules and Regulations) are required to submit written clearance from the AQMD indicating no significant impact will be created by the proposed project.*

C) Noise: Projects located within 600 feet of railroad tracks indicate the number of trains per day.**

Day 7 am - 10 pm Southern Pacific Line - average of 2
Night 10 pm - 7 am

VII. Mitigating Measures:

Feasible alternatives or mitigation measures which would substantially lessen any significant adverse impact which the development may have on the environment.

Appropriate mitigation measures will be identified during the environmental review process.

* Contact the South Coast Air Quality Management District at 572-6418 for further information.

** For information, contact:

Southern Pacific Train Dispatcher	629-6559
Union Pacific Engineering	725-2313
Santa Fe Train Master	267-5546

APPLICANT/CONSULTANT'S APPLICANT

OWNER MUST SIGN AND BE NOTARIZED;

IF THERE IS AN AGENT, THE AGENT MUST ALSO SIGN AND BE NOTARIZED

I, Thomas A. Overturf, Director, Development
Owner (Owner in escrow)*
(Please Print)

Signed: _____
Owner

I, _____
Consultant*
(Please Print)

Signed: _____
Agent

being duly sworn, state that the statement and information contained in this Environmental Assessment Form are in all respects true and correct to the best of my knowledge and belief.

State of California, County and City of Los Angeles\

Signed: _____
Notary

Signed: _____
Notary

Subscribed and sworn to before me

this 13th day of March, 19 96

(NOTARY or CORPORATE SEAL)

MARIA K. BUSSA
COMM. # 1010386
Notary Public — California
LOS ANGELES COUNTY
My Comm. Expires NOV 28, 1997

Subscribed and sworn to before me

this _____ day of _____, 19 ___

(NOTARY)

* If acting for a corporation, including capacity and company name.

CP-1204 (02/03/93)